



Domestic and Family Violence Policy

/ Prepared 15 June 2020

Youi's Domestic and Family Violence Policy

At Youi, we recognise that domestic and family violence (DFV) is a serious issue facing the wider Australian community. As part of our ongoing commitment to assisting clients and employees who may be affected by it, we've created this document to outline ways in which we help support victims and enable them to speak out.

If you've witnessed or been subjected to domestic or family violence, we hope this document gives you the confidence you need to take action.

Speak up

If you, or someone you know, is being affected by family and / or domestic violence, there are options available.

Phone

You can contact our **Priority Assistance service** on **1300 533 700**
Available Monday – Friday 8am to 5.30pm, and Saturday 9am to 1pm

Email

Or email priorityassist@youi.com any time.



Domestic and Family Violence Policy

Date: 08 June 2020 **Approved by the Internal Risk Committee on:** 15 June 2020

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1. Introduction

- 1.1 Youi recognises that domestic and family violence (DFV) is serious and prevalent in the community and we are committed to taking extra care with clients and employees who experience DFV.
- 1.2 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.
- 1.3 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 their families and communities.
- 1.4 DFV can affect people of all cultures, religions, ages, genders, sexual orientations, educational backgrounds, and income levels.
- 1.5 This is Youi's Domestic and Family Violence Policy. This Policy outlines the principles and minimum standards that must be followed to:
- where DFV has been disclosed to or identified to us, we take reasonable steps to provide extra support to clients affected by DFV. The steps taken will be in a manner that is sensitive to the clients' 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.

2. Scope and Audience

- 2.1 This Policy covers Youi Holdings Pty Ltd (ABN 41 124 972 425) ("**Company**"), 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 Properties Pty Ltd (ABN 604 123 873), a non-regulated subsidiary of Youi;
 - Youi NZ Pty Limited (CN 4476298) ("**Youi NZ**"), a non-regulated subsidiary, which provides call centre services to 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.

("Companies" or "Youi Group" in this policy means each of the Company and each subsidiary).



- 2.2 The local Policy incorporates the group requirements of OUTsurance International Holdings Pty Ltd (Org No. 152 271 602, South Africa) (“**OUTsurance**”) which holds the majority of the shares in the Company. RMI Holdings Limited (Org No, 150 198 084, South Africa) is the ultimate holding company of the Company.
- 2.3 This Policy applies to the Youi Group, and includes all Youi employees and contractors in all of Youi locations and to the extent it may be applied, to service providers.
- 2.4 It is important that all Youi employees ensure they understand what DFV is and the requirements of this Policy.
- 2.5 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.

3. Definitions

3.1 Key terms to support the comprehension of this Policy are in the table below.

Term	Definition
Domestic and family violence (DFV)	<ul style="list-style-type: none">• 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<ul style="list-style-type: none">- economic (financial) abuse,- emotional (psychological) abuse,- physical and sexual abuse,- technology-facilitated abuse- social abuse,- spiritual abuse, and/or- verbal abuse.
Client	<ul style="list-style-type: none">• 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.



Term	Definition
Economic abuse	<ul style="list-style-type: none">• 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.
Emotional abuse	<ul style="list-style-type: none">• 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.
Financial abuse	<ul style="list-style-type: none">• See "economic abuse"
Psychological abuse	<ul style="list-style-type: none">• See "emotional abuse"
Physical abuse	<ul style="list-style-type: none">• 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.
Sexual abuse	<ul style="list-style-type: none">• 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.
Social abuse	<ul style="list-style-type: none">• 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.



Term	Definition
Spiritual abuse	<ul style="list-style-type: none">• 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.
Technology-facilitated abuse	<ul style="list-style-type: none">• 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.
Verbal abuse	<ul style="list-style-type: none">• 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 clients 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 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, there are signs of possible DFV which may help in protecting client or employee safety and privacy as quickly and appropriately as possible. These signs may include, but are not limited to the following:

For clients

- Expresses 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,
- Mentions that an intervention order/apprehended Domestic Violence Order (DVO) (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
- 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 ExCo member or to Human Resources. Procedures must be in place for employees to discuss any issues relating to DFV.
- 4.2.4 Clients 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 Clients 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 client 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 If an employee or service provider believes a client or employee or any other person is in immediate danger, the matter should be referred to the Police.

4.3 PRINCIPLE 3: We are committed to taking extra care with clients who are affected by domestic and family violence

- 4.3.1 Clients affected by DFV must be treated fairly and sensitively by employees.
- 4.3.2 The client knows their own experience. Every instance of DFV differs, and every client knows best how to keep themselves safe. The first step is to check with the client how they wish to proceed. We will inform clients 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 client 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 client, it should be verified with the client that the information will be sent in a safe way.
- 4.3.4 Clients who have disclosed they are experiencing DFV are referred to the Priority Assistance Team to support these types of vulnerable clients.
- 4.3.5 If the client does not wish to, we will not require someone to explain that they are experiencing DFV more than once. The client 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 clients who are at risk of harm. Firstly, we will check with the client 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 client at risk. We will discuss options with clients about additional steps available to protect their privacy and get their consent before applying these.

4.3.7 We will ensure the client 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 client has the option to remove an authorised representative.

4.4 PRINCIPLE 4: We are committed to taking reasonable steps to support clients who are affected by domestic and family violence

4.4.1 We will take reasonable steps to support clients who are affected by DFV. As a minimum, support measures clients 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.
- Having access to a dedicated number to the Priority Assistance Team who are trained in supporting vulnerable clients.
- Having access to financial hardship assistance.

4.4.2 Other support options that may be considered to support clients affected by DFV include:

- Giving clients the option to change identity verification procedures so that they are not linked to a client'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 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.
- Reviewing situations, according to State legislation, where your 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: We have 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 Whistleblower Policy outlines how to disclose (internally or externally) actual or suspected improper conduct.

4.6 PRINCIPLE 6: We are committed to 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 leave "family and domestic violence leave" in accordance with Youi Leave Policies and the employee's Employment Agreement.
- Request flexible working arrangements.
- Take paid or unpaid personal/carer's leave, in certain circumstances.
- 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 DVO (or similar), where appropriate.
- 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.
 - 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 providing supporting documentation. Youi should not deny an employee's access to leave and other support options because 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 clients 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, both internal resources such as the Employee Assistance Program, as well as 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 client about DFV is received. As a minimum, Youi's service providers must be made aware of this policy on Youi's website.



5. Roles and Responsibilities

Role	Responsibilities
Chief People Officer	<ul style="list-style-type: none">• must establish, review and maintain appropriate operating processes and procedures to ensure that mechanisms are in place to support Youi employees, so that they are:<ul style="list-style-type: none">- able to access DFV leave,- able to request flexible working, and- protected from being treated adversely or badly if they have been affected by DFV.
Chief Operating Officer	<ul style="list-style-type: none">• must establish, review and maintain appropriate operating processes and procedures to ensure that mechanisms are in place to support employees in:<ul style="list-style-type: none">- identifying clients who are affected by DFV,- protecting the sensitive personal information of clients who are affected by DFV,- minimising the risk of further abuse and harm of clients who are affected by DFV as a result of our interactions with the client,- reviewing policy as and when required.
Chief Product Officer	<ul style="list-style-type: none">• must establish, review and maintain details and product information guidance of any product design features or support measures that can be provided to clients who are affected by DFV.

6. Policy Governance Review

6.1 Policy Owner – Chief Operations Officer

- 6.1.1** The Policy Owner is responsible for ensuring this policy is maintained, as well as including that it addresses relevant legal, regulatory, industry codes, and other key documents.
- 6.1.2** The Policy Owner manages the process for updating the Policy in accordance with the review timing outlined in this Policy, including providing a clear summary of the changes to the Policy for the relevant Committee to approve.



6.2 Policy implementation

6.2.1 Senior Executives must establish, review and maintain appropriate operating processes and procedures to ensure this Policy is implemented effectively across their business areas.

6.3 Policy exemptions

6.3.1 Policy exemptions may be granted where

6.3.1.1 there is a legitimate reason for not meeting a principle or requirement of a policy; and,

6.3.1.2 the provision of such an exemption will not breach any legislative obligations.

6.3.2 The Head of Compliance must review exemption requests, as a minimum.

6.4 Policy monitoring and assurance

6.4.1 Compliance will monitor and review compliance with this Policy as a part of its overall compliance monitoring program.

6.5 Reporting

6.5.1 As a minimum, any identified issues or compliance incidents must be managed as per the requirements in the Compliance Management Framework.

6.5.2 Internal management reporting and escalations must, as a minimum, follow requirements as outlined in the Compliance Management Framework and Risk Management Framework to provide an appropriate level of senior management oversight.

6.6 Policy awareness and risk culture

6.6.1 As a minimum, the Policy must be available to employees on the internal policy register on YourWorld.

6.6.2 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.

6.6.3 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.

6.7 Policy breaches

6.7.1 The Head of Compliance and General Counsel need to do an assessment to determine if the breach is a reportable breach.



7. Related Legislation and Documents

7.1 This Policy aims to meet obligations from laws, regulations, guidelines and industry codes relevant to DFV including, but not limited to:

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 (Cth)
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



8. Document Control

8.1 Identification and approval

Document Name (ID)	Domestic and Family Violence Policy
Document Owner	Chief Operations Officer
Document Approval	Internal Risk Committee

8.2 Revision history

Version	Date created	Drafted by	Reviewed by	Comments
0.1	8/6/20	Head of Investigations Head of Compliance	Chief Operations Officer Chief Risk Officer	New Policy, aligned to Code requirements.

8.3 Approval history

Approved by	Version tabled	Version approved	Date approved
Executive Committee	0.1	0.1	15 June 2020



9. 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>

EAP (Australia and New Zealand)

www.benestar.com

EAP (South Africa)

Phone: 0800 611 238