



# Family Violence & Economic Abuse Customer Policy Guidance

Shine has created this sample customer policy on family violence, which includes economic abuse, in collaboration with Good Shepherd for organisations that serve customers. This sample policy can be adapted for your organisation. The sample policy is intended to be published and easily accessible to customers, so it is written in plain language, with 'you' meaning the customer, and 'us' meaning as the organisation.

We recommend that you have DVF FREE review your customer policy to offer specific specialist advice.

Creating this customer policy this should be a first step towards a safe and good response to customers affected by family violence, alongside a good workplace response for your staff affected by family violence (as explained in the DVF FREE Guidelines for Employers), and training and support for your customer-facing staff.

It's also important for organisations to incorporate 'safety by design', i.e. working towards designing systems and services in a way that prevents them from being weaponised, and to ensure that when it does happen, there are appropriate consequences for people using harmful behaviour as well as safety and support for those victimised. Harm caused by family violence/economic abuse is very different

from financial and other forms of hardship. It is not caused by the customer who experiences it, and they are powerless to stop it. The person using harmful behaviour will continue doing so until they are made to stop. Organisations serving customers will generally have systems and services that can be weaponised by people using family violence/economic abuse to cause harm to the people being targeted.

We are encouraged to see more organisations taking responsibility for supporting customers experiencing family violence/economic abuse, and for stopping their systems and services from being weaponised.

As an emerging field of research and practice, the understanding of family violence, particularly economic abuse, is rapidly evolving. Partnering with family violence specialists like Shine and Good Shepherd will help to ensure that your systems, services, training and support for staff and customers is well-informed and continuously improving to keep pace with this evolving field of knowledge.

**Contact DVF FREE to discuss your policy and training needs today at [dvfree@2shine.org.nz](mailto:dvfree@2shine.org.nz) or 09 815 4601 – option 4.**

# SAMPLE POLICY



**Please note:** Your safety is important to us. If we believe there is an immediate threat to someone's safety, we will call 111 for Police.

## Purpose

We aim to respond safely, fairly and compassionately to customers who experience family violence and economic abuse, to minimise the risk of further harm, to address harm that has been caused and to support their safety and wellbeing.

We also aim to prevent customers and others from weaponising our systems and products to inflict family violence and economic abuse, and we aim to respond when this does happen by holding the person using abusive behaviour accountable if possible, protecting the person experiencing abuse from further abuse using our systems and services, and addressing the harm where it is within our power to do so.

The purpose of this policy is to explain to our customers how we will achieve these aims.

Supports listed in this policy are available to you if you think you might be impacted by family violence or economic abuse. Please reach out to [specific team or role trained to respond to customers affected by family violence] by ringing [phone] or emailing [email]. Confidentiality is explained further below.

Throughout this policy, 'you' and 'your' refers to customers affected by family violence.

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## Understanding family violence

Family violence is defined by the Family Violence Act 2018 as a range of behaviours used within a 'family relationship,' which includes intimate partners, ex-partners, family members, people who share a household (flatmates) and any close personal relationship. It does not always include physical abuse. It is most often a pattern of actions that have the effect of controlling someone or making them feel afraid, threatened, or intimidated, even when specific actions on their own would not be seen as abusive. Experiencing family violence limits a person's freedom and choices, attacks their dignity, causes cumulative harm. The violence, controlling behaviours and harm often continues long after the relationship has ended.

**Economic abuse or harm** is a specific type of family violence, and often part of the pattern of actions to control someone, by restricting, removing, or otherwise negatively impacting on their access to personal or household money and resources, or on their participation in financial decisions. This can be an effective way to stop someone from leaving the relationship, and impact on their safety and survival as well as their long-term financial security and options for them and their children/dependents. There are many ways to cause economic harm. Just some examples are:

- Coercing a person to take on debt in their name that they don't want, which can limit their ability to be financially independent
- Accruing debt in a person's name without their knowledge, e.g. taking out a loan in their name, or making them a business partner or company director

- Refusing to close/separate a joint account after a partner has separated, and refusing to pay joint debt, so that the person is forced to pay it alone in order to maintain a good credit history
- Taking control of someone's income, or living off their income without contributing to the household or without their knowledge
- Withholding financial access or support, such as child support payments after separation
- Using any one of a number of strategies to sabotage their employment or education, such as hiding car keys, tampering with work devices, telling lies about them to their boss or work colleagues, keeping them awake all night so they cannot be productive, etc.
- Unreasonable control or deceptive behaviour that limits or prevents the targeted person's involvement in household or relationship finances.

*You may want to adapt these bullet points to include ways your systems and services can be weaponised to inflict economic harm, if they are not already here.*

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## Privacy and confidentiality

We understand that disclosing information about your experiences of family violence and economic abuse can increase your risk of harm and is highly personal and sensitive information. We will only ask for information that we need to help with your situation. If you share this type of personal information with us, we will only record or share it with your permission, we will store it securely, and it will only be accessible to staff who need it to help you.

The only possible exception to this is if we believe there is a serious threat to someone's safety, then we may share information necessary to address that threat, for example by ringing the Police when there is immediate danger.

If you are a joint account holder, you can request that we keep your address and any other information that we hold relating to your experience of family violence or economic abuse confidential from your joint account holder.

All customers have the right to request a copy of the information that we hold about them at any time; if you have disclosed family violence/economic abuse by your joint account holder to us, we will only share information about you with your joint account holder if safe and necessary to do so.

*Customers experiencing family violence may need reassurance that their disclosure about family violence will not be shared without consent, in particular with their abuser if they are a joint account holder.*

*It's also important to be transparent about limitations to confidentiality when there is an immediate safety risk.*

# Our commitment to customers who experience family violence

We will support the dignity, safety and wellbeing of our customers who experience family violence by:

- Listening if you share your experience of family violence with empathy and without judgment,
- Prioritising your dignity, safety and wellbeing
- Believing you and not asking for proof or evidence of your experience of family violence beyond what you tell us, unless there are exceptional circumstances
- Asking how you would like to be contacted, and using your preferred contact option unless there's a reason it's not possible
- Referring you to our [extra care] team for ongoing customer support if needed
- Offering to set up additional security for you or your account
- Offering to connect you with specialist family violence services
- Offering to connect you with our Extra Care Team (see side bar), to give you a single point of contact with and to minimise the number of times you need to share details about your experience of family violence
- Ensuring our frontline staff have a basic level of understanding about family violence, and that our Extra Care Team have a deeper level of understanding, in order to enable this commitment to be consistently fulfilled

*We highly recommend establishing an internal team of 'Champions' to provide an extra level of care for customers experiencing family violence as well as other inequities and barriers to engaging with your services.*

*The DVFREE Customer Response Champion training is ideal for people in these roles, while DVFREE Customer Response frontline modules are designed for all customer-facing staff.*

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## Our Extra Care Team

You can ask for a referral to our Extra Care Team if you are having issues with your account because of experiencing family violence and economic abuse. Our frontline staff should also proactively suggest this if they recognise you need extra care because you may have experienced family violence. Extra Care Team members have more in-depth and regular family violence training and will be able to explain any options we can offer you in your particular situation, and support you with any specific customer needs with sensitivity, flexibility and care.

If you are assigned an extra care flag on your record, then access to your family violence information will be limited to this team, or restricted even further if you feel it is necessary. You will be assigned one person in the team as your contact person, so you don't need to keep re-explaining your situation, but if that person is unavailable, other people in this team will be available to assist you.

An extra care flag on your record will not impact you negatively in the future, i.e. we will not discriminate against you on the basis of your experience of family violence/economic abuse in future lending decisions, etc.

### **Joint Accounts/Policies**

If you have a joint policy with the person using violence, we will prioritise your safety at all times. We will:

- Inform you of what each person's rights are under the policy
- Help you set up your own account
- Send information to two different addresses, and keep yours confidential from your joint account holder
- Not require you to make or have contact with the person using violence
- Take care with how we share information with your joint account holder, e.g. about altering accounts or access, and work with you to plan the safest approach

### **Financial Hardship and Debt Management**

We understand that economic abuse is a common form of family violence. If you have incurred debt with us or are experiencing another form of financial hardship as a result of family violence, we will work with you to understand your situation and consider use of a range of tools to support you, and to address unjust debt or fraud that may have occurred.

If your debt has already been referred to a third-party debt collection agency, we will work with that agency to provide the best possible outcome for you. Where your credit history has been tarnished as a result of that debt, we will work with you to communicate with the credit reporting agency to try and amend the information relating to the debt in order to repair or prevent harm to your credit history.

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## **Preventing our systems and products being weaponised as part of family violence and economic abuse**

Sometimes financial services and systems are weaponised to cause harm, often as part of a pattern of abusive behaviour, for example:

- Coercing someone to take on unwanted debt
- Refusing to help with paying back debt that was taken out jointly
- Refusing to agree to closing a joint account and separating financial obligations when a partner or other joint account holder is trying to separate and/or separate finances
- Using payment reference fields to abuse or harass someone
- Cancelling a joint insurance policy without seeking consent or even notifying the joint policy holder
- Using a partner or ex-partner's details, ID or login passwords to obtain credit, or to change ownership of an item where finance is attached

Our terms and conditions expressly forbid people from weaponising our systems and services to cause harm to others. They make clear that we will consider a number of options when we are aware this has happened in order to hold that person accountable and to prevent further harm. These options may include removing a customer or narrowing the range of access that a customer has to our systems or services.

If we are aware that a crime has been committed that may have harmed a customer, we will discuss this with the affected customer first where possible before deciding whether to share evidence of the crime with police.

We will introduce processes and policies to prevent financial abuse, and we will review existing policies that may be barriers to safety and wellbeing for customers experiencing family violence, as we become aware of ways to do this.

We will also take reasonably practicable steps to respond to abuse and prevent further abuse of our systems and products by considering appropriate responses on a case-by-case basis. Where possible we will do this after gaining your consent to ensure our actions do not cause you further harm. These actions in response to customers weaponising our systems and products may include, for example:

- Disabling access to withdraw or spend from a joint account
- Disabling access to a service
- Separating accounts
- Changing access methods
- Giving a written warning to a customer of possible account termination should there be any further abuse of our systems or products
- Terminating a customer's account(s) and barring them from opening new accounts
- Recording and reporting any abusive communications using our system/product channels or that contravene a protection order or other court order
- Blocking such future communications

*We highly recommend that businesses address financial abuse in their terms and conditions. Read about how this is being done by many businesses in Australia in the Respect & Protect Index 2025.*

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## Support for our staff

We are also committed to supporting the safety and wellbeing of our own employees impacted by family violence. Our workplace family violence programme is supported by DVFREE, a programme delivered by family violence specialist Shine. It includes:

- Regular specialist training for 'First Responders' and managers to support impacted employees
- Family violence workplace policies, procedures and awareness raising for all staff
- Accountability for employees using work-related family violence and support for behaviour change
- Support for staff who experience family violence, including:
  - Workplace safety and wellbeing planning
  - Access to paid family violence leave and flexible working arrangements
  - Support for employees to access specialist family violence services in the community.

# Family violence services in the community

The national helplines listed below can provide specialist support, information, advocacy and referrals to local services you may need to support your safety and wellbeing.

 **If you or your family are in immediate danger, call Police on 111.**

- **Shine Helpline**

Freephone: 0508 744 633 - 24/7

Live webchat available at [www.2shine.org.nz](http://www.2shine.org.nz)

- **Women's Refuge**

Freephone: 0800 REFUGE/0800 743 833 - 24/7

Live webchat available by clicking on this Women's Refuge shielded site icon in the footer of our website and many other NZ sites, which will not show in the user's browsing history.



- **Are You OK?**

Freephone: 0800 456 450 - 24/7

Live webchat available at [www.areyouok.org.nz](http://www.areyouok.org.nz)

- **Good Shepherd** (economic harm)

Freephone: 0800 466 370 option 4

[www.goodshepherd.org.nz/get-support/our-services/family-violence-economic-harm/](http://www.goodshepherd.org.nz/get-support/our-services/family-violence-economic-harm/)

- **Elder Abuse Response**

Freephone: 0800 32 668 65

Text: 5032

Email: [support@elderabuse.nz](mailto:support@elderabuse.nz)

- **Age Concern**

Freephone: 0800 65 2 105

More information or find a local Age Concern at: [www.ageconcern.org.nz](http://www.ageconcern.org.nz)

- **Hohou te Rongo Kahukura (Rainbow/Takatāpui community)**

While there is currently no dedicated domestic/family violence service for the Rainbow/Takatāpui community in Aotearoa New Zealand, you can find more information and referral pathways at [www.kahukura.co.nz/information/need-help/](http://www.kahukura.co.nz/information/need-help/).

- **VisAble** (disabled people)

Freephone: 0800 998 858

Email or refer via form: [www.VisAble.co.nz](http://www.VisAble.co.nz)

Founded in 2024 to strengthen capabilities to respond to violence, abuse and neglect affecting disabled people.

- **Safe to Talk** (sexual harm)

Freephone: 0800 044 334 / Text: 4334 - 24/7

Live webchat available at [www.safetotalk.nz](http://www.safetotalk.nz)