

# Jewellers Loop Customers Experiencing Vulnerability and Family Violence Policy

Jewellers Loop Pty Ltd (ABN 47 110 767 087, AFSL No. 556525) (Jewellers Loop), trading as JewelCover, holds a binding authority from Chubb Insurance Australia Limited (ABN 23 001 642 020, AFSL No. 239687) (Chubb) to arrange, enter into and distribute insurance on behalf of Chubb, and Jewellers Loop is authorised to provide claims handling services on behalf of Chubb.

## 1. Definitions in this Policy

In this Policy “We”, “Our” and “Us” means Jewellers Loop. “You” and “Your” refers to Our customers and prospective customers as well as those who use Our website.

In relation to dealing with Customers Experiencing Vulnerability, Jewellers Loop Pty Ltd (JL) must comply with the obligations imposed by:

Disability Discrimination Act 1992 (Cth) (Act);  
General Insurance Code of Practice (Code);  
Best practice guidelines developed by the Insurance Council of Australia (ICA); and  
JL’s internal policies and procedures.

We deeply value the trust our customers place in us and recognize the diverse needs of those experiencing vulnerability. When a customer informs us that they require specific support or assistance due to their circumstances, we are committed to responding with care and flexibility. We acknowledge that vulnerability is a condition—not a defining characteristic of the individual.

The Customers Experiencing Vulnerability and Family Violence Policy (the Policy) aligns with relevant legislation, industry codes, best practice guidelines established by the ICA, and JL’s internal policies and procedures.

For customers experiencing vulnerability who are making a claim on JL’s insurance products, we have developed dedicated internal guidelines and standards to ensure their needs

are met with sensitivity and respect throughout the claims process.

## Objective and Scope

The purpose of the Policy is to:

- facilitate a deeper organisational understanding of Customers Experiencing Vulnerability;
- take action to improve inclusiveness and provide better support for Customers Experiencing Vulnerability by understanding their needs; and
- meet the requirements of the Code.

The Policy applies to all Customers Experiencing Vulnerability and outlines JL’s standards applicable to Customers Experiencing Vulnerability.

Unless otherwise defined in this Policy, capitalised terms have the same meaning as those terms as defined within the relevant law and the Code.

For the purposes of this Policy, JL adopts the following definitions:

Complaints Process means the processes and procedures set out in the JL Complaint Handling and Dispute Resolution Policy & Framework and any subordinate systems and procedures established in compliance with that Policy.

Family Violence means 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. It is not limited to physical instances of

violence, and may also include emotional, psychological, financial, economic and sexual abuse, as well as damage to property, or harm to family pets.

Financial Hardship means where an Individual has difficulty meeting their financial obligations to JL.

Mental Health Condition means a clinically diagnosable disorder that significantly interferes with an individual's cognitive, emotional or social abilities.

A Customer Experiencing Vulnerability is a Customer of JL whose vulnerability may be due to a range of factors such as:

- Age;
- Disability or chronic illness;
- Mental Health Conditions;
- Family Violence;
- language barriers;
- literacy barriers;
- cultural background;
- Aboriginal or Torres Strait Islander status;
- remote location;
- financial abuse or distress;
- natural disaster;
- bereavement;
- cognitive impairment;
- other circumstances causing significant detriment.

## Regulatory Alignment

This Policy has been developed to support Jewellers Loop Pty Ltd's compliance with applicable legislation, regulatory obligations, and industry standards, including the General Insurance Code of Practice (the Code).

In particular, this Policy addresses Jewellers Loop's obligations under the Code in relation to:

- Customers Experiencing Vulnerability;
- Customers affected by Family Violence;
- Fair, transparent and timely claims handling;
- Flexible communication and reasonable

adjustments;

- Complaints handling and escalation; and
- Staff training and capability.

Jewellers Loop is committed to applying the principles of the Code in a manner that promotes fair treatment, safety, dignity, respect, and accessibility for all customers, particularly those experiencing vulnerability or family violence.

## 2. General

Standards applicable to Customers Experiencing Vulnerability JL recognises that vulnerability is a state and does not define a person. A Customer Experiencing Vulnerability may have unique needs, and these needs can change over time and in response to particular situations. The following standards have been developed by JL in order to support and assist Customers Experiencing Vulnerability in their dealings with JL's employees and service providers that deal directly with consumers on behalf of JL.

When communicating with a Customer Experiencing Vulnerability, JL must:

- help customers who have trouble meeting identification requirements, particularly if the Individual is from an Aboriginal or Torres Strait Islander community or a non-English speaking background. JL's approach to verification and identification will be supportive and flexible.
- make it as easy as possible for a Customer Experiencing Vulnerability to appoint an agent or representative;
- ask a Customer Experiencing Vulnerability (or their representative) how JL can specifically help the customer access JL's services more efficiently;
- take detailed notes about any additional assistance a Customer Experiencing Vulnerability may need;
- accommodate the request of a Customer Experiencing Vulnerability for formal or informal assistance from third parties (where a Customer Experiencing

Vulnerability tells JL that they need such assistance or support in relation to their vulnerability);

- develop a rapport with the Customer Experiencing Vulnerability by showing empathy and patience and if appropriate, asking questions;
- contact a Customer Experiencing Vulnerability who is not responding to correspondence from JL and ask if there are any reasons why, and offer to clarify any correspondence;
- if necessary and safe to do so, provide the Customer Experiencing Vulnerability with an email or letter summarising a verbal conversation with them, and ask them to confirm if this matches their understanding of the conversation; and
- provide a copy of the Policy upon request.

JL's employees and service providers are to be provided with initial and ongoing training in relation to recognising and engaging with Customers Experiencing Vulnerability; such as how to:

- identify and engage appropriately with Customers Experiencing Vulnerability;
- apply the Policy and related policies and procedures to Customers Experiencing Vulnerability;
- escalate requirements for additional support for Customers Experiencing Vulnerability;
- identify, support and avoid harm to Customers Experiencing Vulnerability affected by Family Violence;
- understand common causes, signs and symptoms of Mental Health Conditions in the community;
- communicate with Customers Experiencing Vulnerability who have or show signs of having a Mental Health Condition; and
- understand the requirements of section 46 of the Act and any relevant State-based anti-discrimination legislation.

All cases involving a Customer Experiencing

Vulnerability must be immediately referred to the team leader of the appropriate department for action.

It is vital to maintain high service standards when dealing with Customers Experiencing Vulnerability.

Resolutions to cases will depend on the individual circumstances surrounding the case, however all cases will be handled using a conciliatory approach, engaging with a Customer Experiencing Vulnerability with sensitivity, dignity, respect and compassion.

A claim by a Customer Experiencing Vulnerability must be handled by the same employee (or a smaller team of employees) who is aware of the issues facing the Customer Experiencing Vulnerability, unless there are circumstances where another employee is required (for example, where a Customer Experiencing Vulnerability nominates a change in the employee, or the existing employee ceases employment with JL).

If a claim belonging to a Customer Experiencing Vulnerability is transferred to another employee, the outgoing employee should inform the Customer Experiencing Vulnerability of the transfer and complete a handover with the replacement employee.

If a case involving a Customer Experiencing Vulnerability cannot be resolved, the matter must be immediately escalated through JL's Complaints Process for review.

Employees and service providers must be able to identify when escalation is required for additional support and be aware of what support services exist for Customers Experiencing Vulnerability, such as financial counsellors or an appropriate community support service.

Standards applicable to customers affected by Family Violence

These standards apply in addition to the "General Standards applicable to Customers Experiencing

Vulnerability” and have been developed in alignment with the ICA’s “Guide to Helping customers affected by family violence”.

Where Family Violence is identified or suspected, the number one priority is the safety of the Customer Experiencing Vulnerability and their family. Situations involving Family Violence require JL to take particular care, and to be flexible with its processes, as the issues are often highly complex.

In the event that a JL employee may need to contact the perpetrator of Family Violence as a joint policyholder, the details of the customer and employee must be protected.

JL will provide initial and ongoing training to its employees and service providers so that they:

- are made aware of JL’s policies and procedures when they are engaging with a customer affected by Family Violence;
- identify customers affected by Family Violence;
- deal appropriately and sensitively with customers affected by Family Violence; and
- apply the Family Violence policy and procedures relevant to their role in dealing with customers affected by Family Violence.

Training should be tapered to the employee’s role within JL, in particular the amount of contact they may have with customers affected by Family Violence in order to build their knowledge, skills, competencies and information.

When communicating with a customer, employees should be aware of the signs that may indicate a customer affected by Family Violence, such as when the customer:

- appears or sounds distressed or scared;
- is seen or heard to be taking instruction/s from their partner;
- remains silent while another party does all the talking;
- does not understand or is not aware of cover taken out in their name or covering

their property;

- asks questions about a joint policyholder’s behaviour or activities;
- has concerns about protecting their personal privacy, safety or security of their policies;
- expresses reluctance to involve the other joint policyholder when making changes to the policy, making a claim or seeking Financial Hardship assistance;
- changes their address frequently or do not want their physical address on file;
- is consistently late with premium payments; and/or
- discloses the existence of an intervention order or equivalent (evidence of an intervention order should not be required to trigger the requirements of the Policy).

Early indicators of Family Violence may be apparent at the time of a claim, or after a major disaster event. These indicators may be any of the signs mentioned above or other behaviour not expected in the context of the claim.

Employees should be alert to the possibility of Family Violence to enable identification as early as possible.

Employees should be aware that traumatic events, such as catastrophes that result in claims, can trigger Family Violence. The claims process itself could also trigger further Family Violence, particularly if the perpetrator has caused the damage.

When dealing with a customer affected by Family Violence, employees should facilitate, rather than act as a barrier to, the identification of Family Violence, and improve the experience of customers affected by Family Violence.

Improving the experience of customers affected by Family Violence includes ensuring that the collection of information needed by JL is handled sensitively and that, to the extent possible, the same employee (or smaller group of employees) consistently handle the matter with the customer. It is also important to ensure that customers do not need to disclose information about family violence more than can be avoided.

A customer that self-identifies as being affected by Family Violence falls within the scope of the Policy, and further proof of Family Violence is not required from them.

JL recognises that a customer affected by Family Violence may be concerned about the security and confidentiality of their personal information held by JL.

The safety of a customer affected by Family Violence must be protected as the number one priority, by providing for the secure handling of information about customers affected by Family Violence, including in a manner that maintains confidentiality.

It is important that the personal information of a customer affected by Family Violence is kept private, particularly when the perpetrator of Family Violence is or has been a joint policyholder. Customers affected by Family Violence need to be confident that their personal information is secure and not at risk of deliberate or inadvertent disclosure. In particular, the physical address of a customer affected by Family Violence must be protected. For example, by only having their email address accessible in the system, or having their physical address password protected, to avoid the risk it will be provided to someone who can answer other security questions. Any protection should be extended across all policies held by a customer affected by Family Violence.

It is equally important for a customer affected by Family Violence to have confidence that information they share with JL about their Family Violence is not disclosed to the perpetrator(s), and that any information they provide is accessible only to authorised JL employees.

When dealing with a customer affected by Family Violence, JL must:

- ask for permission to record the support or assistance that they require, and respect their right to confidentiality;
- treat all information about a customer

affected by Family Violence as sensitive information;

- give a customer affected by Family Violence access to personal information held about them and control over how it is shared with third parties;
- ask a customer affected by Family Violence whether they have a policy or account that requires amendment due to a situation of Family Violence, and proactively search for other policies that may be under their name;
- discuss safe methods of communication and record these (subject to a customer affected by Family Violence consenting to this). For example, asking whether it is a good time to talk or if it is safe to leave phone messages;
- support customers affected by Family Violence to set up new insurance policies;
- facilitate requests from joint policyholders who ask for policy communications and information to be sent to two different addresses (either physical or email); and
- provide a customer affected by Family Violence with customer documents, without charge, to assist in resolving matters or for legal purposes.

Where a policy is a joint policy, JL employees and service providers should take special care to protect the customer affected by Family Violence in relation to the protection of that person's privacy, contact details and assist in any application for Financial Hardship without the permission of the other policyholder. If information has to be shared with a joint policyholder, then the customer affected by Family Violence must be made aware of the circumstances and information to be shared with the joint policyholder so that they can make arrangements.

JL employees should have an understanding of the legal requirements and internal processes if the customer affected by Family Violence and the perpetrator are joint policyholders. This includes the legal reporting requirements in relation to children; and protecting the details of JL employees when they have to contact the

perpetrator.

When a customer affected by Family Violence lodges a claim, employees must:

- clearly and transparently explain the claims process and what is required;
- triage the claim to either a specialist or the team leader;
- understand that a survivor of Family Violence may come across as incoherent and scattered, however this is not necessarily an indication that their claim is not valid;
- understand that lack of contact from a customer affected by Family Violence does not necessarily mean that they have given up on their claim (nor is it an automatic indication of fraud), and some may not have access to telephone or email communication;
- Understand that the claims process itself can potentially trigger Family Violence, particularly if the perpetrator caused the damage the claim relates to;
- understand that a customer affected by Family Violence may not have access to personal or financial records or other documents, and take this into account when requesting information from them; and
- not ask a customer affected by Family Violence to make direct contact with the perpetrator, or make a police report about the perpetrator, unless they are comfortable doing so; and
- ensure that any investigator or interviewer of a customer affected by Family Violence (or is going to their home) must be made aware of any potential danger and is appropriately trained under the investigation standards of the Code.

If a claim benefit is payable to a customer affected by Family Violence, JL must ensure that they are paying the appropriate party or parties.

If a customer self-identifies as being affected by Family Violence, employees should ask the

customer to explain their financial situation, in order to determine whether they are experiencing Financial Hardship. If they are affected by Financial Hardship, the procedures detailed in JL's Financial Hardship Policy must be adhered to.

JL employees may also be affected by Family Violence and require support in the same way as a customer affected by Family Violence. Their interactions with a customer affected by Family Violence may adversely affect them either by the impact of the customer's issues or may cause them to relive their own experiences of Family Violence.

JL should have an employee assistance program designed to support employees affected by Family Violence. The support provided can include training, leave, additional security measures, external referrals and counselling. The support should take into account the specific needs of the employee, the nature of their role and JL's workplace environment.

Appropriate support should also be provided for employees who are known perpetrators of Family Violence.

### **Standards applicable to customers with English as a second language**

These standards apply in addition to the "General Standards applicable to Customers Experiencing Vulnerability".

JL must provide fair, accessible and responsive services, and provide an interpreter to facilitate communication wherever necessary. This includes whenever an interpreter is requested by a Customer, or whenever employees need an interpreter to communicate effectively formally or informally with a Customer.

JL must use its best endeavours to provide access to an interpreter, taking into account languages and dialects that are not common.

Employees must identify when a customer requires an interpreter and, where appropriate,

refer them to an interpreter to assist with communication. Employees should be flexible enough to arrange an interpreter if it becomes apparent that assistance is required. JL's preferred service is Translating and Interpreting Service (TIS National).

While access to an independent interpreter must be provided when it is requested or needed, a customer may choose to use a friend or family member for interpretation support and assistance.

Employees must record the interpretation needs of such a customer requiring an interpreter on the appropriate claims management system (including when an interpreter is offered to a Customer Experiencing Vulnerability but declined by them).

JL must provide information of its website on interpreter services.

### **Standards applicable to customers with impairment of hearing or speech**

These standards apply in addition to the "General Standards applicable to Customers Experiencing Vulnerability".

If a Customer has a hearing or speech impairment they can contact JL through the National Relay Service using:

- TTY/ Voice Text Telephone; or
- Speak and Listen; or
- Internet relay.

The Customer can also nominate to communicate by email or in writing by post.

### **Standards applicable to customers with an intellectual disability**

These standards apply in addition to the "General Standards applicable to Customers Experiencing Vulnerability".

JL recognises that some customers learn and process information more slowly and have difficulty with abstract concepts such as insurance, money, time and the subtleties of

interpersonal interactions. The degree of intellectual disability may range from mild to severe.

JL employees and service providers must be alert for the signs of a customer with a degree of intellectual disability. Signs are:

- more concrete and less complex spoken language (if used), compared with peers;
- limited vocabulary and grammatical skills;
- receptive language that may be limited to comprehension of simple speech and gestures; and
- communication that may occur through non-spoken means only—such as gestures, signs, facial expressions, and other forms of augmentative and alternative communication.

When communicating with a customer with an intellectual disability, JL employees and service providers must adhere to the following practices:

- convey respect for the Individual through verbal language, address the individual directly and in an appropriate tone of voice consistent with their age. Speak to the individual as an adult, not as a child;
- depending on the degree of intellectual disability, ask the customer if they have a family member, carer, friend or representative who can help them on the call or can provide written submissions about a claim;
- speak slowly and leave pauses for the customer to process words;
- speak in clear, short sentences and use simple words, pausing to enable the customer to process what is being said. Always avoid complex technical words or jargon;
- ask one question at a time and provide adequate time for the customer to respond;
- if the employee cannot understand what the customer is saying, ask them to repeat what they have said or say it in another way.

## **Standards applicable to customers with impairment of vision**

These standards apply in addition to the “General Standards applicable to Customers Experiencing Vulnerability”.

When handling claims from a Customer with a sight or vision impairment, employees and service providers must:

- print communications in font size 16 point or larger; or
- take information about a claim over the phone, read it back to the Customer to confirm its accuracy, and file note the conversation.

## **Standards applicable to customers with literacy issues**

These standards apply in addition to the “General Standards applicable to Customers Experiencing Vulnerability”.

If a customer self-identifies that they have literacy issues, or an employee suspects that they do, employees and service providers must:

- ask the customer if they have a family member or friend who can help them provide written submissions about a claim;
- take information about a claim over the phone, and then read it back to the customer to confirm its accuracy, and file note the conversation; or
- where written correspondence is sent to a customer, call them to provide an overview of the content of the communication.

## **Standards applicable to customers with Mental Health Conditions**

These standards apply in addition to the “General Standards applicable to Customers Experiencing Vulnerability”.

Customers who have a past or current Mental Health Condition must be treated fairly and with dignity. JL must adopt a respectful and positive

approach towards customers with a past or current Mental Health Condition.

Where a JL employee or service provider becomes aware that a customer has a past or current Mental Health Condition, they should determine whether they are a Customer Experiencing Vulnerability and treat them accordingly.

Claims involving Mental Health Conditions must be processed sensitively, having regard to the customer’s ongoing medical treatment needs, using the least intrusive methods of investigation and in accordance with the claim investigation standards in the Code.

When a customer with a Mental Health Condition makes a claim against an existing policy, the claim should not be denied on the basis of a pre-existing Mental Health Condition where the covered event does not relate to the pre-existing Mental Health Condition.

JL must design and market its products and apply the product terms in accordance with the requirements of the Act and/or relevant State and Territory anti-discrimination requirements.

JL and service providers acting on its behalf must only ask relevant questions when deciding whether to provide cover for a pre-existing Mental Health Condition. If JL cannot provide the enquirer with cover for that condition JL will tell the enquirer about their right to ask for the information relied on when assessing the application. If the enquirer asks for that information, JL will give it to the enquirer as set out in part 12 of the Code.

## **Standards applicable to natural disasters**

These standards apply in addition to the “General Standards applicable to Customers Experiencing Vulnerability”.

Natural disaster events result in many claims from Individuals who are rendered vulnerable by the event itself. JL employees and service providers must be on the alert for customers who may be experiencing financial difficulties and

emotional stress.

Employees must consider the unique needs of the customer in a natural disaster event such as problems being able to supply documentation and financial and emotional distress. Employees will also be guided by the requirements of Sections 8 and 10 of the Code and JL Policies where these relate to Catastrophes and Financial Hardship or an urgent financial need of benefits.

Wherever reasonable JL should fast track a cash advance pending the full determination of a loss.

In the wake of a major natural disaster event, JL will consider whether it is resourced to have appropriately experienced and qualified counsellors accompany employees to recovery centres to interact with claimants, including Customers Experiencing Vulnerability.

### **3.Contact Us**

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Jewellers Loop can be contacted at:  
Level 10, 61-63 Market Street, Sydney NSW  
2000  
Phone: 02 9234 0555  
Email: [info@jewelcover.com.au](mailto:info@jewelcover.com.au)  
Website: [www.jewelcover.com.au](http://www.jewelcover.com.au)