



# Family Violence Policy

**nib Travel Services (Australia) Pty Limited ABN 81 115 932 173 and all related entities within the nib Travel Group (“nib”)**

**Dated April 2024**



# Contents

Family Violence Policy.....	1
1. Introduction.....	1
1.1. Company’s commitment to customer safety.....	1
1.2. Purpose of the policy .....	1
1.3. Application of this policy.....	1
2. Training.....	1
2.1 Types of family violence .....	2
3. Protecting private and confidential information.....	2
4. Appropriate and sensitive claims handling processes .....	3
5. Financial hardship.....	3
5.1. Recoveries.....	3
6. Employee support.....	4
6.1. Accessing EAP .....	4
7. Information and assistance .....	4
8. Mandatory reporting laws – Northern Territory (NT) only.....	2
9. Review and publication of this policy.....	2

---

# 1. Introduction

## 1.1. Company's commitment to customer safety

nib is committed to ensuring the safety of our customers by providing the appropriate tools and training for our employees so they can better identify and support those who are affected by family violence. The safety of anyone affected by family violence is paramount to nib, and will be handled with sensitivity, flexibility, empathy and care.

## 1.2. Purpose of the policy

The purpose of this policy is to assist in the early recognition of family violence experienced by customers and to help reduce the impact through the provision of appropriate assistance, information, and external resources. Our employees play a role in sensitively identifying customers experiencing or perpetrating family violence, and recognising if other employees (for those managing employees) or themselves are exposed to family violence through customer interactions.

## 1.3. Application of this policy

Our Family Violence Policy applies to Directors, officers, the Senior Executive team and all employees of any entity within the nib Travel Group in Australia ("**employees**").

---

# 2. Training

Through nib's internal training platform, via coaching sessions and other means, nib provides appropriate training to all our employees and service suppliers who:

- Engage with customers; and
- Those managing employees who engage with customers.

nib understands the importance of early recognition of the signs of family violence. Our training considers the consequences of family violence, how to identify both overt and subtle signs, assist and show respect to those affected or engaged in family violence. Examples of signs of family violence may include customers who:

- Appear or sound distressed or scared;
- Are heard to be taking instruction/s from their partners;
- Remains silent while another party does all the talking;
- Does not understand or is not aware of cover taken out in their name;
- Asks questions about a joint policyholder's behaviour or activities;
- Have concerns about protecting their privacy, safety or security of their policies;
- Express reluctance to involve the other joint policyholder when making changes to the policy, making a claim or seeking Financial Hardship assistance;
- Change their address frequently or do not want their physical address on file;
- Disclose the existence of an intervention order or equivalent

nib notes that whilst employees are not trained as experts in family violence, they are however, trained with the expectation of providing support and reducing the overall impact of family violence. Possible support options include, but are not limited to:

- Protection of private and confidential information;
- Appropriate and sensitive claims handling;
- Financial hardship management (inclusive of any recoveries action); and
- Provision and referral to external resource information and mandatory reporting

We review and update our periodic training regularly and as required.

## 2.1 Types of family violence

Family violence very rarely happens as a single incident. Rather, it is a pattern of ongoing behavior that can include multiple tactics used to intimidate, control and abuse someone. The frequency and severity of family violence can escalate over time.

- This abuse takes many different forms, none of which are mutually exclusive. While physical violence may be the most widely recognised, other forms such as sexual, emotional, spiritual and economic abuse can be equally harmful.
  - Emotional Abuse
  - Physical Abuse
  - Sexual Abuse
  - Social Abuse
  - Financial Abuse
  - Spiritual Abuse (religious)

---

## 3. Protecting private and confidential information

nib is committed to protecting our customers and employees' privacy, and any personal information we collect from individuals. For customers and employees affected by family violence, nib will take, but not limited to, the following measures to ensure privacy and confidentiality:

- Ensuring systems keep personal information secure and confidential, with access limited to authorised employees with a legitimate need;
- Provide the opportunity for customers to restrict information with the use of password protection;
- Allow customers to select their preferred method of communication, to be recorded in the CRM, in addition to their safest communication options available (e.g., no voicemails to be left, or calls restricted to certain times of the day);
- Enable notification of vulnerability and/or need for support from another associated party (e.g., lawyer or friend); and
- Minimising the need for customers to repeat disclosures through the provision of a dedicated employee or team for contact.

For more information on how we collect, use, store and disclose your personal information, please read the nib Group Privacy Policy available at <https://www.nib.com.au/docs/privacy-policy>.

---

## 4. Appropriate and sensitive claims handling processes

Where a claim is made by a customer that we identify is affected by family violence, we will handle their claim with sensitivity, flexibility, empathy and care.

nib has developed processes to support customers in such scenarios, ensuring the process of making a claim is clearly and transparently explained, having specialist employees available with adequate authority to make decisions.

If the claim is identified as requiring an outcome outside of our standard processing times, nib has a documented Referral Panel (Fast Track) process where:

- Our system will be flagged that the claim is a vulnerable case and that it requires Referral Panel assessment and will include information such as the customers preferred contact method/s and if they are experiencing financial hardship (refer to section 5)
- Case managers of our claims team with appropriate authority and skillsets will assess the claim ahead of other claims in our system, based on its merits and the documentation provided
- Case managers will offer flexibility and support with the application of processes as appropriate. If further information is required to support the claim the same case manager, wherever possible, will contact the customer as soon as practically possible via their preferred contact method whilst minimising the need for a customer to repeat disclosures related to family violence
- The outcome of the assessment will be communicated to the customer and any payments will be processed to the appropriate person(s)
- Note that if any investigation is required, nib will ensure that the investigator/s involved will be appropriately trained under the investigation standards of the Code

nib has a dedicated policy for customers experiencing vulnerabilities and financial hardship in which the Referral Panel (Fast Track) process is integrated.

---

## 5. Financial hardship

If a customer identifies that they are affected by family violence, nib will sensitively inquire about their financial situation to determine financial hardship. nib has documented financial hardship processes to provide appropriate support and judgement in the assessment of a claim, or of a collection or recovery.

### 5.1. Recoveries

Any recoveries from third parties will be handled sensitively and will be expedited where possible. Collection agents must comply with the *Debt collection guideline: for collectors and creditors* published by the Australian Competition and Consumer Commission and the Australian Securities and Investments Commission. nib will work cooperatively with collection agents in the event family violence is found for customers where the debt has already been sold. nib follows the recommendations from the *Guide to helping customers affected by family violence* published by the Insurance Council of Australia relating to collections arrangements.

---

## 6. Employee support

nib provides support for employees in line with our Domestic Violence Guidelines and encourages employees to talk with their supervisor, manager or a People and Culture representative. This support is extended to both those affected by family violence and employees who experience trauma after serving affected customers. A free Employee Assistance Program (EAP) is available to all employees and their immediate families. EAP provides confidential counselling for personal, family or work issues that are impacting on your well-being or quality of life. Our EAP service is provided by Assure Programs. Assure offer a highly professional global counselling service to nib Group employees at locations around the world. In addition to the above provisions, all employees and distributors are encouraged to consider the contact details outlined in section 7 for personal use if required.

### 6.1. Accessing EAP

Employees can access EAP 24 hours a day, 7 days a week by referring to the EAP contact information via nib's intranet. EAP sessions can be held either over the phone or via digital channels such as Zoom and Skype.

---

## 7. Information and assistance

nib encourage you to tell us about any vulnerability you may have. If you tell us that due to a vulnerability you need additional assistance or support, we will work with you and try to find a suitable, sensitive and compassionate way for us to proceed.

For further assistance with family violence please contact one of the following support services

#### **1800RESPECT**

1800 737 732

24 hour national sexual assault, family and domestic violence counselling line for any Australian who has experienced, or is at risk of, family and domestic violence and/or sexual assault.

#### **Lifeline**

13 11 14

Lifeline has a national number that can help put you in contact with a crisis service in your State. Anyone across Australia experiencing a personal crisis or thinking about suicide can call 13 11 14.

#### **Men's Referral Service**

1300 766 491

This service from No to Violence offers assistance, information and counselling to help men who use family violence.

#### **Aboriginal Family Domestic Violence Hotline**

1800 019 123

Victims Services has a dedicated contact line for Aboriginal victims of crime who would like information on victims' rights, how to access counselling and financial assistance.

#### **Relationships Australia**

1300 364 277 (for the cost of a local call)

A leading provider of relationship support services for individuals, families and communities to support all people in Australia to achieve positive and respectful relationships.

#### **Suicide Call Back Service**

1300 659 467

Free counselling 24/7, whether you're feeling suicidal, are worried about someone else, or have lost someone to suicide.

#### **Australian Childhood Foundation**

1800 176 453 / 03 9874 3922

Counselling for children and young people affected by abuse.

## **8. Mandatory reporting laws – Northern Territory (NT) only**

Under section 124A of the Domestic and Family Violence Act 2007 (NT), all persons aged 18 years and over have a responsibility to report instances of domestic and family violence to the NT Police (either orally or in writing), as soon as practically possible if he or she believes on reasonable grounds either or both of the following circumstances exist:

- Another person has caused, or is likely to cause, harm to someone else (the victim) with whom the other person is in a domestic relationship;
- The life or safety of another person (also the victim) is under serious or imminent threat because domestic violence has been, is being or is about to be committed; and
- The report must contain the belief and any factual knowledge or circumstances forming the grounds of the belief or on which that knowledge is based.

Before any report is issued, the matter must be escalated in accordance with nib's processes.

Reports should be made to Northern Territory Police – 131 444 or 000 in an emergency.

---

## **9. Review and publication of this policy**

This policy will be reviewed every two years to ensure it remains consistent with General Insurance Code of Practice requirements, as well as the changing nature of the organisation.

Policy Owner: Travel Services

Approved By: Chief Executive Officer – nib NZ & Travel

Last Updated: April 2024