



**POLICY RECOMMENDATIONS FOR THE BANKS,
CREDIT UNIONS AND FINANCIAL INSTITUTIONS ON
ADDRESSING ECONOMIC ABUSE IN THE CONTEXT OF
FAMILY VIOLENCE IN CANADA**



CANADIAN CENTER
FOR WOMEN'S
EMPOWERMENT

CENTRE CANADIEN
POUR L'AUTONOMISATION
DES FEMMES

JULY 15, 2021

The Canadian Center for Women's Empowerment (CCFWE) urges Canadian Financial Institutions to develop consumer protection policies, programs and practices to protect and empower vulnerable Intimate Partner Violence (IPV) survivors. These policies should both mitigate the economic consequences of domestic and economic abuse and promote survivors' financial independence.

WHAT IS ECONOMIC ABUSE?

According to the Department of Justice, financial abuse occurs “when someone uses money or property to control or exploit someone else.”^{1a} This can include taking money or property without permission, taking and controlling another person’s financial resources, forcing someone to sign a document or sell something as well as forcing someone to change a will.^{1b} While most forms of financial abuse such as theft and fraud are crimes, economic abuse is not a criminal offense in Canada. Some researchers suggest however, that it is more than this to include interfering with employment, controlling access to financial resources, refusing to contribute to financial costs, and generating financial costs.²

Economic abuse is wider in its definition and has been defined as “a deliberate pattern of control in which individuals interfere with their partner’s ability to acquire, use, and maintain economic resources such as access to money, being excluded from financial decision making, taking on relationship debt and being unaware of the consequences or not being allowed to work or study”.

Often the terms “financial abuse” and “economic abuse” are used interchangeably. CCFWE works to create awareness and policies to address financial abuse as well as the broader issue of economic abuse. In Canada, neither “financial abuse” nor “economic abuse:

are recognized in the statutory definition of domestic abuse and family violence. However, Canada is making progress. In March 2021, revisions to [Canada's Divorce Act](#) now require courts to consider the impact of domestic violence including financial abuse within its definition.



1a-b About Family Violence. (2017, July 26). Department of Justice. <https://www.justice.gc.ca/eng/cj-jp/fv-vf/about-apos.html#fin>.

2 Nicola Sharp. (2008). ‘What’s yours is mine’ The different forms of economic abuse and its impact on women and children experiencing domestic violence. Refuge for Women and Children Against Domestic Violence. <http://www.refuge.org.uk/files/Whats-yours-is-mine-Full-Report.pdf>.

3 Maureen Outlaw. (2019). No One Type of Intimate Partner Abuse: Exploring Physical and NonPhysical Abuse Among Intimate Partners. *Journal of Family Violence*, 24(4), 263–272. https://www.researchgate.net/publication/246936470_No_One_Type_of_Intimate_Partner_Abuse_Exploring_Physical_and_NonPhysical_Abuse_Among_Intimate_Partners.

Websdale 1999 <https://ndviri.org/meet-the-director/>

[Surviving Economic Abuse \(SEA\)](#) research shows that 95% of domestic abuse victims experience economic abuse, and the current environment will provide abusers with more opportunities to control, exploit and sabotage their partner's economic resources. Women who experience economic abuse are five times more likely to experience physical abuse and other forms of gender-based violence such as sexual and psychological abuse as economic abuse is also linked to physical safety. Women experiencing coercive control who also experience economic abuse are at increased risk of being killed.³

Women from marginalized groups including newcomers, 2SLGBTQ+ identifying individuals, refugees, racialized and Indigenous women are at a higher risk of economic abuse due to other systemic factors including poverty or limited access to social services and support systems. Survivors of economic abuse are also at higher risk of becoming victims of predatory lending practices including payday loans and check cashing services as they attempt to gain access to economic resources without their abuser's knowledge.⁴

The 2019 study by [Woman Abuse Council of Toronto \(WomanACT\)](#) entitled [Hidden in the Everyday](#) found that unlike physical abuse, financial abuse often continues long after a woman has found the strength to leave the abusive relationship, because their abuser can maintain contact and control through spousal or child support as well as through other financial and activities. Coerced debt and bad credit scores often prevent survivors from securing housing in the short and long term. This also creates obstacles to accessing student loans, lines of credit, car loans, credit cards and sometimes jobs due to screening by employers. Additionally, having to repay accumulated debt can lead to further economic hardship and even mental illness, placing survivors at increased risk of returning to an abusive relationship in order to "survive".⁵

In February 2021, the CCFWE participated in a national consultation of communities for the National Action Plan (NAP) on Gender Based Violence (GBV). Most women indicated that financial institutions and shelters do not have adequate education to identify economic or financial abuse. Services providers reported that, while able to recognize signs of abuse, they do not have the necessary infrastructure in place to respond to or flag these incidents.

INTERNATIONAL FINANCIAL SECTOR BEST PRACTICES

While Canada is very much lacking behind other countries in adequately addressing economic and financial abuse and consequences as part of domestic abuse, there are several countries where the government as well as industries including financial services have taken measures to support survivors in their financial recovery from abuse. These consist of legislative steps taken by the government as well as voluntary guidelines and Codes implemented by the industry sectors.

⁴ Research into the extent and nature of financial abuse within intimate relationships in the UK

<https://www.co-operativebank.co.uk/assets/pdf/bank/aboutus/ethicalpolicy/financialabuse/moneymattersreport.pdf>

⁵ WomanACT. (2019). Hidden in the Everyday: Financial Abuse as a Form of Intimate Partner Violence in the Toronto Area. https://womanact.ca/wp-content/uploads/2020/11/WomanACT_Hidden-in-the-everyday_Financial-Abuse-Report-1.pdf

UNITED KINGDOM (UK)

- In October 2018, UK's financial service sector launched a "[Financial Abuse Code of Practice](#)", a voluntary code of conduct that focus on a few key areas: raising awareness and encouraging disclosure; training of staff; identification and appropriate response; minimizing the need to repeat the victim's story in one institution; help to regain control of finances; signposting and referral.^{6a} Numerous large banks and financial firms have since adopted the Code of Practice, including Barclays, HSBC, Santander, RBS, Nationwide and Lloyds.^{6b}

- The [UK government included economic abuse](#) in the new statutory definition of domestic abuse when introducing the draft Domestic Abuse Bill in January 2019.⁷ In addition, controlling or coercive behaviour in intimate or familial relationships was criminalized by making it a new offense under section 76 of the Serious Crime Act (2015).⁸

- [The Financial Support Line for victims of domestic abuse \(UK\)](#)- The Financial Support Line is for anyone in England and Wales who has experienced, or is experiencing, domestic abuse and financial difficulty. The telephone service is delivered in partnership by registered charities, [Surviving Economic Abuse \(SEA\)](#) and Money Advice Plus. Advice provided to victim-survivors by

MAP can cover a range of topics including: strategies for dealing with debt and responding to utility companies and other bills; advice on how to safely open a new bank account or work through problems you're experiencing banking; and in some cases of severe financial hardship, signpost people to financial assistance or grants.

The specialist debt advisers on the Financial Support Line are trained by [Surviving Economic Abuse \(SEA\)](#) in economic abuse and regularly kept up to date with specialist knowledge. Much like financial counsellors in Australia, debt advisers need to be accredited before they can practice and are regulated by the Financial Conduct Authority.⁹

- In 2016, [Citizen's Advice](#), in partnership with the [British Bankers' Association](#) (now UK Finance), developed a useful framework to help banks, other creditors and advice providers challenge financial abuse. Also, in 2016, the [Financial Services Vulnerability Task Force](#) recommended providing further support to victims of financial abuse.

- The Group liaises with frontline domestic abuse experts as part of their undertaking to raise their level of understanding regarding economic abuse and tailor the bank's responses to

6a-b UK Finance (2018). Financial Abuse Code of Practice. <https://www.ukfinance.org.uk/system/files/Financial-Abuse-Code-of-Practice.pdf>

7 Gov.UK (2020). Policy paper. Statutory definition of domestic abuse factsheet. <https://www.gov.uk/government/publications/domestic-abuse-bill-2020-factsheets/statutory-definition-of-domestic-abuse-factsheet>

8 Crown Prosecution Service (2017). Controlling or Coercive Behaviour in an Intimate or Family Relationship. <https://www.cps.gov.uk/legal-guidance/controlling-or-coercive-behaviour-intimate-or-family-relationship>

9a-c Rebecca Glen (2021), Churchill Trust Fellow, Study Service to Response to Woman Experiencing or Escaping Domestic Financial Abuse USA, Canada and UK, [Centre for Women's Economic Safety](#)

UNITED STATES OF AMERICA (USA)

individual victims and survivors. Giving customers the power to take control and restore things to normal as quickly as possible can transform their banking experience, building confidence and trust.

- In 2019, [Lloyds Banking Group](#) and Surviving Economic Abuse launched a specialist customer support service for victims of financial, economic and domestic abuse. Lloyds Banking Group is one of the largest financial institutions in the UK with around 30 million customers and more than 65,000 employees.

The Domestic and Financial Abuse team (DFA) supports customers on various financial issues. Support includes how to manage joint accounts, options for opening new accounts, and advice on dealing with debts, such as loans or mortgages as well as directing customers to specialist organisations for emotional and practical support. Training to develop the team's deep understanding of domestic, financial and economic abuse was developed in partnership with Lloyds Bank Foundation for England & Wales, Tender, and Surviving Economic Abuse (SEA).^{9a}

- Moving Ahead Through Financial Management The Moving Ahead Through Financial Management curriculum is the USA's largest financial literacy program aimed at survivors developed in partnership between [Allstate Foundation](#) and the [National Network to End Domestic Violence \(NNEDV\)](#). NNEDV has adopted a train the trainer model to equip advocates to be able to work through the Moving Ahead curriculum with survivors. The program is built on the recognition that economics and finances impact survivors' ability to get and stay safe and is designed to help survivors move from short-term safety to long-term security. The curriculum is supported by presentations and webinars and has five key modules (The Allstate Foundation and NNEDV, 2019):

1. Understanding Financial Abuse
2. Learning Financial Fundamentals
3. Mastering Credit Basics
4. Building Financial Foundation
5. Creating Budgeting Strategies

- Consumer Rights for Domestic and Sexual Violence Survivors Initiative - [The Center for Survivor Agency and Justice's \(CSAJs\)](#) longest running project is the Consumer Rights for Domestic and Sexual Violence Survivors Initiative, which recognises the value of consumer law to support and restore survivors of domestic violence, financially.

A key product of the initiative is CSAJ's Guidebook on Consumer & Economic Civil Legal Advocacy for Survivors (2017). The comprehensive, 267-page Guidebook was developed in partnership with on-the-ground

advocates, lawyers, and organisational partners and is rooted in the experiences of survivors who are living in poverty. The survivor-centric Guidebook offers practical consumer and economic civil legal remedies, as well as non-legal advocacy strategies, across many relevant areas of consumer law including, Credit reporting and repair, including discriminatory credit and identity theft, Debt collections and defense, including navigating student loan, Bankruptcy and foreclosure, Federal tax advocacy, Economic relief in civil protection orders, Economic issues in family law, Barriers in civil court, Rights and protections in housing and employment, including advocacy for survivors with criminal records.^{9b}

- [FreeFrom's Survivor Wealth Banking Initiative](#) aims to include banks as a partner in combating economic abuse. They have developed Survivor Safety Banking Guidelines that banks can implement to address intimate partner violence and economic abuse. The guidelines cover everything from training for bank tellers, organizing systems to protect survivors' privacy, and creating new products to support survivors' financial recovery.

AUSTRALIA

- In February 2015, the government of the Australian province Victoria established a Royal Commission into Family Violence whose recommendations included one chapter, dedicated specifically to economic abuse and suggestions for

the financial sector.¹⁰ In response, the government as well as various industry sectors implemented measures to better support family violence survivors experiencing financial difficulties:

- All financial counsellors in Victoria receive training on identifying family violence and economic abuse.
- The Essential Services Commission (ESC) which regulates the water and utility sector in addition to the Insurance Council of Australia and the telecommunications industry all modified its Energy and Water Codes requiring businesses to implement processes to assist customers experiencing family violence.
- The Insurance Council of Australia, as well as the telecommunications industry, developed industry guidelines on family violence.
- [The Australian Banking Association \(ABA\) released new industry guidelines in November 2016](#) for banks to better support customers and staff experiencing financial abuse. In addition, family violence is referred to in the revised Banking Code of Practice In response, major banks have implemented processes for adequately training staff on signs and impact of financial abuse and domestic violence, but also offer special services to survivors such as waiving debt in certain circumstances and providing grant programs. In addition, victim-survivors of economic abuse can expect banks to:

¹⁰ Carolyn Bond; Dr. Madeleine Ulbrick, for the Economic Abuse Reference Group (January 2020). Responding to Financial Abuse. Full Report. https://earg.org.au/wp-content/uploads/Responding-to-Financial-Abuse-Report-2020_Digital.pdf (p. 7)

- Not reveal new contact details to the ex-partner, even if he/she is a joint account holder;
- Provide copies of any documents needed free of charge;
- Help in contacting specialist domestic violence support;
- Offer fast-tracked and flexible hardship arrangements to help customers to deal with joint debts.^{9c}



THE ROLE OF THE CANADIAN CENTER FOR WOMEN'S EMPOWERMENT (CCFWE)

The Canadian Center for Women's Empowerment (CCFWE) is a national organization dedicated to empowering domestic violence survivors through advocacy, mentorship, and economic empowerment. The CCFWE is the only organization in Canada dedicated to fighting economic abuse. The organization's mission is to create a world where domestic violence survivors can access the resources they require for their safety and financial independence. Among other efforts, the CCFWE seeks to educate the public on what economic and financial abuse is, how to recognize it within the context of domestic abuse, and how to seek help.

CCFWE'S 3 YEAR STRATEGIC PLAN IS FOCUSED ON:

- **Awareness and Education:** In collaboration with Canadian banks and credit unions, the CCFWE will develop evidence-based, survivor-centred, culturally-sensitive public awareness campaigns and education resources for survivors, allies, and employees in the judicial system, social services and financial institutions in identifying and responding to economic abuse.
 - Help survivors heal from family violence including generational trauma, build resilience and lead a healthy lifestyle.
 - Empower survivors to strengthen their financial knowledge and behaviors to achieve financial safety and security.
 - Educate policymakers and financial institutions to remove structural financial obstacles that impact the economic empowerment of survivors.

- **Policy Influencing and System Change:** the CCFWE works with policymakers, government, financial institutions, allied healthcare providers, IPV and women's organizations to coordinate a national, cross-sectoral approach to understand, address and prevent economic abuse.
 - Work with the CCFWE's National Economic Abuse Task Force advocates to influence and support the Financial Consumer Agency of Canada (FCAC), Canadian Bank Association and domestic violence service agencies to develop a Family Violence program and protect survivors.
 - Organize the **'Investing in Change'** knowledge sharing event which will include the following stakeholders: Head of Customer Care at National Australia, UK Banks to Canadian Bank Association, The Learning Network at Western University, Women's Shelters Network, Ending Violence Canada, YWCA Canada, Woman ACT, and METRAC.
 - Develop economic and financial abuse screening tools: According to new Canadian research "[Understanding coercive control in the context of intimate partner violence in Canada](#)", to date, there are no mechanisms in place to flag economic abuse, coercive control, for shelters, banks, decision-makers to identify and remove the structural barrier. The research recommends the establishment of a new screening tool. The CCFWE will develop Economic and Financial Abuse Screening Tools modeled after the validated in the UK that are proven to overcome systemic barriers for underrepresented women.
 - Organize "Best Practice Award" to recognize ten banks that are implementing best practice approaches to tackling financial abuse and family violence experienced by customers or staff.
 - Develop policy papers, survivors' banking guides in collaboration with Canadian banks.
 - Advocate for the Canadian government's recognition of Economic Abuse and coercive control and raise public awareness on economic abuse in the context of domestic violence.
 - Advocate for the creation of a Canadian National Action Plan and landscape survivors to recover from Financial Abuse.
 - Support banks and policymakers to end economic abuse by bringing together women's community organizations, financial institutions such as banks, utilities, and essential service providers, telecommunications companies, industry regulators and ombudsman services, local and national government, the criminal justice system (police, prosecutors and the judiciary), the family justice system, consumer lawyers, and researchers and academics.
 - Develop accessible technological tools to educate advocates about responses to economic and financial abuse by provincial financial institutions.
- **Research and Evidence-based Practice:** the CCFWE initiates and shares research to better understand the prevalence of economic abuse in Canada and to assess the Economic safety needs of survivors of financial and during COVID-19. While there is little Canadian-specific data available, the CCFWE's first major research project currently underway will shed light on the nature of economic abuse in Canada.
- **Capacity Building and Fundraising:** To fund activities and ensure sustainability, the CCFWE is working to increase funding and staff capacity.

FINANCIAL INDUSTRY CHANGE IS HIGH PRIORITY

Through consultations with survivors and our National Task Force for Economic Justice, the CCFWE has identified the Financial Sector as a high priority target for education, system change and partnership. Survivors need access to a safe and protected bank account because abusers often actively monitor and at times even deplete survivors' online accounts. Without access to secure and protected bank accounts, survivors are trapped in abusive situations as they try to save money by (for example) hiding cash around their homes. Key challenges survivors face with financial institutions include:

- Parameters around joint accounts including:
 - Protection from giving their abuser access to their new contact information/ whereabouts.
 - Education and protection from abusers increasing survivors' credit card and loan debt without informed consent.
- Access to affordable banking services and support to enable survivors to rebuild their financial independence.
- Education about the importance of establishing their credit scores and financial literacy.
- Support and referral guidance as survivors will often tell their financial service providers about their abuse before any other organization.
- Survivors can't safely save the money they need to get to safety and don't have access to the cash they need to leave.
- The financial devastation of abuse makes banking products unaffordable for survivors.
- Harm-doers are incurring debts in survivors' names without their knowledge or consent. Because harm-doers typically monitor and control survivors' online bank accounts, most survivors are unable to safely save the money they need to leave abuse.
- Bank employees are not trained to detect, prevent or respond to domestic violence or economic abuse. The cycle of economic abuse continues as abusers are able to go unnoticed while misusing banking products and systems. At times, in plain sight of bank employees.

THE FINANCIAL CONSUMER AGENCY OF CANADA ROLE

The Financial Consumer Agency of Canada (FCAC) can play an important role in establishing specific guidelines to reduce economic burdens on past or present survivors of domestic violence who may face a range of economic consequences and financial hardships. The CCFWE urges the FCAC to develop federally-regulated consumer protection policies, programs and practices that address financial services and support for survivors of intimate partner violence. These policies, programs and practices should both mitigate the economic consequences of abuse and promote the financial independence of women and gender non-conforming individuals.

Based on the CCFWE's stakeholder audits and research to date, policies and programs should prioritize:

- **Credit Regulation** Credit regulation is reviewed to assess how consumers can separate the liability of joint account holders when economic abuse has occurred and provide clearer options for recovering/waiving debt from a joint account holder who has not benefited, or is not benefiting, from a service or product.
- **Responsible Lending Practices** As part of their responsible lending practices, credit providers exercise care to ensure that economic abuse is identified before providing credit to their customers.
- **Identify Theft** Expanding the definition of identity theft to include intimate partner violence related coerced and fraudulent debt.
- **Police Report Requirements** Explicitly removing police report requirements to access relief offered under the Acts and replacing such requirements with alternative certifications that survivors can access and produce outside of interacting with law enforcement or the courts.
- **Fraud Alert** Creating an Economic Abuse Fraud Alert.
- **Intimate Partner Violence (IPV) Protocol Training** Requiring that credit reporting agency staff is trained in IPV and economic abuse and creates written protocols for dealing with IPV-related coerced or fraudulent debt including:
 - Report suspected cases of economic abuse to federal authorities in order to collect and publish data.
 - Designate internal teams to handle survivor accounts.
 - Implement enhanced fraud protections.
 - Keep survivors' contact information confidential and secure.

These guidelines for survivors of intimate partner violence (IPV) and economic abuse may take a similar form to FCAC's [Voluntary Code of Conduct to Protect Seniors](#), introduced in 2019 and enacted in January 2021, that engage with banks and seniors' groups to create a code of conduct to guide banks in their delivery of services to Canada's seniors. FCAC should, in coordination with CEOs and Boards, create a standing expert Advisory Committee on Family Violence and Economic Abuse. This panel should include individual experts on GBV, economic empowerment, financial issues, mental health and family law.

- **Support the CCFWE National Task Force** Provide funding and support for the CCFWE's National Task Force for Women's Economic Justice to develop financial abuse screening tools, building societies and to develop resources which help banks identify financial and economic abuse and take steps to rebuild economic safety.

ROLE OF FINANCIAL INSTITUTIONS

Several organizations working on financial abuse have noted that financial institutions could draw from examples of how they already handle elderly abuse prevention efforts. According to the U.S. based organization FreeFrom, more than half of all U.S. banks offer products for elders with favourable terms, have dedicated staff to manage elder customer programs, and require training for all frontline and customer service staff on how to detect and report elder financial abuse. In addition, more than 80% of all banks place holds on suspicious transactions in elder customer's accounts.^{11a} Similar efforts could be implemented for customers who are victims of economic abuse and/or domestic violence.



Taking note of the aforementioned best-practice examples and recommendations by various organizations, including [FreeFrom](#)^{11b} and the U.K. based organization [Surviving Economic Abuse](#) and [Citizens Advice](#),¹² the CCFWE proposes the following measures:

1. STAFF TRAINING

- Identify signs of domestic violence and financial abuse including identification of financial abuse in risk assessment and safety planning.
- Create written protocols for dealing with Intimate Partner Violence (IPV) related, coerced or fraudulent debt.
- Potentially designate an internal team to handle survivor accounts.
- Validating disclosures as it often is challenging for victims to talk about abuse.
- Avoid customers having to present their story numerous times to different personnel.

2. PROTECTING CONFIDENTIALITY

- Keep contact information of survivors confidential and secure.
- Avoid joint account communication to both parties.
- Avoid sharing records of transactions that show the location of ATMs and bank branches.

3. OFFER EXTERNAL SUPPORTS AND REFERRALS

- Including helplines, financial counsellors, organizations on domestic violence, and guidance on when to call the police.

4. ASSIST SURVIVORS WITH REGAINING CONTROL OF FINANCIAL AFFAIRS

- Allow survivors to open accounts with ID and address alternatives.
- Work with survivors in default to develop a flexible and achievable repayment plan. These plans will save survivors' credit, increase their confidence, and foster customer loyalty to the bank.
- Credit regulation is reviewed to assess how consumers can separate the liability of joint account holders when economic abuse has occurred and provide clearer options for recovering/waiving debt from a joint account holder who has not benefited, or is not benefiting, from a service or product. As part of their responsible lending practices,

11 a-b FreeFrom, FreeFrom's Survivor Safety Banking Guidelines, <https://static1.squarespace.com/static/56a24df4d8af10a5072bed7c/t/5f7377bbc1bff472ddeb8dae/1601402816516/Survivor+Safety+Banking+Guidelines.pdf> July 2020

12 Alistair Chisholm, Citizens Advice, British Bankers' Association, Addressing financial abuse, <https://www.citizensadvice.org.uk/Global/CitizensAdvice/Debt%20and%20Money%20Publications/Addressing%20Financial%20Abuse%20-%20AFD%20report.pdf> April 2016

credit providers exercise care to ensure that economic abuse is identified before providing credit to their customers.

- Quick access to new services like accounts, credit cards or debt relief
 - Explicitly removing police report requirements to access relief offered under the Acts and replacing such requirements with alternative certifications that survivors can access and produce outside of interacting with law enforcement or the courts.
 - Offer survivor safety account which will not appear in online profiles, will only be accessible in-person at a branch location, and will include a free safety deposit box to help survivors protect important documents.¹³
- Offer flexible repayment plans and forbearance arrangements. Provide accessible and free credit repair and debt remediation services for survivors. Financial Institutions should work with survivors in default to develop a flexible and achievable repayment plan to save survivors' credit, increase their confidence, and foster customer loyalty to the bank.
- Offer interest-free deferred payment emergency loans. For survivors and their families, an emergency loan from their bank can mean the difference between remaining in danger and getting to safety. To ensure that these loans don't cause survivors further financial harm (e.g., further damaged credit), they should be interest-free and offer an option to defer payments for a period of 12 months, with incentives for those who start making payments early (e.g., "matching" the payments with an equal reduction from the principal due).
- Expanding the definition of identity theft to include Intimate Partner Violence related coercion and fraudulent debt.

5. CHEQUING AND SAVINGS ACCOUNTS

- Financial institutions should offer affordable checking & savings accounts. Such services can be made affordable for survivors by offering savings and chequing accounts with the following features for a 2-year period:
 - No minimum balances and no overdraft fees
 - No dormancy / inactivity fees
 - Free and unrestricted use of ATMs
 - Free transfers between accounts
 - Free debit & prepaid card options and free cheque cashing

¹³ FreeFrom, FreeFrom's Survivor Safety Banking Guidelines, <https://static1.squarespace.com/static/56a24df4d8af10a5072bed7c/t/5f7377bbc1bff472ddeb8dae/1601402816516/Survivor+Safety+Banking+Guidelines.pdf> July 2020

6. BUSINESS ACCOUNTS AND SERVICES

- Financial institutions should provide programs and services to help survivors whose businesses have been impacted and/or whose partners may have become enmeshed with their businesses. For example:
 - Emergency business credit and loans for survivors' small businesses that may have ended up being joint or even in the partner's name, even when the woman owns the business. Also to assist survivors pursue new entrepreneurial and microbusiness initiatives.
 - Provide better access and integration for payroll, hiring employees, and other parts of scaling a business.
 - Educational programs and resources to help women learn to build small business credit in their own name and also in the business name.

7. CLIENT FINANCIAL LITERACY RESOURCES AND EDUCATION

- Financial institutions should work with Domestic Violence Agencies to offer clients increased access to financial literacy education for survivors, including credit counselling and financial empowerment services. It is essential that financial literacy education integrates a gender and trauma-informed approach and promotes women's economic security and independence.
- Banks should train bank staff to detect, prevent and respond to economic abuse.

We urge you to consider how you and your organization can help effect change to empower survivors of Intimate Partner Violence and economic abuse.

We look forward to partnering with you in this critical work.

SIGNED, THE NATIONAL TASK FORCE FOR WOMEN’S ECONOMIC JUSTICE ADVOCATES AT THE CANADIAN CENTER FOR WOMEN’S EMPOWERMENT.

	Name	Organizations
1	Alia Abaya-Mannell	Alternia Savings Alternia Bank
2	Brenda Bolton	Ministry of Indigenous Relations and Reconciliation
3	Jacqueline Buchanan	Edmonton Police Service
4	Laurie Campbell	Consumer Credit and Money Expert. Consumer advocate.
5	Andrea Coutu	Trustmode Marketing
6	Cathy Cowan	Canadian Center for Women's Empowerment (CCFWE)
7	Meseret Haileyesus	Canadian Center for Women's Empowerment (CCFWE)
8	Glenna Harris	Prosper Canada
9	Lisa Hoffe	St. John's Status of Women Council
10	Jen Lawrence	Designed Divorce
11	Carla Leon	United Church of Canada
12	Debbie Owusu-Akyeeah	The Canadian Centre for Gender and Sexual Diversity

The National Task Force for Women's Economic Justice advocates for the policies to achieve women's economic rights and justice established in late 2020. It will provide strategic direction and leadership to support domestic violence survivors through advocacy, mentorship, and economic empowerment.

This task force will work with policymakers at all levels of government and with financial institutions to create meaningful changes to better support the women who are rebuilding their lives after escaping abusive domestic relationships.

Advocates are drawn from women's community organizations, financial institutions such as banks, utilities, and essential service providers, telecommunications companies, industry regulators and ombudsman services, local and national government, the criminal justice system (police, prosecutors and the judiciary), the family justice system, consumer lawyers, and researchers and academics.

Contact:

Meseret Haileyesus (she/her)

Executive Director

Canadian Center for Women's Empowerment
(CCFWE)

www.ccfwe.org

Email : mesi.haileyesus@cfwe.org

Cathy Cowan (she/her)

Finance Policy Committee Lead

Canadian Center for Women's Empowerment
(CCFWE)

www.ccfwe.org

Email : cathy@cc-consulting.ca

Ms. Judith Robertson
Commissioner, Financial Consumer Agency of Canada
427 Laurier Avenue West,
6th Floor, Ottawa, ON
K1R 1B9

July 15, 2021

CC: Supriya Syal Ph.D.
Deputy Commissioner, Research, Policy and Education
Financial Consumer Agency of Canada
427 Laurier Avenue West,
6th Floor, Ottawa, ON
K1R 1B9

CC: Darren Hannah
Vice President, Finance, Risk and Prudential Policy at Canadian Bankers Association

CC: Neil McLaughlin
Chair of the Canadian Bankers Association's Executive Council

Cc: Anita Vandenberg, MP
Member of Parliament for Ottawa West-Nepean

CC: Mona Fortier, MP
Associate Minister of Finance and Minister of Middle Class Prosperity

Dear Ms. Judith Robertson,

The Canadian Center for Women's Empowerment (CCFWE) has developed a comprehensive list of policy recommendations in collaboration with the National Task Force for Women's Economic Justice to fight financial and economic abuse in the context of domestic violence. These policy recommendations help protect victims and survivors of domestic violence and help them become financially independent.

Statistics Canada has reported a 12% increase in domestic abuse calls since the beginning of the COVID-19 pandemic and nation-wide lockdowns, but the number of incidents is likely much higher. A new national survey by Women's Shelters Canada offers a glimpse into the experiences of front-line workers and women fleeing violence during the COVID-19 pandemic, with reports of clients facing more violence that is also increasing in severity.

In February 2021, the federal government committed to creating a National Action Plan (NAP) to address gender-based violence. As part of building the NAP, organizations dedicated to eradicating gender-based violence led consultations to garner policy recommendations from stakeholders. The majority of respondents indicated that there was "little to no support" available to support survivors of economic and financial abuse in financial institutions.

July 15, 2021

Currently, the CCFWE is calling on the Government of Canada to include all forms of economic abuse in the National Action Plan and the amended Divorce Act. This provides a crucial opportunity to transform responses to economic abuse and to improve the lives of survivors. CCFWE advocates and supports the development of new approaches to economic and financial abuse, working with organizations such as banks to review their existing systems, policies and procedures in order to remove barriers to survivors' economic safety.

Many women experience economic abuse within the context of domestic violence. Economic abuse limits women's choices and ability to access safety. We believe that family violence is a problem for banks and their customers. It is a risk to their organization if it means loans can't be repaid. It is a risk to their customers if they are made homeless, lose income, and face mental health challenges in the financial fallout of abuse.

CCFWE believes that providers of everyday financial products, banks, insurance companies and building societies have an unrivalled ability to reach and support those experiencing economic abuse. Since perpetrators of abuse use joint financial products and banking systems to control their partner, including post-separation, banks and building societies can also take action to close these loopholes.

Today, the National Task Force for Women's Economic Justice advocates are working to create systems of change to enable survivors of economic abuse, allowing them to receive an appropriate response from banks, building societies, and insurance companies. The CCFWE National Economic Abuse Task Force advocates have representatives from various organizations across Canada. Please see page 15 for our list of Task Force advocates.

These recommendations are a combination of literature reviews, community consultations, and testimonies from both support workers and survivors of gender-based violence. The National Task Force for Women's Economic Justice advocates highlight seven key areas of policy recommendations to protect both survivors of gender-based violence and their families.

We look forward to collaborating with you to ensure that every woman and survivor is equipped with the education, resources, and support necessary to safely and securely manage their finances. Kindly contact mesi.haileyesus@ccfwe.org to arrange a meeting with the Canadian Center for Women's Empowerment team.

We look forward to hearing from you.

Yours sincerely,
Meseret Haileyesus