Supporting Survivors of Economic Abuse: Implementing Learning in the UK



Revisiting my WCMT Report: Five Years On (June 2021)

Dr Nicola Sharp-Jeffs 2016 Churchill Fellow





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WCMT

www.wcmt.org.uk

The Winston Churchill Memorial Trust (WCMT) was established when Sir Winston Churchill died in 1965. WCMT carry forward his legacy by funding British citizens from all backgrounds to travel overseas in pursuit of new and better ways of tackling a wide range of the current challenges facing the UK. Churchill Fellows are required to demonstrate the desire and motivation to improve their community, profession or field.

SEA

www.survivingeconomicabuse.org

Surviving Economic Abuse (SEA) is the only UK charity dedicated to raising awareness of economic abuse and transforming responses to it. The charity works day in, day out to ensure that women are supported not only to survive, but also to thrive.

Abbreviations

- CCB Controlling or Coercive Behaviour in an Intimate or Family Relationship
- CCR Coordinated Community Response
- CEO Chief Executive Officer
- **CPS Crown Prosecution Service**
- CWASU Child and Woman Abuse Studies Unit
- DAHA Domestic Abuse Housing Alliance
- DCMS Digital, Culture Media and Sport
- DEAP Domestic and Economic Abuse Project
- EAEF Economic Abuse Evidence Form
- EEG Experts by Experience Group
- EIDA Employers Initiative on Domestic Abuse
- EJP Economic Justice Project
- FCA Financial Conduct Authority
- LBG Lloyds Banking Group
- MAP Money Advice Plus
- MoJ Ministry of Justice
- MaPS Money and Pensions Service
- NAB National Australia Bank
- OBE Order of the British Empire
- SEA Surviving Economic Abuse
- US United States
- VAWG Violence Against Women and Girls
- WCMT Winston Churchill Memorial Trust

Note on terminology: At SEA, we use the combined term victim-survivor to acknowledge that anyone who is experiencing abuse is already surviving. The term 'victim' can be useful and even empowering when someone is trying to access justice, for example in court. Some people feel the term 'victim' validates their experience and reassures them that the perpetrator's actions were not their fault. However, other people dislike the term victim because they feel it is disempowering or makes them appear vulnerable. Where the term victim appears on its own within this report, it reflects the language used by other organisations

Biography

Dr Nicola Sharp-Jeffs OBE is an expert in economic abuse as it occurs within the context of coercive control. She has worked in the violence against women and girls (VAWG) sector since 2006 in policy-influencing, advocacy and research roles.

In 2016, Nicola was awarded a Churchill Fellowship and travelled to the United States and Australia to explore innovative responses to economic abuse. It was her determination to ensure that women in the UK have access to the same responses that led her to establish the charity Surviving Economic Abuse (SEA).

At the time of her WCMT travels, Nicola was a Research Fellow in the Child and Woman Abuse Studies Unit (CWASU) at London Metropolitan University. She now combines her role as SEA's founder and CEO with the posts of Emeritus Fellow at CWASU and visiting Senior Fellow in Social Policy at the School of Law and Social Sciences, University of Suffolk.

In 2018, Nicola received the Pol Roger award, which is given to Churchill Fellow who has conducted an outstanding Fellowship and generated significant publicity for their findings. In 2020, she was the joint winner of the Rising Chief Executive award at the Third Sector Awards and, in the same week, was appointed OBE for services to victims of domestic and economic abuse.



Acknowledgements

Surviving Economic Abuse (SEA) has grown from a bold idea into an established charity making a difference to the lives of many. I'd like to thank the charity's Trustees, an amazing staff team, the women who work alongside us, our many supporters and our funders for being part of the SEA story. Thanks also go to my family and friends who have believed in and supported me. This report is dedicated to the memory of <u>Rachel Griffin</u> who was so supportive of me and SEA.

1. Introduction

In 2016 I was awarded a Churchill Fellowship to the United States and Australia. The objectives of my Fellowship were to:

1. Explore innovative responses to supporting women who experience financial abuse in the context of domestic violence.

- 2. Understand how different stakeholders work together to address financial abuse; and
- 3. Evaluate the potential for transferring the learning gained to the UK.

At the time, work to address financial abuse in the UK was described as historically 'under-funded and over-looked' by the violence against women sector.¹ The End Violence Against Women coalition observed that there has been a lack of focus on women's economic rights² and my own Fellowship report concluded that, when compared to international practice, responses to financial abuse in the UK were at an 'early stage of development'. Indeed, the Westminster Government's *Ending Violence Against Women and Girls (VAWG) strategy* published in March 2016 made just one reference to financial abuse.

The innovative practice I saw in the United States and Australia and the learning I took from understanding how different stakeholders were working together to address financial abuse made me determined to ensure that women in the UK received the same response. I set up the charity Surviving Economic Abuse (SEA) following my Fellowship, to act as a catalyst for the change I wished to see.

Five years later, I am revisiting the recommendations I made within my 2016 report: *Supporting Survivors of Financial Abuse: Learning for the UK.* It is timely to do so because the Westminster Government will imminently publish a new three strategy (2021-24) on violence against women and girls to drive forward further improvements.

June 2021 also marks four years since Surviving Economic Abuse (SEA) was registered with the Charity Commission and we will publish our refreshed 3-year strategy (2021-24) later this month.

The charity has grown to a team of over 20 staff members and 2 associates, alongside a Board of 9 Trustees, over 100 survivors (the Experts by Experience Group – EEG) and countless supporters (see appendix one). Together we work - day in, day out - to achieve SEA's mission: to raise awareness of economic abuse and transform responses to it. We are determined that women are supported not only to survive, but also to thrive.

2. Revisiting the Fellowship Recommendations

In this section, I introduce the approach SEA takes to address economic abuse and outline how this links to the recommendations of my 2016 Fellowship report. I then consider each recommendation in turn, set out the learning which informed it, provide a brief overview of the 2016 context, and describe the role SEA has played in moving the agenda forward.

2.1 Economic Space for Action

Intimate partner violence (domestic abuse) is rarely a single incident, but a pattern of behaviour that extends beyond physical force, beyond the home and beyond the duration of a relationship. This understanding is commonly articulated through the concepts of power and control³ and coercive control.⁴ More recently, legislation has criminalised this behaviour though the offence of Controlling or Coercive Behaviour (CCB) in an Intimate or Family Relationship, introduced by the Serious Crime Act (2015).

Since coercive control is ongoing rather than episodic, its unrelenting nature means that women have little volitional space to exercise autonomy. It is within this narrowing of life and options that women's 'space for action' is diminished across a range of domains, including their economic well-being.⁵

SEA undertakes advocacy to increase women's economic space for action along a continuum: from building the capacity of frontline organisations to advocate effectively for individuals, through to institutional advocacy – recognising economic abuse and ensuring that an understanding of the issue is reflected within national policy and legislation, thereby removing barriers to economic safety. This approach is recognised within our four strategic priorities: awareness-raising; professional responses; systems change; and policy influencing.

In 2016, economic abuse was not recognised in policy or legislation. To create a framework within which to deliver effective responses, it was necessary to name and define economic abuse. We believed that legal recognition would serve to improve knowledge and awareness of economic abuse, thereby validating the experience of victim-survivors and empowering them to act. Furthermore, legal recognition of economic abuse means that its impact must be addressed, ensuring that perpetrators are held accountable for their behaviour.

2.2 Legal and Policy Context

Recommendation one: The Westminster Government should broaden the definition of domestic violence to recognise financial abuse within the wider category of economic abuse.

Recommendation two: The Westminster Government should develop a policy/legislative definition of economic abuse.

I. International learning

An exploration of legal and policy frameworks in the US and Australia revealed that financial abuse was recognised within the wider category of economic abuse.

Whilst the terms financial abuse and economic abuse are often used interchangeably, economic abuse is a 'more inclusive' concept⁶ and one that reflects the lived reality of survivors. In fact, economic abuse was first introduced into discourse by survivors when they identified it as a tactic used by perpetrators within the Duluth Power and Control Wheel.

Since 2017, I have argued through my academic work that, although involving similar behaviours, financial abuse is a sub-category of economic abuse. This is because financial abuse relates specifically to the control of money and finances, whereas economic abuse is a broader term which recognises that – in addition to money and finances - abusers also control economic resources including, for example, transportation and a place to stay.⁷

The Royal Commission Inquiry into Family Violence (convened by the Victorian Government in Australia in 2015) made 15 recommendations to address economic abuse through initiatives promoting economic independence. These fell into four categories: debt, personal property, residential tenancies and economic recovery – highlighting the range of issues that need to be addressed.

II. UK context in 2016

In 2016, work to address domestic abuse as a form of violence against women and girls in England and Wales had followed various policy definitions, all of which referenced 'financial abuse'.⁸

The Westminster Government's <u>Ending Violence Against Women and Girls (VAWG) strategy</u> published in March 2016 referred to financial abuse just once - within a case study example. The issue itself was not addressed within the strategy, nor the action plan that underpinned it. Reference was made only to the fact that the needs of victims may be 'complex' and can include 'assistance with debt'.

III. The role played by SEA

In February 2017, the Prime Minister set out that a major consultation across government would result in a Domestic Violence and Abuse Act (as it was known then) consolidating other relevant legislation and introducing new measures to help victims. Importantly, it would also introduce a statutory definition of domestic abuse.

After the Domestic Violence and Abuse Bill was brought forward within the Queen's speech in June 2017, SEA met with civil servants and the Parliamentary Undersecretary of State for Safeguarding at the Home Office, Sarah Newton MP and then her successor Victoria Atkins MP.

We <u>advocated</u> that the statutory definition domestic abuse proposed within the act should expand the policy recognition of financial abuse to include economic abuse.

In December 2017, SEA also published a piece of <u>research</u> into successful prosecutions of the **CCB offence**. As noted above, the CCB offence was designed to recognise that the term 'domestic violence' had come to acquire a meaning beyond physical violence only, and that it should be interpreted to include the use of emotional and psychological abuse.

Yet SEA's research revealed that the CCB offence not only addressed the use of emotional and psychological abuse, but also economic abuse. It showed that 6 in 10 cases featured at least one form of economic abuse, yet this was not named and recognised as such.

The charity drew on this research to further build the case for economic abuse to be recognised within the statutory definition of domestic abuse introduced via the Bill. In addition, we recommended that: statutory guidance on controlling or coercive behaviour should name and define economic abuse; consideration should be given about how to address forms of economic abuse whilst result in economic costs to the victim-survivor in sentencing and possibly criminal injury claims; and awareness-raising activity should be undertaken so that economic control of a partner/family member is understood as abusive.

The research was launched at a reception hosted by Victoria Atkins MP, Parliamentary Undersecretary of State for Safeguarding at the Home Office, in the House of Commons.



The Government was receptive to our ask and, in March 2018, the consultation document <u>*Transforming the Response to Domestic Abuse*</u> proposed including economic abuse within the new statutory definition.

As part of the consultation, **SEA facilitated a roundtable discussion** of 18 victim-survivors of economic abuse (Experts by Experience) at the Home Office in May. This was attended by Home Office and Ministry of Justice (MoJ) officials, as well as the Crown Prosecution Service (CPS) and the Economic Crime lead for the police. Our <u>written response</u> to the consultation, drew on a <u>report</u> of the roundtable discussion. SEA also facilitated a <u>cross-sector response</u> on the economic abuse related questions via the National Working Group on Economic Abuse which we set up and co-chair with Hannana Siddiqui.

We received particular support from Women's Aid and were asked us to speak on a <u>panel</u> <u>discussing economic abuse</u> alongside Victoria Atkins MP at a **Conservative Party fringe event** in October 2018. In early 2019, SEA was also asked to **meet with the Prime Minister's special advisor.**

Throughout this time, **SEA engaged in media work** to highlight the issue, sharing hundreds of <u>stories</u> of how economic abuse has impacted women's lives, and reaching millions. Within the print media this included the Financial Times, the Times, the Guardian, the Telegraph, the Independent the Daily Mirror and the Daily Mail. In broadcast, coverage has featured on BBC Woman's Hour, BBC Moneybox, the BBC Today Programme, BBC News, BBC Breakfast, Victoria Derbyshire, ITV's This Morning and as a storyline in Coronation Street.

In July 2019, Media Zoo created a multi-award-winning⁹ public education **awareness-raising film**, <u>*Drowning*</u>.

The <u>draft Bill</u> was published in late January 2019 and, much to SEA's delight, economic abuse was both named and defined within the Bill. In the paper published alongside it, the Westminster Government explicitly recognised that **economic abuse 'encompasses a wider range of behaviours than financial abuse.'**

Not only did the Westminster Government include economic abuse in the new statutory government definition of domestic abuse, but it also undertook to **update the statutory guidance for the offence of controlling or coercive behaviour to include references to economic abuse** (see also below).

The term 'economic abuse' was used 35 times within the paper published alongside the Bill. The Westminster Government also made **7 commitments to addressing economic abuse** within its plan of action moving forward (see appendix two).

The <u>Domestic Abuse Act</u> was enacted in April 2021 and incudes economic abuse within the definition of domestic abuse in Section 1 in subsection 3(d). Economic abuse is defined in subsection 4:

"Economic abuse" means any behaviour that has a substantial adverse effect on B's ability to (a) acquire, use or maintain money or other property, or (b) obtain goods or services¹⁰

SEA's work to bring about this change was recognised when we were <u>shortlisted</u> in the campaigning and advocacy category of the **2019 Charity Awards**.

One of the judges stated that SEA's work showed that 'even a very small organisation can raise the profile of an issue and achieve success.' Another said that SEA had 'shone a spotlight on a topic that was not well understood previously' and had conducted a 'great campaign on not very much'.

Recommendation three: The Westminster Government should consider making economic abuse a criminal offence within the proposed Domestic Violence and Abuse Act.

I. International learning

Stakeholders in both the US and Australia stated that the criminal justice system lacks understanding of financial abuse arising in the context of domestic violence. Some compared this to the way in which the police responded to physical abuse forty years ago. Evidencing financial abuse can also be particularly challenging and this was identified as a reason why the police may 'push back' on acting in this area. The exception was in Tasmania, Australia where economic abuse was made a criminal offence under Section 8 of the Family Violence Act (2004).

II. UK context in 2016

Some of the behaviours associated with economic abuse have long been criminal, for instance, theft and damage/destruction of property. Historically, the police tended not to prioritise these crimes when perpetrated by a current/former partner; nor did they recognise them as potentially taking place within a wider pattern of abuse. As noted above, the Serious Crime Act (2015) introduced the CCB offence; yet this was designed to recognise the use of emotional and psychological abuse.

III. The role played by SEA

It was not until 2017, when SEA undertook an analysis of successful prosecutions into the CCB offence, that the potential for criminalizing economic abuse was recognised. One of the seven commitments made by the Westminster Government in 2019 when it published the draft Domestic Abuse Bill was to **'update legal guidance for prosecutors to ensure cases of economic abuse can be successfully prosecuted.'**

In addition, the Government committed to **'provide funding to update the Domestic Abuse** Matters police change programme so that it includes economic abuse.'

SEA worked with the charity SafeLives to develop and deliver follow-up training specifically around the issue of economic abuse to Domestic Abuse (DA) Matters Champions and force leads in ten DA Matters early adopter forces. The training was delivered as a half-day workshop and explored: what economic abuse is and how it operates within the context of coercive control; how the police can identify economic abuse; collecting evidence for prosecution; and actions that the police can take to help create economic safety.

An <u>evaluation</u> showed that nearly all (98%) of learners felt that they had a strong understanding of the tactics used by perpetrators to economically abuse their victims, an increase of 77%. The same percentage reported a strong understanding of the impact that economic abuse has on victims, including the long-term impact on quality of life and safety (an increase of 74%).

At the same time, SEA heard from victim-survivors that the provision of the CCB offence was limited since it applied only to those living or still in a relationship with an abuser. It is common for coercive control to continue or escalate post-separation, but economic abuse and other forms of post-separation control could not be prosecuted.

SEA therefore <u>called</u> for an amendment to the Domestic Abuse Bill to widen the scope of the Controlling or Coercive Behaviour Offence within the Serious Crime Act (2015) to apply post-separation.

Working with Jess Phillips MP in the House of Commons and then Baroness Lister in the House of Lords, a case for support was put forward with endorsement from SafeLives, the wider violence against women and girls' sector and academic Cassandra Wiener.

In the **House of Commons** (June 2020), Justice Minister, Alex Chalk MP, agreed that it was an important issue to raise:

"I entirely agree with the Surviving Economic Abuse charity raising the issue, and it has done an important public service in doing so."

However, he pointed to the review of the CCB offence that the Westminster Government was undertaking and stated that it was important to have 'a sound evidence for any changes to the offence'.

This was also the response of Baroness Williams at Committee Stage in the **House of Lords** when the amendment was raised again (February 2021). She noted that until the review had concluded,

the case for change was not 'clear-cut' but that in 'coming to a final view' the Government would 'reflect very carefully on the issue'.

Once more, SEA was delighted when the <u>review</u> of the CCB offence was published on the 1 March 2021 and the **Westminster Government** <u>announced</u> it was in support of the proposed amendment.

At Report Stage (10 March), both Baroness Lister and Baroness Bertin recognised the role that SEA had played in bringing about this change:

"The Government's decision to accept an amendment on post-separation abuse has been widely welcomed by organisations on the ground, and by survivors themselves. I pay special tribute to Surviving Economic Abuse, which has campaigned on the issue of post-separation economic abuse with such determination and skill, in response to concerns raised by victims and survivors."

"I will also begin my speech on Amendment 45 with some thanks. We definitely would not be here welcoming this amendment without Nicola Sharp-Jeffs and her team at Surviving Economic Abuse."

So too did Baroness Williams on behalf of the Government:

"Controlling or coercive behaviour is an insidious form of domestic abuse and this Government are committed to ensuring that all victims are protected. We have heard the experts and considered the evidence on this issue and I am very pleased to support the amendments brought forward by the noble Baroness, Lady Lister. She has campaigned on it. She owns it. I am very happy that she is the sponsor. I commend the resolute campaigning on this issue by Surviving Economic Abuse and other organisations."

Section 68 of the <u>Domestic Abuse Act</u> amends Section 76 of the Serious Crime Act 2015 (offence of controlling or coercive behaviour in an intimate or family relationship).

Recommendation four: The Westminster Government should undertake work to explore family law mechanisms that could be used to address financial abuse.

I. International learning

In addition to criminal law, other legal remedies can be used to address economic abuse. In the US and Australia, family law is recognised as being essential in facilitating access to a property settlement, access to a car or furniture, spousal maintenance, dividing pension pots and dealing with joint debts or debts accrued in a woman's name without her knowledge.

II. UK context in 2016

Use of family law in responding to economic abuse had not been explored in any detail within the UK. However, non-recognition of economic abuse meant that some victim-survivors were struggling to access family law legal aid, due to the domestic violence evidence requirements. At the same time, the family court system was being used as a mechanism to exercise economic abuse through costly proceedings in relation to children cases.

Furthermore, changes to legal aid introduced by the Legal Aid, Sentencing and Punishment of Offenders Act 2012 meant that many domestic abuse victims were unable to qualify for legal aid in family proceedings due to the means test, which took into account income and capital which women appeared to own but couldn't access due to economic abuse.

III. The role played by SEA

Immediately following the Fellowship, learning gained was shared with the MoJ to inform its review of the regulations for family law legal aid and the impact of the domestic violence evidence requirements. **Legal aid regulations were amended to include evidence of financial abuse** such as bank statements, communications with the perpetrator (texts or emails), a letter from a domestic violence support service or a narrative statement from the survivor.

Yet, despite the broader range of evidence that victim-survivors can submit to prove eligibility they still need to satisfy the means test. Those with equity in a house, or 'trapped capital' elsewhere will, therefore, be denied legal aid despite having very limited available cash to afford legal representation. When these assets are controlled by the abuser who blocks access to them i.e., delays/prevents the sale of a joint property, victim-survivors may be forced to accrue considerable debt or declare bankruptcy to have legal representation to prove their allegations of domestic abuse.

SEA raised this issue within our written response to the MoJ consultation on *Assessing Risk of Harm to Children and Parents in Private Law Children Cases*. In addition to the lack of legal aid leading to victims ending up as litigants in person (which in turn leads to poorer outcomes in family cases), we raised our concerns about the ways in which the family courts process perpetuates and facilitates economic abuse. These include through: perpetrators bringing repeated and vexatious applications; refusing to disclose assets; and victims' employment being adversely affected by the demands of litigation, exacerbated by the lack of legal assistance.

We also raised several ways in which cases could be used as a mechanism of economic control, including requests to share/transfer residence being used by fathers to either reduce/cut child benefit and child maintenance payments or require the non-abusive parent to pay child maintenance.

This led to a recommendation within the <u>final report</u> (June 2020) that **training in the family justice system should lead to in-depth understanding of domestic abuse, including economic abuse**. The report also recommended changes to the law relating to 'barring orders' (orders under the Children Act which may be used to prevent unnecessary applications being brought). The Westminster Government committed to explore whether this could best be achieved through an amendment to the Domestic Abuse Bill and went on to include related provisions in the Bill which are now part of the Act.

SEA also provided a statement in support of a High Court legal challenge around 'trapped capital' led by <u>The Public Law Project</u>. The High Court ruled in November 2020 that the **Legal Aid Agency does have a discretion to discount property in assessing an applicant's capital if it is not possible to get any equity out of the property.** On the means test more generally, SEA is calling for domestic abuse victims to be exempt from the test altogether and we are actively engaging in an ongoing review of the means test by the Government.

2.3 Stakeholder Responses

Recommendation five: Domestic violence services need to work across sectors and develop relationships with a wide range of stakeholders to address financial abuse.

Recommendation six: The Westminster Government should recognise that financial stability underpins physical safety by setting out the importance of this work in the National Statement of Expectations for VAWG services.

Recommendation seven: Local authorities and the Westminster Government should encourage a coordinated community response (CCR) to financial abuse.

I. International learning

In both the US and Australia, providers of domestic violence services were collaborating with stakeholders outside the 'usual realm' when responding to financial abuse. Responses to financial abuse were cross-sectoral, with stakeholders sharing their respective skill sets to develop integrated practice which is both effective and safe for survivors.

II. UK context in 2016

Resources to tackle domestic abuse had been directed towards responding to so-called high-risk cases of domestic violence meaning that the emphasis of responses was on physical safety. National policy failed to recognise that financial stability underpins physical safety. For instance, the <u>National Statement of Expectations for VAWG services</u> which sets out what local areas need to put in place does not mention the importance of economic advocacy. At the same time, the

Statement does recognise the role banks can play in identifying and supporting individuals who may be experiencing coercive control, including acting as a safe disclosure point for victims.

III. The role played by SEA

SEA's founding <u>Economic Justice Project</u> (EJP) ran a pilot which introduced a Debt and Benefit Specialist role – a domestic abuse specialist with an advanced understanding of the financial, money advice and debt sectors. Funded via the Department for Digital, Culture Media and Sport (DCMS) the role was co-located within Solace Women's Aid - a specialist domestic abuse service. The objective of the role was to support the overall capacity of the service in responding to economic abuse and provide more intense advocacy for women in this area. It also delivered training on economic abuse to local money/debt advice services, highlighting the importance of integrating safety within practice when working with victim-survivors.

As the project developed, economic advocacy was also identified as a priority within the work of other specialist VAWG organisations working in the pilot area. Moreover, economic abuse was introduced into the CCR strategy led by the local authority.

SEA has since met with national government to share these findings. We recommend that economic advocacy is reflected within the National Statement of Expectations and made a requirement within commissioning frameworks. We have also raised this issue with the Domestic Abuse Commissioner who will assess, monitor, and oversee the provision of services across the country moving forward.

Recommendation eight: Local authorities and the Westminster Government should provide domestic abuse services with resources to develop collaborative partnerships with financial and legal organisations and institutions.

Recommendation nine: Local and national Governments should facilitate relationships between domestic violence services and social/financial/legal/political stakeholders.

I. International learning

In Australia, a family violence-specific industry guideline had been launched by the Australian Bankers' Association (ABA) and was supported by training and education for relevant banking staff. The guideline was a direct response to recommendation 111 of the Royal Commission and the Victorian Government recognised its coordinating role and ability to facilitate relationships between stakeholders.

II. UK context in 2016

As is noted above, the National Statement of Expectations for VAWG services set out the role banks can play in identifying and supporting individuals who may be experiencing coercive control, including acting as a safe disclosure point for victims. A <u>report</u> by the Cooperative Bank and the charity Refuge in 2015 recommended that the financial services sector should develop a code of practice to guide the response of financial institutions to financial abuse.

Similarly, in 2016, the Financial Services Vulnerability Task Force recommended providing further support to victims of financial abuse. Also in 2016, the British Bankers' Association (BBA) and Citizen's Advice published a <u>framework</u> 'to help the banks, other creditors and advice providers challenge financial abuse in intimate partner relationships.' This led the BBA to announce in November 2016 that it would introduce a code of practice on responding to financial abuse by the end of 2017.

III. The role played by SEA

SEA advised on the development of the Code of Practice on financial abuse which was <u>published</u> by UK Finance (the new name for the BBA) in October 2018.



In December 2018 we held our **inaugural banking conference** which brought together domestic abuse experts and industry professionals to discuss how to implement the Code. The keynote address was given by Norm Kalcovski (pictured above) of the National Australian Bank who helped develop the ABA family violence-specific industry guideline.

At the conference, financial journalist Paul Lewis also launched the **SEA Best Practice Award for Banks and Building Societies**, encouraging them to go above and beyond the principles outlined in the Code. Within its 2019 commitments to address economic abuse, the Westminster Government stated that it would continue to work with UK Finance to encourage banks and financial authorities to do more to support victims of domestic abuse. The Home Office provided a grant to SEA to create a **national advice service for banks and building societies** in implementing the Code of Practice.

We helped establish and train the specialist Domestic and Financial Abuse (DAFA) team at Lloyds Banking Group (LBG) and, from September 2020, have seconded a member of SEA staff to the specialist team. We provide expert advice to SafeLives in their work with NatWest Group and have recently supported Refuge and The Cooperative Bank in their work to <u>raise awareness</u> of economic abuse.

In December 2020, two years after our inaugural banking conference and a year after we announced the first Best Practice Banking Award for Banks and Building Societies, we hosted a <u>webinar on banking</u>. At the webinar we launched an <u>evaluation</u> of our work in this area undertaken by Dr Olumide Adisa at the University of Suffolk and our <u>latest briefing</u>.

Alongside our work with particular firms, SEA has responded to consultations on vulnerable customers by the Financial Conduct Authority (FCA). Following our most recent written submission to the FCA and conversation with officials, there is now increased emphasis on economic control as a form of domestic abuse within <u>guidance</u> for firms on the fair treatment of vulnerable customers published in early 2021. Reference is also made to SEA's role in supporting firms to implement the principles set out within the UK Finance Code of Practice on Financial Abuse, including via the LBG secondment.

In April 2021, we chaired the first meeting of the **National Banking Policy and Practice Group** which we set up and chair to coordinate work being undertaken by charities and banks to support victim-survivors of domestic abuse and to speak with one voice to industry

2.4 Practical responses

Recommendation ten: Domestic violence services should collaborate with consumer lawyers to address identity theft and coerced debt.

I. International learning

In the US, innovative projects were exploring the use of consumer law in responding to the issue of coerced debt, helping survivors maximise income and avoid bankruptcy. For example, the Domestic Violence Consumer Advocacy Project based at the Legal Aid Society provided representation to survivors of domestic violence across New York City in consumer debt cases, credit repair and personal bankruptcy. It also recognised that links between family and consumer

law are important since divorce orders may not account for related consumer law issues that victims could be facing (see above).

II. UK context in 2016

Between 2010 and 2012, Women's Aid and Money Advice Plus (MAP) entered into a partnership to provide a telephone advice line which supported domestic abuse survivors with financial difficulties, including coerced debt. After the initial funding ended, MAP continued to lever small pots of funding to keep the service going, running at reduced capacity.

III. The role played by SEA

In 2017, SEA and MAP received DCMS and Home Office funding to establish the Domestic and Economic Abuse Project (DEAP). The project facilitated the ongoing delivery of support for domestic abuse victims experiencing financial problems and increased the capacity of the service. The expertise and relationships held by SEA's specialist economic abuse team supported MAP's service delivery and evidence of the issues arising via the service was collated and used to underpin advocacy at industry and governmental level. **Our partnership work was recognised by the Institute of Money Advisers (Best Partnership) in 2019 and again by the Third Sector Awards (charity partnership of the year) in 2020.**

As part of SEA's founding EJP, the charity developed a **screening tool for economic abuse** with the aim of consistently asking standard questions to establish prevalence. A number of these questions related to coerced debt. MAP implemented the screening tool within its advice work, establishing that 95 per cent of domestic abuse survivors experience economic abuse and that 60% of those who experience economic abuse are coerced into debt. Monitoring of the coerced debt cases also revealed that women had an average of five creditors. Write-offs were requested in coerced debt cases, with a success rate of 1 in 4.

Pro bono support was also levered via Latham and Watkins LLP. Lawyers developed a **scoping report around the use of consumer law in coerced debt cases**. This report was utilised to develop a <u>series of resources</u> for victim-survivors to provide information on coerced debt and how consumer law could be used to challenge it. The scoping work also identified areas for reform within consumer law, resulting in <u>recommendations</u> linked to recognising third-party coercion within the concept of duress.

Another recommendation arising from the EJP was the development of an Economic Abuse Evidence Form (EAEF). Modelled on the existing Debt and Mental Health Evidence Form, the EAEF is designed to communicate to creditors a victim-survivor's experience of economic abuse. The EAEF was <u>recommended</u> to the Money and Pensions Service (MaPS) by the Challenge Group Chairs advising on the Implementation of the UK Financial Wellbeing Strategy in light of Covid-19. MaPS is providing backing and financial support for the pilot having <u>accepted</u> the

recommendation and SEA is working with MAP to roll it out nationally by the end of 2021. Phase one of the pilot includes LBG, HSBC and Cabot Financial.

Recommendation eleven: Local authorities and the Westminster Government should recognise that responses to financial abuse are required during and post-crisis.

I. International learning

Economic abuse may continue, escalate or begin post-separation. Learning from the US and Australia reflected this, with practice showing that support is required during and post-crisis.

II. UK context in 2016

A <u>longitudinal study</u> following women rebuilding their lives after domestic violence (2011-2014) found that, although economic security improved immediately after leaving, the percentages of women who felt economically secure over time did not increase as much as some of the other measures that were tracked. In fact, compared to other measures, women's economic space for action showed little change – starting and remaining low. Very limited support existed for women experiencing economic abuse post-separation.

III. The role played by SEA

In 2020, SEA undertook a <u>rapid review</u> to establish women's immediate economic safety needs arising from the Covid-19 pandemic. The responses of 293 victim-survivors were analysed – just 21 respondents were still living with the abuser. The high numbers of respondents who were no longer in a relationship with, nor living with the perpetrator, served to illustrate just how prevalent economic abuse is post-separation. This reinforces the significance of the work SEA has successfully undertaken over the same period to ensure post-separation abuse is made a criminal offence via the Domestic Abuse Bill (see above).

Much of our work with banks and other financial institutions (see above) is focused on closing down opportunities for abusers to continue to exercise control post-separation and supporting victim-survivors in their efforts to <u>delink</u> from joint financial products.

Recommendation twelve: Domestic violence services should explore the development of a financial capability curriculum to increase the financial confidence of survivors and help them (re)gain the skills required to achieve financial stability.

I. International learning

In the US and Australia, financial education programmes were run for victim-survivors of economic abuse, helping them to rebuild or develop financial capability. Some programmes were run in-house, others sat within community based financial education projects which positioned financial abuse as part of broader discussions on women and finance. Learning suggested that

interventions related to financial support are most effectively delivered when domestic violence support workers are confident about their own financial capability. In addition, work to (re)build survivors' confidence in managing finances often sat alongside counselling and other mental health services.

II. UK context in 2016

A <u>scoping report</u> into economic advocacy indicated that domestic abuse services were supporting victim-survivors around setting up bank accounts and with budgeting skills. Workshops were developed with other voluntary sector organisations to address financial abuse and develop financial capability skills.

III. The role played by SEA

Another of the 2019 Home Office commitments to addressing economic abuse was the provision of funding to the National Skills Academy for Financial Services **to develop and deliver financial capability training for front-line workers**. This work was undertaken in partnership with SEA and the housing provider Gentoo.

The training was designed for those who provide financial capability support as part of their role with the objective of enabling them to develop a range of skills, knowledge and behaviors so that their practice provides safe and appropriate support to victims-survivors of economic abuse. An <u>evaluation</u> of the training revealed that practitioners gained a deeper understanding of economic abuse and improved their ability to recognise it within their practice. This helped them gain the confidence they needed to openly talk about finances and economic abuse with victim-survivors and thus overcome the stigma attached.

The importance of simultaneously addressing mental health was identified within an evaluation of the <u>DEAP</u>. One in five MAP clients reported having mental ill health, making it reasonable to assume that their **work impacts on emotional well-being of clients** to some degree. Certainly, qualitative feedback within the evaluation suggested positive effects on emotional well-being. SEA is working with specialist organisations such as Woman's Trust to <u>address</u> this nexus.

Recommendation thirteen: Local authorities and the Westminster Government should introduce a grant giving scheme for women who are leaving an abusive partner and seeking to rebuild their lives.

I. International learning

In the US cash grants are provided to victims of domestic abuse through initiatives such as Flexible Funding Assistance. Similarly, National Australia Bank (NAB) administers a family violence assistance fund. Small amounts of money can have significant impact for a survivor, helping them to maintain financial stability and, therefore, physical safety.

II. UK context in 2016

Successive reports have recommended that local authorities and central Government should consider introducing some form of specific financial support for those who have experienced domestic violence to help tide families over and assist with their resettlement.¹¹ This argument has taken on urgency because of cuts to the Social Fund. Indeed, an <u>evaluation</u> of a grant programme open to survivors of domestic violence shows a year-on-year increase in applications to the fund.

III. The role played by SEA

This issue was raised again with the findings of SEA's rapid review into **women's immediate economic safety needs** arising from the Covid-19 pandemic. SEA recommended that the Government distribute funding to local authorities to provide local hardship funds and emergency grant schemes to victim-survivors. Importantly, these schemes need to be flexible to meet their specific needs.

SEA was delighted to support the launch of the <u>Circle Fund</u> in February 2021 which is targeted at frontline specialist domestic abuse services. NatWest Group donated £1m, enabling services to distribute funds to those most in need. The charity SafeLives is administering the Fund.

Recommendation fourteen: Work to address financial stability needs to be integrated with work to sustain the tenancies of domestic violence survivors.

I. International learning

Within the category of residential tenancies, the Royal Commission Inquiry into Family Violence (convened by the Victorian Government in Australia) made five recommendations. These ranged from appropriate training for housing professionals, to ensuring that victims of family violence are not held liable for tenancy-related debt and notifying a protected person about their right to apply for a new tenancy agreement as soon as possible.

II. UK context in 2016

In 2016, housing responses to domestic abuse tended to focus on emergency refuge and moveon local authority accommodation. Issues connected to joint tenancies and private tenancies, for instance, had yet to be addressed.

III. The role played by SEA

SEA recognised the need for frameworks through which to tackle the complex interplay between debt, protecting personal property, residential tenancies and economic recovery. Our work in this area has been as a partner of the **Whole Housing Approach (WHA)** which aims to improve access to safe and stable housing across all tenure types.

Within the WHA, SEA has led on supporting victim-survivors stay in privately owned property – working to address issues linked to mortgages, family law and property law.

The WHA was conceptualised via the <u>Domestic Abuse Housing Alliance</u> (DAHA) in collaboration with members of the National Housing and Domestic Abuse Policy and Practice Group. DAHA is an alliance between <u>STADA</u>, <u>Gentoo</u> and <u>Peabody</u> formed in 2014.

In 2016, Gudrun Burnet (now CEO of STADA, previously at Peabody) was also awarded a Churchill Fellowship and looked specifically at <u>domestic abuse and housing</u>. This led to the formation of the National Group and key actions within her report were taken forward.

In relation to tenancies, these have included: working with the private rented sector to support victim-survivors retain their tenancies, the <u>Pan-London Reciprocal</u> which enables victim-survivors to transfer their tenancies and lobbying the Westminster Government for an amendment to the Domestic Bill to improve the situation for people with joint tenancies. Whilst the amendment was not successful, the Government did commit to hold a consultation on the issue.

3. Reflections and Taking Forward the Agenda

3.1 Reflections

All the recommendations made within my WCMT report have been addressed – to a greater or lesser extent - within the work of the charity. On reflection, they created the foundations on which to build Surviving Economic Abuse (SEA) and enabled the charity to be strategic from the beginning. The recommendations sit well within our approach to economic advocacy and the charity's strategic priorities. SEA has been able to have significant impact.

3.11 Impact

A strategic evaluation¹² of the charity undertaken in FY20-21 identified seven key themes in relation to this.

1. Influence: stakeholders are impressed with the way in which SEA works with policy makers, including Government, and can see tangible results such as through the Domestic Abuse Act.

"In terms of awareness [SEA has] had spectacular impact. [The] fact there is about to be new legislation recognising economic abuse."

2. Expertise: stakeholders recognise that SEA is specialist and reflected on how we use our expertise to add value across sectors.

"[SEA is] an organisation that has got a lot of credibility in a lot of different sectors – government, financial sector and the DA sector – its unique, SEA spans a lot of those very different areas."

3. Transformational: stakeholders note that SEA does not only offer an analysis and policy recommendations, but also offers practical tools and support to change practice.

"Transforming is harder to achieve [SEA has] done a good job in not shying away from tackling what is probably within the [VAWG] sector considered far removed from our normal comfort zones."

4. Logical: stakeholders recognise SEA's ability to take a logical approach to making change, that is realistic and tangible.

"They [SEA] have taken a very practical approach. Rather than awareness-raising distinct from responses, they have put the two pieces together, not just agitating about a problem but a mass of suggested solutions that are practical and rooted in practice. Whether a legislator or giant bank they have understood the grain of those organisations and given them brilliant things [they] can incorporate into [their] response."

5. Reach: stakeholders credit SEA for the shift toward discussing economic abuse rather than financial abuse, and ensuring all sectors are aware of how to identify it.

"The fact we talk about it [economic abuse] so clearly and distinctly as a phenomenon that needs to be specifically addressed is entirely down to them [SEA]."

6. Scale: stakeholders recognise the scale of the issue and are impressed with the level of impact SEA has already been able to make in strengthening understanding of economic abuse and responses to it.

"They [SEA] are doing such a brilliant job – really identified a gap and the reason they have grown so quickly is evidence of how much they were needed."

7. Leadership: stakeholders believe that SEA is a credible organisation, and that the charity's reputation has been an enabling factor of our success.

"I think the piece about building a wide set of relationships is a real strength."

3.12 Values

The themes identified above also reflect the values of the charity, developed by the team and Trustees in October 2018 (see appendix three). Working in partnership has been vital in growing

the charity so rapidly and ensuring that expertise on economic abuse is integrated with the expertise held by other sectors. Of particular significance is our multi award-winning partnership with MAP which provides a frontline response.

Believing victim-survivors through centering their lived experience within our work has enabled SEA to be purposeful in approach and to maximise impact with the limited resources we have. As illustrated by our response to the Covid-19 pandemic, the charity is agile in meeting need. We are always learning about what works in terms of positive outcomes for victim-survivors and have recently established an Impact and Partnerships team to develop and share the evidence base.

3.2 Taking Forward the Agenda

3.21 Continuing the momentum

Because of Covid-19, the issue of domestic – and economic – abuse has never so high in the public consciousness. We know at SEA that the aftermath of the pandemic will continue to impact and shape our work. Yet despite all the obstacles that the pandemic has brought, it has also been a time where we have seen extraordinary innovation in responses to economic abuse. As one victim-survivor so aptly stated within their answer to the Cost of Covid survey – responses to economic abuse should be the same *'whether it is national emergency or a personal crisis.'*

Moving forward we will harness this high level of awareness with the momentum created by naming economic abuse in the Domestic Abuse Act (2021) and via national recognition of economic control as a driver of financial vulnerability.

3.22 Equality and reach

SEA will continue to be bold and innovative in approach. The charity will work to ensure that recognition of economic abuse underpins relevant government policies, including the single payment of joint Universal Credit claims, access to legal aid, payment of child maintenance and the no recourse to public funds rule which discriminates against women with insecure immigration status.

Within our response to the Westminster Government consultation on the new strategy, **SEA is calling for women's economic safety to be at the heart of an integrated approach to tackling the issue of violence against women**. If women are to have economic independence, then practice and policy needs to be consciously aligned with this goal.

Indeed, we are determined that *all* women are supported to survive and thrive, so we will stepup our efforts to address the multiple inequalities that the pandemic has exposed. In addition to gender, these include race, religion or belief, socio-economic status, age, disability and sexual orientation. As part of this work, we will build on our engagement with a diverse group of victim-survivors via the Cost of Covid rapid review to undertake a national evidence-gathering exercise on economic abuse. In partnership with the Domestic Abuse Commissioner, we will aim to engage victimsurvivors in a wide-ranging consultation on economic abuse, so that we can better understand and address the breadth of response that is needed and the stakeholders who need to be involved.

This will lead to us working with an even greater range of stakeholders across different sectors. In the current financial year, we will expand our current focus on banking, mortgages and coerced debt to build on our work related to insurance,¹³ pensions and utilities.

LBG has highlighted the importance of responding to abuse experienced by colleagues as well as customers. Both groups will be made up of victim-survivors, and it is vital that colleagues in this situation are supported in their response to customers. For this reason, we worked with the Employers Initiative on Domestic Abuse (EIDA), Hestia, the Corporate Alliance, the Woman's Trust, Cardiff Women's Aid, TecSOS and Bulbshare on the *Everyone's Business Project*. SEA's work in holding abusers to account for their behaviour also includes via the use of professional regulatory frameworks.

SEA will expand the geographical reach of its work too, having become a national training partner within the Labyrinth Project in April 2021. This will enable us to work with women's groups in Scotland and Northern Ireland and explore the potential for our work to translate into frontline services.

3.23 Funding

SEA has grown significantly in the past four years, but now needs to raise more funds to 'stand still'. Moreover, we anticipate that the growing and consistent demand for our expertise will continue. With the pent-up demand from the pandemic, cases will inevitably also be even more complex. As a team and through our partnerships we will rise to this challenge and ensure that the Experts by Experience will remain central to all that we do.

Appendix one: SEA team, Trustees and Supporters

Current team members

- 1. Nicola Sharp-Jeffs
- 2. Kathryn Royal
- 3. Jasbinder Kaur
- 4. Christina Govier
- 5. Katy Blanchard
- 6. Stephanie Orr
- 7. Cyrene Siriwardhana
- 8. Jo Elkington
- 9. Michelle Everitt
- 10. Jennifer Glinski
- 11. Louise Jones
- 12. Hannah Weber
- 13. Nicola Barratt
- 14. Helen Liles
- 15. Rosa Wilson Garwood
- 16. Kate Cattermole
- 17. Harriet Alexander
- 18. Ana Miranda
- 19. Keith Gibson
- 20. Eleni Kazaglis
- 21. Melissa Bradshaw
- 22. Ian Lomax
- 23. Lydia House

Former team members

- 1. Georgia Powell
- 2. Judy Barber
- 3. Sian Scholes
- 4. Alexandra Jones
- 5. Dal Lall
- 6. Holly Cameron
- 7. Jo Trask
- 8. Angela Magny
- 9. Rebecca Stevens

Current Trustees

1. Janqui Mehta

- 2. Richard Walsh
- 3. Cathy Millis
- 4. Sue Lewis
- 5. Ruth Mason
- 6. Jonathan Speight
- 7. Annabel Griffiths
- 8. Sarah Williams-Gardener
- 9. Katie Sayer

Former Trustees

- 1. Nesta Lloyd-Jones
- 2. Holly Towell

Current associates

- 1. Marisa Bate
- 2. Stuart Leech

Former associates

- 1. Sam Dixon
- 2. Danielle Davis

Experts by Experience

Over 100 women who are anonymous

International network

164 members across 14 countries

Supporters

- 1. Jennie Bateson
- 2. Jenny Brown
- 3. Gudrun Burnet
- 4. Francesca Campbell
- 5. Gemma Claire
- 6. Aruna Dudhia
- 7. Lee Healey
- 8. Nicole Jacobs
- 9. Cathy Kane
- 10. Liz Kelly
- 11. Magnus Laurie
- 12. Sarah Learmonth
- 13. Paul Lewis

- 14. Alice Merry
- 15. James Mole
- 16. Jane Portas
- 17. Emma Scott
- 18. Kate Weston
- 19. Cassandra Wiener
- 20. Anthony Wills
- 21. Jo Youle
- 22. Sharoo Izadi

Pro bono supporters

- 1. Ashurst
- 2. Association of British Insurers (ABI)
- 3. Beck Fitzgerald
- 4. Boy Meets Girl Photography
- 5. Capital One
- 6. Contemplative Spaces
- 7. Cooley LLP
- 8. Doughty Street Chambers
- 9. EY
- 10. Frazer Jones
- 11. GK Strategy
- 12. Latham & Watkins LLP
- 13. Media Zoo
- 14. Millwood Partnership
- 15. Northumbria Law School
- 16. Pracedo
- 17. Ridley and Hall Solicitors
- 18. Rights of Women
- 19. Salesforce
- 20. Shelter
- 21. Smart Energy
- 22. WetInk
- 23. VK Law

Individual givers

- 1. Janet Roberts
- 2. Janice Wilson

Funders

- 1. 29th May 1961 Charitable Trust
- 2. Allen & Overy Foundation
- 3. Aviva Foundation
- 4. Broad Cairn Associates
- 5. CAF
- 6. Charles Hayward Foundation
- 7. Cisco
- 8. Clothworkers Foundation
- 9. Comic Relief
- 10. Department for Digital, Culture, Media and Sport (DCMS)
- 11. Eleanor Rathbone Charitable Trust
- 12. Esmée Fairbairn Foundation
- 13. Evan Cornish Foundation
- 14. John Ellerman Foundation
- 15. Joseph Rowntree Charitable Trust
- 16. Goldsmiths Company Charity
- 17. Home Office
- 18. Lloyds Bank Foundation
- 19. Lloyds Banking Group
- 20. London Catalyst
- 21. Marsh Christian Trust
- 22. MHCLG
- 23. MSE Charity
- 24. Money and Pensions Service
- 25. National Lottery Community Fund
- 26. Nationwide Community Grants
- 27. Oak Foundation
- 28. People's Postcode Trust
- 29. Police and Crime Commissioner for Northumbria
- 30. The Rayne Foundation
- 31. StepChange
- 32. Smallwood Trust
- 33. Standard Life Foundation
- 34. The Telos Foundation
- 35. Treebeard Trust
- 36. Winston Churchill Memorial Trust (WCMT)

Appendix two: Westminster Government Commitments to Economic Abuse

Domestic abuse consultation response and draft bill - GOV.UK (www.gov.uk)

Commitments on economic abuse:

- 1. Include reference to economic abuse in the statutory guidance for the offence of controlling or coercive behaviour and in the statutory guidance for future Stalking Protection Orders and DAPOs (Home Office).
- 2. Update legal guidance for prosecutors to ensure cases of economic abuse can be successfully prosecuted (Crown Prosecution Service).
- 3. Continue to work with UK Finance to encourage banks and financial authorities to do more to support victims of domestic abuse (Home Office).
- 4. Provide £200,000 to the National Skills Academy for Financial Services to develop and deliver financial capability training for front-line workers (Home Office).
- 5. Provide funding to update the Domestic Abuse Matters police change programme so that it includes economic abuse (Home Office).
- 6. Provide approximately £250,000 of funding to create a national advice service for banks and building societies, increase the capacity of existing telephone casework services for victims of domestic abuse and develop resources to help people identify if they are experiencing economic abuse (Home Office).
- 7. Work closely with the Scottish Government to establish the practicalities of delivering split payments in Universal Credit in Scotland (Department for Work and Pensions).

Appendix three: SEA's Values

- **1. We are purposeful:** Everything we do is driven by our passion to make the world a safe and equal place for women.
- 2. We believe: Our work is led by survivors of economic abuse: their experiences and knowledge shapes how we respond.
- **3.** We learn and share: Our team is curious, reflective, always learning and eager to share its expertise.
- **4. We are agile:** We move fast and are creative in meeting the challenges that must be overcome to create change.
- 5. We work in partnership: We know that we can only achieve our goals if we work alongside others our colleagues, the women who inspire our work and our partners.

¹ Kail, A., Blathwayt, I. and Jarvinen, J. (2008) Hard knock life: Violence against women – a guide for donors London: New Philanthropy Capital

² Dustin, H. (2016) Where Are We Now? 10 Year Review of Westminster Government Action to End Violence Against Women and Girls London: End Violence Against Women (EVAW)

³ Pence, E. and Paymar, M. (1993) Education Groups for Men who Batter, New York: Springer

⁴ Stark, E. (2007) Coercive Control: How Men Entrap Women in Personal Life, Oxford: Oxford University Press

⁵ Sharp-Jeffs, N., Kelly, L. and Klein, R. (2018) Long journeys toward freedom: the relationship between coercive

control and space for action – measurement and emerging evidence, Violence against Women, 24(2): 163–85 ⁶ Christy, K., Welter, T., Dundon, K. and Bruce, A. (2020) Economic abuse: a subtle but common form of power and control, Journal of Interpersonal Violence, 9/10(35): 1–27

⁷ Sharp-Jeffs, N. (2015). Money matters: Research into the extent and nature of financial abuse within intimate relationships in the UK. London, England: The Co-operative Bank/Refuge

⁸ See, for example: Home Office (2013) Information for local areas on the change to the definition of domestic violence and abuse

 ⁹ Bronze in social welfare at the Evcom Clarion awards; Gold in innovation at the Evcom Clarion awards; Cannes Corporate Media & TV Award; Shortlisted for the Charity Film Awards; Nominated for The Third Sector Awards
 ¹⁰ See Sharp-Jeffs, N. (2021) Understanding the economics of abuse: an assessment of the economic abuse definition within the Domestic Abuse Bill, Journal of Gender-Based Violence for more details

¹¹ Bell, K. & Kober, C. (2008) The Financial Impact of Domestic Violence; Home Affairs Select Committee (2008) Domestic Violence, Forced Marriage and "Honour"-Based Violence; Sharp, N. (2008) 'What's Yours is Mine' - The Impact of Economic Abuse on Women and Children Experiencing Domestic Violence London: Refuge

¹² Davis and associates (2020) The story so far: A strategic evaluation of Surviving Economic Abuse

¹³ SEA was nominated by TrustLaw for an <u>innovation award</u> for our work with Cooley LLP in relation to insurance. We are also part of the <u>Insuring Women's Futures</u> work led by Jane Portas.