

# CUSTOMERS EXPERIENCING FAMILY VIOLENCE AND SUPPORTING VULNERABLE CUSTOMERS POLICY

**PROTECSURE PTY LTD**  
ABN 26 094 997 163 AFSL NO 238815

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## 1. INTRODUCTION and PURPOSE

This Family Violence & Supporting Vulnerable Customers Policy (Policy) has been developed to comply with The Insurance Council of Australia's (ICA) General Insurance Code of Practice (the Code) and sets out how Protecsure Pty Ltd ("Protecsure") identifies and supports vulnerable Customers, including those affected by Financial Hardship and Family Violence.

For the purposes of this Policy, any reference to "Customers" includes customers of Protecsure as well as any other individual entitled to Financial Hardship support 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 Customer.

This policy forms part of Protecsure Compliance Management System which represents the entire suite of policies and procedures that fulfil Protecsure legal and regulatory requirements as an Australian organisation providing intermediary General Insurance services.

Protecsure is committed to exercising greater care when dealing with vulnerable Customers. A person may be vulnerable due to a range of factors, including:

- a) age;
- b) disability;
- c) mental health conditions;
- d) physical health conditions;
- e) family violence;
- f) language barriers;
- g) cultural background;
- h) Aboriginal or Torres Strait Islander status;
- i) remote location; or
- j) financial distress.

## 2. POLICY STATEMENT

Protecsure has a long-standing commitment to conducting its business with honesty and integrity and remains committed to full compliance with the Code and informing Customers, employees, distributors and service suppliers about information and assistance available to vulnerable people, including those experiencing Financial Hardship and Family Violence.

This policy and the Protecsure internal policy and training programs assist employees to:

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

Protecsure 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.

## 3. 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.*

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 Customers who may be affected by Family Violence should facilitate, rather than act as a barrier to identifying Family Violence and improve the experience of those affected by Family Violence.

The aim of the 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.

Protecsure recognises that Family Violence is unacceptable in any relationship and Customers experiencing Family Violence will be treated with dignity and respect.

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

### **3.1 Minimising Re-Traumatisation Through Repeated Disclosures**

To reduce the risk of re-traumatising customers affected by family violence, Protecsure will take reasonable steps to minimise the number of times a customer is required to disclose their experience. This includes:

- Documenting relevant disclosures securely and sensitively.
- Ensuring internal referrals include sufficient context to avoid unnecessary repetition.
- Assigning a consistent point of contact where possible.

## **4. ASSISTING CUSTOMERS**

Protecsure can assist vulnerable Customers, including those experiencing Financial Hardship 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.

These assistance measures may be expanded and varied depending on what our security partners have established.

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 the Compliance Team for consideration.

The Customer must be informed of this action.

### **4.1 Sensitive Claims Handling**

Claims involving customers affected by family violence will be managed with additional care to ensure:

- The process is trauma-informed and avoids unnecessary delays.
- Claims assessors are trained to recognise and respond to signs of family violence.
- Communication is handled with discretion and empathy.
- Customers are not required to interact with perpetrators of violence during the claims process.

## **5. INTERPRETERS**

If a Customer informs Protecsure of their need for an interpreter, or we identify such a need, we will direct the Customer to the relevant section of the insurer's website.

## **6. IDENTIFICATION**

If a Customer requires support to meet identification requirements, Protecsure will take reasonable measures to provide such support. The approach of Protecsure to satisfying customer identification requirements will be in accordance with section 7 of the Access and Correction of Personal Information Policy.

## **7. FINANCIAL HARDSHIP**

Financial Hardship occurs when Customers experience difficulty in meeting their financial obligations to Protecsure or our security partners.

The support Protecsure can offer does not include support with paying the premiums under an insurance policy we have issued.

If a Customer informs Protecsure, or we identify, that they are experiencing Financial Hardship, we will provide them with:

- a copy of our Financial Hardship Application Form; and
- if appropriate, contact details for the National Debt Helpline - 1800 007 007.

### **7.1 Assessing Requests for Financial Hardship Support**

When assessing requests for Financial Hardship support, Protecsure will consider all reasonable evidence, including:

- evidence of serious illness that prevents the Customer from earning an income;
- evidence of a disability, including a disability caused by mental illness;
- Centrelink statements; and
- evidence of unemployment.

If Protecsure requires additional information after receiving the application, we will inform the Customer of the information required as soon as possible. The Customer will have 21 Calendar Days from the day of the request to provide the additional information unless an alternative timeframe has been agreed.

### **7.2 Putting Recovery on Hold**

If Protecsure is taking action to recover an amount from a Customer, the action will be put on hold if we identify the Customer is experiencing Financial Hardship or if the Customer requests Financial Hardship support in relation to that amount.

When putting the action on hold, Protecsure will contact any collection agent or lawyer we have appointed and inform them the action is on hold. The action will remain on hold until we have assessed the Financial Hardship application and notified the Customer of the decision.

### **7.3 Making our Decision**

Protecsure will inform the Customer in writing of our decision about whether to give Financial Hardship support within 21 Calendar Days of receiving the application, unless we have requested additional information.

### **7.4 Customers Entitled to Financial Hardship Support**

If Protecsure determines a Customer is entitled to Financial Hardship support, we will work with the Customer to implement an arrangement that could include any one or more of the following:

- delaying the date on which payment must be made;
- paying in instalments;
- paying a reduced lump sum amount;
- delaying one or more instalment payments;
- deducting the excess from the claim amount paid.

### **7.5 Customers Not Entitled to Financial Hardship Support**

If Protecsure determines a Customer is not entitled to Financial Hardship support, we will inform them of the reasons for the decision and about our Complaints process.

## **8. PROTECTING PERSONAL INFORMATION**

At all times and in accordance with Privacy laws and Protecsure Privacy policies, we will ensure the secure and confidential handling of private, confidential, and personal information about vulnerable Customers,

including those affected by Family Violence, in order to protect their safety. This will enable Customers to have confidence that such information is secure and not at risk of deliberate or inadvertent disclosure.

The Code requires Protecsure to protect the right to privacy of vulnerable Customers who have notified us of their need for additional support from someone else. For example, a lawyer, consumer representative, interpreter or friend.

## **9. TRAINING**

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

Protecsure will aim to ensure that all employees and third-party providers have been trained and receive ongoing training so that they:

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

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

### **9.1 Service Suppliers**

Protecsure will ensure that service suppliers who deal directly with Customers, such as loss assessors, investigators and claims management services are trained to the same level as our employees.

### **9.2 Supporting Employees and Distributors**

Protecsure recognises that employees and distributors may themselves be affected by family violence or experience vicarious trauma when supporting vulnerable customers. We are committed to:

- Providing access to confidential counselling and support services via our Employee Assistance Program.
- Offering flexible work arrangement where appropriate.
- Ensuring managers are trained to respond sensitively and refer staff to appropriate support.
- Promoting a workplace culture that prioritises psychological safety and wellbeing.

Accessing the Employee Assistance Program:

W [www.accesseap.com.au](http://www.accesseap.com.au)

E [info@accesseap.com.au](mailto:info@accesseap.com.au)

T 1800 81 87 28 or (02) 8247 9191

## **10. REPORTING**

Any notification of Vulnerability or Financial Hardship received by a member of staff must be reported via the ERM Online form: GI Code of Practice - Referrals.

## 11. SUPPORT SERVICES AND RESOURCES

| Organisation                                                | Services Provided                                                                                 | Website                                                                                                                  | Phone Number                                               |
|-------------------------------------------------------------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| Police<br>Ambulance Services                                | Emergency Services                                                                                |                                                                                                                          | 000                                                        |
| <b>Family Violence Counselling information and referral</b> |                                                                                                   |                                                                                                                          |                                                            |
| 1800RESPECT                                                 | National 24-hour Domestic & Family Violence and Sexual Assault Line.                              | <a href="http://www.1800respect.org.au">www.1800respect.org.au</a>                                                       | 1800 737 732<br>NRS: 1800 555 677<br>Interpreter: 13 14 50 |
| <b>Mental Health</b>                                        |                                                                                                   |                                                                                                                          |                                                            |
| Beyond Blue<br>Lifeline                                     | 24/7 counselling & referral service for people in a crisis situation.                             | <a href="http://beyondblue.org.au">beyondblue.org.au</a><br><a href="http://www.lifeline.org.au">www.lifeline.org.au</a> | 1300 224 636<br>13 11 14                                   |
| <b>Legal Aid</b>                                            |                                                                                                   |                                                                                                                          |                                                            |
| Legal Aid                                                   | Legal Aid provides a number of free legal services which are available to anyone in the community | <a href="http://Legalaidact.org.au">Legalaidact.org.au</a>                                                               | ACT 1300 654 314                                           |
|                                                             |                                                                                                   | <a href="http://Legalaid.nsw.gov.au">Legalaid.nsw.gov.au</a>                                                             | NSW 1300 888 929                                           |
|                                                             |                                                                                                   | <a href="http://Legalaid.nt.gov.au">Legalaid.nt.gov.au</a>                                                               | NT 1800 019 343                                            |
|                                                             |                                                                                                   | <a href="http://Legalaid.qld.gov.au">Legalaid.qld.gov.au</a>                                                             | QLD 1300 527 700                                           |
|                                                             |                                                                                                   | <a href="http://Lsc.gov.au">Lsc.gov.au</a>                                                                               | SA 1300 366 424                                            |
|                                                             |                                                                                                   | <a href="http://Legalaid.tas.gov.au">Legalaid.tas.gov.au</a>                                                             | TAS 1300 366 611                                           |
|                                                             |                                                                                                   | <a href="http://Legalaid.vic.gov.au">Legalaid.vic.gov.au</a>                                                             | VIC 1300 792 387                                           |
|                                                             |                                                                                                   | <a href="http://Legalaid.wa.gov.au">Legalaid.wa.gov.au</a>                                                               | WA 1300 650 579                                            |