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# Survivors' Needs:

How financial services firms can support customers experiencing economic abuse to regain financial control and rebuild their lives

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Thank you to the arbdn Financial Fairness Trust and Joseph Rowntree Charitable Trust for funding this vital research and our work in creating change for victim-survivors of economic abuse across the financial services sector.



**About Surviving Economic Abuse:**

Surviving Economic Abuse (SEA) is the only UK charity dedicated to raising awareness of economic abuse and transforming responses to it. All our work is informed by Experts by Experience – a group of women who speak about what they have gone through so that they can be a force for change.



**About The Joseph Rowntree Charitable Trust:**

The Joseph Rowntree Charitable Trust is a Quaker trust which supports people who address the root causes of conflict and injustice. It is a registered charity in England and Wales (210037).



**About abrdn Financial Fairness Trust:**

abrdn Financial Fairness Trust funds research, policy work and related advocacy activities. It aims to tackle financial problems and improve the living standards of people on low-to-middle incomes in the UK. It is an independent charitable trust registered in Scotland (SC040877). The Trust's name recognises a historic donation from Aberdeen Group plc, which led to the foundation of the Trust. The views expressed by the Trust and its funded partners do not necessarily represent those of the Aberdeen Group.

# What is economic abuse?

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Economic abuse is a form of coercive control through which domestic abuse perpetrators seek to reinforce or create economic dependency and/or instability. This, in turn, limits the choices that victim survivors can make and their ability to access and build economic safety.

The term 'economic abuse' recognises that it is not just money and finances that a perpetrator can control (known as 'financial abuse'), but also the things that money can buy, like food, clothing, transportation and housing. Control takes three forms: restriction, exploitation and/or sabotage. Moreover, because it does not require physical proximity, economic abuse can continue, escalate or even start after separation and be experienced for many years.

In the last year alone, 4.1 million UK women experienced economic abuse from a current or former partner.<sup>1</sup> Perpetrators do not economically abuse in isolation. By using physical, emotional and sexual abuse, abusers create a context of fear and isolation.

Perpetrators' control over victim-survivors' money and resources limit their freedom and creates economic dependency and/or instability that makes it harder for them to flee. In fact, nearly a quarter of UK women who experienced economic abuse in the last year said that the economic abuse prevented them from leaving a dangerous abuser.<sup>2</sup>

While for victim-survivors who do manage to escape, the abuser's ongoing interference with and lack of access to economic resources post-separation is the primary reason women return to an abusive partner where they are at risk of harm and homicide.<sup>3</sup> Recent Home Office analysis found that financial abuse was an aggravating factor in over a third of domestic abuse-related deaths reviewed between September 2021 and October 2022.<sup>4</sup>

# Introduction

## Background

Surviving Economic Abuse (SEA) has a strong track record of collaborating with the financial services sector. We work alongside firms to help them understand and recognise domestic including economic abuse and support them to provide adequate, tailored support to victim-survivors. We have prioritised working with financial services due to the huge reach and significant role they can play as part of the coordinated community response to domestic abuse – a role that is recognised within the statutory guidance underpinning the Domestic Abuse Act (2021). In SEA's most recent strategy (Making Waves, 2022–2025), we made a commitment to work with financial institutions. This built on our work with the Financial Conduct Authority (FCA) to recognise economic control as a form of domestic abuse within its Guidance for Firms on the Fair Treatment of Vulnerable Customers. SEA also worked with UK Finance to develop the 2021 Financial Abuse Code, to which 29 firms covering 39 brands have signed up to date.

Our objectives in working alongside the financial services sector are to ensure that all victim-survivors of economic abuse:

- are empowered to engage with financial services firms
- receive consistently good outcomes, no matter who they bank with

We support firms to develop the skills and tools needed to provide adequate support. We also work with them to identify good practice and deliver high-quality responses to victim-survivors of economic abuse. Key to this is encouraging firms to share their approaches to economic abuse, so that others can learn from these and victim-survivors know what support they can expect and how to access it. This is critical to ensure that all victim-survivors receive the support they need.<sup>5</sup>

Our engagement with victim-survivors includes working alongside the Experts by Experience (EEG) – a group of more than 50 women who share their experiences with us. From our work with survivors, we know that while the financial services sector has made huge progress in how they recognise and respond to economic abuse, there is more to do to ensure all victim-survivors are economically and physically safe.

Whilst men can, and do, experience economic abuse, evidence shows that women are disproportionately impacted.<sup>6</sup> Moreover, women experiencing intersecting inequalities are at increased risk. For example, research undertaken by Ipsos for SEA in 2024 shows that Black, Asian and racially minoritised women are over twice as likely to experience economic abuse than White women (29% compared to 15%).<sup>7</sup> In recognition of this, and in line with our continuing commitment to equity and diversity, we conducted research to explore the particular experiences of women with intersecting inequalities when engaging with financial services firms. This included inequalities such as disability, sexuality, and race. Our research also explored how perpetrators can misuse products to exert control, and how financial service firms have responded to these behaviours.<sup>8</sup> The findings of this research led to the development of a set of recommendations for financial services firms that are based on the experiences of female victim-survivors; however, acting on the recommendations would benefit all customers who may have experienced domestic, including economic, abuse.

Our research shows that  
**1 in 7 UK women**  
experienced economic  
abuse in the last 12 months.<sup>5</sup>



SEA's vision is a world in which all women and girls achieve economic equality and can live their lives free of abuse and exploitation. Our vision and strategy name women specifically because they are disproportionately impacted by economic abuse. Our research shows that 1 in 7 UK women experienced economic abuse in the last 12 months.<sup>9</sup> We also know that women and men experience economic abuse differently.<sup>10</sup> As such, this study interviewed women only and the recommendations are focused on the experiences of female victim-survivors. However, the findings are also informed by consultation with specialist services that support male victim-survivors as well as LGBT+ victim-survivors.

## Existing guidelines for financial services firms

SEA has aligned this research and the development of the recommendations for financial services firms at the end of this report with existing industry guidelines. This ensures that the findings and recommendations that follow are as clear and accessible as possible for firms. These existing guidelines include the FCA's Consumer Duty, the UK Finance 2021 Financial Abuse Code, and the Economic Abuse Principles developed by Sharp-Jeffs (2022).<sup>11</sup>

### FCA Consumer Duty

The FCA's Consumer Duty<sup>12</sup> sets out new responsibilities for financial services firms. It came into effect in July 2023 for open products and services (new or existing products and services that are available to customers) and in July 2024 for closed products (products and services that are no longer marketed or distributed to customers). It includes higher standards and protections for retail consumers and is mandatory for all financial services firms carrying out regulated activities (and certain ancillary activities) that provide products or services to customers in the UK.

The Consumer Principle set out in the Consumer Duty requires firms to act to deliver good outcomes for customers. There are three cross-cutting rules in the Duty:

1. To act in good faith towards retail consumers
2. To avoid causing foreseeable harm to retail consumers
3. To enable and support retail consumers to pursue their financial objectives.

These three rules support outcomes in four areas:

1. Products and services
2. Price and value
3. Consumer understanding
4. Consumer support

The Consumer Duty also explicitly requires financial services firms to pay attention to the needs of vulnerable customers — they must embed the needs of vulnerable customers in all aspects of product design, product distribution, and customer support.

The Consumer Duty does not apply retrospectively<sup>13</sup> (i.e. before 31 July 2023), so it does not apply to many of the experiences victim-survivors and professionals refer to within this report. However, other obligations on financial services firms were in place, including the FCA's guidance for firms on the treatment of vulnerable customers,<sup>14</sup> which recognises domestic abuse (including economic control) as a driver of vulnerability. We have used the Duty in the analysis of our research findings to show:

- how financial services firms' responses to victim-survivors may align with the Consumer Duty
- how the Consumer Duty could apply in practice

This serves to highlight how a firm's response can have an impact on victim-survivors. It also shows how firms can work within our interpretation of the existing regulations and go beyond these to deliver good outcomes for victim-survivors.

With support from law firm Simmons & Simmons, SEA published a briefing on how the Consumer Duty can be used to transform responses to economic abuse. This provides additional guidance to firms on how to improve outcomes for victim-survivors, since the Duty does not expressly cover economic abuse.<sup>15</sup> One such piece of guidance suggested within SEA's briefing is the 2021 Financial Abuse Code.

## UK Finance 2021 Financial Abuse Code

The Financial Abuse Code was first published in 2018. It was updated in 2021 to reflect FCA Guidance for firms on the fair treatment of vulnerable customers and the Domestic Abuse Act (2021). The 2021 Financial Abuse Code developed by UK Finance (with support from organisations including SEA) provides a set of principles for financial service firms to embed in their responses to economic abuse. These fall under five pillars:<sup>16</sup>

- **Understanding customers:** Firms will raise awareness amongst their staff about the existence and impact of economic abuse.
- **Communications:** Firms will make an industry-wide information leaflet (which was updated by UK Finance and SEA in 2021) available to customers.
- **Customer service:** Firms will improve the service victim-survivors receive, such as through encouraging disclosures, supportive responses to disclosures, accepting a victim-survivor's representative to act on their behalf (such as an Independent Domestic Violence Advisor (IDVA) or a money and debt advisor), treating situations on a case-by-case basis and providing exception processes where appropriate, supporting victim-survivors to access financial services in their own name, support around debt and arrears, and informing customers about external sources of support.
- **Skills and capability:** Frontline staff will be empathetic and have appropriate skills and knowledge to support customers experiencing economic abuse, and firms will provide training for their staff which aligns with the Code, including on empathy, understanding the definition of domestic and economic abuse within the Domestic Abuse Act (2021),<sup>17</sup> recognising signs and effects of economic abuse, encouraging disclosures and being aware of support options and processes. This principle also includes that firms will offer practical and emotional support and adopt policies to support employees who are victim-survivors of economic abuse.
- **Continuous improvement:** Firms will design their products and services to be inclusive of victim-survivors, consider economic abuse as part of the vulnerable customer monitoring, and UK Finance will regularly review the Code to ensure it meets the needs of victim-survivors and remains aligned to legislative and regulatory requirements.

The 2021 Financial Abuse Code is voluntary. At present, 29 firms representing 39 brands have signed up to the Code.<sup>18</sup> SEA is working with nearly all these firms to support their implementation of the Code and ensure good outcomes for victim-survivors.

## Economic Abuse Principles

The Economic Abuse Principles are also a significant tool to support financial services firms' responses to victim-survivors of economic abuse.<sup>19</sup> These were developed by SEA's founder and include:

- **Survivor-centred:** Firms work in collaboration with specialist organisations to engage with victim-survivors in their work to respond to economic abuse and create economic safety in ways which are intersectional, both for customers and employees.
- **Intersectional:** Firms understand intersecting factors (such as sex, gender identity, race, ethnicity, sexuality, disability, and immigration status) and ensure that survivor voice represents diverse experiences. Firms will also work to address economic abuse through collecting data and use this to inform product and service design, as well as employer policies and operations.
- **Safety-focused:** Policies and processes create economic safety for victim-survivors. These are trauma-informed and hold perpetrators accountable.
- **Coordinated:** Firms are coordinated in their response to economic abuse, ensuring that the right parts of the firm work at the right level (such as decisions being made without a need to refer upwards when appropriate), and ensuring that economic abuse is linked to other vulnerability issues for customers and employees.
- **Collaborative:** Firms work in partnership with specialist organisations like SEA.

These three sets of rules, guidelines and principles have been central throughout this research, to ensure that the findings are relevant and translate into practice seamlessly. This report therefore includes our interpretation of how these rules and guidelines could apply in practice to ensure firms are reaching good outcomes for survivors.

## Aims of the research

This research explores victim-survivors' experiences of financial services and products. In particular, it focuses on the experiences of minoritised victim-survivors in line with the intersectional economic abuse principle.

It was important that victim-survivors could share their experiences as fully as possible. Therefore, throughout the data collection, 'financial services and products' was deliberately interpreted broadly. This means that there is more information for some types of products (such as joint accounts or loans) than there is for other types of products (such as insurance). However, the findings relate to a broad range of products and services.

This research explores the following questions and sub-questions about victim-survivors' experiences of financial services firms (and the experiences of the professionals who support them):

- Do responses from financial services firms meet existing rules and principles including the Consumer Duty, 2021 Financial Abuse Code and Economic Abuse Principles?<sup>20</sup>
  - Do financial services firms' products and services meet the needs of victim-survivors?
  - Do victim-survivors receive a fair price and good value for the products they can access from financial services firms?
  - Do financial services firms show a good understanding of the needs of consumers who are victim-survivors of domestic including economic abuse?
  - Does the support offered by financial services firms to consumers meet the needs of victim-survivors?
  - Are responses from financial services firms survivor-centered, intersectional, safety-focused, coordinated, and collaborative?
- If not, how not and what needs to change?



Throughout the report, we use the term 'victim-survivor' to describe individuals who have experienced domestic including economic abuse. We also use terms such as 'perpetrator' or 'abuser' to describe the individual who is perpetrating the abuse. This is based on the experiences of the victim-survivors and frontline domestic abuse professionals we spoke to. Data from the Office for National Statistics (ONS) shows that only one in five victim-survivors of domestic abuse reports it to the police. ONS data also shows that there were just 566 convictions for controlling or coercive behaviour in 2022.<sup>21</sup> For these reasons, we did not require victim-survivors to provide evidence that the abuser had received a criminal conviction to take part in the research.

# Methods

The research employed a number of qualitative methods to:

- explore participants' experiences
- identify practices that need to change to ensure that financial services firms can meet victim-survivors' needs

The research was conducted by SEA's Research Officer, Dr Kathryn Royal.

## Focus groups

The research began with two focus groups with members of the Experts by Experience (EEG) Financial Services Group in May 2023. This is a self-selecting sub-group within the EEG membership. These sessions were also attended by SEA's then-Survivor Engagement Specialist, Emily Wolfson. Participants were asked about their experiences with financial services firms, with discussion linked to the research questions outlined above. These sessions also piloted the questions, which were developed for the individual victim-survivor interviews. They therefore informed the development of the structure of the interview guide. Some members of this sub-group were unable to attend the focus group sessions, so sent their comments via email instead.

## Individual interviews

We partnered with by-and-for<sup>22</sup> domestic abuse organisations to conduct interviews with minoritised victim-survivors. Specific funding was included within the research budget to enable this. The Sharan Project<sup>23</sup> and Southall Black Sisters<sup>24</sup> facilitated the recruitment of victim-survivors, attended the workshop, and reviewed the report and its resulting recommendations. SEA is incredibly grateful to The Sharan Project and Southall Black Sisters for their support with this research.

We provided partner organisations with a research brief to help them discuss the research with potential participants. This explained what the research was about, who would be conducting the interview, and how the research would be used. Research partners also shared an information and consent form with participants before the interview, which the interviewer went through with participants before starting. We collected demographic information from participants, either at the beginning of the interview or through a form/online survey completed by the victim-survivor (either by themselves or with the support of the partner organisation). Budget for interpretation was available if needed.

SEA's frontline partner Money Advice Plus (MAP) also facilitated recruitment for interviews with victim-survivors who have a long-term health condition. Two further interviews were held with members of the EEG who have a disability or long-term health condition. All interviews were conducted by SEA's Research Officer.

Interviews took place either online or over the phone and lasted approximately one hour each. With the victim-survivor's consent, interviews were recorded. One participant was interviewed by email. A total of 21 one-to-one interviews with victim-survivors were conducted and recorded. These interviews explored victim-survivors' experiences of financial services firms, including how perpetrators misused financial products as part of their economic control. The interviewer also asked victim-survivors about their experiences of financial services firms and what changes they would like to see.



Of the 21 victim-survivors who were interviewed:

- All were female.



- 17 experienced abuse from an ex-partner and two from their current partner. Two experienced abuse from their parents and/or siblings.



- Participants shared how their ethnicity was best described:

Black/Black British African



Asian/Asian British Pakistani



Asian/Asian British Indian



Arab



Mixed or multiple ethnic backgrounds



White English, Welsh, Scottish, Northern Irish or British



White Irish



White Other



- 14 considered English to be their first language, whilst six did not (data was missing for one respondent).



- Three did not have access to public funds (also known as No Recourse to Public Funds or NRPF). The remaining participants did have access to public funds, including four foreign nationals and two European Union citizens. Eleven were UK citizens and data was missing for one interviewee.



- Just under half of participants (n=9) were aged between 36 and 45, whilst seven were aged 26 and 35. One participant was aged between 18 and 25, two were aged between 46 and 55, and two were aged between 56 and 65.

18 – 25 years old



26 – 35 years old



36 – 45 years old



46 – 55 years old



56 – 65 years old



- 19 participants identified as heterosexual, one as bisexual and one as 'other'.



- Eight had a long-term physical health or mental health condition and 11 did not, whilst two preferred not to answer.



- 11 were not in paid employment at the time, three were students, one was employed part-time, and five were employed full-time. Data was missing for one interviewee.



- A third (n=7) of participants reported having no income, whilst two were unsure of their income. One reported their annual personal income was up to £10,000, four as £10,001–£20,000, three as £20,001–£30,000, two as £30,001–£40,000, one as £40,001–£50,000, and one that it was more than £50,000.

Unsure	No income
2	7
Up to £10,000	£10,001 – £20,000
1	4
£20,001 – £30,000	£30,001 – £40,000
3	2
£40,001 – £50,000	More than £50,000
1	1

- Six identified as Muslim, eight as Christian, one as Hindu, and two as other. Four said they had no religion.

Muslim	Other
6	2
Christian	No religion
8	4
Hindu	
1	

### Workshop for professionals

In addition to interviews with victim-survivors, we held a half-day workshop online in September 2023 with professionals from organisations across the domestic abuse sector. Almost all of these were by-and-for organisations, representing a wide range of experiences. Attendees at the workshop included representatives from:

- The Sharan Project
- Latin American Women's Rights Service (LAWRS)<sup>25</sup>
- Bawso<sup>26</sup>
- Respect<sup>27</sup>
- Galop<sup>28</sup>
- Jewish Women's Aid<sup>29</sup>

An individual interview was held with a member of the Southall Black Sisters team using the same questions asked in the workshop.

The workshop was framed using the four outcomes of the Consumer Duty (price and value, products and services, consumer understanding, and consumer support). Danielle Rosario, then one of SEA's Financial Services Specialists, also attended to answer any questions from participants about financial services firms and how they could support clients. With the permission of participants, the workshop was recorded.

### Analysis of the findings

The interview and workshop recordings were transcribed using Otter.ai. Transcripts were imported into Nvivo, software which supports qualitative analysis. An initial coding structure was developed using the outcomes associated with the existing guidance for financial services firms, as well as the mechanisms outlined in the briefing SEA developed with Simmons and Simmons on how the Consumer Duty can transform responses to economic abuse. Additional codes were added during the analysis process as they emerged.

### Limitations

As with any research, there are limitations to this work. A significant limitation is that the interviews with victim-survivors only represent the experiences of those accessing support services. We know there are barriers to victim-survivors seeking and receiving support, particularly for those who are minoritised. We therefore do not know how and if the issues raised in this research apply to victim-survivors who are not receiving support from a specialist organisation. Further research is needed to explore this.

The sample size of participants is also relatively small. The findings here cannot necessarily be generalised across the population of participants or financial services firms. Nonetheless, the findings raise issues for further exploration and examples of good practice.

# Findings

Findings are presented using headings of the four outcomes of the **Consumer Duty**. Where they apply, findings are also related to the 2021 **Financial Abuse Code** principles<sup>30</sup> and **Economic Abuse Principles**. The cross-cutting rules of the Consumer Duty are also referenced. Findings that fall outside of the Consumer Duty outcomes are then explored, before moving on to opportunities participants identified for financial services to improve outcomes for survivors. Wherever possible, we refer to examples of good practice from financial services firms of which we were aware at the time of the research. These are not intended to be a comprehensive list of all firms providing these practices.

Safety is paramount and we know that physical and economic safety are intrinsically linked. Perpetrators' control over victim-survivors' money and belongings limit their freedom and creates economic dependency and/or instability that makes it harder for them to flee. According to SEA's research, nearly one million UK women were trapped with an abusive partner because of the economic abuse in the last year.<sup>31</sup> While for those victim-survivors who do manage to escape, they are forced to rebuild their lives from scratch and often the abuse does not end when they leave. Through ongoing financial ties, such as coerced debt and joint mortgages, abusers find many opportunities to control from 'afar'. This ongoing interference with and lack of access to economic resources post-separation is the primary reason women return to an abusive partner where they are at risk of harm and homicide.<sup>32</sup> Therefore, victim-survivors cannot be physically safe without being economically safe and, as such, victim-survivors' safety is referenced throughout the findings.

Positively, participants did tell us of times they felt a financial service firm considered their safety and helped them to feel safe. Examples of these positive actions in responding to economic abuse, including around victim-survivors' safety, are included throughout the report. One such example involved a member of staff at a firm supporting a victim-survivor to change her address within their systems, and her being assured that this change had been made. However, there are also examples in the findings where victim-survivors felt their safety had been put at risk by firms.



Examples included victim-survivors being unable to close joint accounts and firms sharing new safe addresses with perpetrators. Examples also included occasions in which the design of products and services impacted victim-survivors' safety. We urge financial services to be alert to safety when reading the report and the recommendations, ensuring that any actions taken are **safety focused** and trauma-informed, working alongside organisations such as SEA to implement these.

Trauma-informed practice recognises the impact of trauma on victim-survivors and prioritises a safe and empowering response to prevent re-traumatisation – the re-experiencing of thoughts, feelings or sensations associated with past traumatic events. It recognises the multiple disadvantages victim-survivors may face and adopts a strengths-based, intersectional approach to remove barriers to accessing support. By fostering trust, choice, collaboration, and cultural sensitivity, it increases victim-survivors' space for action so they can make informed decisions in a safe, accessible environment to support them to rebuild their lives.

## Products and services

The **products and services** outcome of the Consumer Duty sets out that products and services must be fit for purpose. Consumers can only **pursue their financial objectives** and firms can only **avoid causing foreseeable harm** when this is the case. The Duty outlines a number of rules which stipulate how firms **acting in good faith** should design and distribute products and services to meet this aim.<sup>33</sup> In our briefing on the Consumer Duty, produced with support from Simmons & Simmons, we explored how the products and services outcome can be used to transform responses to victim-survivors of economic abuse.<sup>34</sup> This includes ensuring that products and services are designed in a way that considers the needs, characteristics and objectives of vulnerable customers, involves experts in the design process, and considers whether a product or service has features that could risk causing harm to vulnerable customers.

One example of this is Starling Bank's work to improve their online banking app to enable victim-survivors to hide abusive payment references from others. Abusers had previously been able to use payment references to intimidate victim-survivors.<sup>35</sup> Starling made this change to their app as a direct result of working with SEA, after the issue was raised by a survivor we were working alongside. We spoke to the victim-survivor in question as part of the research; she shared her experiences of the abuser using abusive payment references on payments to her Starling account, which led directly to the development of the app's new feature. The victim-survivor had originally tried to contact the abuser's bank about these messages, but she felt they 'weren't interested' unless the perpetrator was sending her direct threats or using violence. She felt that Starling, her bank, had taken this issue seriously and said they remained in touch to check in on her. This is an example of a financial services firm enhancing the design of a product to make it safer for victim-survivors and enabling them to take back control of their accounts.

## How perpetrators misuse financial products

Throughout the research, participants shared a number of ways abusers misused existing financial products as a means of perpetrating economic abuse. We know that perpetrators personalise their abuse to the individual experiencing it; and while this report cannot include all the ways perpetrators misuse financial products, it can provide examples based on the victim-survivors and professionals we spoke to. This section summarises the findings raised by participants relating to each type of financial product. Each section starts by outlining existing good practice publicly shared by firms.

### Current accounts

Current accounts are a key financial product and are used for many everyday financial transactions.

In cases of abuse, Victim-survivors may be forced to flee without the documents they need to open a new current account. A perpetrator may prevent them from having access to these, for example by withholding their passport, or preventing them from being named on utility bills which could be used as proof of identity.

The 2021 Financial Abuse Code states that wherever possible, banks should support victim-survivors to **access services in their own name**, including by accepting '**non-mainstream**' documentation. Firms that have signed up to the Code, such as Barclays and TSB, are taking action to support survivors in these circumstances, accepting limited or non-standard documentation to support victim-survivors to open a new account.<sup>36</sup> Previous research shows that firms have also supported victim-survivors to access basic bank accounts when fleeing abuse.<sup>37</sup>

Financial services firms have also taken other positive steps to support victim-survivors with safe access to current accounts. For example, Barclays, HSBC and Lloyds Banking Group can provide non-geographic sort codes for a current account, so that the code cannot be used to locate a victim-survivor.<sup>38</sup> Firms have also shared work they are doing to help secure victim-survivors' accounts – again in line with the Code. For example, HSBC, Lloyds Banking Group, Nationwide and NatWest provide help to reset PINs or login details, while HSBC and Nationwide provide support with changing addresses.<sup>39</sup>



In research conducted by the Child and Woman Abuse Studies Unit, one financial services professional stated that their organisation accepted a refuge as the customer's address. They also put a flag onto an account to ensure additional care is taken to avoid sharing details.

SEA's nationally representative research in 2024 found that:

- 1 in 22 (5%) had a partner or ex-partner control, or try to control, access to their personal bank account
- 3% of UK adult women reported that they'd had their wages paid into an account they did not have control over by a current or ex-partner.
- 9% of Black, Asian and racially minoritised women experienced a partner control their access to a personal bank account, compared to 3% of White women<sup>40</sup>

In the current research, victim-survivors also reported that abusers prevented them from having their own bank account or having access to it. Perpetrators took bank cards or obtained details for accounts, broke bank cards to stop the victim-survivor accessing and withdrawing their money from their account, and forced victim-survivors to share their PIN codes.

One woman shared that her account was closed by her bank when her ex-husband falsely told them she was no longer in the country. This prevented her from being able to use a debit card, as she could only open a basic account, which prevented card payments and only allowed access to cash. Her experiences were prior to the Covid-19 pandemic, which accelerated a decline in the use of cash and saw some businesses refuse cash payments.<sup>41</sup> The victim-survivor felt that relying on cash would have been much more difficult had this happened during or following the pandemic. In addition, she had to rely on using her teenage children's accounts — including using their cards — and she had great difficulty getting parental authority over these accounts. She described herself feeling 'very compromised as a parent' — that her children were made to take on this role and were seen as more responsible than her. During the time she was engaging with her bank, she described how she was not **supported to access financial services in her own name**. This put her at increased risk of economic harm and prevented her from being able to **pursue her financial objectives**.

In the current research, women from minoritised and/or migrant backgrounds shared how their background intersected with their experiences of current accounts and economic abuse. One woman shared that when her husband moved to the UK after their marriage, her bank account details were given to him by her father. She recalled this was 'just the way that it was done in our family,' with men's control over a woman's bank account being common in both her family and the abuser's country of origin. Similarly, another victim-survivor reflected that all her bank cards were held by the perpetrator, but that this was not considered to 'even constitute as abuse', explaining that 'Culturally, this is something that's very normalised.' She added that a woman taking control of her own finances was felt to be 'rare and something really out of order.'

A professional from the domestic abuse sector reflected that issues with current accounts happen 'over and over again' for migrant women — many do not have their own account and are dependent on the abuser and his account. They also said that economic abuse overlaps with threats to be deported or have the children taken away:

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**"The perpetrator keeps threatening to deport them back, keeps threatening to take them away, wherever it is, the agencies or authorities are going to take the children, these kinds of threats that keep the migrant women so dependent on them that many of them don't even have their own bank accounts, they don't have identifying documents, and they have zero control over their money."**

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(NRPf Team Lead, Southall Black Sisters)

One victim-survivor shared that a perpetrator only allowed her to open a bank account after the police became involved. Even then, the abuser opened the account on his laptop and attended the bank with her when she went to verify her identity. The perpetrator then used her account to hold large amounts of money; she was unaware that this could constitute money laundering in the UK.

The migrant women we spoke to shared how perpetrators were able to use their immigration status to control their access to financial services and current accounts. This was heightened for those who did not have leave to remain and who were legally unable to open their own account. We heard from both victim-survivors and professionals that perpetrators would use the promise of supporting a woman to gain her right to remain in the UK as a form of control. This control continues post-separation when migrant women who have been prevented by the abuser from regularising their immigration status cannot open a bank account and the resulting financial exclusion only makes it harder for them to stay fled.

An IDVA from LAWRS highlighted this in the workshop with professionals:

**"If that woman who has the right to make an immigration application, but doesn't have the support of her partner, therefore is intentionally kept undocumented with the purpose of controlling the survivor, then that woman wouldn't be able to work. If she finds some form [of] financial support but she doesn't have a bank account to receive any money, then any form of financial support will go to the perpetrator's account or to a joint account that she wouldn't have access to... [there's] no way for them to save money in a bank account where the perpetrator wouldn't have access. This makes finding a way out of an abusive relationship very difficult."**  
(IDVA, LAWRS)



As reflected in the quote above, women spoke about how perpetrators took advantage of them not being able to have a bank account. This became part of the control, for example by making the victim-survivor put any money she did have (such as through casual work) into his account:

**"So yes, he [did] do that, he took the money from me. So yeah, because I can't open a bank account. I don't have a valid passport. So then he said, when he helped me with my papers, then I can open the bank account."**  
(Victim-survivor)

**"I'm not allowed [to have a bank account]. And he knew that."** (Victim-survivor)

Perpetrators also withheld the documentation migrant women needed to open their own bank accounts:

**"When I go to the bank to open my bank account... they were asking for me my address, my ID, and to open my account. So when I asked for him to give me all this proofs, he doesn't allow for me."** (Victim-survivor)

Perpetrators used women's current accounts to make fraudulent transactions, go into overdrafts, or for credit or loan payments — including post-separation. They would also closely monitor women's bank accounts and question payments they had made. One victim-survivor told us that the abuse she experienced took place before mobile phone banking applications were available, and she 'hate[d] to think' what the abuser would be able to do had this been available to him then.

Some victim-survivors shared that they resisted the abuser's control of their current account. This included secretly opening accounts which the perpetrator did not know about. For example, one victim-survivor, who was abused by her parents, was able to open a Monzo account and keep the mobile app hidden in a folder on her phone. Another woman told staff in her local branch that any spending on her account from a certain area should be blocked, as it was her partner using her card and not her. Staff were able to support her to limit the perpetrator's use of her bank card. This is an example of a firm being **survivor-centred** and supporting a victim-survivor to help them **regain control** of their accounts and finances. Taking action such as this also supports the victim-survivor and **avoids causing foreseeable harm**.

Women also shared that they had been unable to apply for and receive Universal Credit upon leaving the abuser until they had a current account. This was even the case for migrant women whose immigration status meant they had a visa (even if only temporary) and were allowed to receive Universal Credit. Migrant women also spoke about the difficulty in opening an account after fleeing – they were unable to open an account if they did not have a permanent address, or did not have proof of this because the abuser had prevented them from being named on bills (which could act as proof of address). This was in addition to lacking the required documentation (such as biometric residence permits). Some participants had received support from frontline domestic abuse organisations to open current accounts, including support with obtaining the documentation required. Women shared how difficult it was to acquire these documents and how it was often a long process.

The women we spoke to were all being supported by specialist organisations. If they found these processes difficult, it seems likely that victim-survivors not receiving such support will find it even more difficult (and potentially even more costly). This is also dependent on victim-survivors being aware of what financial services firms can do, which may be less likely for those who are not receiving specialist advocacy support.

Professionals shared how difficult opening a current account could be and reported differing experiences with different banks. For example, one bank was reported by a professional to be 'an absolute nightmare'. When the bank rejected an application for a current account, they did not provide any explanation and did not allow for any appeal. There are legitimate reasons why a firm may not be able to open a bank account for a customer. For example, this might be because of anti-money laundering regulations, which firms are legally obliged to follow. However, this does not offer a clear way forward for victim-survivors to access their own account, and they may not be aware of any markers against them.

This is an example of where firms' obligations are at odds with victim-survivors needs, which leads to poorer outcomes for victim-survivors. Some have had accounts denied due to the impacts of the abuse, including marks on their banking records due to an abuser's behaviour they are unaware of, thus are unable to challenge.

One professional reflected that they were not always able to help victim-survivors open an account even if they had documents and supporting letters from the support organisation. They reported the work they had to do to help victim-survivors, including a case in which the victim-survivor only had a copy of her passport, rather than the physical passport itself:

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**"We didn't have [a]... physical copy of her passport. We did have a photo, we got that printed out... and you try to speak to them and say 'Look, this person really needs a bank account'. And they refuse to provide it... they wanted to scan [her] passport and you can't do that with a photo. So, she was left without a bank account for a really long time... She had to pay someone... who was in her country to go and do a proxy application on her behalf to get a passport that they then posted here... so it's been about a year before she could actually get her hands on a bank account."**  
 (NRPF Team Lead, Southall Black Sisters)

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The 2021 Financial Abuse Code sets out that where possible, firms should support victim-survivors to access financial services in their own name. The example above demonstrates where this did not happen, or where it was not possible under existing rules, and the impact this had on the victim-survivor.

The importance of having their own bank account was particularly strong for some of the migrant women we spoke to (including those with restrictions which prevented them from holding an account). One woman described having a current account as her 'dream', partly because it would mean she was 'recorded in the country'. Another woman echoed this sentiment — she was unable to open an account due to her immigration status and spoke about feeling like she did not exist:

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**"It's [having a bank account] part of something in life that people are doing and you, because you don't exist, you can't do it... I see a bank card, like I value it because I've never held one. So for me, it will make a great change. When I look at it even to say that my name is written on it, that it belongs to me. I will be so happy that yes, that will make me feel like a part of the life and part of the system and doing what human beings are doing. I can see myself as human that okay, I'm existing." (Victim-survivor)**

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This woman also spoke about how having her own bank account would help improve her confidence, her mental health, and allow her to develop independence. Other victim-survivors also said it was significant to have control over their own account, as the abuser had taken this control away from them:

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**If I'm able to be given an account...then to pay my money to my accounts, I can control it. Because I've been controlled, all of my life, I've been controlled. (Victim-survivor)**

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**I was so happy. It felt like a bit of freedom. (Victim-survivor)**

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The second woman quoted above expanded upon this by saying that she used to be scared when using the card provided to her by her partner. She never knew if there was any money in the account and what was happening, but with her own account, 'now I know'. Another woman who now has an account reflected that this had made a big difference for her, not least because she no longer had to 'beg or ask someone before spending'. In addition, the confidentiality of having her own account was significant, as no-one knew how much money she had in the account, either currently or in the future.

There are also very important practical considerations for having a current account. For some women who receive financial support from charities or their communities, having a bank account enables them to receive this support more easily (for example, by allowing money transfers). As one professional recognised, storing money in a bank account can be safer for women who are in temporary accommodation than keeping cash. Reliance on physical money may also be an issue, given the increasing use of debit and credit cards for payments in the UK.<sup>42</sup>

Having a bank account is therefore significant for victim-survivors for a number of reasons, including their emotional, physical, and economic safety.<sup>43</sup> However, migrant women with insecure or unclear immigration status are unable to open their own accounts, leaving them dependent on perpetrators. Home Office rules (under guidance underpinning Section 40 of the 2014 Immigration Act) do allow for those who have a 'legitimate barrier' to leaving the UK to be allowed to open a bank account;<sup>44</sup> however, what is considered to be a 'legitimate barrier' has not been clearly defined. If the Home Office were to recognise domestic including economic abuse as a legitimate barrier to leaving the UK within its guidance, this could enable victim-survivors to access their own bank accounts. It would also enable firms to support them while they take steps to regularise their immigration status after fleeing an abuser.



## Joint accounts

Consistent with the 2021 Financial Abuse Code, financial services firms have taken steps to help victim-survivors separate joint accounts held with a perpetrator. For example, Barclays has stated they will consider removing an abuser on a case-by-case basis; HSBC offers help to separate joint finances; and Lloyds Banking Group have said they will remove a joint party from accounts where they have been the victim of financial abuse.<sup>45</sup>

In a nationally representative survey, 3% of adult women in the UK reported that a partner or ex-partner stopped them from having information about a joint bank account in the last 12 months.<sup>46</sup>

The 2021 Financial Abuse Code states that signatories should, where possible, support victim-survivors to **separate joint finances**. Despite many firms taking positive steps, domestic abuse professionals in this research shared that joint accounts posed a particular difficulty for victim-survivors. They shared, for example, that banks have often said they require the perpetrator's consent to close the account or take action to support good outcomes for the survivor.

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**Joint accounts [are] such an issue, it's almost the dreaded question, do you have a joint account and you hold your breath and then go 'Oh, you've got a joint account'. Because whenever they approach a bank, it's always well we need the signature of the other person, but we're not talking about a reasonable person, we're talking about a perpetrator of abuse. So you're essentially asking the victim, to get back in contact with the perpetrator of abuse, to get a signature for you to close an account. And sometimes these accounts are dormant and there is no activity occurring in these accounts. But it keeps the victim attached to that perpetrator. (The Sharan Project)**

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**In the last 12 months,  
1 in 22 UK women  
had a current or  
ex-partner control their  
access to their bank account**

In line with the 2021 Financial Abuse Code, firms are encouraged to support victim-survivors to **gain control of their finances** and **separate finances in joint banking relationships where possible to do so**. In our research, victim-survivors felt that responses by some banks to requests to close joint accounts were not **safety-focused**. One victim-survivor shared that years after separation, she had asked in numerous branches to close the frozen joint account she held with her ex-partner. After 'many, many months' she spoke to a bank manager who closed the account for her, although this was not the bank's policy at the time. The victim-survivor also felt that the bank had only frozen the account when she fled because she had the support of a social worker when requesting this. While the firm in the example above was eventually able to support the victim-survivor, it took a long time and lots of persistence for this to happen. Conversely, we also heard from victim-survivors that perpetrators had been allowed to close joint accounts without their knowledge or permission, despite them being unable to do this themselves. Firms have a duty to support both customers in joint accounts, but the rules also allow them to act flexibly to respond to victim-survivors' specific circumstances where there is no detriment to the other account holder. This could include closing an account with no balance and no payments going in or out.

Women reported not having access to a joint account because it was restricted by the abuser. Victim-survivors also reported perpetrators taking money from joint accounts (which the perpetrator had often not contributed to), including after separation. In one case, money from the joint account was used to support the abuser's other partner. Money taken from joint accounts was often needed for essentials like rent, food, and utilities. This could leave women destitute. Southall Black Sisters shared a devastating case in which an elderly woman who had an Occupation Order against the perpetrator was left destitute while he was living in luxury:

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**Both [the perpetrator] and the victim are in their late 80s. And they have a joint bank account, they've always had a joint bank account since their early 20s. That's when they got married. And now that she has an occupation order, [he] has gone out of the house, but he keeps withdrawing all this retirement money from both of them. And he keeps living in five-star hotels ordering whatever, so she can't go through the bank statements, she just cannot put a stop to him withdrawing it... He's withdrawing chunks and chunks and we don't know where she's going, she's going to be destitute, she can't work, she's got Parkinson's, she needs that money for her caring expenses. (NRPF Team Lead, Southall Black Sisters)**

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Despite appeals to close the account, the NRPF Team Lead shared that the bank told the victim-survivor the issue was a 'personal conflict'. The bank did not take action to support her, such as freezing the account. We understand that banks cannot always close joint accounts on the instruction of one account holder; however, they can act flexibly when it supports good outcomes for the victim-survivor and does not cause foreseeable harm to either account holder. In this scenario, the bank could have considered support options such as freezing the account or opening a bank account in the victim-survivor's name.

They could have then supported her to divert her pension to the new account to protect her from further economic harm. As stated previously, the 2021 Financial Abuse Code states firms should support customers to **separate finances in joint banking relationships where possible**, as well as to **regain control** and **access existing funds and accounts**. In addition, the Economic Abuse Principles outlines how firms can be **collaborative**. This can include, for example, working with frontline by-and-for organisations. The Principles also recommend that firms provide **coordinated** support, recognising victim-survivors' **intersectional** needs. In the case above, the victim-survivor was in her late eighties, had a long-term health condition, and was from an ethnically minoritised group. This can then inform a **survivor-centred** and **safety-focused** response.

Joint accounts could also be a barrier to accessing legal aid. For example, there may appear to be money available in an account for a victim-survivor to access, but in reality this access may be withheld by an abuser. Difficulty in accessing legal aid is a significant barrier for victim-survivors.<sup>47</sup> Changes have been made to remove inaccessible capital (such as a shared home) from the legal aid means test; however, other joint assets (such as joint bank accounts) are still considered within this test.<sup>48</sup> This issue has been recognised by UK Finance, who have recommended that the Ministry of Justice and the Home Office ensure that all victim-survivors can access professional legal advice.<sup>49</sup>

These findings suggest that, while positive steps have been taken by many financial services firms to support victim-survivors, these are yet to be embedded across all areas of the sector. This is leading to poorer outcomes for victim-survivors. In particular, colleagues in customer-facing roles, who may be the first port of call for victim-survivors in these circumstances, may need additional training and support to recognise and respond to economic abuse.



**Coerced debt is a significant issue for victim-survivors of economic abuse — Our Economic Justice Project found that 60% of victim-survivors supported had been coerced into debt.<sup>47</sup>**

### **Debts – loans, credit cards, overdrafts and finance**

Loans, credit cards, overdrafts, and other types of finance (credit agreements) are financial products that create debt. They can impact an individual's credit score if not repaid on time.

Coerced debt is a significant issue for victim-survivors of economic abuse — SEA's founding project, the Economic Justice Project, found that it impacts 60% of victim-survivors.<sup>50</sup> In our nationally representative research, 4% of all women reported that, in the last year, a current or ex-partner had taken out credit in their name without their consent or because they were scared to refuse permission, and 4% also reported that a current or ex-partner had damaged their credit rating in the last 12 months, either by taking out credit, running up debt or stopping them from making repayments.<sup>51</sup>

Debt principles were introduced within the 2021 Financial Abuse Code, prompting financial services firms who have signed up to consider how they can respond to coerced debt. SEA and frontline partner Money Advice Plus (MAP) have piloted the Economic Abuse Evidence Form (EAEF), an information-sharing tool which can be used by money and debt advisers to support a victim-survivor, by evidencing economic abuse when communicating with creditors about possible solutions to coerced debt. Supported by the Money and Pensions Service, as well as UK Finance, this is an example of promising practice. With the support of UK Finance, the EAEF has now been rolled out to a number of major high street banks and building societies, supporting quicker and more consistent outcomes for victim-survivors.<sup>52</sup> Positively, Allied Irish Bank has also launched an initiative enabling customers to bypass standard credit checks when applying for lending if they have a poor credit score due to financial abuse.<sup>53</sup>

The findings of the current research also established how perpetrators use debt as a form of control. Women reported that perpetrators used their credit cards or took out loans or finance agreements in their names. Others used the victim-survivor's overdraft or stopped making previously agreed loan repayments. One woman reported that a perpetrator had been able to freeze her credit card and another shared that her partner redirected post to stop her from learning that he had taken out debts in her name. Building up debt was felt by some women to be part of a 'strategy' by the perpetrator to make it harder for the victim-survivor to access a fair financial settlement in court post-separation.

Some perpetrators took out loans and credit cards in the victim-survivor's name without their knowledge. One victim-survivor said she felt 'physically sick' when she realised the extent of the debt post-separation. One domestic abuse professional described an instance in which a victim-survivor who had fled showed them her purse, which was full of credit and store cards. The victim-survivor did not know what these were, and the resulting debt was a huge barrier to rebuilding her life. The domestic abuse professional said that debt could cause some women to consider returning to the perpetrator, reflecting wider research findings<sup>54</sup>:

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She just went 'I don't know what these are' and she opened her purse and they were just multiple cards, store cards, different credit cards and what happened is her partner had taken out all these cards online and run up this huge amount of debt. So when she fled... she then was faced with all this debt. She said 'I didn't say yes to any of this. I don't know what this is, I don't even know how this works.' She didn't know that actually that was a credit card and that was a store card. And so then we not only had to support her with safe housing and getting on benefits, but we've had this huge amount of debt. For the client, she's almost wondering if it is easier to just to go back then face the debt alone.

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#### (The Sharan Project)

The domestic abuse professional felt that this case had been exacerbated by financial services firms not providing interpreters for customers. This means that victim-survivors could be unaware of products being taken out in their names, particularly if the perpetrator was acting as an interpreter. The issue of interpretation services is a theme we return to within this report.

Abusers have taken out finance in victim-survivors' names for items such as phones, cars, and products in catalogues. One woman shared that the perpetrator would take phones out on contract in her name, sell them, then gamble the money away. She did not know how much debt she was in, but thought some of it may have been assigned to her ex-partner in court. Other women were left in debt after separation. Examples include two women who had to obtain Debt Relief Orders and another who had to obtain an Individual Voluntary Arrangement for the debt the perpetrator built up in her name. Solutions such as Debt Relief Orders can impact negatively on victim-survivors applying for UK citizenship, as part of the process involves assessing an applicant's financial history. This includes previous debts and any steps they have taken to pay them off.<sup>55</sup> This may therefore limit the options that migrant victim-survivors can access.

One victim-survivor shared that she was only able to access support from creditors after Money Advice Plus, SEA's frontline partner, intervened on her behalf. One woman faced thousands of pounds worth of repayments for a car the perpetrator coerced her into taking out finance for. Student loans were also misused by perpetrators, or victim-survivors were forced to use these to pay off debts. One woman, who was in a relationship with the perpetrator at the time of the interview, shared that she was dealing with debt enforcement agents for debts in his name. She was understandably worried about the effect this may have on her when it came to repossession of their home.

The victim-survivors we interviewed shared that they were often held responsible by financial services firms for paying these debts. One victim-survivor said, 'even though it was in both of our names, I was the one still being penalised'. Another woman shared that after telling her bank it was the abuser who had created debts in her name, 'all they did was extend the date' the payments were due by. She 'didn't feel like it was fair' — this lack of flexibility based on the victim-survivor's individual circumstances did not enable her to **pursue her financial objectives**. Neither did it **avoid causing the foreseeable harm** created by her having to pay back debts she had neither created nor benefitted from.



There were also acts of resistance around credit. For example, one victim-survivor had a student credit card which the perpetrators (her parents) did not know about. This was a 'backup' and enabled her to build a positive credit score for the future.

The research showed that the impact of coerced debt on victim-survivors is long-lasting. This includes effects on mental health, with one woman sharing she was 'so depressed...I was completely isolated...I just felt very numb and very alone and very lost for a really long time'.

Post-separation, women reported not being able to access credit, with multiple women saying they were 'blacklisted'. One victim-survivor shared that even having a small amount of credit available to her would do her 'a very big favour', enabling her to be able to do small things for her children or cover unexpected costs. She was unsure why she could not access credit through her bank, as she had her residency in the UK and had a steady income. This highlights the long-term consequences of coerced debt, and the damage perpetrators can do to victim-survivors' credit ratings. It also highlights the need for firms to take a flexible approach to supporting victim-survivors in these circumstances. This may include considering a debt write-off and working with credit reference agencies to restore a victim-survivor's credit file and rating. In recent portfolio letters to lenders, the FCA highlighted coerced debt as a key risk area,<sup>56</sup> encouraging firms to be aware of coercion and reminding them to treat victim-survivors appropriately to avoid further harm. This includes considering how they treat the repayment of debts and how this is recorded.

It is also worth noting that definitions of what financial services firms consider to be coerced debt and fraudulent debt may differ between and within individual firms. This can lead to different outcomes for victim-survivors depending on who they are seeking support from. Alongside UK Finance, we are therefore calling for the government to convene an economic abuse taskforce to consider this issue, and others, to ensure that victim-survivors can access consistently good outcomes.

## Mortgages

Unlike other forms of debt, mortgages are a form of secured lending against a property – usually the victim-survivor's home.

Our recent research found that 750,000 women in the UK have experienced a form of economic abuse via a mortgage.<sup>57</sup> Perpetrators refuse to pay their agreed share, refuse to accept better terms, or refuse to sell the property. This makes it hard for victim-survivors to flee, plunging them into debt and homelessness. This issue has been highlighted by UK Finance in their report *From Control to Financial Freedom*. In addition, our other research found that 3% of women in the UK had experienced a current or ex-partner unreasonably blocking or prolonging the sale of joint property in order to cause harm or distress, rather than for a legitimate reason.<sup>58</sup> Whilst the 2021 Financial Abuse Code outlines that firms should **separate joint finances where possible**, the Code does not specifically extend to secured lending. This is because of the complexity of the product as a joint contract with joint and several liability against a property. However, we know that some firms have taken steps to address this issue. These include implementing single signature processes in exceptional circumstances.

The domestic abuse professionals who took part in this research shared that perpetrators could simply stop paying the mortgage to further their abuse. They know that a victim-survivor would be unable to pay it on her income alone, which could be further limited by a victim-survivor's immigration status preventing her from being in paid employment, or by caring responsibilities. Threatening to not pay the mortgage was also a way to prevent the victim-survivor from leaving the abuser.

**750,000 UK women** experienced joint mortgage abuse from a current or ex-partner in the last two years

Bawso shared a case in which a perpetrator stopped paying the mortgage after separation, knowing that the victim-survivor could not pay it alone. The service reported that the mortgage provider was not understanding of the situation, stating only that she was liable for the full payments. The victim-survivor continued to pay what she could, even if this was only the interest, whilst the case progressed through the courts. Though a judge told the perpetrator to pay the mortgage, he refused, and the house was repossessed.

It was eventually being sold for the amount that was owed, leaving the victim-survivor with nothing. The complexities around the joint contract and joint and several liability limit the options that financial services firms can provide victim-survivors in these circumstances. However, following standard processes rather than acting flexibly to support a customer based on their individual circumstances negatively impacts victim-survivors of economic abuse and enables perpetrators to continue and extend their control.

Many of the victim-survivors we spoke to had faced similar difficulties. One woman shared that her student finance was used as a deposit for a mortgage she was not named on, for a property that she was not on the deeds for, and that the financial services firms involved did not question this. Removing friction in the sales process in this case caused harm to the victim-survivor. Indeed, the victim-survivor indicated that she was not even present when these conversations were happening with the mortgage provider, even though huge amounts of money were coming from her account. For her, it felt like 'as a woman, my name didn't need to be anywhere, and I didn't need access to it'.

Another woman shared that the abuser had convinced her to sell her home and use the money for a home with him, despite him keeping his property. Upon separation, the mortgage provider would not allow her to keep the home herself, as they did not think she could afford it — even though she was the only one paying into the account from which the mortgage was paid. Others shared that they had also struggled post-separation for the mortgage to be moved solely into their name. This was because they failed affordability requirements or because they would need a guarantor.



Another victim-survivor had been coerced into adding the perpetrator to her existing mortgage. This meant the perpetrator could then force the victim-survivor out of the home following separation. The longer-term impact of this was that she could only obtain a mortgage through shared ownership. She suspected that the interest rate she received on this was worse than it would have been without the perpetrator's actions. One abuser had drawn-down thousands of pounds from the mortgage to spend on himself, including on a new car.

One woman also shared that she was currently facing repossession post-separation. There was debt secured on the property, a lot of which was the perpetrator's, and the victim-survivor had paid off a huge amount of this. However, every time the victim-survivor negotiated a payment plan with the mortgage provider, the abuser stopped paying child maintenance. She was therefore struggling to pay the mortgage. She also had conflicting feelings about staying in the property in which she had experienced so much abuse. The mortgage provider 'was sending [her] so many letters',<sup>59</sup> so she eventually disclosed the abuse to a field agent they sent.

The agent told her to stop paying if she knew she wanted to move out anyway. She had been able to share contact information for her ex-partner, which the mortgage provider had struggled to find. Since then, there had been a 'big drop' in the number of letters they were sending her. She felt that the field agent had 'probably told me a little bit more than he should', but that this member of staff had been 'really nice' and things had been 'much better' since she disclosed information about the abuse by the perpetrator.

Years after separation, another victim-survivor was struggling to have the home repossessed by the mortgage provider – which at that stage would be the best outcome for her. The perpetrator had been able to afford legal representation when she could not. This resulted in him being granted sole charge of the property despite the victim-survivor having bought the house before the relationship and that he was preventing repossession. He stopped paying the mortgage, and the victim-survivor could not afford this as well as rent. The perpetrator had built up further arrears, 'wip[ing] out' the work the victim-survivor had done to pay off previous arrears he had created (and re-damaging her credit score in the process). He refused to sell the property to the victim-survivor and was negatively impacting the equity in the property. She had tried explaining to the mortgage provider that these behaviours were part of economic abuse, but said they did not take action. The abuser had previously attempted to prevent the victim-survivor from moving to a new fixed rate. Eventually, after five years, the bank allowed her to do this without his permission. However, by keeping her on a standard variable rate for five years, the victim-survivor said that she had paid far more than was necessary, and that she would have been able to pay off the mortgage in full at a fixed rate.

In this victim-survivor's case, the abuser had also tried to prevent her from taking a mortgage payment holiday during the Covid-19 pandemic. However, the bank did not allow him to do this, saying he had not paid the mortgage in a number of years. It was this reasoning which enabled the victim-survivor to secure a new fixed rate, when she was **supported to pursue her financial objectives**. The mortgage provider recognised his control during the pandemic, but not when it came to organising a new fixed rate before this. The pandemic allowed many sectors to operate flexibly under exceptional circumstances by taking a coordinated and individualised approach when identifying and supporting vulnerable customers. The victim-survivor felt that a mortgage provider should have taken action after a party had not contributed for a number of years:

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**I think there has to be a point at which, if somebody has not contributed to the mortgage and you as the bank or building society are aware that the couple have split up, irrespective of whether there's domestic abuse involved or not, I think it would be reasonable to say that in terms of who makes the decisions on that mortgage, it should be the person whose bank account is making those payments, if they are aware that the other person has left the property, they're not making any contribution to it. (Victim-survivor)**

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We explore support options and forbearance measures firms can offer to survivors and make recommendations for legislative change in our report on joint mortgages, *Locked into a mortgage, locked out of my home*.

The following areas are financial products that participants had less experience with, but where there were still findings. We have included these so that financial services firms can understand the full range of products and services victim-survivors can be impacted by, and to give voice to these victim-survivors' experiences. These areas are therefore in need of further exploration and consideration.

## Accounts for children

Coercive control through economic abuse can extend to children, and the Domestic Abuse Act 2021 recognises children as victims of domestic abuse in their own right.<sup>60</sup> We know that children's bank accounts can be impacted – in research undertaken by Sharp, some victim-survivors shared that perpetrators accessed their children's money and savings.<sup>61</sup> A report by Portas and Sharp-Jeffs also raised concerns about children's bank accounts being used by perpetrators to carry out economic abuse.<sup>62</sup>

In this research, some victim-survivors raised that the perpetrator was able to misuse accounts set up for children as a means of abuse. This included putting money into accounts or trusts, either to hide money from the victim-survivor or to present an image of providing for the children's futures, only to remove it later.

Communications around these accounts were also a risk for victim-survivors. One woman shared that she was 'very scared' of the consequences from her ex-partner when she changed the address associated with an account for one of her children, which was in both the victim-survivor and perpetrator's names. The child lived with her, but communications went to the perpetrator. The address was changed, but she shared her fears of the perpetrator's reaction to this. This victim-survivor also shared concerns that if she removed her own name from the account, he would remove the money and take it away from their child.

## Business accounts

Business debts and business accounts are subject to different regulations from personal accounts. This means that the principles outlined in the 2021 Financial Abuse Code to **support victim-survivors with debt** cannot be applied when supporting a victim-survivor with business debts. Business accounts being subject to different regulations also means that the process of **separating joint finances** is different – and is likely to be much more difficult. Despite this, the FCA's principles for supporting customers in vulnerable circumstances stipulate that customers in these circumstances ought to receive support – this should certainly be offered if there are established procedures to respond to accounts being set up fraudulently without one party's knowledge or consent in place.<sup>63</sup>

SEA's roundtable event with victim-survivors in 2018 raised the issue of businesses and business debts. One victim-survivor shared that the perpetrator had run up huge debts in her name, leading to liquidation of the business.

In the current research, one woman found out in court that her ex-partner had set up a joint business account in her name. Domestic abuse professionals also shared that abusers set up companies or business accounts in victim-survivors' names without their knowledge or by forging their signatures. This led to business debts being run up in their names and has made it very difficult for victim-survivors to remove themselves from these accounts. Alongside the business debts that perpetrators can run up in a victim-survivor's name without their knowledge or consent, this can have long-term consequences for victim-survivors.

## Insurance

Insurance policies are another financial services product which abusers use to control victim-survivors. We have worked with partner organisations and victim-survivors to understand the issues relating to insurance policies, and recently published a briefing on the ways in which abusers misuse insurance products, highlighting a number of challenges.<sup>64</sup> This briefing identifies the steps insurance providers have begun to take to address economic abuse. These include referring victim-survivors to specialist teams that have received training to support them, recording appropriate information about their circumstances on the customer's record (with their permission) to minimise the need to repeatedly explain what has happened to them, and making referrals to external specialist support.<sup>65</sup> The briefing recognised that Aviva PLC has also taken steps to support customers and their colleagues, including offering domestic abuse training, creating a network of internal domestic abuse champions, and introducing a formal policy with a zero tolerance stance on domestic abuse.<sup>66</sup>

Another of SEA's briefings highlights that life insurance can present a particular challenge for victim-survivors. For example, joint policies cannot be separated without the consent of both parties and perpetrators can gain financially after a victim-survivor's death (which they may have caused and evidence suggests there are cases where life insurance is an incentive for the abuser to kill the victim<sup>67</sup>).<sup>68</sup>



One victim-survivor we spoke to recalled that the abuser had prevented them from making a claim on a joint home insurance product around eight weeks after they separated. This was because she had, understandably, not yet sought to remove him from the policy. Another victim-survivor explained that the perpetrator had kept a life insurance policy on her post-separation, initially without her knowledge. This ongoing financial tie meant the abuser stood to gain financially from her death and when she discovered the policy this left her in fear for her life.

## Savings accounts

In research by Sharp-Jeffs:<sup>69</sup>

- 6% of women reported that a previous partner had not allowed them to have their own savings
- 2% reported their current partner prevented them from having their own savings
- 5% of women reported their previous partner had prevented them from having access to a joint savings account
- 3% said their current partner stopped them from having access to a joint savings account.

The victim-survivors and domestic abuse professionals we spoke to as part of the current research shared little about savings accounts. However, one migrant victim-survivor, who experienced abuse from her in-laws as well as her husband, shared that she was only able to open a savings account after police involvement. The perpetrator later attempted to force her to close the account because he said having her own savings was 'an act of disrespect'. She was then pressured into giving her savings to the perpetrator after others tried to 'mediate' with her, 'constantly ask[ing]' why she needed savings. Another victim-survivor shared that her abusive parent tried to withdraw her savings. The bank did not allow this, but only because the victim-survivor's other parent also needed to be there. This highlights the need for financial services firms to be aware that a victim-survivor could be subject to abuse from multiple perpetrators, who can be family members as well as intimate partners or ex-partners.

## Pensions

Work by Portas and Sharp-Jeffs has highlighted the potential ways victim-survivors' pensions can be impacted by perpetrators of economic abuse. For example, abusers may control victim-survivors' access to pension funds or they may coerce them into opting-out of having a pension.<sup>70</sup> International evidence has also highlighted that perpetrators may force victim-survivors to 'cash in' their pension savings.<sup>71</sup> In addition, in the UK, 1% of victim-survivors reported that economic abuse began when they retired.<sup>72</sup>

Like savings, pensions were not mentioned in the current research as much as other financial products. This may be because of the lower 'urgency' associated with pensions, compared to many of the issues victim-survivors raised. It could also be because some of the women involved in the research were not working (either because of issues like caring responsibilities or immigration status, or as a tactic of economic abuse used by the perpetrator), or because the perpetrator prevents them from having a pension.

However, one woman did share that she had taken out a private pension for her and her then-partner. She was paying £300 per month into her own pension and £50 per month into his from their joint account. Whilst she was unwell, her ex-partner had changed the payments from the joint account so that all the money went into his pension. This created a huge discrepancy between the size of each pension, with the perpetrator's worth over five times as much.

These findings demonstrate how perpetrators are using a broad range of financial products to facilitate abuse.

## How financial products and services enable perpetrators of economic abuse

In our research, victim-survivors not only spoke about times where the abuser had used financial products and services to facilitate economic abuse, but also about how financial services firms' actions had inadvertently supported the perpetrator. The Consumer Duty's cross-cutting rule that financial services firms should **avoid causing foreseeable harm** is therefore highly relevant here. The examples below highlight missed opportunities that could cause harm to victim-survivors.

One woman, whose first language was not English, shared that she had only spoken to a financial services firm to confirm her date of birth. Her husband then spoke to them on her behalf, with this being allowed by the bank:

**So there have been times where he would contact the banking agency and tell them that 'my wife cannot speak English, so I'm just calling on her behalf' and then like carrying on...the bank has allowed because [I had] given [my] date of birth while on the phone. (Victim-survivor)**

There were also instances where staff unwittingly supported abusers to remove money from a joint account to a sole account. For example, one woman told us that bank staff had helped her ex-partner take more than £40,000 from their joint account, even though he had not paid into this account 'for years and years'. He unsuccessfully tried to transfer the money to himself, before staff — unaware of the circumstances — then helped him remove the money from the joint account without the victim-survivor's consent:

**[He'd] tried to take £42,000 out of that joint account, couldn't do it, because he did it [as] a bill payment to himself, and it didn't work. And then, because [he's] so charming... he went back in and somebody in the bank helped him take out £42,000, told him how to do it, and it went through...because it's in a joint account [it] wasn't counted as fraud or anything...Surely there should have been like a red flag somewhere in that account, why was he wanting to take out £42,000 when you can see every deposit in was in my name and the only other outgoings were from him or to pay the mortgage or to pay electricity, utility bills. And there was no red flag to that person. (Victim-survivor)**

This happened when the victim-survivor was unable to access her bank accounts, as the abuser had taken or destroyed the paperwork she needed to do so. She had also been told by the bank that the joint account could not be frozen, as there were mortgage payments coming from it. She was later told that this advice was incorrect, which caused significant distress and made it more difficult for her to regain control of her finances:

**I went to the bank, and said to them 'if we freeze the joint account, can you still take out the mortgage payment?' And the person who advised me and said 'No, we can't do anything, the mortgage payments can't be taken out of the bank if you freeze it'. I explained what has happened, and that he's taking money and I've been advised by the solicitor that [the account] needs to be froze, but until the property sells, the mortgage payments still need to be made, there was enough money in there for the mortgage payments to be made... And I got advised 'No, you can't [freeze] an account if you want payments still to be made'. And that was why he was able to take the money because the bank account wasn't frozen. And then I was told that was not the right advice that I should have been given. (Victim-survivor)**

Similarly, one bank overrode their policy of requiring two signatures for withdrawals from a joint account, allowing the abuser to withdraw money from the account they had with the victim-survivor because they were aware of 'marital disharmony'. The victim-survivor was told by the bank they had made reasonable checks by calling her on an incorrect phone number. She found out the account had then been closed when she put her card into an ATM, only for it to be swallowed by the machine.

There were other times when the victim-survivor felt the response of the financial services firm had facilitated the abuser's behaviour. One woman said that her ex-husband would take her into banks to transfer money from her account into his, but staff never questioned this. She felt that this, combined with the norms of the country he was raised in, added to his entitlement:

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**Interviewer:** Do you feel that any of that response [from bank staff] enabled him to do what he was doing?

**Victim-survivor:** Yes! Yeah, yeah, yeah, he knew there wasn't going to be any [consequences]. I think the first time we went, I think I think one of the things with him was that because he was obviously born and brought up in [South Asian country]. The men do everything there, the women don't really get involved. So for him, it was normal...But there was another side to him where it was about control and it was about him taking everything that he could from me to sort of leave me powerless, but he did get a kick out of going and the more we went and the more he saw that no one's ever going to sort of ask any question, the sums that he was taking out were getting bigger...I should have been taken to a side taken into a room at the back end, saying you know, 'he's withdrawing this amount of money, are you happy with it, it's coming out of your account'?

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As other studies have found,<sup>73</sup> harmful societal norms and values about the roles of men and women can facilitate economic abuse, as well as masking the abuse completely. This context was significant for the interviewee and her experience as a South Asian victim-survivor whose partner was from the same community. She reflected that if a staff member had said something (for example, that the money was from her account), even if it was 'said in jest', it 'would have thrown him a little bit'. Similarly, bank staff did not question the fact that the victim-survivor's money was used as a deposit for a home and that she was not named on the mortgage or deed. This enabled the perpetrator to use her money for his gain without challenge. Another woman shared that the abuser told financial services firms that she was 'very manipulative', and that he was in fact a victim.

Domestic abuse professionals shared that they were aware of perpetrators presenting as victims to financial services firms before the victim-survivor contacted them for help. This is particularly difficult to identify, and firms do have a duty to both customers. However, training for financial services firms must include recognising how perpetrators may try to manipulate services — potentially using learning from specialist organisations like Respect, which works with both perpetrators and male victims of domestic abuse. This training would mean that colleagues are informed before acting to ensure that victim-survivors can be physically and economically safe. Firms can also act flexibly, taking an individualised approach to support good outcomes and prevent causing foreseeable harm to customers. For example, firms can act on the instructions of one party to make non-contractual changes if it would support good outcomes for the victim-survivor i.e. agreeing to forbearance measures without the perpetrator's consent to help manage arrears on a joint mortgage.

### **Products and services as a barrier to victim-survivors accessing safety**

The experiences we heard about during this research clearly demonstrated that economic and physical safety are intrinsically linked. As explored later in the report, some victim-survivors received responses from financial services that helped them to feel safe. This included:

- being advised and supported to change account information by a staff member in a bank
- being guided through processes that were new to the victim-survivor (including for migrant women who were unfamiliar with UK banking systems)
- being supported to **minimise the need to repeat their story**
- being contacted by a bank's specialist team after disclosing domestic abuse

These examples demonstrate firms taking positive and proactive action to support customers in vulnerable circumstances.

However, victim-survivors also shared that financial products and services had prevented them from being physically safe. One victim-survivor shared how long it took her to have a joint account closed; she shared with bank staff that she feared her abusive ex-partner would be able to find out her new address and the risk this would pose to her, and was only able to close the account and feel safe due to the discretion and understanding of a bank manager.

Another woman was told by police to immediately move from her safe accommodation because her bank had shared her new address with her ex-partner. One woman shared that her bank had alerted her husband when she tried to access her own funds, effectively 'tipping him off'. She had to 'face him' when she got home as he 'recounted every step I took in [the bank]'. This could be incredibly dangerous — we know that abusers have killed women when they have become aware of them taking steps to leave, including by moving their money prior to separation.<sup>74</sup> Domestic abuse professionals also shared experiences where clients had been told by financial services firms to use a mediator, without understanding that this is not safe for victim-survivors. Mediation is never appropriate due to the power imbalance between victim-survivor and perpetrator. It can therefore facilitate or enable further abuse, putting the victim-survivor's physical safety at risk. These examples show financial services firms attempting to support survivors but lacking the knowledge and skills to be **safety-focused** or **survivor centred** in their response.

It is also important that victim-survivors can access financial services in a way they feel is safe, as outlined in the 2021 **Financial Abuse Code**. For example, one woman reported feeling physically unsafe when she had to go into a branch when her issue could not be dealt with over the phone. She had recently left hospital with injuries from the abuser and described herself 'looking around all the time' for the perpetrator. Staff had tried to send documentation to the address she had shared with the perpetrator, and did not understand when she told them she could not simply go to the address to collect this.

## Barriers to victim-survivors accessing products, services or support

One issue that frequently came up as a barrier for victim-survivors accessing financial services (and is reflected in many of the examples given above) was the documentation needed to open an account. This was particularly difficult for migrant women. Abusers may prevent victim-survivors from having their names on documents that can be used as proof of identity, such as Council Tax or utility bills, or withhold documents such as passports. One domestic abuse professional reflected that she felt services wondered 'what are migrant women are trying to get out of this country?' She felt this played a role in the difficulty her clients often faced in opening a bank account. The fear of racism is therefore an additional barrier for migrant victim-survivors to access financial services — research has found that people from minority ethnic groups have reported being treated with suspicion or have been accused of lying by financial services firms.<sup>75</sup>

Being able to access services in their language was also a barrier for victim-survivors. Whilst firms are not obligated to provide translation or interpretation services, not doing so is neither **survivor-centred** nor **intersectional**. The lack of translation or interpretation services does not recognise that some victim-survivors do not speak English, which allows perpetrators to carry out the abuse whilst acting as an interpreter. For example, one victim-survivor shared that while she was grateful her bank was able to help her, she would have preferred to have done this with the support of an interpreter, which could have also enabled more information to be shared between her and the bank. This places further burden onto support services to act as a interpreter — if a victim-survivor can access these to begin with. In certain scenarios, failing to provide translation or interpretation services could also amount to indirect discrimination by financial services firms and has been considered as such by the Financial Ombudsman Service.<sup>76</sup> Imkaan, the national umbrella organisation dedicated to addressing violence against Black and minoritised women and girls, recently published a review of domestic homicides of Black and minoritised women. It highlighted that the lack of interpreters within other services amounted to indirect discrimination.<sup>77</sup>



Broader research has also found that those who do not speak English as their first language are less likely to feel that ways to access banking services meet their needs, compared to minority ethnic groups and White British people.<sup>78</sup> Financial services firms should consider this, as well as the potential risk of harm to vulnerable consumers based on their target markets and customer base.

A conversation with one victim-survivor also highlighted how little information banks may have about their customers. This means that they may not see all their intersecting needs and therefore all the challenges and barriers they face in accessing financial services. For example, one victim-survivor who had the right to reside in the UK shared that she was pregnant and on maternity leave at the time when she reached out to her bank for support. She had also recently graduated from university (and had student loans) and had little family in the UK. This highlights a number of intersecting vulnerabilities.<sup>79</sup> The design of products and services must therefore consider the intersecting needs of customers and the range of barriers they may face in engaging with services, as well as ways in which perpetrators may exploit these.

Meanwhile, the domestic abuse professionals we spoke to shared that victim-survivors might be told to access services such as opening a new account online and not in branch, but that not all victim-survivors have internet access. This is not **survivor-centred** and **intersectional** because it does not recognise the financial barriers facing low-income victim-survivors which could prevent them from accessing the internet. Further, it does not enable and support these women to **pursue their financial objectives**. In addition, a perpetrator may be using technology-facilitated economic abuse, such as by monitoring or restricting a victim-survivor's access to the internet or use of a computer or mobile phone. This makes it unsafe for a victim-survivor to access services online. There were positive examples of support from financial services firms in place around access to technology — for example, one victim-survivor shared that she was supported to access a computer in branch (see more on this in the inclusive design section below).



Research undertaken by Ipsos for SEA in 2024 shows that **Black, Asian and racially minoritised women are over twice as likely to experience economic abuse than White women**

### Need for inclusive design

The Consumer Duty requires firms to consider the needs, characteristics, and objectives of customers when designing products and services. The guidance for implementing the Duty highlights inclusive design as an 'approach to meet the needs of customers'.<sup>80</sup> The 2021 Financial Abuse Code also states that **firms should design products and services inclusively**. As explored in the opening to this section, involving victim-survivors in the design process of products and services is a way to ensure they meet victim-survivors' needs. Starling Bank's response to abusive payment references, as noted above, is an example of this. Financial services firms that participated in research conducted by CWASU also highlighted firms' work to identify and respond to abusive payment references. As part of the research, one firm shared that they were trialling 'proactive identification' of abusive words in payment references.



During this research, one domestic abuse professional reflected that financial services firms need to more thoroughly consider how products can be misused by perpetrators in and throughout the design process:

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**Put themselves in the position of someone looking to take power and control and reflect on how each of those items could be used in that effort - reflect on how those in themselves could be tools of abuse. (Training and Commercial Manager, Galop)**

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There were two main themes for the design of products and services within these findings:

1. there needs to be more understanding and consideration of intersecting needs, such as sex, race or ethnicity, migrant status, sexuality, disability or class, and of how these will vary for a victim-survivor based on their identity
2. there needs to be a greater level of understanding of physical and economic safety and how they are related

#### **Consideration of intersecting needs**

Victim-survivors shared some positive examples where they felt firms had considered inclusivity within the design of products and services. For example, one woman shared that her local branch had been designed to offer free Wi-Fi in branch (meaning she did not have to use mobile data) and had computers available for customers to use. A member of staff also supported her to use these to open her account.

Migrant women in the research described that they may need particular support from financial services firms to open and access their own bank accounts. Their ability to do so may be influenced by cultural norms around women having bank accounts, as well as the perpetrator's ability to restrict victim-survivors from opening or accessing an account (such as through preventing their name being on utility bills or threatening them with deportation). One migrant woman shared how important it is that banks design ways 'that women can reach out to them or have access to the finances'. This is particularly important when an abuser may be preventing the victim-survivor from doing so, and when they do not know how systems work or speak English. She shared that education from banks (for example, on how to open and access a bank account) would have been helpful for her. This needs to be in a range of languages to ensure it is accessible for all victim-survivors.

A professional from Galop also reflected that this education could be helpful for victim-survivors where perpetrators deliberately 'remove all financial knowledge ... making sure that you have no understanding of how financial systems work'. This is therefore something that financial services firms could include in the design of their products and services. Firms could also consider a range of ways they could provide education around products and services to ensure victim-survivors can access it.

One victim-survivor, who is deaf, shared that she knew staff could not always see this information on their records. Though it was included on systems, in her experience it was not available to all levels of staff — often visible only to more senior staff. She reported that she repeatedly had to share this information. It is vital that information regarding victim-survivors' accessibility needs is always available, and that reasonable adjustments are made (including in accordance with the Equality Act). Products and services should be designed in a way that is accessible to all customers. Mechanisms should be in place to securely record relevant information to ensure customers can fairly access their services and are not disadvantaged.

It is key that intersectional needs (such as those a victim-survivor may have due to their race or ethnicity, sex or gender, sexuality, or disability) are considered at *all* stages and levels of product and service design. This will ensure they are fully embedded and that all victim-survivors can be seen and supported (being **intersectional**). As a professional from Galop shared, firms must 'start from that point of valuing diversity' when responding to domestic abuse and include these intersecting needs within the design of products and services. Without this, there is a risk that products and services will not be 'very meaningful' for minoritised victim-survivors, including those from LGBT+ groups, as well as ethnically minoritised or disabled victim-survivors. Inclusive product and service design supports multiple customer groups, including minoritised victim-survivors, to engage with financial services. Diversity and intersectionality cannot be viewed as an 'add-on' to the design of products and services but must be considered throughout their development. This serves to benefit all customers and links to the cross-cutting rules of acting in **good faith, avoiding causing foreseeable harm to consumers**, and **enabling and supporting them to pursue financial objectives** highlighted within the Consumer Duty.

#### Understanding of physical and economic safety

This report highlights many examples of the design of products and services putting victim-survivors' safety at risk. This has included sharing addresses with perpetrators (or risking this by refusing to close joint products), or not considering fraudulent transactions or loans taken out by the abuser as fraud.

The design of services could also create difficulties for victim-survivors to access these in a way that 'felt' safe. For some this was over the phone, while others felt safer in branch. Domestic abuse professionals felt that financial services firms assumed that everyone has access to a mobile phone, internet, or a computer when designing products and services, when this may not be true — or access may not be safe for all victim-survivors.

## Price and Value

The **price and value** outcome of the Consumer Duty states that customers experience harm when they do not receive value for their money, and this can prevent customers from realising their financial objectives.<sup>81</sup> In addition, it states that firms cannot **act in good faith** if they are knowingly manufacturing or distributing products or services that provide poor value for money. The outcome therefore aims to tackle factors that can result in unfair or poor value, and which can lead to **causing foreseeable harm** for customers. Positive outcomes could include ensuring that the price a customer pays for a product or service is reasonable compared to the overall benefits of that product or service. The FCA notes that vulnerable customers may be more susceptible to receiving poor value. It expects firms to evidence that the price of the product or service represents fair value for vulnerable customers. This section of the report shares the findings relating to price and value.

### Financial services firms' responses causing economic harm to victim-survivors

Examples throughout this research show where financial services firms' responses and standard processes caused victim-survivors further economic harm, such as charging for products or services that victim-survivors were only accessing as a result of the perpetrator's economic abuse. Furthermore, there were occasions where these responses or processes also impacted upon a victim-survivor's physical and emotional safety. For example, one firm tried to inappropriately sell life insurance to a victim-survivor who was accessing support.

Another victim-survivor recalled that when she was going through court proceedings, she was asked to provide bank statements for the last five years. When she contacted her bank, she was told she would have to pay £10 for each month's statement; this totalled more than £500, which she could not afford. However, the bank did not recognise her vulnerability as a victim-survivor of economic abuse and followed its standard process, offering her no alternative but to pay £500 to access the statements. She shared that 'in the end', she was able to speak to a manager who acted outside of policy and printed the statements for her, although she felt he did this because 'he just felt sorry' for her. It is positive that the manager acted to support a vulnerable customer in these circumstances. However, the bank could have recognised the victim-survivor's vulnerability sooner and identified the **foreseeable harm** that either not being able to access the statements or having to pay £500 would cause. As a result, it could have offered support options sooner, minimising the impact and distress caused.

Another victim-survivor shared her experiences of using a joint account for which a monthly fee was payable. The account had been frozen, but the bank continued to charge the £5 monthly fee for 'seven years, even though I couldn't use the account'. This forced the account into its overdraft. The victim-survivor said she 'fought and fought' to get the monthly charges on the frozen account refunded, but the bank did not agree because the perpetrator would not consent to have the account closed. This shows how a perpetrator can maintain control post-separation, even if it is to their own financial detriment. The victim-survivor described the impact this had on her as 'huge', and that she was still in debt to her parents as a result. In this case, the bank could have frozen the charges to stop the account from running into its overdraft. They could also have considered refunding the charges and closing the account after several years had passed with no account activity. This presents a good outcome for both customers and reduces additional harm to the victim-survivor.

Another victim-survivor said that her bank tried to sell her life insurance after contacting her to confirm the perpetrator's request to remove himself from their joint account. He often took money from the account, despite never paying into it. She described this as being 'useless' and particularly difficult given that they knew her situation:

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**They knew the issue I was having at that particular time. I didn't have money coming in, nothing. Why were you selling me insurance, life insurance? You know, did they think I was going to die and leave my children alone or something? ...I don't have money in the account. My partner then has taken his name off the account. Why [are] you selling me life insurance? You know, there is no helping. It doesn't help. It was useless to me. Even if it was important, but not at that time.**  
(Victim-survivor)

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The risk of domestic homicide escalates upon separation.<sup>82</sup> Whilst this staff member may have been unaware of this risk, to offer a recently separated victim-survivor life insurance is insensitive and can cause distress. For this reason, it is absolutely vital that staff in financial services firms adopt a survivor-centred approach and understand the risks facing victim-survivors after separation. This would help them to understand the impact – however inadvertent – that their actions might have.

Others shared that the impacts of the abuse meant they had to pay more for products and services. For example, they needed a higher deposit to access a mortgage, were given higher interest rates on mortgages, had been prevented from moving onto a new fixed rate for their mortgage (so were forced to pay more), or had been offered higher interest rates for credit cards. Similarly, one victim-survivor described mounting interest on a debt she was coerced into. She felt that even if she still had to pay this debt, having the interest frozen would have been helpful. An inconsistent, slow, or poor response from a financial services firm is likely to result in the victim-survivor suffering financially – in addition to the economic harm they have already experienced from the abuser.



In one case of coerced debt, a victim-survivor described herself as being 'really sensible with money' before the abuser started to control her. She shared the experience she had with a car finance company — the abuser bought a £25,000 car on finance, with the contract in the victim-survivor's name. He promised her it would be a family car and that he would pay the monthly instalments. She had recently finished university, had just started working, and was pregnant (and was not eligible for maternity pay from her employer). The abuser was imprisoned during this time. Following this, she phoned her bank to disclose the abuse. She told them that she had been threatened into signing the contract and that she was on maternity leave — which should have been viewed as an additional vulnerability. The bank told her that 'there was nothing they could do' because she had signed a contract:

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**I called them and explained to them the situation of domestic abuse, the coercive control, the fact I was on maternity leave, the fact that obviously, I'd been threatened into signing this contract. And they basically just said that there was nothing they could do...they just recommended me going back to [car dealer] and trying to arrange something with them. Zero help, zero advice, zero support.**

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**(Victim-survivor)**

She also described their advice as being 'patronising', amounting to 'don't say yes to people ... don't allow someone to do that'. She then got in touch with the car finance provider and told them 'everything'.

The finance company told the victim-survivor there was nothing they could do, informed her that she was subject to a £20,000 fee if she broke the contract, and suggested she go to the car dealership. She went there 'in tears' and, finally, two members of staff tried to find a 'more liveable' solution. They created a new contract for the victim-survivor to help her get out of the £25,000 debt. However, it meant she had to trade in her own car (which was fully paid for) to refinance the car the abuser had coerced her into buying (which she paid £10,000 for and would be 'impractical' when the baby was born). In addition, there was a fee of £5,000 (which the victim-survivor had to use her overdraft to pay for). Seeking support with coerced debt was ongoing throughout her pregnancy, and had a significant impact on her health:

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**It was just a one big web of mess and this was going on for months right up until I had my [child]. And yeah, depression is an understatement of that time of my life...my [child] actually came early because of the stress of everything. (Victim-survivor)**

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For this victim-survivor, 'even just putting a pause' on the payments would have helped relieve the pressure of the situation. The support she eventually received from the car dealership saw the victim-survivor lose her assets (her own car), as well as remaining in debt and paying off finance for a car she did not want.

Victim-survivors should not have to pay more and be left in debt and poverty because of the abuse they have experienced. Firms should have processes in place to act flexibly to support them, outside of standard practice, when not doing so causes harm. Acting flexibly allows survivors to rebuild their lives through maximising their access to economic resources, supporting them to achieve economic independence from the perpetrator.

Financial services firms should ensure that victim-survivors are not economically harmed by their responses, even if they do not intend to cause harm. As a positive example, one woman told us that she was supported by a staff member to access a lower interest rate on a credit card than she had been able to find herself.

## Holding perpetrators responsible

As shown in the experiences outlined so far, participants often felt that financial service providers did not hold perpetrators responsible for their abusive behaviours. As one domestic abuse professional reflected in the workshop, it is key that financial service firms consider their responses to perpetrators. She said, 'we often see survivors having to bend so much to systems and processes [but] not the same for perpetrators'. Similarly, another domestic abuse professional said responsibility is placed fully on victim-survivors but never abusers.-

We recognise that holding perpetrators to account is difficult. It can present risks to victim-survivors and firms still have a legal obligation to perpetrators as customers. CWASU's research demonstrates the tensions and challenges in responding to perpetrators. These challenges include recognising, evidencing and then acting upon perpetrators using financial services firms as part of their abuse, and the extent of the powers and role of firms in responding to this abuse.<sup>83</sup> It is also crucial that any action a financial services firm takes against a perpetrator is done safely, is **survivor-centred** (and survivor-led), and does not put victim-survivors at risk of harm. Positively, participants in the CWASU research were aware of the need to keep victim-survivors safe when considering perpetrators.<sup>84</sup> CWASU's research also recognised this tension in holding perpetrators to account whilst considering the victim-survivor's safety.<sup>85</sup>

In this research, some victim-survivors shared examples of instances in which they felt that perpetrators were not held responsible. Instead, victim-survivors felt they were held responsible, which prevented them from feeling they were achieving economic safety and justice. The victim-survivors we spoke to shared that responses they received from some financial services firms left them paying costs they had not incurred; some had to take on multiple jobs for several years to pay debts to financial service providers or borrow from friends and family members. Others shared that they had been blocked from their accounts as their bank had believed the explanation given by the abuser.

## Consumer Understanding

The **consumer understanding** outcome is focused on ensuring that financial services firms can support customers to make informed decisions about financial products and services. They must be given the information they need at the right time, presented in a way they can understand, so they can **pursue their financial objectives**.<sup>86</sup> For vulnerable customers, the emphasis is on ensuring that financial services firms tailor their communications to ensure that information is accessible. This section of the report outlines the findings relating to consumer understanding, including what prevents or enables victim-survivors' ability to disclose abuse to financial services firms. As discussed below, this includes ensuring that financial services firms provide customers with the relevant information to know that they can disclose economic abuse to them. As explored above under Products and Services, examples throughout the findings show victim-survivors not having sufficient and accessible information to make informed decisions and pursue their financial objectives. This includes:

- financial services firms not speaking to or providing key information about products and services to victim-survivors in a language they understood
- victim-survivors being given incorrect advice by staff members in financial services firms
- victim-survivors not being informed when a life insurance policy is taken out against them
- financial services firms not checking consent when a perpetrator is taking money from a victim-survivor's account or using their money as a deposit for a mortgage they are not named on

## Barriers and enablers to disclosing to a financial service firm

As highlighted above, financial services firms should ensure they are providing vulnerable customers with the information they need at the right time to make informed decisions about their finances. This includes ensuring that a victim-survivor has the information they need to decide whether they disclose abuse to a firm. This section therefore explores what victim-survivors described as the enablers and barriers to disclosing abuse to a financial services firm.

### Urgent need

When victim-survivors disclosed to financial service providers, it was often because there was a specific need or reason for them to seek support. Examples included attempting to close a joint account, changing their address due to safety concerns, or seeking help because of the abuser's spending. The victim-survivors in our research therefore did not tend to disclose economic abuse generally to financial services firms, but in relation to a specific need for which they required support. Previous research has also found that victim-survivors tend to only report abuse to the police when there is an urgent need to do so.<sup>87</sup>

### Information and support to disclose abuse

One victim-survivor did not disclose the abuse to her bank but had been into the branch to speak to staff about changing her PIN and other details. She shared that had she seen materials in the bank about abuse, she 'probably would have just mentioned' it 'if I'd known they were capable of doing something'.

Domestic abuse professionals also reflected that having a range of disclosure options could be useful — some victim-survivors may prefer the anonymity of disclosing online, whilst others may prefer to disclose in person if they suspect that the abuser is monitoring their technology. Similarly, and as reflected in the 2021 Financial Abuse Code, financial services firms should be proactive in **creating an environment for victim-survivors to disclose**. Firms have undertaken work around this. For example, in their scoping of the services that financial services firms provide to victim-survivors, Which? found that all of the banks offered discreet ways for victims to get in touch.<sup>88</sup> This includes the 'share with us' tool on the Monzo app. TSB has also joined online Safe Spaces, which provides an online portal for victim-survivors to seek advice and support information.<sup>89</sup> Domestic abuse professionals gave suggestions for building on this, including for financial services firms to know the demographics of their branch areas and utilise staff skills to meet these needs. This could be knowing which languages might be in demand, in addition to trauma-informed training for frontline staff in banks. This might mean victim-survivors feel more able to disclose.

This research identified a number of barriers to disclosing abuse to financial services firms, the biggest being that victim-survivors are unaware that they *can* tell financial services firms:

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**I didn't know I was supposed to call the bank to say this. (Victim-survivor)**

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**No, I didn't think of them. (Victim-survivor)**

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**I think most people are just unaware, or it just doesn't come to their mind that I can approach my bank and get advice on this. (Victim-survivor)**

It's vital that financial services make the support they can provide clear and accessible, so victim-survivors know what they can expect from their bank (or other service). Raising awareness about economic abuse is also impactful. HSBC, for example, in collaboration with UK Says No More, undertook a large awareness-raising campaign inspired by SEA's research.<sup>90</sup> SEA's Banking Support Directory brings together all the support that banks offer in one place, including ways to safely disclose to your bank, making it easier for victim-survivors to access these details. However, the level of detail and support provided by each firm is not consistent and firms could do more to make their support offer for victim-survivors publicly available, such as including details on their website or SEA's Banking Support Directory.<sup>91</sup>

Others did not disclose abuse to financial services firms because they felt the service would not understand, or they did not see the point as they thought nothing would be done. One domestic abuse professional said this may be especially true for migrant victim-survivors with NRPF, who may have been continuously let down by agencies and feel that banks would do the same. Similarly, another professional shared that dealing with financial services firms can be a lengthy and complex process and victim-survivors may just want to move on, especially when they may have so many other pressing issues to deal with upon leaving:

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When you tell [clients] about the process, it's, okay... I might be here in a year's time still trying to, depending on obviously the amount of debt and what the debt is, whether it's a loan. But I think that they don't make it easy. The process isn't simplified or, you know, there's so many hoops and different departments you have to deal with. And if you've got a client who's come out of an abusive situation, and you know, you've got so much already going on priority things, housing, money, income, food, if they've got children schooling, they might be relocating, and then they've got this sort of hanging, as well. And some of these places, some of these providers have limits, you know, 'you have to have told us about it by this time', and then you start prioritizing what's more important. So I think, yeah, the process isn't easy. The process isn't easy for clients, and then actually, it becomes a deterrent. (Jewish Women's Aid)

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Some did not know how to contact their bank or how to tell them about what they were experiencing. This was particularly the case for services that were online-only, without any support available in a physical branch. One woman shared that she was worried about causing a misunderstanding and welcomed the idea that an advocate may be able to speak to the bank on her behalf. Others were similarly positive about the difference this would have made for them:

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If [an advocate] can speak to them on my behalf because, like I said, I don't have that skill to communicate with a bank and because I don't know how to communicate with them because I don't want to cause any misunderstanding. (Victim-survivor)

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I would have loved to have had somebody with me, because obviously, my brain was just completely frazzled. I couldn't think straight, and it would have been really helpful to have had an advocate. (Victim-survivor)

#### Accepting a victim-survivors' representative

**Accepting a victim-survivor's representative** (such as a domestic violence advocate or money/debt advisor) with the appropriate authority from the victim-survivor is included within the 2021 Financial Abuse Code as good practice. As shared previously, one woman felt she had only received help from her bank because she had a social worker with her. Another shared that she had 'no problem' when her support worker from the specialist domestic abuse organisation had spoken to financial services firms on her behalf. Allowing an advocate to speak to financial services firms may be particularly significant for women who are unfamiliar with banking systems in the UK, such as migrant women, helping to ensure they can access the full range of services they are entitled to. However, Southall Black Sisters shared that whilst they had been able to speak to firms on behalf of clients, they were prevented from doing this 'all the time'. This was a double-edged sword, as it did make the domestic abuse professional feel slightly more confident that firms would not allow a perpetrator to speak on behalf of a victim-survivor:

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**Interviewer:** Have there been any times that you're aware of where you've tried to [speak to them] and the financial services have said no?

**Southall Black Sisters:** All the time. So we've always taken the clients with us and we, even if you're speaking to them on phone, we try and get the client on because they almost never speak to us, which isn't the worst thing... because that also makes me feel a tiny bit safer in terms of understanding that okay, if someone does call on the client's behalf, this person is going to make sure that my client is there before they do anything else. So that does instil some confidence in me when they do that. Even if they're trying to be difficult.

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This again highlights a need for further guidance and support for frontline domestic abuse professionals on how the 2021 Financial Abuse Code can be used to support and advocate for clients where clients wish for them to do so. Another professional reflected that being on hold to try and talk to financial services firms on behalf of clients could take up a significant amount of time. This sometimes resulted in little help when they did speak to someone at the firm. This could create further barriers to economic safety and justice for victim-survivors, particularly for those with intersecting needs. This is especially significant given the ever-increasing demand on frontline domestic abuse services (including longer and more complex cases) in a context of a lack of funding across the sector (particularly for by-and-for services).<sup>92</sup>

### Cultural barriers

Differences in cultural understanding around what constitutes abuse were also felt to present a huge barrier to recognising economic abuse. This was coupled with a limited awareness of domestic, including economic, abuse, more generally:

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**A lot of times disclosures don't happen because they [victim-survivors] don't recognise it as a form of financial abuse either. (NRPF Team Lead, Southall Black Sisters)**

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In addition, victim-survivors raised that there could be cultural barriers for women having their own bank accounts – or being able to access or have control over it if they do have one. Cultural barriers could even prevent women from going out into the community alone, which could limit their ability to go to their bank. Furthermore, expectations of men's and women's roles within religious communities could create power dynamics that prevented victim-survivors from disclosing abuse. This could include the fear of how financial services firms would respond if they did not have an understanding of their religion. A professional from Jewish Women's Aid raised similar concerns for some of their clients from Orthodox communities, where there may be different expectations around women's roles which could form barriers to accessing financial services firms:




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**Something that we see kind of with our much more religious clients is the kind of expectation that's set on them. So you know, they generally in the Hasidic communities, the role of the woman is to stay home and look after the children and the role of the man is to go and learn. And this can really create a power dynamic. So if our clients are going out and looking for support with benefits and support with their bank accounts, the banks can turn around and just say 'well, you have to find a job, you have to find some work and then we can start talking'... It's definitely something that that we see a lot is just that, you know, being scared, and not wanting to go and talk to the bank and the bank kind of saying 'Well, you know,' not responding in a way that is conducive to their culture. (Jewish Women's Aid)**

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In addition, it was suggested that financial services firms ensure that appointments they offer to victim-survivors do not conflict with religious requirements, such as the Sabbath for Jewish customers. These are examples of how financial services firms could do more to consider **intersectional** needs to ensure that victim-survivors do not face additional barriers to disclosing. Similarly, one study found that many people felt that high street banks 'adopt a uniform approach' which can act as barrier for those with specific cultural or religious needs.<sup>93</sup>

### Abusers preventing victim-survivors from seeking support

In our research, we also found that victim-survivors were prevented by the perpetrator from being able to seek support. For example, one woman shared that the abuser prevented her from having credit on her mobile phone and went with her everywhere outside the home, including the bank.

Abusers were also reported to have told victim-survivors that services and agencies were untrustworthy. They were also reported to have manipulated services so that they appeared as victims or so that the victim-survivor appeared unreasonable. As mentioned elsewhere, this behaviour can be difficult to detect, especially if the abuser contacts a financial services firm before the victim-survivor is able to. **Training for colleagues** should include how perpetrators may present as victims to financial services firms.<sup>94</sup>

### **Shame, embarrassment and fear of discrimination**

Feelings of shame and embarrassment were also barriers for some women that prevented them from disclosing abuse, as was fear around not being believed by financial services staff. For example, one woman said it had been 'embarrassing' for her to have to disclose to financial services firms. She said she had done so because she was 'desperate' to get out of the debt her ex-partner had left her in. However, the lack of support she received felt 'degrading':

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**I felt like, you know, when you feel like the most like bottom of the pile person. Like it literally felt like there was no understanding it was, they were like gobsmailed and were just like, 'oh, sorry', like I was desperate, so I had to try my best for someone to hear me and my problem. And it was just like 'um, yeah, we're really sorry there's nothing we can do'. Like it's just, that was it. So obviously, that felt degrading, like the shame and the embarrassment that you know, I already carried for being with someone like that for so many years. But at that time, I was pretty desperate. And I just had to just say what I had to say, you know, it didn't help me. There was no relief from me saying that any of those people, the finance or the bank. (Victim-survivor)**

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It is important that financial services firms can **create an environment to encourage disclosures** and provide training to staff to have more understanding and **empathy** to help reduce the risk of this for victim-survivors and provide a **supportive response**. Firms can also do more to help victim-survivors understand their circumstances and options, such as how to access accounts held in their name.

For LGBT+ victim-survivors, one domestic abuse professional shared that there was also the fear of having to disclose their gender identity to staff and being met with a discriminatory response. Participants also mentioned worries about being judged when trying to access the financial service further down the line, for example if they had disclosed to the financial service at a time of a mental health crisis.

### **Financial services firms' rules**

Domestic abuse professionals further felt that financial services firms' rules could be a barrier. Victim-survivors were worried about being blamed for giving their information to abusers if staff did not understand coercive control:

**How [is it] possible to prove that when the survivor is coerced by someone [alleged perpetrator], [it's] not that the survivor has consented to something. We from the VAWG sector all understand that. But in the financial sector, there are other rules at play like the one that you shouldn't share your PIN numbers, passwords, etc. So from the moment that the survivor disclosed that she shared [these], even though she explains the reasons for this, her case is over. (IDVA, LAWRS)**

### Barriers related to bank branches

As mentioned elsewhere, branches themselves were also reported as being a barrier for victim-survivors feeling able to disclose. For some, this was linked to fears around being seen or overheard. Others were told to go and do things online, with some staff not recognising that this is not an option, nor is it safe, for everyone. This is particularly true if a perpetrator is restricting or monitoring a victim-survivor's use of technology.

The barriers raised in this section highlight the need for financial services firms to demonstrate to victim-survivors (and the professionals that support them) their awareness and understanding of economic abuse. They also need to show an understanding of the support that is needed to encourage safe disclosures.

## Consumer Support

The **consumer support** outcome of the Consumer Duty states that customers can only pursue their financial objectives where firms support them to use the products and services they have bought.<sup>95</sup> It is expected that firms will provide support that meets their customers' needs. This includes providing support that enables the customer to realise the benefits of products and services, **pursue their financial objectives**, and ensure they can act in their own interests. This requires firms to respond flexibly to the needs of customers in vulnerable circumstances, including by providing support through different channels or by adapting their usual approach. For victim-survivors of economic abuse, this can involve supporting them to (re) gain financial independence, and ensuring staff are trained to respond appropriately to economic abuse.<sup>96</sup> This section of the report therefore explores the findings relating to the consumer support offered to victim-survivors by financial services firms.

As explored below, some victim-survivors shared that they received good levels of understanding from financial services staff when disclosing economic abuse. SEA has trained several financial services firms on economic abuse, working alongside them as secondees and consultants. This demonstrates a commitment by firms to increasing the understanding and support they can offer to victim-survivors. SEA is also aware of several initiatives banks have introduced to provide increased support to victim-survivors. This includes collaborating with SEA and other specialist organisations to create specialist domestic, financial and economic abuse teams, and creating flee funds or providing grants for victim-survivors. As we explore under Supportive Responses below, there were some instances in which participants described how they felt financial services firms supported them and understood their circumstances. However, this was not consistent throughout the findings of this research.

### Financial services firms' awareness and understanding of domestic, including economic, abuse

This section will discuss the findings relating to how participants felt financial services firms were aware of and understood domestic, including economic, abuse. The **Understanding customers** pillar of the 2021 Financial Abuse Code also states that **firms should raise awareness amongst staff** about the existence of economic abuse. This includes raising awareness of what it looks like, who is at risk, and the challenges that victim-survivors face.

Some victim-survivors reflected that staff they encountered were helpful, listened to them, understood what they had been through, and that they felt believed. One victim-survivor said that bank staff had shared a support phone number with her after recognising that her partner was abusing her. Another described staff in her local bank branch as 'superb'. A third had been asked for her permission to add notes about her experiences to her file (**acknowledgement and recording of relevant information**). She felt that staff had always taken her 'really seriously', including when she needed extra checks to confirm that she was in fact talking to the bank and not the abuser, which she worried could sound 'far-fetched' to them.

Her experience had been that this bank did 'certainly pause and listen'. This is also an example of the bank recording evidence that could potentially be used in a criminal investigation if the victim-survivor wanted to pursue this (see more in relation to evidencing prosecutions below).

However, some of the victim-survivors we spoke to felt that staff they had interacted with showed little understanding of domestic, including economic, abuse. One victim-survivor described staff as 'just look[ing] blank' or becoming uncomfortable — a sentiment echoed by other women:

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**I didn't get any understand[ing]...the person just looks blank. They don't know what you're talking about. Or if they do, they just look uncomfortable when you start telling them stuff. (Victim-survivor)**

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This also demonstrates the importance of **colleague training** to spot the signs and understand the prevalence of economic abuse. This would improve their ability to recognise and handle disclosures of economic abuse sensitively and appropriately, as well as provide emotional **support for frontline staff** who are receiving disclosures.

Domestic abuse professionals also shared that there is a need for financial services firms to broaden their understanding of how victim-survivors and perpetrators may present to a financial services firm. This would help ensure they are not taking a narrow and stereotypical view, including an ability to recognise abuse in same-sex relationships or familial abuse. For example, a professional from Galop shared that stereotypical views around 'same sex relationships being more equal' could prevent staff from understanding and responding appropriately to LGBT+ victim-survivors. Spotting signs of abuse and how they might present in victim-survivors of different identities was felt to be key to financial services firms understanding **intersecting inequalities**. The Consumer Duty stipulates that firms should identify their target markets and ensure that they offer appropriate support for those identified as customers. This includes ensuring they are appropriate for all customers, including those with intersecting needs.



One victim-survivor felt that though 'there'd begun to be some awareness' of domestic abuse generally, there was 'none' of economic abuse as a specific form of control. She described the bank as seeming 'oblivious' when she explained the risk she was at from her ex-husband if he were to access her address. Neither did they understand her experiences of abuse as an Asian woman. She stated that she was made to feel as if she was being dramatic:

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**They just seemed oblivious...also I think one of the issues was that a lot of people don't understand, you know, financial abuse, domestic abuse, all of these things are happening in every community but I think in our Asian community, it's a lot worse. And I think people just didn't understand those far-reaching consequences. I think that a lot of the times that kind of was met with statements like 'so what if he finds out your address' and I thought well he's a grown man, he can come and kill me. 'Oh, now you're just being dramatic.' And I thought, 'you guys actually don't know.' (Victim-survivor)**

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This demonstrates the additional challenges that victim-survivors from minoritised backgrounds may face, including differing expectations or pressure from members of their community.

Similarly, a domestic abuse professional felt that, in her experience, institutions including financial services firms seemed to have a higher level of distrust towards migrant and minoritised women compared with other customers. Until this changed, she felt there was little point in financial services firms working **collaboratively** with specialist domestic abuse organisations to improve responses and prevent victim-survivors experiencing racist attitudes:



In terms of how people see women, and how we've been seeing Black and brown women, especially with what lens that is viewed, because they could they could work with us day and night [but] if they're still going to look at someone that's disclosing abuse to them, as you know, from a point of view where they're thinking 'what does she want, or is this a lie, is she telling me this because she wants a bank account and she can't get it because she's done some fraud in the past'. So if they are beginning their inquiry from this, then there's no point [in] them working with us or anybody else to make these changes. (NRPF Team Lead, Southall Black Sisters)

Belief and understanding were therefore felt to be vital foundations for financial services firms working with victim-survivors from all backgrounds, but particularly so for migrant and minoritised women. Further research is needed to better understand this.

Other participants shared that they wanted financial services firms to be able to recognise the signs of abuse and be able to act if needed. However, this was dependent on staff having an understanding of abuse in order to respond appropriately:

I want the bankers to know if they see sign of abuse, if a partner is abusing, they need to know the signs as well, what is going on the bank need to ask where is the card, the account, the card holder and the bank holder and try to support in whatever way they can. (Victim-survivor)

You're relying on the individual employee at the bank being informed enough and, I guess, informed in terms of their services, but also informed around the dynamics of domestic abuse and recognising it's happening, and... [the] various different ways that domestic abuse can present, which I think still isn't, unfortunately, understood enough. (Safe and Together Project Manager, Respect)

Building on this, one victim-survivor felt that following her disclosure, she should have been asked if she needed further support. However, she did not feel staff had the necessary understanding to do this:

People don't have the training in identifying and spotting these things I guess...when I had made the bank aware of what happened... no-one ever did ask, is there anything, any other support I needed? You know, maybe I would have said, yes, maybe, I don't know. At the time but the option wasn't there. (Victim-survivor)

She shared that the response she received from her bank and a car finance company made it feel like 'it was literally all my fault' and that she was being 'told off'. Many domestic abuse professionals and victim-survivors interviewed therefore felt financial services firms needed to be aware of the impact of trauma on victim-survivors and how this might affect their behaviour. This would support them to respond appropriately to avoid causing further harm:

I think, general knowledge of what abuse is and how that may impact the person or what are the long-term consequences of this person being subjected to this abuse. (NRPF Team Lead, Southall Black Sisters)

If they know that this person has gone through domestic abuse, they should also know that this person is going not going to be normal for some time until he or she gets herself back. (Victim-survivor)

Domestic abuse professionals reflected the value in financial service sector staff being trained around 'mutual allegations' of abuse and how perpetrators can present to services as victims. A victim-survivor described this as financial institutions needing to be 'on high alert' for how perpetrators might present.

In addition, one victim-survivor reflected that while some staff she had spoken to 'absolutely get what's going on', she felt that more broadly, there was a lack of recognition that that these behaviours could constitute a criminal offence under the controlling or coercive behaviour. In SEA's monitoring of this offence, Sharp-Jeffs et al. highlight the role that financial services firms can play in evidencing economic abuse,<sup>97</sup> recommending that guidance is needed to support them in doing so for criminal cases. This recommendation is recognised and reiterated by UK Finance in its report 'From Control to Financial Freedom', which also calls on the government to work with financial services firms to explore how they can support criminal prosecutions of coercive or controlling behaviour.<sup>98</sup>

Some victims-survivors also felt that their experiences with financial services firms' staff were shaped by societal norms around women and money. For example, some shared that responses from staff had made them feel like they were acting emotionally or overstating the risk they were at.

One victim-survivor shared that she felt the bank manager she spoke to thought she was being dishonest:

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**One bank manager said to me 'just be real, he just got in there before you did' and I'm thinking no, not everybody is dishonest, I thought, if that's the concept of women [they hold], that was another thing that really shocked me. (Victim-survivor)**

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As is reflected in the quote above, participants expressed their concerns that staff might hold the idea that women were 'money-grabbing' and were attempting to 'poison' a financial services firm's view of a male partner. This sentiment that survivors were being treated differently because they were women is something that needs further research and understanding. We would encourage financial services firms to ensure that work is undertaken to challenge stereotypical ideas and attitudes around gender norms. This could be done through training and long-term work with their staff and designing out any gender bias that may exist within their systems. This could help to address attitudes that can negatively impact women customers, including victim-survivors.

## Responses from financial services firms

How a financial service firm responds to a victim-survivor and supports them can have a significant impact. Several participants in the current research shared they felt they had received a supportive and helpful response. This section will explore whether and how financial services firms supported a victim-survivor's **intersecting needs**, such as those linked to sex, gender identity, immigration status, language barriers, class, disabilities or health conditions, or sexuality. As outlined below, there were some examples of financial services firms doing this, including staff supporting victim-survivors to use online banking in branches, victim-survivors being supported by a member of staff from the same background who understood their needs, and victim-survivors being supported to withdraw cash when the perpetrator had taken their bank card. It will also explore whether financial services firms considered victim-survivors' physical and economic safety in their responses. We know that economic safety and physical safety are linked — the Products and Services section of this report, above, set out how victim-survivors felt some firms' responses put them at risk of additional harm. This is key, as the Consumer Duty's cross-cutting rules state that financial services firms must **avoid causing foreseeable harm** to customers.

### Supportive responses

As outlined previously, firms have implemented several options to support survivors with opening new bank accounts. These include **considering non-mainstream documentation**, non-geographic sort codes, and offering 'basic' accounts for customers fleeing abuse.

We heard from a small number of victim-survivors that their bank accepted an **alternative address** for them, as outlined in the Financial Abuse Code, such as a refuge or a letter from a support worker. Similarly, some women were advised and supported by bank staff to change the address or other details associated with their account. One woman was supported to **access existing accounts, funds and services**, with support to regain access to an account after she was forced to give access to the perpetrator.

One woman described the care the staff member took and the concern they had shown her, and how the staff member supported and reassured her through the process. This was particularly helpful for the victim-survivor, who struggled with concentrating due to the stress caused by the abuser's actions:

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She [staff member] was concerned, she made sure I changed my address...She made sure she was on the phone with me, she was helping me go through the process. And she called me afterwards like 'oh, it's been changed, it's safe now'...She was really, really, really helpful, to be honest. She was very patient with me...she took me through the process of changing my address, doing everything. It wasn't hard. But because I wasn't concentrating, I wasn't focused. It became like, I'm stressing myself but she was able to talk me through the process. (Victim-survivor)

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Some banks have shared publicly the work they are doing to help secure victim-survivors' accounts. This includes firms such as HSBC, Lloyds Banking Group and Nationwide helping to reset PINs; firms like NatWest supporting survivors to reset login details; and firms including HSBC and Nationwide supporting survivors to change their correspondence address.<sup>99</sup> These are examples of victim-survivors being **enabled and supported to pursue their financial objectives**. They are crucial to ensure survivors are physically and economically safe, reducing the risk of further harm.

Some other victim-survivors described staff members guiding and supporting them through processes, such as depositing cash, opening a new account or cancelling payments. This is particularly important for migrant women in the UK who are unfamiliar with banking systems, highlighting a response which was understanding of a victim-survivor's **intersectional** needs:

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They guide for me all the things, how can I use the online banking? I didn't know before, how can I use the online banking because it's different in our countries. The system is different from the country so it's my first time to use this kind of system so they will guide for me and they will understand for me what I need and what I know about the bank system, what they allow for me and what they didn't allow for me. They all explained for me about these things. (Victim-survivor)

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They were therefore supported to **regain control and minimise distress** and to **access financial services in their own name**. This level of support may also be beneficial for other victim-survivors who have been prevented from accessing banking systems by a perpetrator and are therefore unfamiliar with how they operate.

Victim-survivors further shared examples of times when financial services firms supported them to keep safe and helped **avoid causing foreseeable harm**. This included one victim-survivor who was advised by a staff member to open a new account so that the perpetrator could not access her new address through their joint account. In this case, however, the victim-survivor reflected that this meant she could not apply for an overdraft on her account, so there was a direct impact upon her access to economic resources which was crucial to her safety. This staff member also supported the victim-survivor through the process of changing her address and phoned her again to confirm this had been done. This is an example of a **safety-focused** response. The victim-survivor described the staff member as being 'very patient' and 'really, really, really helpful' at a time when she was stressed and struggling. As shared earlier, victim-survivors also reported instances when staff had supported them to feel safe, for example by giving them their contact details to ensure they did not need to speak to someone else or by taking them into a private room to speak.



Another survivor shared that she was supported by a staff member to access a credit card with a low interest rate. This was after she had been refused a credit card by other firms or had been offered a credit card with 'ridiculous fees'. She had needed the card for an emergency, and the staff member had been understanding and supported her to access a deal that was not available online:

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I'd spoken to them on the phone and explained the situation of you know, I don't want to be left in debt and I can't afford this and they found a plan that was like really low interest. And it's like you get like two years interest free. They said that put me on this so if there was an emergency. And I think I needed it for like my car or something to get repaired on so I explained the situation and because this deal wasn't even available online. So they was like I explained the situation... this person was really nice on the phone. And they said 'like okay, we can do this for you'... I felt I felt like they had a good understanding of my situation and didn't want to leave me in a situation that would be worse. (Victim-survivor)

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This colleague supported the victim-survivor to **pursue her financial objectives** and avoided **causing foreseeable harm** through a high interest rate.

Another victim-survivor said that her bank had promptly shared the bank statements she requested when she disclosed that they were part of a court case. Similarly, another woman shared that her bank refunded fraudulent transactions that the perpetrator had made using her bank details post-separation. However, the refund was only given after she reported multiple incidents.

Firms also supported two women to **minimise the need to repeat a story**. This included one member of staff giving the victim-survivor her direct contact information so she could go straight to them in the future if needed:

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[The staff member] went, 'Okay, here's my card. You need to come to me every time' and then they took me into this room and they said 'you don't need to go to anybody else. I don't want you repeating your story. You need to come to me.' They were really good. (Victim-survivor)

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One woman found this particularly helpful, as the staff member was from the same background as her (the below quote is from the victim-survivor, told to the interviewer via her interpreter):

She went to a bank to change address again. Luckily she said the person that she was dealing with was [from South Asian country] as well. And finding out that she was in a refuge she opened up the doors for her, [the staff member] gave her own personal number, offered her to help her if she needs help with anything in the future. (Victim-survivor)

Another woman shared that whilst on the phone to her bank, the staff member asked if they could record some details of the abuse on her account record (**acknowledgement and recording of relevant information**). However, she did not feel that staff had access to this when she later contacted the bank again. This echoes the issues raised earlier around ensuring that staff can access relevant information about customers, though this must be securely and sensitively held on systems.

Another woman was supported to **access financial services in her own name** in her local branch. She firstly shared how she had found it helpful that her branch had Wi-Fi and computers available for customer use, as she did not have a computer or internet access at home. She also found that staff were available to help, including assisting her to open her own account:



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Because I don't have internet or laptop or computer in the house, in the branch they have a separate room with screens, with laptops, even with persons who are expert in digital skills. They help you to, even I just giving the information and the guy was putting all in, and they are nice. They are very helpful. Even they are they are helping with internet and all things, even when you enter the branch there is a Wi-Fi you have to click in and you got connected. You [don't] have to spend your own mobile data, because when I enter I said 'I don't have mobile internet or any device at home how I can open my account?' They can 'No, there is no point of getting worried, just come in and there is a person'. (Victim-survivor)

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This **enabled her to pursue her financial objectives**. In addition, she also felt the staff she encountered were understanding of the abuse she had been subjected to. They also took her safety into consideration by talking to her in a separate room.

One woman in our research contacted her bank's specialist domestic abuse team via their text service to say she was in a refuge and needed to change her address. She described their support as 'the most important and the most positive help she received'. Significantly, she said that she did not have to share her experiences, she was 'just heard'. Barclays, Lloyds Banking Group, Nationwide, NatWest and Starling have all shared that they have specialist teams or team members who specifically respond to customers who have experienced domestic, including economic, abuse.<sup>100 101 102</sup> Starling's support team has even been known to reach out to customers who disclose a vulnerability or have a notice of correction on their credit file.<sup>103</sup> Similarly, some organisations may locate their support for victim-survivors within a broader vulnerability team. One report noted that AIB, Danske Bank, First Direct, Hampshire Trust Bank, JN Bank, Marks and Spencer, MBNA, Metro Bank, Santander and Virgin Money have 'general customer support'.<sup>104</sup>

We also heard from a domestic abuse professional that a victim-survivor was supported by her local branch to continue to be able to access her money when the perpetrator took her bank card. This woman was facing multiple disadvantages and had additional intersecting needs due to substance use. The perpetrator would take her bank card when her benefits were paid into her account. Her local branch had recognised this and were flexible in how they allowed her to withdraw money. This response was **safety-focused** and supported her to **access her existing funds and accounts**. However, the professional suggested that many other banks would not give this response to victim-survivors. Similarly, one woman told us that at her request, local branch staff were able to block transactions from certain areas. They also told her that she could not complete certain transactions if she came into branch with the perpetrator, and that they would blame this on computer error or systems. This response supported her to resist the abuser's control and limited his abuse:

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I even went into my bank when I was on my own. I said 'if I come in here and ask for a joint account, you have to say because of the account that I'm on, I can't do it'. And they were very good with me....I used to look at them and they just understood. Sometimes they even refuse my transaction because they'd say all the computers are down and winked at me as I'm walking out and I'd be so relieved. Or they'd block my cards, 'oh no, there's some suspicious activity'. (Victim-survivor)

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This is a particularly powerful example because the firm did not reveal to the perpetrator that the victim-survivor had disclosed the abuse. The response therefore prevented further abuse from occurring. These examples show financial services firms acting to **avoid causing foreseeable harm** and empowering survivors to **regain control** of their accounts. Sharp-Jeff's research similarly found examples of victim-survivors sharing that their bank had blocked a website the perpetrator was using to make purchases with the victim-survivor's bank card.<sup>105</sup>

A small number of women who participated in the research shared that their bank had provided information on **external support**. Branch staff gave one woman information about Citizens Advice, whilst another staff member shared a refuge phone number.

It is vital that all victim-survivors receive a **supportive response** from their financial services firm. Significantly, some women we spoke to shared that they felt staff in financial services firms met their disclosures with belief, sympathy and understanding:

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**They just show empathy and like they were happy that I'm safe now and then not with the same person. (Victim-survivor)**

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**They knew about my violence at that time. So because of this, they treat me well...they are understanding. (Victim-survivor)**

These examples show financial services firms treating victim-survivors' situations on a **case-by-case basis**. Work by Plenitude Consulting highlighted that many firms<sup>106</sup> direct customers to additional sources of information, though it is not known if these are always specialist services.<sup>107</sup> One common source of information on further support is the UK Finance leaflet 'It's Your Money', developed in partnership with SEA. All firms who have signed the 2021 Financial Abuse Code have committed to making this available to customers. Some firms' websites also signpost to SEA's resources, whilst Lloyds Banking Group's ATM receipts include information on specialist support for victim-survivors. Other firms, such as Barclays, include details about how to access support on their ATM screens.<sup>108</sup>

The examples shared in this section of the report demonstrate a survivor-led approach, resulting in responses that are flexible, rooted in safety and belief, treat the survivor with dignity and respect, and enable them to regain control of their economic resources. It is, however, important to acknowledge that whilst financial services firms play a vital role in responding to victim-survivors, they are not and should not be expected to be specialists in domestic abuse.

In particular, expertise cannot be expected when it comes to identifying risk and safety planning. It is important that firms can identify the signs of abuse and respond appropriately, providing support and signposting, but firms should recognise where their expertise ends and should continue to work collaboratively with organisations that are specialists to provide a safety-focused response to survivors.

At the same time, domestic abuse professionals who took part in this research felt it important that financial services firms understand risk within the context of abuse. This is also key when it comes to responding to perpetrators. In some cases, a response to a perpetrator (such as making them responsible for a coerced debt) could put the victim-survivor at risk — the abuser may link the victim-survivor to the action and view this as a challenge to their control. Therefore, we encourage financial services firms to work in **collaboration** with specialist domestic abuse organisations to understand risk, but also to understand the boundaries and limits of their role. They must also be survivor-centred, trauma-informed, and guided by victim-survivors around what is safe for them.<sup>109</sup>

## Unsupportive responses

Whilst there are examples of firms supporting victim-survivors, victim-survivors who participated in this research did not consistently receive such support. Victim-survivors gave several examples where a firm's response was detrimental to them, and the firm did not consider their individual needs and **provide appropriate exception processes**. This was also heavily reflected in feedback from the domestic abuse professionals participating in the research, whose examples are explored later in this section.

Examples of unsupportive responses included allowing a perpetrator to speak on behalf of a victim-survivor when they did not speak English (see section on interpreters above) and not questioning transactions when perpetrators were transferring money from the victim-survivor's account into their own.

Victim-survivors also shared examples of firms' actions facilitating post-separation abuse, such as firms refusing to close a joint account without both parties' consent — an issue mentioned by multiple victim-survivors and domestic abuse professionals. In addition, opening a new bank account in their own name proved difficult for migrant victim-survivors, including those being supported by domestic abuse professionals. Some felt that financial services firms could do more to explain processes and systems clearly for those unfamiliar with these, such as migrant women. This may also be the case for women (including older women) who have experienced economic restriction. If perpetrators have prevented them from accessing financial services, they may be similarly unfamiliar with systems. For migrant women, this unfamiliarity would add to the barriers they face. Victim-survivors may find it difficult to know what exceptions financial services firms may be able to offer them, such as the ways in which they may be able to act outside of standard policy or practice. This is particularly true for those unfamiliar with UK systems and means victim-survivors may feel unable or not know what they can ask for and when they can challenge. It is important, therefore, that firms proactively share that they can make exceptions and give examples of the support they can provide, so that all victim-survivors can access this. Again, this demonstrates how important it is that financial services firms are transparent about the support they can provide to victim-survivors.

Victim-survivors also described times when financial services firms were unsupportive around coerced debt and fraudulent transactions. For example, one victim-survivor described how the perpetrator had run up nearly £40,000 in debt in her name, saying he would pay it back, but had stopped making any payments after the first monthly sum. She told the creditors what had happened, and they conducted a fraud investigation rather than identifying this as a potential coerced debt. Another woman described that it took multiple fraudulent transactions by the perpetrator post-separation before she received a refund from her bank. Victim-survivors shared that small actions such as pauses, or interest being frozen on debts, would have been helpful. Similarly, a domestic abuse professional shared that huge debts had been written off for businesses, so 'why wouldn't you do that for [a victim-survivor]?' Victim-survivors are prevented from accessing economic safety, security and independence through having to pay for debts accrued because of the abuse they experienced.

Regarding **communications** from financial institutions, one victim-survivor said she always asked for these to be via letter, as this allowed her more time to respond. However, she said that '[firms] always...want an explanation' for this, and it was becoming more difficult to request. The Consumer Duty sets out that firms should consider customers' interests in the way they present information and take particular care when communicating with customers in vulnerable circumstances.<sup>110</sup> A victim-survivor requesting information in writing, therefore, is a reasonable adjustment firms could make to support her.

Domestic abuse professionals also raised how financial services firms need to consider intersectional needs within their responses and the support they provide to victim-survivors. A service working with LGBT+ victim-survivors described their advocates as educators for other services and agencies — they explained the harm that LGBT+ people may be at risk of, including being outed:

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**All of our advocates are also educators in their own right. So sometimes what they're doing is not just coming in to start with advocating for need, but also explaining and educating any professional involved. They are also often helping professionals to understand how they can actually create risk by not being both LGBT+ inclusive and trauma informed. For example, ensuring they understand the potential to increase risk if they were to 'out someone' and how that could impact their life. (Training and Commercial Manager, Galop)**

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This also involved concerns that abuse may not be identified for LGBT+ clients and that this would impact the support a financial service would offer and provide. Additionally, domestic abuse professionals said that it needs to be 'incredibly clear' all the time (i.e. not just around Pride Month) that financial services firms are supportive and open to disclosures from LGBT+ people.

A domestic abuse professional who worked with minoritised and migrant women shared that she had repeatedly been mistaken for the client, and that the way staff spoke to her could be 'condescending'. This reflects the way women of ethnically minoritised groups may be spoken to by staff:

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If I'm advocating on behalf of a client, it's often they talk to me initially thinking I am the client. So I will see the way of speaking, it's not, I don't know if that's the way they will speak to all of their customers, but I know that there's a lot of just this really condescending, really, you know, talking down kind of behaviour, and that's not just with clients, but I think that's a lot of SBS staff. There have been times where we've gone to banks... and this has been one of the recurring thing[s]. (NRPF Team Lead, Southall Black Sisters)

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She then reflected that in her view, this was regardless of the person's country on their passport or their immigration status, but was down to if 'you look a certain way, you are put in a bracket'. This highlights the racism victim-survivors may experience from institutions and society more broadly and is supported by research conducted by Fair4All Finance. This research found that that one in five people from ethnically minoritised groups had experienced discrimination due to their race when dealing with financial services firms.<sup>111</sup>

In addition, working with and listening to support services that the victim-survivor may already be engaged with was felt to be key, including when it came to understanding risk and safety:

**Just listen to the support services or the support workers that the service user already has. Because that itself is 80% of the work done for you, more than 80% really. (NRPF Team Lead, Southall Black Sisters)**

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**The kind of response you get [from banks] is 'that's not our bag, we'll do the banking side, and I'm sure someone will deal with the safety'. It's not joined up working, even if there is an IDVA service, I've never experienced a bank saying 'let's talk. This is what we're doing and what are you doing and how can we make it work or ensure that we've got the client's safety in mind, or ask what could put the client at risk or in difficulty?'...It's almost 'safety isn't what we deal with [in] banking.' (The Sharan Project)**

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To be **collaborative**, financial services firms should be working alongside domestic abuse organisations to respond to customers facing domestic, including economic, abuse. This will ensure that their safety is prioritised. As frontline services have a strong understanding of the intersecting needs of each victim-survivor (for example, being a migrant woman), they are best placed to provide this support. By developing responses with specialist organisations, financial services firms can better consider victim-survivors' intersectional needs and ensure that victim-survivors are not inadvertently harmed through the support they provide.

### **Missed opportunities by financial services firms to spot economic abuse**

This research highlights multiple occasions where financial services firms missed opportunities to recognise that abuse was happening and provide a **safety-focused response**. Some of these examples were flagged by victim-survivors themselves.-

Previous research undertaken by CWASU found that identifying economic abuse was a 'central challenge' for financial services firms. Participants shared that they focused on conversational triggers (such as a customer struggling to answer their own security questions) or transactional triggers (such as a wage being paid into their own account but being transferred to another shortly after).<sup>112</sup> More recently, UK Finance's report highlights the potential of data and artificial intelligence (AI) as part of prevention work. Such tools could potentially be used to support firms to recognise the signs of economic abuse and controlling or coercive behaviour, and help use this learning to inform product and service design.<sup>113</sup>



However, participants in CWASU's research noted that these possible signs could vary significantly as each victim-survivor's circumstances could differ so much.<sup>114</sup> This could mean it's difficult for financial services firms to have a set policy for identifying economic abuse.

This research also highlights examples of missed opportunities to spot abuse, such as perpetrators withdrawing money from joint accounts they had never paid into. Similarly, a victim-survivor who experienced abuse from her parents shared that as a young adult, she had been taken into a branch to change her PIN and deposit cash into her account. Her mother then took the card. She had hoped someone would notice, but felt the pandemic impacted staff's ability to recognise this:

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**We had to go into the bank in person to deposit cash. And yeah, she had to go into the bank to change my PIN number. I don't remember exactly how we changed my PIN number, but I do remember it was kind of stressful and it was during Covid, but I do remember her kind of giving me 2000 pounds and being like 'now put this on your account and give me your card' and I was just like 'oh my God'. So this was at the bank, and I think, I don't know, I guess I was hoping people would notice what was going on but then again, it was like peak Covid. So I don't think, everyone was just avoiding everyone and, you know, not everyone can spot abuse...I don't think they realise[d] what was going on. (Victim-survivor)**

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Another victim-survivor shared that no-one at her bank questioned the abuser making withdrawals at counters in branches from her sole account. Neither did anyone question why her name was not on the mortgage when the deposit was mostly her money. Damaged bank cards may also present an opportunity for staff to question how this happened (e.g. had the perpetrator deliberately caused the damage). Firms could have also verified a victim-survivor's identity in branch after an account was opened online by taking them into a separate room alone, away from the perpetrator. Victim-survivors also shared that there were no checks when perpetrators took out credit in their names.

Changes in a victim-survivor's financial behaviour were also felt to be a missed opportunity to spot abuse. Our briefing on the Consumer Duty raised the potential for technological advances to monitor this.<sup>115</sup> Technology could detect changes in the amount of money being deposited or withdrawn from an account, or loans or finance being taken out in someone else's name. For example, the perpetrator had opened a current account for one woman from outside of the UK. When opening the account, he had told the bank he would transfer her a certain amount of money every month. However, it was not questioned when he used her account for money laundering, transferring ten times as much each month as he told the bank he would. Victim-survivors shared that they would have appreciated a staff member at a bank (safely) checking in with them or questioning why their account or money was being used in this way.

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**I think the biggest thing is, if someone's like financial behaviour starts to change. You try to kind of check in with them in a way that's friendly, that [won't] seem suspicious to the abusers because they're suspicious of everything. (Victim-survivor)**

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**If the bankers who did [see a] sign there's abuse in the family, they could send a text message secretly before they transfer the money or they could support me in a way if they notice that my money has been missing, they will call me... the security can catch them in the act before it goes any further. (Victim-survivor)**

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**For those questions to be asked at the cashier. 'Are you happy with this' and then sort of say 'Oh, well, because it's your account, we just need to ask you some security questions. Can you come into another room?', and then give her that space to be able to say something, and then have a plan for her so if she does make any disclosure, you know, there's a safe exit for her.' (Victim-survivor)**

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In line with their obligations to detect fraud and money laundering, firms will already have systems in place. There is the potential for these systems to also be used to detect economic abuse when a customer's account behaviour is unusual. This could support firms in achieving the cross-cutting rule of **avoiding causing foreseeable harm** within the Consumer Duty and taking steps to prevent economic abuse.

Conversely, one victim-survivor said she had been subjected to a fraud check for transferring money to her adult child's account. She described this as 'aggressive', 'extremely threatening', and as triggering her PTSD (which the bank was aware of, along with the abuse). Banks are required to take these measures if they have concerns around a customer's account usage. However, the customer's health needs and status as a victim-survivor need to be when communicating with her about this.

One woman we spoke to had debt run up in her name by the perpetrator and felt that 'opportunities [to recognise the abuse] were missed multiple times' by financial services firms. When she disclosed the abuse to them, she said they did not provide any support, even though her account history showed that this was abnormal behaviour:

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**I've been with [bank] since I was 18 and never had any financial difficulty...So it was in a space of three or four years, lots of things were coming out of my account because of him. It was an abnormal pattern of behaviour... all these payments of direct debits and mobile phone contracts and for car contracts. So it would have been nice if they'd have been willing to look into it a little bit more for me and help me. (Victim-survivor)**

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Similarly, one victim-survivor shared that her bank missed an opportunity to reach out and offer support when she asked them for copies of her bank statements:

**They just put the statements in an envelope. Now what I think what would have been really nice and it would have taken someone about five minutes to do would be to put a little email in it or letter in it saying 'I know you've just disclosed economic abuse to us, are you okay? These numbers might be helpful', you know, that type of thing. I think it's a missed opportunity. (Victim-survivor)**

She described these, and other opportunities like pop-ups on banks' websites, as 'brief interventions' where financial services firms could communicate the support available. In Sharp-Jeffs' research, victim-survivors shared that branches had printed bank statements and suggested they could be used as evidence in a criminal prosecution.<sup>116</sup> The Consumer Duty outlines that firms should take care with their communications, taking into account what they know (or could reasonably be expected to know) about the 'sophistication, financial capabilities and vulnerability' of the recipients.<sup>117</sup>

The examples above highlight opportunities for firms to tailor their communications with victim-survivors in a way that is survivor-centred and highlights the support available. This could be lifesaving.

As summarised by the victim-survivors below, financial services firms can hold a lot of power in supporting women to disclose economic abuse. As we know from other domestic abuse research,<sup>118</sup> this can support a victim-survivor to disclose when they otherwise would not:

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**If they'd asked, I would have probably said something. (Victim-survivor)**

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Even if they were not able to take it up at that point in time, victim-survivors also felt that this could demonstrate that help and support were available. This may directly counter what a perpetrator has told them, therefore firms should not underestimate the strength of small interventions that could offer a lifeline to victim-survivors.

## Financial services firms' consideration of physical and economic safety

In addition to the responses outlined above, there were times when victim-survivors shared that they felt that financial services firms did not consider their physical and economic safety. This section will focus on safety in more detail.

One victim-survivor described the difficulty she faced in closing a joint account. After separation, she had frozen the account but was unable to close it without the perpetrator's signature. They went through divorce proceedings, the joint account remained frozen, and the victim-survivor eventually moved out of the area. It was only some years later that she tried to close the joint account, as she was worried that the perpetrator would be able to obtain her new address via bank statements. She had told the bank that she was a victim of abuse from the other account holder and asked what they would do if he asked for her new address. They told her that they would give it to him:

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**I said what would you do if he turned up and said 'I want statements from the joint account'. They said they'd give it to him and I said 'this has got my address on it my new address and I'm a victim of abuse and he can't have my address'. They said, 'oh well, there's nothing they can do about it. If he walks in, we can't stop him from taking your address', they even told me that he may already have my address. He may have gone into a different branch and asked for a copy of the statement. And that really scared me. (Victim-survivor)**

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She feared for her life if the perpetrator found out where she was living. She felt that staff did not understand that their actions in sharing her address with him could lead to serious harm. This limited awareness and understanding demonstrates a severe safety risk and must be addressed through additional support and training for colleagues handling disclosures.

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**I was so scared he was going to turn up on my doorstep after all these years...it was for my own safety I didn't want him to know where I am, because we still had a child that he didn't want to see. You know, you're just scared, aren't you, that he might turn up, he might want to hurt [the child]. He might want to hurt me, might want to hurt my other children, damage my property I don't know. The banks just didn't deal with it, they just didn't want to know... I think at the time, the frustration was that they don't understand how dangerous it is. I mean, he may do nothing, but then he may do the ultimate thing and just end me. (Victim-survivor)**

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Another victim-survivor also spoke of the lack of understanding bank staff showed around protecting her new address. She was living in a safe house through police protection at the time and shared that her bank had sent the perpetrator a letter saying a joint account had been closed, with the address of the safe house on it. When she told staff how dangerous this was, they said there was nothing they could do now. Their only suggestion was that she call the police. The police moved her to a new location the same day. Reflecting on this, the victim-survivor felt that banks 'have no comprehension of the level of fear and the consequences' for these situations. She also reflected that it makes her interactions with banks more anxious, which in turn makes 'you harder to deal with' from the financial services firms' perspective. She also felt that they interpreted this as her having 'something to hide'.

One victim-survivor shared her recent struggles to change her address with her mortgage provider. After being told by staff this was not possible in branch due to the age of the account – which also prevented them from sharing the statements the victim-survivor needed – the victim-survivor then phoned the provider, only to speak to a member of staff in a different branch. That staff member said it could not be completed over the phone, as they needed to check her ID before doing so. Doing this via an online call or by email or post was rejected, even after she disclosed experiencing abuse and that this was why she needed to access the statements. This victim-survivor had also received mixed responses from banks around changing her name. One bank had accepted the deed poll, but another had told her they needed an enrolled deed poll – which requires the name change to be shared publicly. This is not **safety-focused** and does not recognise the risk a victim-survivor would face by doing this. It also demonstrates the lack of consistency between firms and the harm this can cause to victim-survivors.

On several occasions, participants identified that a response from a financial services firm was a barrier to them being physically safe. Examples included:

- allowing abusers or family members to act as interpreters, or to speak or act on behalf of victim-survivors
- sharing a new address with the perpetrator
- not considering the victim-survivor's physical safety in branch
- recommending a victim-survivor and perpetrator use a mediator
- Domestic abuse professionals also expressed concerns about:
  - how victim-survivors with mental health issues may be treated and the long-term impact of this (for example, ongoing treatment by professionals when they are no longer in crisis)
  - the ability of staff in financial services to recognise and respond to abuse in same-sex relationships, or abusers other than partners (such as family members)

Physical and economic safety are closely linked to economic justice, where victim-survivors are not held accountable for the perpetrator's economic abuse i.e. by not being liable for paying off debt the abuser took out in their name.<sup>119</sup> In addition to the points above, participants shared several responses that also limited their economic safety and/or their access to economic justice. These included:

- financial services firms' policies not recognising fraud if it involved an address the victim-survivor had previously lived at
- not providing an interpreter to enable the victim-survivor to speak directly to a service or to maximise the information a victim-survivor may be able to share
- not providing information or communications in a range of languages or formats
- not logging information about a victim-survivor's accessibility needs on systems or making reasonable adjustments
- incidents where victim-survivors felt they received poor treatment because of their identity or felt subject to racism (such as advocates reporting minoritised women were viewed with suspicion, or talking to minoritised women condescendingly)
- a limited understanding of religion, such as offering appointments on days that are religious holidays
- charging to provide bank statements requested for legal proceedings
- limited support around coerced debt (including when one victim-survivor was pregnant/on maternity leave)
- refusing to close joint accounts without both parties' consent, despite this causing foreseeable harm to the victim-survivor
- continuing to charge monthly fees for an account that was frozen for many years
- losing or not sensitively handling a court order
- directing victim-survivors to carry out actions online without consideration of their language needs, safety, affordability, or access
- requiring particular identification documents for opening an account (such as a passport or immigration documents), when the perpetrator may have restricted the victim-survivor's access to these
- accounts not being available for victim-survivors who are in the process of regularising their immigration status



Domestic abuse professionals also expressed concerns that financial services firms would not be understanding about clients' cultural or religious needs or may have expectations or make judgements linked to these. This may include expectations about women's roles in relation to work or access to a bank account.

There are also examples where firms have not considered several principles outlined in the 2021 **Financial Abuse Code**. These include:

- supporting victim-survivors to **regain control and minimise distress**
- situations being treated on a **case-by-case basis**
- **support around debts and arrears**
- These examples also have the potential to cause significant harm by not addressing and adequately responding to the victim-survivors' needs.

One domestic abuse professional also reflected that when financial services firms cannot or do not support a victim-survivor, this reinforces what they have been told by the perpetrator — that they will not be believed and that there is no help available for them:

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**When banks and services aren't able to offer support, it reinforces what the perpetrator says. 'No-one's going to believe you. No-one's going to understand you', especially if English isn't the first language. 'You're not going to be able to get help'. 'I'm going to get away with this' and it reinforces that. I'm not being helped, he's right. So if he's right about this, he's probably right about everything else... So I think by banks making it as difficult as they are, the long term impact is huge. Because if you reinforce one message, it makes the victim essentially think 'well, he or she was right about this'. (The Sharan Project)**

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This demonstrates the psychological impact that firms' responses can have on victim-survivors when their vulnerability is heightened, or they are in crisis.

Many firms have taken positive steps to support victim-survivors. However, Black and minoritised victim-survivors are more likely to be impacted by a lack of consistency in a financial service's response due to existing barriers and inequalities. Firms also need to ensure that the work being done at a strategic level to support victim-survivors reaches colleagues on the frontline who are handling disclosures. For example, by building the skills and capabilities of frontline colleagues to recognise economic abuse and respond to customers experiencing it, particularly those from minoritised backgrounds, and ensuring all customers can access support in a language and format that is accessible to them. As this research highlights, the impact on the victim-survivor of getting it wrong or missing the signs can be substantial. However, there is also the risk of vicarious trauma on colleagues when they are not fully supported to respond. This is explored in more detail in the 'other findings' section below.

## Signposting to internal and external support

Signposting to additional support is a key part of the role financial services firms can play in supporting victim-survivors. This might include internal signposting to a specialist domestic or financial abuse team, or to a vulnerability team. Externally, as highlighted in the 2021 **Financial Abuse Code**, it might include specialist organisations such as a frontline domestic abuse charity or a debt and money advice organisation.

### Signposting to internal support

Only one of the victim-survivors we interviewed had spoken to a specialist team within her bank. This was after requesting to change her address as she was living in a refuge. She was then contacted by the bank's domestic abuse team (an example of a financial service being **coordinated** internally). Similarly, a domestic abuse professional shared that a client who was being supported by their organisation had also been supported by a firm's specialist team. As a result, the victim-survivor had felt 'understood and heard'.

Unfortunately, very few of the victim-survivors we spoke to had been referred to another specialist team within the firm. One victim-survivor felt that the staff she spoke to in branch would not have offered this to her:

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**I feel like the attitudes of the people that I met the people at the front desk, I doubt they would have had the courtesy to do things like that. They just wanted to move people along. (Victim-survivor)**

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One victim-survivor reflected that she was not sure how she would have responded at the time if she had been offered this signposting. However, she felt that following up with information may have been helpful for her:

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**I think that, rather than just saying it on the phone, I think that moment in time when you're asked, you are quite, I was very defensive and I would never really let on to anyone how severe things were, but you know, follow up, maybe an email sent or letter in the post or just a text message, something like that where you can, because a lot of time you're in flight or fight mode. So [you're] kind of like, oh, no, everything's fine and dismiss that...so you know, a follow up call, or maybe just passed on to a different team for wellbeing check team. Like that might have helped. (Victim-survivor)**

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The above quote illustrates how many victim-survivors will assess the risk involved in disclosing abuse by sharing a little about their situation to "test the waters". They may then gauge the reaction and consequences of the person receiving the disclosure, before deciding whether to share more. A positive interaction may lead to a survivor feeling able to share their full story.

Few of the domestic abuse professionals who participated in our workshop had experience with specialist support teams in financial services firms. Some were not aware that such teams even existed, as clients had not been referred to them. One domestic abuse professional commented that not all firms have such teams and that even where they

do exist, frontline call handlers may not be aware of this to refer victim-survivors for more support. In addition, there is limited information shared publicly about these teams, highlighting a need for greater transparency.

As noted, staff in frontline domestic abuse services felt that there was a lack of consistency in signposting victim-survivors to internal support. They also raised the issue that some banks do not publicise that they have specialist support available for victim-survivors. We know from our work with financial service firms that some have specialist teams in place around domestic, including economic, abuse, but that victim-survivors cannot always access these without support. This demonstrates the importance of sharing what support is available for victim-survivors. The Consumer Duty outlines that firms' communications can help **enable and support customers to pursue their financial objectives**. This could be seen to include delivering specialist support for customers who need it, which is recognised by the FCA as good practice. Where firms do not do this, they may struggle to deliver good outcomes for victim-survivors who require a tailored and safety-focused response.

### **Signposting to external support**

Some victim-survivors had been provided with signposting to external support. One victim-survivor said that bank staff had told her about Citizens Advice and 'another financial agency'. By this point, however, she was receiving support from one of the domestic abuse organisations who took part in this research. She did, however, share that it was 'nice to know' they did signpost her. This was the only example in the research of victim-survivors being **advised to seek independent debt advice** by financial institutions.

Another victim-survivor shared that a member of staff at her bank gave her the phone number of a refuge. This was after she requested that transactions by the perpetrator be blocked on her account:

**I actually got given a number written down on a piece of paper and passed to me in my hand...It was a number for refuge, I believe. (Victim-survivor)**

She said that she realised at this moment that the bank staff were seeing it as 'not just...a financial issue'. However, she added that she threw the phone number away as soon she got out of the bank, as she 'couldn't be found with anything on me'. Following separation, she had gone back to the bank to thank the member of staff who gave her the phone number. He told her that he had spotted signs of abuse beyond those related to her bank account:

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**He said that I'd been seen crying outside... and I just didn't look happy. And he said it wasn't because of the money or that he said, you know, or where the card was being spent. He said you just didn't look happy when you was out as a family, you was always anxious. (Victim-survivor)**

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The economic abuse was, she described, 'the cherry on the cake' in terms of what the staff member had recognised.

This victim-survivor's experience highlights that if financial services firms do signpost victim-survivors to domestic abuse services, it is vital that this is done discreetly and safely. In this case, the victim-survivor did appreciate the staff member's support and later thanked him. However, she also described that she could not be 'found' with the number on her, suggesting she may have been at risk if the perpetrator found it and discovered what it was for. Lloyds Banking Group's solution of providing support details on the back of ATM receipts<sup>120</sup> could be a safe way to overcome this safety risk. Firms could proactively encourage survivors to obtain a statement to receive these details if they have concerns linked to domestic and economic abuse. This is particularly helpful as it is an intervention which is not only for victim-survivors, thereby minimising the risk of a perpetrator reacting if they found the receipt. In addition, banks that are part of the Safe Spaces initiative can provide a separate and private space for a victim-survivor to disclose abuse and seek support.<sup>121</sup>

Firms also need to ensure that any signposting is done meaningfully, not as a tick-box exercise. For example, one woman (who had previously been in a refuge) contacted her bank wanting to know if she could extend her overdraft. Though she described the staff as 'well-meaning', she did not find their suggestion to contact Women's Aid helpful. She wanted help from *them*, rather than to be sent elsewhere. Though signposting to external support is important, being signposted away from a financial service when practical support from the bank is needed was not supportive. It is also of note that victim-survivors with NRPF will not be able to access support or benefits from all services. This means that signposting should be tailored to their needs (for example, by sharing specialist services that can support survivors with NRPF).

Domestic abuse professionals said that their experiences of **collaboration** with financial services firms were rare. One professional shared that she had processed 'over 300 referrals over the last year' but was not aware of any signposting to their organisation from a financial service. Others felt that staff were unaware of other forms of support and therefore unable to signpost effectively. This included the local IDVA service and relevant legal organisations, as well as organisations that could provide basic safety advice. Signposting must therefore be planned in **collaboration** with local services to ensure it is safe and considers the capacity and resources of those services, particularly by-and-for organisations. Financial services firms' responses to economic abuse will often be delivered by a central team (such as a specialist domestic abuse team), so consideration needs to be given to how these responses can be implemented locally and in branches.

## **Inconsistency from financial services firms**

Our analyses of the interviews with victim-survivors and the workshop with domestic abuse professionals both showed a lack of consistency and **coordination** within and between firms in their approach to supporting victim-survivors.



In the workshop with domestic abuse professionals, participants reflected that experiences with banks felt reliant on speaking to the 'right person'. This led to responses being described as 'really random', 'potluck' and a 'lottery'. Professionals said that survivors had to be 'lucky enough' to speak to someone who understood. This was felt to create barriers for victim-survivors and more work for advocates, and to be even more difficult when victim-survivors faced intersectional barriers. Previous research highlights the barriers women face when disclosing domestic abuse.<sup>122</sup> For example, a woman who does not speak English faces an additional language barrier in telling people about what is happening to her, while a disabled woman may have access needs that make going into a branch difficult. Similarly, migrant women without leave to remain may face barriers to disclosing to services due to data-sharing between statutory services and Immigration Enforcement.<sup>123</sup> This is in addition to a perpetrator weaponising their immigration status as part of the abuse. Migrant victim-survivors often fear that immigration action will be taken against them if they seek support and that the support they can access will be severely limited due to their no recourse to public funds status. This puts additional barriers in the way of them disclosing the abuse, including to financial services firms.

It is vital that all victim-survivors receive the right support from financial service firms the first time they seek it, as they may not be able to try again. Domestic abuse professionals also expressed that 'ad hoc' support from local branches was dependent on the individual branch and staff within it, rather than being underpinned by systems. This was summarised by one professional who shared that the responses to victim-survivors were 'not consistent and ingrained'. As has been evidenced throughout this report, inappropriate and/or inconsistent responses from financial services firms can inadvertently cause great harm to victim-survivors.

We also heard from both victim-survivors and domestic abuse professionals that they were unable to access the support outlined in the 2021 **Financial Abuse Code**, including separating joint accounts or opening a bank account using non-mainstream identity documents — despite the firms being signatories to the Code. Others shared that the responses they received from firms did not show an understanding of domestic, including economic, abuse. One victim-survivor said that she was really disappointed in her bank's response to a complaint she had raised with them. Although this bank had signed the 2021 Financial Abuse Code, she said that in her experience, they 'do not even acknowledge the existence of economic abuse'. She shared that the response she had received from a senior member of staff showed 'how little awareness or training there is on this important issue'.

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**I just wanted you to know how shambolic and wrong it is that banks can sign up to this code, it looks good for them publicly so they do it even though they have no intention of following the code. (Victim-survivor)**

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She felt that the process of signing the 2021 Financial Abuse Code needed more behind it to ensure that firms could not sign up without implementing the principles within the Code in practice.

Whilst signing the Code is voluntary, these experiences demonstrate the need to ensure that the Code is meaningfully implemented by all firms who have signed up to it. This would help ensure that victim-survivors can consistently access the support and responses that it advocates. Despite the **Continuous Improvement** pillar within the Code, the voluntary nature of signing it limits accountability. However, the Consumer Duty has introduced mandatory rules for UK financial services firms dealing with retail customers, which now means that firms must do more to deliver good outcomes and consider the specific needs of vulnerable customers when doing so. The 2021 Financial Abuse Code must therefore be updated in line with the principles of the Consumer Duty.



As reflected by domestic abuse professionals and shown through inconsistency of responses, financial services firms need to ensure that changes they have committed to making are implemented:

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**We know that now we've done this with X, Y, Z banks, we know they put their names down, but they don't implement this, then it will now become crucial. If we want to take it forward... this is what they said they will do, [it] is just accountability moving forward. (Bawso)**

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Similarly, another domestic abuse professional felt that financial services firms' responses must be 'organisational...it has to be really clear' to be more **coordinated, safety-focused**, and consistent across the firm. This research highlights that practices outlined in guidelines like the 2021 **Financial Abuse Code** are not yet being consistently implemented both across and within firms. There were also examples of victim-survivors being unable to access these, such as the separation of joint accounts.

Many of the findings explored in this research link strongly to the Consumer Duty outcome of Consumer Support. This suggests that improvements to the support provided by financial services firms are essential to ensure that victim-survivors receive consistently good outcomes and responses across all four outcomes of the Consumer Duty.

## Other Findings

Within the research, there were some findings that did not fit into the four outcomes of the Consumer Duty, but which were felt to be relevant to the research questions. These are explored here.

### Overlap with other systems

Women spoke about how perpetrators used other systems and agencies as part of their abuse. This included the police and criminal justice system, family court system, immigration, and social services. It also included utility and council tax bills, as well as using a victim-survivor's student loan. Whilst not direct, it is important to recognise how and when financial services firms interact with these other systems and the impact this can have.

For example, Universal Credit requires the recipient to have a bank account for the funds to be paid into; but as explored in this research, migrant victim-survivors can be excluded from having a bank account by a hostile immigration environment. Eligibility for legal aid can also be affected by a joint account balance that victim-survivors don't have control over or access to. It is important for financial services firms to be aware that victim-survivors can be dealing with a wide range of issues and agencies (in addition to their intersecting needs), and that they play a role within this. As highlighted by one domestic abuse professional:

**In terms of economic abuse, it is so difficult to get the police interested in investigating, and it's the type of abuse that is part of controlling coercive behaviour in a way that is preventing many survivors from leaving their perpetrator, including the survivors that work and have a salary. I heard the term middle class gap, because the survivors work, they have a salary but they are not eligible for benefits or Legal Aid. Sometimes they are homeowners, they have a mortgage to pay. So it makes it even more difficult for them to flee, etc. So how can justice, in terms of economic abuse, could be achieved without cooperation from the bank? (IDVA, LAWRS)**

Responses from financial services firms must therefore be **intersectional, coordinated**, and **survivor-centred** throughout the firm. They must also work to create economic safety in a way that reflects victim-survivors' intersecting needs and life experiences, as well as being joined-up with support they may be receiving from any other agencies. These are issues raised within the UK Finance report 'From Control to Financial Freedom'.<sup>124</sup> UK Finance has also identified the need for a cross-government task force to help tackle financial and economic abuse, which SEA is also calling for.<sup>125</sup>

## Support for financial services firms' staff

The 2021 Financial Abuse Code states that firms should provide **practical and emotional support for frontline staff**, as well as **support for employees who are victim-survivors themselves**. Domestic abuse professionals involved in this research echoed this. They said that it is vital for staff in financial services firms to receive support, as hearing details of abuse could be traumatic, and some may be victim-survivors themselves. It was also acknowledged that it could be difficult for staff who might feel that the systems in place did not allow them to appropriately respond to victim-survivors:

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**I also think it is particularly traumatizing and upsetting [for staff] to recognise that something doesn't feel right, and to not have the support and competence to do something about that. I think, because you're working with some of the public, there's also a really awful position that staff who could historically be survivors, or could just be people who care are being put in a position where they're not equipped with the right information...Especially if they feel like they wish they could do something, they wish they knew what to do next, they wish they had said something or made that opportunity to get that person alone, and they haven't been equipped with that. I think that is an awful position to be in as well. (Training and Commercial Manager, Galop)**

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Policies for staff experiencing abuse must ensure that they are intersectional, considering staff members' different needs or experiences to ensure they can access support. This may include, for example, women whose visa is linked to their spouse or LGBT+ staff members. Additionally, staff who are victim-survivors must be treated with the same care and understanding — their knowledge of financial services does not prevent them from experiencing abuse:

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**I've had clients where they worked in banking, and it's happened and having that 'you should have known better because you had all the resources, or you had the opportunity to raise it, and you didn't'. (The Sharan Project)**

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Similarly, financial services firms must consider how they will respond to employees who are perpetrators of domestic, including economic, abuse. This must also be carefully considered to ensure that victim-survivors' safety is central.

## Impacts on victim-survivors

The victim-survivors we spoke to shared a range of impacts of both the abuser's actions and financial services firms' responses. These impacts demonstrate how vital it is that financial services firms recognise and respond appropriately to economic abuse. They also demonstrate the huge difference that financial services firms can make for victim-survivors rebuilding their lives after abuse.

Victim-survivors' economic safety is directly linked to physical safety. Women described not being able to apply for an overdraft on their account due to changing their address after separation. One victim-survivor said that she had been unable to apply for an overdraft for five years since the address change and that 'initially, it was really difficult'.

Similarly, others were unable to access credit following coerced debt, including from their bank. Some described themselves as 'blacklisted'. This could potentially push victim-survivors into high-interest or 'payday' loans, or even illegal lenders, increasing their risk of other forms of harm (spiralling debt, threats of violence) and financial exclusion. Some women had borrowed money from family and friends. Those we spoke to said they would appreciate even a small amount of credit to help them deal with unforeseen expenses. Some victim-survivors also mentioned that this would be helpful to cope with the abuser's failure to pay child maintenance post-separation.

In addition, one woman shared that her adult children struggled to access credit because they lived at the same address as her. Others had been forced to seek debt solutions like Debt Relief Orders or Individual Voluntary Agreements, which affected their ability to access credit or their credit scores, as well as their mental health. One woman felt that the Debt Relief Order, though helpful financially in releasing her from the debt, made her feel 'like a failure' and 'really inadequate as a person'. Debt write-offs may therefore deliver greater economic justice for victim-survivors.<sup>126</sup>

One woman also described being 'bombarded' by debt companies for repayments, despite having disclosed the abuse, and said that this was having an impact on her mental health. This is not in accordance with the **support for victim-survivors with debt and arrears** outlined in the 2021 Financial Abuse Code. Neither is it in accordance with the Money Advice Liaison Group guidelines for firms supporting customers with mental health conditions and debt.<sup>127</sup> It is also an example of financial services firms not tailoring their communications to a customer in vulnerable circumstances.

One victim-survivor had worked multiple jobs to pay off the coerced debt the perpetrator ran up in her name, which took five years. She described her mental health as being 'in a very bad place' during that time. Victim-survivors spoke about the mental health impacts of a financial service not recognising and responding appropriately to economic abuse — one woman shared that this lack of understanding had 'significantly impacted' her mental health.

Financial services firms' responses also had other long-term impacts on victim-survivors. For example, some described avoiding finance or credit cards. Others described finding banks 'incredibly stressful', creating a lot of anxiety, including if they had shared their experiences with multiple staff members. One victim-survivor shared that her behaviour could appear 'erratic' to financial systems, as she may move money from one account to another if she became anxious.



One woman said that before she came to the UK, she was financially independent. She felt that she had 'unlearned everything' during the relationship with the abuser, now finding it difficult to deal with banks. Similarly, another woman felt she became 'financially really insecure', with the abuser's behaviour and then the reactions of staff undermined her confidence:

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**I just became financially really insecure. I think that was probably it, you stop believing yourself, you stop thinking that you can make financial decisions, because you've been brainwashed into thinking you can't. And then because of the reaction of professionals, you get really scared of making really bad decision because you stop trusting yourself financially. (Victim-survivor)**

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Financial services firms therefore must be aware of the impact that their response may have on victim-survivors. The response may be seen as an extension of the abuse they've experienced.

It is important that firms are also aware of how trauma can affect victim-survivors and their behaviour. Responses that are not **survivor-centred, safety-focused, coordinated, collaborative, and intersectional** can put victim-survivors at further risk of harm and impact their ability to rebuild post-separation. This can have a negative effect on their mental health.

With the right responses, financial services firms can, as we have seen, make a significant difference to victim-survivors. We encourage firms to continue to build upon these.

## Participants' Recommendations for Change

Throughout the research, participants discussed several recommendations for change they felt would improve financial services firms' responses to economic abuse. These are presented below and inform the recommendations in our report.

### In branches

Members of SEA's Expert by Experience Group suggested having a specialist colleague in domestic, including economic, abuse within branches. This colleague could provide trauma-informed and **safety-focused** support akin to an IDVA, but a specialist in economic abuse:

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I would actually quite like to see like within every branch somebody who has like a specialty of women that have been abused, and then you see them and it's not just financial support that they give you, but [they] understand what it is that you're going through, that you're still in fear... And for somebody to really take you along with sometimes small steps, because they would be the expert at some point, how to maybe do that in a financial sense, because we don't. And, you know, we know what [the abuser's] reaction would be, what we don't know [is] the ins and outs of financial...[so to] stay safe to change our financial situations without triggering him. And so I think if there could be, you know, like an IDVA, but [a] financial IDVA. (Victim-survivor)

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This call was echoed by domestic abuse professionals:

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Definitely if a client knew that if they went into branch, and they were going to speak to somebody who had a[n] understanding of domestic abuse or had that understanding of financial abuse, because often when we suggest, 'you can call the bank, they've got this number you can call', it's always, but 'who am I going to get on the other end?' ... If we could reassure clients that actually you're going to go to the bank, they've got somebody with an understanding about financial abuse that you can either book an appointment with, or go into the branch and ask to speak to somebody who has that understanding, and you will be taken separately, it won't be a counter service, and give that kind of reassurance. (The Sharan Project)

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Similarly, participants suggested a 'fast-track' service for victim-survivors who may have very limited time in a branch if the perpetrator is controlling or monitoring their movements.

As discussed previously, victim-survivors suggested that staff could undertake more checks with them or speak to them privately, away from partners or family members who may be accompanying them. Private spaces were felt to be vital for this, as were independent interpreters to ensure that perpetrators could not speak on behalf of victim-survivors. Similarly, domestic abuse professionals suggested that branches could better understand the demographics (and therefore needs around languages and/or religious practices) of their local communities. This highlights how financial services firms can take an **intersectional approach to providing support**. However, one victim-survivor felt that banking apps may mean there will be fewer opportunities for staff to do this in-person. Therefore, firms could consider how these private spaces can be replicated in a virtual environment, particularly for firms who do not have a physical branch presence at all.





Victim-survivors suggested that branches could also be a source of information on economic abuse. For example, branches could display flyers in a range of languages that could be seen or picked up without a perpetrator noticing. One woman who had experienced abuse from her parents whilst she was a student also felt that having more branches based on university campuses would be helpful. She 'remembered them being a lot more accessible and involved' than the other branch of her bank. Safe Spaces may be one mechanism to ensure this exists locally, and an in-branch economic abuse specialist (as suggested above) could be an additional aspect of this.

## On the phone

One change that could be applied to financial firms' phone services would be to ensure that independent interpretation is available and encouraged. This would reduce the likelihood of a perpetrator using this as an opportunity to restrict a victim-survivor's ability to speak to their bank or other services.

One victim-survivor also suggested 'an additional [phone] line' that victim-survivors could use, referring to a specialist team that specifically supports victim-survivors of abuse. SEA is aware of several financial services firms that do have such teams which can be contacted directly. Similarly, ensuring some consistency in who a victim-survivor can speak to can help with **minimising the need to repeatedly share experiences**. In turn, this may also reduce the impact of vicarious trauma on banking colleagues. SEA's recently published Banking Support Directory includes this information with the phone numbers for these teams where possible, to make it easier for victim-survivors to access the specialist support they need from their banks.<sup>128</sup>

## Online

Our research found that websites being made available in different languages would be an important step in the support that financial services firms offer. This would mean that victim-survivors who do not speak English may be able to understand what a perpetrator is asking them to sign (though, of course, this may not mean a victim-survivor can safely resist the perpetrator's control by refusing to sign). In addition, domestic abuse professionals suggested having educational information on the types of products available in different languages:

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**Nowadays, you can put flags on a website, and a person clicks a flag that they recognise, and the language changes, and the person can then understand what's been signed up for...And [in] my previous role with victims that would come into refuge and not know how to use a bank, how to use online banking, how to go to the cash point, and we were doing a lot of education around that and keeping safe online. Banks could create short videos in...a variety of languages. And that could talk about what's the difference between a debit card and a credit card? What is interest? What's a loan? What's a credit score? (The Sharan Project)**

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These resources could be helpful **in enabling and supporting victim-survivors to pursue their financial objectives** and are an example of how firms could tailor communications to meet customers' information needs. Firms' websites could also have further information on domestic, including economic, abuse, as well as information on support. One victim-survivor suggested having pop-ups with information on economic abuse. SEA's review of bank and building societies' websites showed that information across websites varies significantly. At the very least, the 2021 Financial Abuse Code outlines that signatories should have an **accessible, industry-wide leaflet available to consumers** that includes information on how firms can support victim-survivors.

## Systems

One of the significant issues that participants felt required change was the process of opening a bank account for migrant women or women who do not have access to mainstream ID documentation. Participants reported inconsistency across banks in the documentation they accept and the information they require. Victim-survivors described how difficult it could be to have the required proof of identity documents and go through the steps required by financial services firms. As one migrant woman said:

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**There must be some leniency for the woman like us. (Victim-survivor)**

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A suggestion from one migrant woman we spoke to was a temporary bank account for victim-survivors without regularised immigration status. This could be restricted to the length of their temporary visa, or the time it takes to receive a decision on their application for leave to remain. This could then be extended if their application is taking longer or temporary visa is renewed, or made permanent if they are granted leave to remain. She felt that this would make a big difference for women like her. As previously explored, this would require regulatory or potentially legislative change. It may also be that the definition of a 'legitimate barrier' to leaving the UK (which could enable a bank account to be opened) could be expanded to include domestic abuse.

In addition, participants suggested that further work is needed to ensure those coming to the UK who were eligible to open a bank account did so. This may include education about doing this.

**There must be some rule that women should have their account. (Victim-survivor)**

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**They must like educate [women] how to be financially independent and how to access the financial means...I don't know how to open a bank account before even, I was not guided properly. So there must be some like, when you land in a country there is some visitors office, like they give you information how to travel. So there must be things like in banking sector too. (Victim-survivor)**

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Firms need to be aware of factors that may increase the risk of someone experiencing economic abuse, based on the evidence. If risks were identified, accounts could be flagged to help firms to be more aware of signs of economic abuse in these accounts:

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**When someone comes to the UK as a spouse, whether it's a man or a woman, and then people open a bank account with that immigration status attached to it, it might be helpful if the bank monitors what kind of control is executed through money because... finance is important. Everybody needs money. So that's a way to kind of evaluate and monitor if the abuse is happening, because it kind of tells a lot. (Victim-survivor)**

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Any such action would need to ensure that this does not put victim-survivors at risk (including around data-sharing and immigration enforcement). As mentioned previously, participants suggested that systems change around the use of interpreters would be vital to ensure that a victim-survivor can speak directly to a financial service.

With appropriate permissions from the victim-survivor, financial services firms must also ensure that they can accept a third-party representative to interact with the firm on their behalf. This may include support services like IDVAs or interpreters, as mentioned above.

As discussed, when exploring missed opportunities to identify economic abuse, victim-survivors felt that the ability of systems or staff to spot signs of economic abuse through changes in a person's behaviour could be improved. Changes in behaviour could include a variation in the usual amount of money being deposited or withdrawn, for example. Participants felt that flagging issues like these so firms could check in with victim-survivors would make a difference. Implementing any of these would need to be done in **collaboration** with specialist services to ensure they were **safety-focused**. Participants therefore also recommended training for staff in financial services firms. The **Skills and Capability** pillar of the 2021 Financial Abuse Code includes **colleague training**, which includes training in responding with empathy and training in recognising the signs of abuse. Again, this needs to be done in **collaboration** with specialist organisations like SEA. Other changes suggested included ensuring that victim-survivors could access support for fraudulent transactions made by the perpetrator post-separation.

Again, although the 2021 **Financial Abuse Code** does guide firms to inform customers of external support services, few of the victim-survivors we spoke to had been supported in this way. Therefore, signposting both externally and internally (such as to vulnerable customer or specialist domestic abuse teams) was felt to be a change that could support victim-survivors. More firms having specialist support teams was also suggested, particularly if these could work in **collaboration** with domestic abuse organisations. The collaboration between SEA and Lloyds Banking Group is an example of good practice.

Some victim-survivors also shared that changes to systems were required to ensure that staff could see pertinent information, such as a disclosure of experiencing domestic abuse or that a victim-survivor has a disability. Some reported that this information was only accessible to staff at certain levels. Whilst recognising that security is important, this is also part of the 2021 Financial Abuse Code's principle that **the need to repeat stories should be minimised**. Similarly, victim-survivors suggested the ability to use a code word to signal to firms that they had experienced abuse without having to share details.

In addition, participants suggested that different types of joint accounts or processes for opening these would make it more difficult for perpetrators to exploit banking products. It would therefore minimise the risk of further harm to victim-survivors. As SEA's Consumer Duty briefing outlines, the design of products and services provided by financial firms is a vital way to protect victim-survivors from harm. This could also apply to joint loans, though it must be understood by financial services firms that the abuser's coercive control could prevent victim-survivors from accessing these. Similarly, domestic abuse professionals suggested a change in the way that victim-survivors' credit scores are treated to ensure they are not penalised for coerced debt created by the abuser. This is particularly important given the impact a damaged credit score can have on the ability to rebuild lives after domestic abuse, such as by renting a property. Victim-survivors would like to see financial services firms' implement ways for them to rebuild their credit. There were also calls for changes including debt write-offs to ensure that victim-survivors were not held responsible for debt their ex-partners had created in their names (coerced debts). The 2021 Financial Abuse Code already calls on firms to be **flexible in their approach and solutions** around debt. Some of the victim-survivors we spoke to had been supported by Money Advice Plus and their debts had been written off this way.<sup>129</sup>

Participants also suggested that financial services firms could support victim-survivors by helping them find any available grants that could enable them to train or study. Further, they suggested that firms could provide these grants for customers, along with low (or no) interest loans.

One victim-survivor felt that services often assume 'you're at the beginning bit' of leaving and rebuilding, but pointed out that long-term support is also needed.

Another suggestion was that financial services firms could support victim-survivors with professional development opportunities. Such support could help victim-survivors to start their own business, as well as build their confidence following abuse:

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**There should be something for people that have struggled with domestic violence so that they can actually you know, I'd love to have my own business but it's only people with good credit can get loans...We have it ripped from us, all of our ambition, all of our ideas, all of our confidence...Banks, it's your people, these have been with you since they first opened up an account. I've been with [bank] for 13 years... Invest in me, help me, put me on a business course. (Victim-survivor)**

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These suggestions could build on existing flee funds, such as the one offered by TSB,<sup>130</sup> or the grants offered by NatWest via the Circle Fund.<sup>131</sup> This financial and career support would empower victim-survivors more long-term, as well as providing them with funds so they could access legal support.

Participants felt that these longer-term opportunities would need to be understanding of how factors like sex, gender identity, race and disability intersect, and the impacts of trauma on victim-survivors. Support would need to be tailored to individual needs so that all victim-survivors could access the opportunity. Victim-survivors also felt that more widespread access to flee funds would be beneficial, including for those who may have no recourse to public funds. One victim-survivor reflected on her own experiences and how she felt she had to return to the abuser (shared in the interview via her interpreter):

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**There was an incident where she tried to flee the abuser. She contacted the police who then contacted the different domestic violence agencies in the area. But a lot of all of them rejected her because she had no recourse to public fund... She says that [flee funds] will obviously make a lot of difference and make it easier for women to escape. (Victim-survivor)**

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The value of flee funds can be seen in the high demand for the emergency fund piloted and administered by Women's Aid, which ran out within 16 calendar days<sup>132</sup>. Being unable to meet debt repayments was the second most common reason for being referred to the fund.<sup>133</sup> It is therefore promising that the then-Conservative government launched a two-year Flexible Fund providing further funding. This is distributed via Women's Aid and its members to enable victim-survivors to flee, as well as giving payments to help secure 'a sustainable independent future'.<sup>134</sup> Importantly, this funding can be accessed by victim-survivors with NRPF.<sup>135</sup> Further support to achieve long-term financial security could include support to save for or obtain a mortgage, or information on topics such as investing. The Government should make this Flexible Fund permanent to enable victim-survivors to flee and safely rebuild their lives.

Domestic abuse professionals and victim-survivors shared that they would like to see a shift in how firms respond to perpetrators. They said this should include greater awareness of what perpetrators could do, and that they might falsely present to services as victims and manipulate outcomes. One victim-survivor felt that perpetrators were not held accountable, which empowered them to continue this behaviour following the end of one relationship and beginning of another:

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**If he was made accountable afterwards, and actually was forced to pay that money back at some point, you know, things may change. All the while someone's doing something and getting away with it, they're going to keep doing it. (Victim-survivor)**

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This must be done safely and led by victim-survivors.<sup>136</sup> One domestic abuse professional reflected on this alongside the need for firms to ensure they have a good understanding of the dynamics of abuse. This includes understanding how perpetrators might use these if not challenged, and ensuring that services were accessible to all victim-survivors with a range of identities:



**There is a potential for perpetrators to also know that they're not going to be seen. And that it's going to be much easier for them to carry on with their behaviours to take power and control. So sort of continually coming back to that idea that if abuse is about power and control, the strongest thing you can do for survivors, return that power and control to them in a way that is representative of their experience and of their position in the world. (Training and Commercial Manager, Galop)**

Similarly, domestic abuse professionals spoke about further systems monitoring and safeguarding processes that financial services firms could put in place to prevent perpetrators from taking further control of the victim-survivor's finances:

**If someone who we know has been economically abusive, then is trying to open a joint account with somebody else or trying to take out a loan or trying to take out something...what are the processes in place around that [and] what is the safeguarding around that? (Safe and Together Project Manager, Respect)**

Participants appreciated that legalities may prevent financial services firms from implementing such changes. However, further monitoring and safeguarding processes would enable firms' responses to victim-survivors to be proactive towards abusers rather than reactive to victim-survivors. Another domestic abuse professional shared that 'the onus [is] on victim-survivors to resolve everything'. They felt that financial services firms could do more to prevent perpetrators from going on to abuse others.

One professional therefore suggested something similar to Clare's Law,<sup>137</sup> which would allow financial services firms to know if a perpetrator had behaved abusively previously, including with other firms. This could echo other work around domestic abuse, such as Multi-Agency Risk Assessment Conferences (MARACs). It would also prevent financial services firms from working in isolation, though participants did acknowledge there were likely to be data concerns here:

**Often [with] perpetrators it's not one victim. So if the perpetrator has got a record, or they've had allegation, or even proven against them where they have either coerced somebody or if the victim [is] saying 'well, he forced me to take out a credit card, or coerced me into agreeing to a credit card because he couldn't, he's not allowed to have, he can't get a bank account or a credit card', actually utilising banks communicating with each other, or having a central base where they could say 'well, we can see that he's had multiple allegations or she has had multiple allegations against them, or there has been a court process where it's been proven'. Similar to what you do with domestic abuse, when you look at is this person a perpetrator with multiple victims or history...that's what police look at, whereas I feel the banks are very isolated in terms of 'I'm here and there's another bank there', but they could, obviously, I understand GDPR and you can't share but things where somebody has been accused or if multiple victims are approaching saying that they have been financially abused or they have been coerced by the individual and it keeps popping up, then to take action. (The Sharan Project)**



UK banks' standard terms and conditions do also allow firms to 'unbank' customers in certain circumstances (with reasonable notice).<sup>138</sup> Internationally, two Australian banks have now changed their terms and conditions to enable them to respond more strongly to perpetrators. This includes being more easily able to unbank abusers and closing their accounts.<sup>139</sup> Any response to perpetrators must involve the victim-survivor to ensure it is **safety-focused**. In addition, consideration must be given to abusers who are employed by financial institutions, including in high-level positions. This not only represents a huge barrier to victim-survivors disclosing and seeking support but means that such perpetrators will have an even more significant opportunity to restrict, exploit, and/or sabotage victim-survivors.

Participants also felt that financial services firms' responses must be trauma-informed, particularly around requiring evidence. They must seek to avoid victim-blaming and understand the impact abuse can have on victim-survivors:

**[Banks] say 'Okay, well give us evidence'. And sometimes there is no evidence, it's just been happening, and you may only realise once you fled, so things like that, and just going back to not having a view of victims, if victim approaches the bank, they think 'oh they should have known better' ... change in terms of the way they're thinking and viewing victims. (The Sharan Project)**

## Working with frontline services

Participants suggested that there may be opportunities for local branches to work **collaboratively** with local services, refuges, and IDVAs to provide victim-survivors with support or education around finances:

**Being open to working with us as frontline professionals working with clients. We deal with ...so many different professionals, especially at MARACs and everything. And it's a shame that they're [banks] not there to input and to really highlight that...it feels like there's a very big wall up in regards to the financial sector, so just feeling like there's a little bit more access there. And we can actually go to our clients and say 'Look, we can help with this. We can support you to do this'. Because it feels like at the moment, it's not something that's possible. (Jewish Women's Aid)**

**I agree... we have all the different professionals around the MARAC...and yet, there might be huge financial abuse, but we never have anybody from the financial sector there or from the bank, or anyone that we could even tap into. So creating, you know, stronger positive relationships within the financial sector. (The Sharan Project)**

These relationships could be mutually beneficial, as one domestic abuse professional reflected that they would 'love to understand more, in terms of what I could do' to support clients around financial services firms. Others suggested that these relationships need to involve a long-term commitment to change, rather than a one-off interaction. This would be particularly important in ensuring that responses are informed by an **intersectional** understanding of how victim-survivors may be impacted by factors such as their sex, ethnicity, sexuality, immigration status, or disability.

## Recommendations

### Recommendations for UK Finance:

- To update the 2021 Financial Abuse Code so that it reflects firms' obligations under the Consumer Duty and accompanying guidance.
- To work alongside SEA to raise awareness amongst specialist domestic abuse services of the Financial Abuse Code and firms' obligations under the Consumer Duty and accompanying guidance. This will empower specialist domestic abuse services to provide accurate information to victim-survivors about the support they can receive from financial services.

### Recommendations for financial services firms:

- To ensure that victim-survivors receive a fair price and value when accessing products and services by acting flexibly so where possible, victim-survivors are not charged or financially penalised for the abuser's behaviour. This could include pausing repayments on coerced debt or waiving fees on products victim-survivors are only using because of the perpetrator's abuse.
- Ensure they understand their customers by conducting an intersectional analysis of victim-survivors' needs and implement this learning into their product design, service delivery, and colleague training. This should include implementing inclusive design principles and including survivors' lived experience in product and service design and future reviews.
- Consult with victim-survivors, including those from a minoritised background, to ensure their products and services are survivor-centred, safe, and inclusive. This should include identifying and closing down opportunities for abusers to misuse products, for example, where possible by taking a safe and consistent approach to the separation of joint products.
- Ensure their consumer support offer meets the needs of all victim-survivors, including those with intersecting needs. This could include adopting the Economic Abuse Evidence Form so victim-survivors only have to tell their story once and offering translation and independent interpretation services to meet customers' needs in their target market.

- Support consumer understanding of economic abuse by raising awareness of how to spot the signs and what support the firm can offer customers, in particular those from minoritised groups. This could include running customer awareness campaigns targeting under-served audiences, publicising their support offer on SEA's Banking Support Directory, and introducing notification messages around economic abuse and "positive friction" at key points in the customer journey.
- Support continuous improvement by building colleagues' skills and capabilities so they can recognise economic abuse and how to respond to victim-survivors, including those from minoritised backgrounds. This should include providing economic abuse training delivered by specialists to colleagues and promoting better coordination by ensuring all colleagues know what support the firm can offer to customers and how to signpost to specialist domestic abuse services.
- Collaborate with Surviving Economic Abuse, UK Finance and credit reference agencies to establish an industry-wide approach to restoring victim-survivors' credit files so they reflect their creditworthiness and not the abuser's behaviour.

### Recommendations for credit reference agencies:

- Collaborate with Surviving Economic Abuse, UK Finance and financial services firms to establish an industry-wide approach to restoring victim-survivors' credit scores so they reflect their creditworthiness and not the abuser's behaviour.

## Recommendations for SEA

- To explore undertaking further research on the experiences of Black and minoritised victim-survivors and their needs and interactions with financial services.

## Recommendations for the government:

- The Treasury and Home Office should jointly convene an economic abuse taskforce. In the first instance, this should bring together relevant stakeholders from the violence against women and girls, financial services, and legal sectors, as well as financial services regulatory bodies. They should consider legislative reforms to prevent abusers using joint mortgages to perpetrate economic abuse and offer victim-survivors space to regain economic safety and freedom. Secondly, the taskforce should consider any reforms required to support a consistent industry-wide approach to coerced debt and credit restoration for victim-survivors.
- The Chancellor of the Exchequer and the Business Secretary should work with the FCA to maintain the Consumer Duty, which sets clear standards for financial services firms on supporting good outcomes for vulnerable customers, including economic abuse victim-survivors.
- The Home Secretary should include domestic, including economic, abuse as a 'legitimate barrier' to leaving the UK within the guidance that underpins the 2014 Immigration Act. This will allow victim-survivors without leave to remain to open a bank account while they apply to regularise their immigration status and help them take a key step towards economic and physical safety.
- The Lord Chancellor should commit to reviewing the legal aid means and merit test thresholds for victim-survivors of domestic, including economic, abuse in family court proceedings. Measures should also be implemented urgently to increase the supply of legal aid solicitors who can support victim-survivors through financial remedy proceedings.
- The Lord Chancellor should provide sector-wide guidance for financial services firms on how they can support prosecutions linked to domestic, including economic, abuse. For example, this could include providing evidence to investigators in a straightforward and timely way that could be used to prosecute economic abuse under the controlling or coercive behaviour offence.
- As a part of the government's cross-governmental mission to halve violence against women and girls in a decade and to increase financial inclusion, the Economic Secretary to the Treasury should support the role of financial services firms in response to economic abuse. This should include encouraging firms to share and replicate good practice. For example, this could be by establishing specialist economic abuse teams (as introduced by Lloyds Banking Group and recognised as good practice by the FCA) and the provision of flee funds for customers and employees (as demonstrated by TSB).
- The Ministry for Housing, Communities and Local Government should commit to making it a statutory duty to commission community-based services, including specialist economic advocacy support, and provide sufficient funding to councils to meet their duty. A proportion of this funding must be ring-fenced for specialist 'by and for' services.

## For the FCA:

- The FCA should continue to work with the Chancellor of the Exchequer and the Business Secretary to maintain the Consumer Duty, which sets clear standards for financial services firms on supporting good outcomes for vulnerable customers, including economic abuse victim-survivors.
- To continue monitoring how the Consumer Duty is being implemented and how this is specifically impacting victim-survivors, with particular consideration to the Equality Act 2010.





## Conclusion

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Within the research, we found some examples of positive practice where financial services firms supported victim-survivors of economic abuse. These included:

- supportive responses to disclosures
- being supported to access systems
- consideration of physical and economic safety
- feeling believed by financial services firms

However, this research has also demonstrated that more needs to be done to ensure that *all* victim-survivors can access financial services products and services and achieve good outcomes as vulnerable customers.

We found evidence of how perpetrators were able to misuse a range of financial products to perpetrate abuse. We also found evidence of how at times, financial service firms were also exploited by the perpetrator and inadvertently facilitated their abuse. Despite a lot of progress within the financial services sector to raise awareness of domestic abuse and the support available, we found that victim-survivors were still not able to consistently access help when they needed it most. Domestic abuse professionals similarly described their frustration and difficulties with supporting clients in accessing these responses.

In particular, the research has demonstrated issues that need urgently addressing to ensure that Black and minoritised victim-survivors can access financial services products and services and the support they can provide around economic abuse. Common issues included a lack of independent interpreters and difficulties in accessing or opening bank accounts. Participants raised significant concerns about the fact that victim-survivors without leave to remain are unable to open bank accounts, which the government must address. The issues presented throughout this report prevent minoritised women from gaining financial independence and rebuilding their lives following economic abuse.

Using the research findings, we have developed a series of recommendations for financial services firms, sector bodies, the regulator and the government. The recommendations for firms present the changes that victim-survivors and domestic abuse professionals told us are needed, framing these within the context of the Consumer Duty, the 2021 Financial Abuse Code, and The Economic Abuse Principles.

# Endnotes

- 1 Surviving Economic Abuse (2024): "Measuring economic abuse: preliminary findings on the prevalence and impact of economic abuse on women in the UK" <https://survivingeconomicabuse.org/wp-content/uploads/2024/11/Measuring-economic-abuse-preliminary-findings-Nov-2024.pdf>
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- 14 Financial Conduct Authority, (2021), *Guidance for firms on the fair treatment of vulnerable customers*, Available from: <https://www.fca.org.uk/publications/finalised-guidance/guidance-firms-fair-treatment-vulnerable-customers>
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- 16 UK Finance, (2021), *2021 Financial Abuse Code*, Available at: [https://www.ukfinance.org.uk/system/files/2022-12/Financial-Abuse-Code-2021\\_Updated\\_2022.pdf](https://www.ukfinance.org.uk/system/files/2022-12/Financial-Abuse-Code-2021_Updated_2022.pdf)
- 17 'Domestic and economic abuse' is the language used within the Financial Abuse Code. SEA would instead describe this as 'domestic abuse, including economic abuse'.
- 18 The list of financial service firms that have signed up to the 2021 Financial Abuse Code can be found at the end of the latest version: [https://www.ukfinance.org.uk/system/files/2022-12/Financial-Abuse-Code-2021\\_Updated\\_2022.pdf](https://www.ukfinance.org.uk/system/files/2022-12/Financial-Abuse-Code-2021_Updated_2022.pdf)
- 19 Sharp-Jeffs, N. (2022) *Understanding and Responding to Economic Abuse. Feminist Developments in Violence and Abuse*. Emerald Publishing, UK.
- 20 Ibid.
- 21 Office for National Statistics, (2023), *Domestic Abuse and the Criminal Justice System*, <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasetsdomesticabuseandthecriminaljusticesystemappendixtables>
- 22 These are organisations which are led by and for communities (such as Black and minoritised, disabled or LGBT women) which are disproportionately impacted by domestic abuse and which, according to Imkaan, 'despite this, face greater barriers to reporting the abuse, accessing support services, and engaging with the criminal justice system'. These services have specialist understanding of the abuse experienced by these communities. For more information, see Imkaan: <https://www.imkaan.org.uk/about-imkaan>
- 23 The Sharan Project provides support and advice for vulnerable women, particularly those of South Asian origin, including by providing Independent Domestic Violence Advisor (IDVAs) services. For more information, see: <https://sharan.org.uk/>

- 24 Southall Black Sisters provides information, advice, advocacy, practical help, counselling and support to Black and minoritised women and children experiencing domestic or sexual abuse, including migrant women and those with no recourse to public funds (NRPF). For more information, see: <https://southallblacksisters.org.uk/>
- 25 LAWRS support Latin American migrant women living in the UK. For more information, see: <https://lawrs.org.uk/>
- 26 Bawso supports Black and minoritised victim of abuse, violence and exploitation in Wales. For more information, see: <https://bawso.org.uk/en/>
- 27 Respect advance best practice on work with domestic abuse perpetrators, male victims and young people who use violence and abuse. For more information, see: <https://www.respect.uk.net/>
- 28 Galop supports LGBT+ people who have experienced violence and abuse. For more information, see: <https://galop.org.uk/>
- 29 Jewish Women's Aid support Jewish women and children affected by domestic and sexual violence. For more information, see: <https://www.jwa.org.uk/>
- 30 Within the research, there were some principles of the 2021 Financial Abuse Code which were not evidenced by the victim-survivors and professionals we spoke to. These included: notifying other areas of the firm or contacting another firm, contacting the police if an immediate response was required, sharing information on the options available to a victim-survivor to inform their next steps, and escalating the situation if abuse by a third party (such as a Power of Attorney) was suspected. Similarly, there was no discussion from participants around firms including economic abuse as part of their monitoring of vulnerable customers. However, this does not mean that these issues do not occur for victim-survivors of economic abuse in their interactions with financial institutions, but simply that they had not happened for those we spoke to.
- 31 Surviving Economic Abuse, (2024), Measuring economic abuse: Preliminary findings on the prevalence and impact of economic abuse on women in the UK, Available from: <https://survivingeconomicabuse.org/wp-content/uploads/2024/11/Measuring-economic-abuse-preliminary-findings-Nov-2024.pdf>
- 32 ANZ/RMIT University (2016) MoneyMinded Impact Report: The Role of Financial Education in a Family Violence Context
- 33 Financial Conduct Authority, (2022), PS22/9: A new Consumer Duty, Available from: <https://www.fca.org.uk/publications/policy-statements/ps22-9-new-consumer-duty>
- 34 Surviving Economic Abuse, (2023), How the Consumer Duty can transform responses to economic abuse, Surviving Economic Abuse.
- 35 Surviving Economic Abuse, (2023), A UK first: Starling Bank launches 'Hide references' to help survivors of economic abuse, Available at: <https://survivingeconomicabuse.org/news/a-uk-first-starling-bank-launches-hide-references-to-help-survivors-of-economic-abuse/>
- 36 Which?, (2022), TSB launches emergency 'flee fund' for domestic abuse victims – how are other banks helping?, Available from: <https://www.which.co.uk/news/article/tsb-launches-emergency-flee-fund-for-domestic-abuse-victims-how-are-other-banks-helping-arSND8h82IGJ>
- 37 Garner, M., and Kelly, L., (2023), Shifting the Dial: How financial services could detect, disrupt and hold perpetrators of economic abuse to account, CWASU, London Metropolitan University.
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- 39 Which?, (2022), TSB launches emergency 'flee fund' for domestic abuse victims – how are other banks helping?, Available from: <https://www.which.co.uk/news/article/tsb-launches-emergency-flee-fund-for-domestic-abuse-victims-how-are-other-banks-helping-arSND8h82IGJ>
- 40 Preliminary findings are available in: Wilson Garwood, R., (2024), Measuring economic abuse: preliminary findings on the prevalence and impact of economic abuse on women in the UK, Surviving Economic Abuse. More detailed findings will be released in 2025.
- 41 For more, see: UK Finance, (2021), The Impact of Covid-19 on Cash, Available at: <https://www.ukfinance.org.uk/news-and-insight/blogs/impact-covid-19-cash>
- 42 UK Finance, (2023), Half of All Payments Now Made Using Debit Cards, Available at: <https://www.ukfinance.org.uk/news-and-insight/press-release/half-all-payments-now-made-using-debit-cards>
- 43 Economic safety can be created by maximising a victim-survivors' access to economic resources, and by closing down the systems, policies and practices that abusers can use to control them. For more, see Sharp-Jeffs, N., (2022), Understanding and Responding to Economic Abuse, Emerald.
- 44 Migrants' Rights Network, Know Your Rights Guide: Banking, Available at: <https://migrantsrights.org.uk/resources/know-your-rights/banking/>

- 45 Which?, (2022), TSB launches emergency 'flee fund' for domestic abuse victims – how are other banks helping?, Available from: <https://www.which.co.uk/news/article/tsb-launches-emergency-flee-fund-for-domestic-abuse-victims-how-are-other-banks-helping-arSND8h82IGJ>
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- 51 Preliminary findings are available in: Wilson Garwood, R., (2024), Measuring economic abuse: preliminary findings on the prevalence and impact of economic abuse on women in the UK, Surviving Economic Abuse. More detailed findings will be released in 2025.
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Surviving Economic Abuse (SEA) is the only UK charity dedicated to raising awareness of economic abuse and transforming responses to it. We work day in, day out to ensure that women are supported not only to survive, but also to thrive.

#### **Get involved**

If you would like to get involved in our work:

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