

Addressing the Financial Impacts of Family Violence – Good Practice Industry Guideline

Businesses and government agencies have a role to play in reducing the harmful impacts of family violence. Effective policies can benefit customers, staff, and the community.

This document provides guidance for industry and government bodies (“businesses”) which are considering developing, or enhancing, policies to respond to customers at financial risk due to intimate partner family violence.

While other forms of family violence (for example elder abuse) have some similarities to intimate partner violence, some of the specific problems and responses are different and not covered here.

Read [more about family violence and economic abuse](#).

1. Developing and implementing family violence policies can be a complex and ongoing process – but make a start anyway.

Business policies to respond to family violence issues are relatively new. Where there is a lack of guidance, or good examples, for a particular type of business a staged approach could be considered, where the business takes a number of steps towards good practice.

2. Policies should be tailored to take into account all functions of the business which could impact on customers experiencing family violence.

Businesses should analyse their products and processes to identify the various points at which product design and the business’ activities (including outsourced tasks) could potentially impact on family violence victim/survivors. Activities which may impact include:

- responding to customer requests for financial hardship assistance,
- establishing customer contracts, making changes to account details,
- or handling disputes about liability.

Sometimes good initiatives have unintended consequences, so ensure you review family violence related risks when developing new products or changing business processes.

3. A clear commitment to addressing family violence for customers and staff must come ‘from the top’.

Senior management leadership and support has been identified as a key factor in the effectiveness and successful implementation of family violence policies.

Some of your staff may have been impacted by family violence, therefore policies to support staff should overlap with those for customers. Policies to support staff also demonstrate the business’ commitment.

For more on implementing policies for employees see [Australian Human Rights Commission Factsheet](#).

4. Design policies around an understanding of the nature of family violence and the experiences of victim/survivors.

Victim/survivors:

- are often reluctant to disclose family violence and may not recognise they are experiencing economic abuse
- have complex lives and need accessible processes which don't require them to repeat their story or to provide evidence of family violence
- are not to blame for the violence (the perpetrator is).

Each situation is different, so policies and solutions need to be flexible. See [Guideline on responding to requests for documents](#).

5. Staff should receive training based on their role within the business.

Ensure staff receive the appropriate content, and level of training. While all staff may receive basic awareness training, additional targeted training should be provided for those:

- who have any customer contact
- who respond to vulnerable customers (eg through hardship programs)
- who hold management roles which may involve supporting staff who are dealing with family violence issues (either personally, or through their dealings with a customer)

Training should enable staff to identify and respond appropriately to family violence. However, your staff are not qualified family violence workers, so it should also help staff determine when, and how, to refer to support services. See our [Good Practice Guide– Referrals](#).

6. The safety of customers and staff is paramount.

Considerations may include:

- Staff awareness of potential safety risks
- Secure handling of contact information
- When/how information relating to one joint account holder should not be disclosed, and “hidden” to the other account holder
- How/when customers/accounts could be “flagged” for the customer’s safety and to alert staff of possible risks

7. Learn from others, and share your experience.

Guidance, support and good practice examples have been published by some regulators, peak bodies and ombudsman schemes. Some community organisations can provide feedback on family violence policies.

Many businesses are willing to share their experience, for example see [Thriving Communities Partnership](#).

8. Avoid aiding family violence.

Some customers will be perpetrators of family violence. Financial arrangements and accounts can be used as weapons to perpetrate abuse, for example by changing account

details, coercing a person to sign for credit where they receive no benefit, or obtaining contact details from a joint account profile.

Businesses should be aware and mindful of this to ensure their processes do not inadvertently facilitate family violence.

9. The customer's access to essential services (or goods), including communication, housing and transport, should be protected wherever possible.

Options/solutions presented to customers should focus on preserving services such as a vehicle, internet and mobile phone – as well as access to housing – as these are likely to be vital to the victim/survivor's safety and their ability to establish a new life.

10. Regularly review the application and effectiveness of family violence policies.

Businesses should have effective and ongoing review processes in place to monitor the quality and effectiveness of their responses to family violence.

Find more good practice resources at <http://earg.org.au/good-practice/>

Version 2, April 2018

[Economic Abuse Reference Group](#)

The Economic Abuse Reference Group is supported by the Victorian Government.

The following organisations contributed to this guideline: Consumer Action Law Centre, Domestic Violence Victoria, Financial & Consumer Rights Council, Good Shepherd Youth and Family Services Aust/NZ, Justice Connect, Uniting Kildonan, WestJustice, Women's Information & Referral Exchange, Womens Legal Service Victoria, Care Financial Counselling Service & Consumer Law Centre (ACT), Financial Counselling Australia, Financial Rights Legal Centre (NSW), Australian Communications Consumer Action Network, Legal Aid NSW.