Supporting Women's Financial Safety

A Guide to Prevention and Action on Financial Abuse within the Financial Service Sector





Department of the Prime Minister and Cabinet







Supporting Women's Financial Safety

This guide provides user-friendly checklists for financial service organisations to better understand, prevent and address financial abuse.

The purpose of this guide is to support your organisation to build knowledge and awareness of financial abuse and develop industry best practice.

To aid your journey, the guide includes a set of Principles, to inform the prevention and response to financial abuse within your financial service's policies, processes, products, services and culture.

By working through the Principles, and adopting a growth-mindset, your organisation will move from providing ad hoc, customerfocused responses to harms to systemic, organisational changes that can help prevent financial abuse.

Why preventing financial abuse matters to the financial service sector

The financial wellbeing of customers is a growing area of focus within financial service organisations, with hardship and equity teams managing the needs of vulnerable customers. Women are overrepresented as victims of financial abuse. While hardship teams can provide significant support, greater focus on prevention would help minimise the harm caused.

Adopting a dual approach of prevention and response to financial abuse creates better outcomes for women and their families.

Eliminating harms at their source

By preventing your financial products and services from being used to perpetrate financial abuse, women will experience improved financial security and wellbeing while organisations benefit from the reduced need for financial hardship services.

Safer environments

Preventing financial abuse as an organisational priority means implementing values-based decision-making frameworks that prioritise safety. By applying these frameworks, your employees, executives and contractors will also benefit from the changes you make to support customer financial wellbeing.

More accessible products

Making your financial products inclusive for women at risk of financial abuse will make them more accessible for everyone.

Improved customer satisfaction

By regularly reviewing and updating your products and services from a financial abuse prevention perspective, you will improve customers' experience and consumer wellbeing.

Product and service innovation

By prioritising the diverse needs, experiences and capabilities of women at risk of, or experiencing financial abuse, you can develop customer service, contractual or product innovations that change your 'business as usual' operations. Thinking in new ways to prevent financial abuse can seed innovations across your organisation.

Demonstrating your corporate responsibility

Taking action to prevent harm, in addition to responding to crisis, is an effective way to demonstrate the role that your organisation can play in supporting women's safety and financial wellbeing. Assuring women that your organisation recognises and is working to prevent financial abuse will build trust with your customers, as well as society at large.

A competitive advantage

By developing and championing best practice in the prevention of financial abuse, your organisation can position itself as a leader on this important issue and offer your organisation a point of difference for customers, employees and investors.

How to use this Guide

Who is this Guide for?

The guide is for financial service and related sectors, including utility companies, banks, insurance, and loan providers. The guide may also be helpful to other organisations to inform discussions about systems reform to prevent financial abuse.

The Principles will be applicable across your services and are particularly relevant to people in your organisation that:

- design and develop financial products or services,
- work in hardship teams, management, customer service or communications, and
- make decisions at the executive level.

These departments and individuals have the capacity to implement impactful changes to support customers who are vulnerable to, or experiencing, financial abuse.

The issue of financial abuse is complex. All employees at every level will require support to implement changes and build organisational capacity.

The Principles can be used as an action plan or for stimulating ideas within relevant teams to target areas for change or improvement.

Changes could include the design of products and services, additional employee training, communicating the implications or risks of financial abuse and the support your organisation provides for victim-survivors of financial abuse.

By starting small and progressing through the checklists, your financial service will move from responding to financial abuse on an individual and case-by-case basis to preventing financial abuse through systemic and cross-industry interventions.

Using this guide

The Principles are intended to be a launching platform for change. The Principles are described in detail in their dedicated stand-alone sections of the guide. As each organisation and industry face different and varied challenges, the Principles are indicative of potential action rather than prescriptive.

In each section,

- a 'how-to' details potential ways to implement the Principles.
- a 'progression plan' allows you to assess your current approach or readiness for action and provides a pathway for continuous improvement.
- an 'illustration' demonstrates how the Principles might look in practice.

The Resources and Support Section on page 35 provide avenues for further exploration. The section includes links to practical supports on how organisations can do informed work in the domestic family violence sector. These links range from referrals for customers, training for employees, and additional resources.

What is Financial abuse?

Financial abuse is a form of intimate partner violence where a perpetrator deliberately controls a victim's access to, use of, or ability to control their finances. It often occurs alongside other forms of violence, or on its own after physical contact has ceased.

This form of violence that can extend long after a couple's relationship has ended, especially when involving protracted legal matters, including the division of property, joint bank accounts and businesses, family law and child support. While this guide focuses on financial abuse in an intimate partner relationship, such abuse can happen in other settings like between family members or with a person's carer.

How to take action

This Guide moves organisations from recognising and responding to violence to preventing financial abuse.

It encourages business to understanding how their products or services may be used to perpetrate abuse and develop a plan to prevent harm and mitigate risks. To gain the most out of the checklists, conversations across your organisation are required that place an emphasis on coordination, consultation and cooperation. These conversations will draw together insights from work areas and data not usually combined or drawn upon for this purpose.

Coordination

Who in your financial service is best placed to coordinate a whole-of-organisation conversation and lead your organisation's response?

Consultation

Which organisational stakeholders and expert knowledge-holders should you include?

Cooperation

How can you learn from the diverse experiences of others and share your expertise?



Prevention and response ecosystem

The Principles have been developed to assist financial service organisations to prevent risks and mitigate harms related to women's financial safety.

The Principles can be applied to both online and offline customer environments and products and have been informed by the Australian eSafety Commissioner's Safety by Design work. The Principles are also informed by the work of the domestic and family violence sector and government initiatives, including the National Plan to Reduce Violence against Women and their Children (2010-2022). Efforts to address all forms of gender-based violence are underpinned by work to address gender inequality.

The Principles offer recommendations for producing broad and systemic level changes to initiate lasting reform.

To inform the Principles,

research was conducted with a broad range of stakeholders from the financial, government, community service and advocacy sectors.

The research responded to an identified need to achieve both systemic prevention and short-term mitigation of harm across online and offline service systems.

The Principles focus on service, policy and cultures for safety. Any action informed by the Principles should be supplemented with specific advice from, and supported by, expert advisory groups and specialist services.

The research informing

the Principles:

- included the experiences of women with histories of financial abuse through advocates and support services,
- drew on the work of those that specialise in inclusion and accessibility, including women's and disability rights organisations,
- applied a design lens to achieve accessible, responsible and research-led innovation,took the view that 'service' is what brings together disparate product offerings, and
- was informed by the eSafety Commissioner's Safety by Design Principles and applied them to both online and offline service encounters.

1 Safety by Design

Safety by Design places user safety and rights at the centre of the design and development of online products and services. It focuses on the ways technology developers and service providers can prevent online harms by anticipating, detecting and eliminating risks before their products and services reach the market and throughout their lifecycle. It embeds safety into the values, culture, leadership and operations of businesses.

This proactive and or spite proactive preventative approach was spearheaded in Australia by the eSafety Commissioner. While the Principles were developed with online interactive services in mind, they equally apply to in person and other forms of delivery.

3. Service Design

Service Design integrates seemingly disparate products, systems and processes to make a service journey seamless from the customer's perspective.

INTEGRATED A service design perspective views service as a process that can be designed. It takes digital and physical touchpoints to be part of the same service system.



by Design

2.

A person-first

approach

2. A person-first approach

A person first approach understands that every RESPECT · ACCESS person experiences specific and unique vulnerability according to their lived ex perience and background.

These vulnerabilities occur through systems that are not designed, or set up, to and advocated for by rights INCLUS accommodate people's specific needs. Taking a movements and fields where person-first approach can also help to understand that an 0 individual's expe Z rience of financial

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Research-led Innovation

Research led innovation takes the view that complex issues require fresh thinking and data informed solutions.

Research led innovation is prac tical as it applies effectiveness, feasibility and viability lenses.

Developing innovative solutions involves an ongoing process of expanding the scope to discover new issues, exploring possible solutions and determining appropriate practical outcomes.

abuse may involve an inter

section of factors including

gender, race, age, geographic

location, sexual orientation,

ability or class (referred to as

an 'intersectional approach').

son-first focus is recommended

wellbeing is paramount, such as

healthcare. Access. inclusion.

and proactive design are vital

preventing financial abuse.

cornerstones in addressing and

An intersectional and per

based organisations, social

· JIJSITOH

Prevention-focused approach

The Principles at a glance

1.

Build empathy and awareness

Listen and learn about the lived experiences of financial abuse victim-survivors. Build empathy and awareness into your financial service's policies and practices.

Be inclusive and accessible

2.

Design products, services and systems to support the different needs, experiences and capabilities of individuals experiencing or at risk of financial abuse.

3.

Prioritise safety

Once you have a greater understanding of the issue, design your systems, services and products with Safety by Design principles, violence prevention and wellbeing in mind.

4.

Act with integrity

Use a values-based framework to guide employees, system and policy decision-making when engaging with regulatory requirements.

5.

Operate holistically

Guide customers throughout their service journey on the risks of financial abuse and how it can be best prevented or managed.

6.

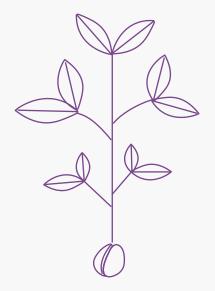
Take responsibility

Understand how the system can be misused. Take preventative action and build in ongoing reviews to update your understanding.

7.

Champion for change

Lead by best practice and advocate for change within and beyond your organisation.



Progressing: A growth mindset



are budding.

3

Branching out What's next?

You build upon current best practice and organisational barriers to change.

• You gain knowledge of the perspectives of victim-survivors. including those of women from diverse backgrounds and circumstances.

the process of change.

- You identify areas where your • organisation can take initial action and encourage ideas to germinate.
- You sow the first seeds for women's financial safety within your financial service.

- You consider how current best practice could apply in your organisation.
- You set out a framework for action.
- You strive to know more about the experiences of your most vulnerable customers and their safety needs.
- You foster small changes across all areas of your organisation.
- You share best practice and promote financial abuse prevention among team members.

- You take responsibility for and understand the urgency required to support women's financial safety in your organisation's systems and service.
- You create feedback loops and strive for continual improvement.
- You assess performance, evaluate how products serve your most vulnerable customers and can be refined to prevent financial abuse.

- You promote supporting women's financial safety as the responsibility of each person in your financial service.
- You lobby for change to existing barriers to financial safety beyond your organisation.
- You encourage and support other players in your sector by sharing best practice.
- Your preventative strategies accommodate women with diverse experiences, not only those who are most easily engaged.

Build empathy and awareness

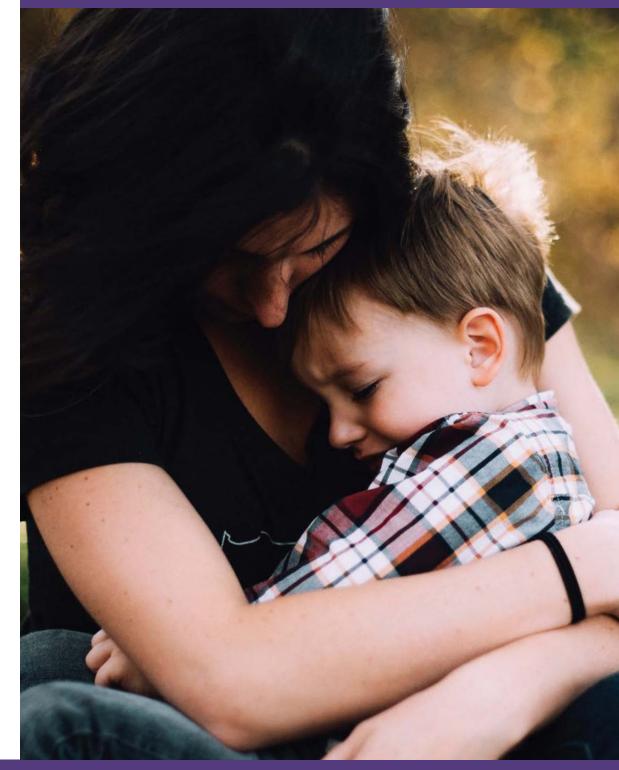
Listen to and learn from the lived experiences of financial abuse victim-survivors to build empathy and awareness into your financial service organisation's policies and practices.

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You can't put family violence clients into a box and say 'this is how you deal with it'.

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- Mary, Financial Counsellor



1. Build empathy and awareness

As a service provider, there can be an inherent power imbalance between you and your customers that may compromise their ability to question what is happening, or to say no to a situation or a product that will put them in a vulnerable position.

When victim-survivors are separating from an abusive partner, they are interacting with multiple systems while also addressing their immediate safety needs. A personcentred framework involves responding empathetically and appropriately to an individual's unique circumstances and understanding that their situation extends beyond the confines of your service.

To better respond to these issues, your financial service organisation needs to listen to the lived experiences of victimsurvivors and women vulnerable to becoming victims of financial abuse. By listening to victim-survivors and their advocates, you can understand the complex nature of financial abuse and how it intersects with your products and services.

Only when you listen to someone's story can you begin to understand the difficulties of their situation, take action that prevents their financial abuse, and make meaningful changes to your product and service design.

How to build empathy and awareness

1. Listen to victim-survivors of financial abuse.

- In consultation with specialist support organisations, develop safe avenues for feedback from people with lived experience and find ways to action change based on feedback.
- Invite specialist agencies that represent or work closely with victim-survivors to advise your organisation or provide training.
- Build a library of diverse examples of how your products might be used to perpetrate financial abuse to understand the different situations, circumstances and conditions that enable it to occur.
- Embed co-design practices into your product design teams by inviting organisations that work with victim-survivors, and who can safely include victim-survivors, to participate in your product design and review processes.

2. Work within a person-centred framework that places your service in the context of an individual's relationship journey, unique circumstances and interactions with other service systems.

- Collect information to understand the complexities of customers from different backgrounds and include these in the design of products and policies.
- Understand that customers' situations and circumstances change throughout their product use and provide a service that takes these experiences into account.
- Act with an understanding that individuals at risk of financial abuse or who are experiencing financial abuse may not be able to represent their best interests when contacting your organisation.
- Be open to listening but mindful not to unnecessarily ask customers to re-tell their story multiple times.

3. Provide training and education to employees at all levels of your organisation about the issues facing customers who are at risk of or who have been subject to financial abuse.

Provide employees with information from specialist organisations who have expertise in financial abuse, who can share the lived experiences of victim-survivors to build compassion and advocacy.

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In some frontlines service industries, there is high staff turnover and not a lot of background ...I think that noticing something is wrong, being in a place where you're able to bring that to somebody's attention when it might be unwelcome news, and to do that in a safe way ... I think we need to be really mindful of the limitations there.

- Clive, Financial Front-line Worker

1. Build empathy and awareness

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- Seek advice from specialist support organisations to provide training to frontline employees. Ensure that training is appropriate to their role or level of engagement with customers, so they feel empowered to act confidently and safely to identify warning signs, prevent or respond to financial abuse and its precursors.
- Train product design and analysis teams to identify financial abuse through customer feedback and product or service usage patterns.
- Know what to do at each level of your organisation when risk factors, red flags or opportunities for perpetuating abuse are identified. This includes how to appropriately capture and store this source of data to inform future preventative actions.
- Provide front line employees with upto-date referral information to specialist services to support a customer at risk of, or subject to, financial abuse when it is beyond your organisation's expertise.
- Create accessible and easy to understand guidelines for employees to confidently engage women at risk of financial abuse and victim-survivors of financial abuse in conversations about what options are available.

4. Commit to increasing understanding, by training employees, especially those working in small or close communities, to respond appropriately, confidentially, and respectfully when engaging with vulnerable women and victim-survivors.

- Convey the importance of referring to financial abuse guidelines and specialist advice to all teams within your financial services organisation to avoid increasing women's risk.
- Upskill employees with resources and training to understand how to apply a person-centred framework to customer service interactions and product design.
- Ask employees to declare conflicts of interest if the assumed perpetrator is part of their family, extended family, friendship circle or community network.

Further Reading

To learn more about service provider responsibilities online:

eSafety Commissioner
 Safety by Design: Principles and background

To learn more about supporting customers:

- Australian Government (2011)
 <u>The National Plan to Reduce Violence against</u>
 <u>Women and their Children</u>
- Thriving Communities Partnership
 One Stop One Story Hub
- Centre for Women's Economic Safety.
 Lived Experience Stories

To learn more about the role of businesses and government in tackling economic abuse:

Economic Abuse Reference Group. (2018)
 Good Practice Industry Guideline

To learn more about how workplace diversity builds an empathetic attitude to customers and design for customers:

Business Solver (2021).
 State of Workplace Empathy: Empathy
 and the Diversity Divide Whitepaper

'I am in financial hardship' - If they don't use those words, they will not get put in touch with the right department.

- Lin, Financial Counsellor

1. Build empathy and awareness – Assess your progress





Enacting

Your financial service organisation works with specialist financial abuse service providers to consider consumer vulnerabilities in product design and delivery. Your awareness of financial abuse risk factors informs the design of safer products and services

employees throughout your organisation are provided with specialist financial abuse training to guide best practice on designing products through to customer service to prevent them being used for abuse.

Your customers who are experiencing family violence or financial abuse are allocated a single point of contact to reduce victimsurvivors having to repeat their story.

Specialised training was offered to

Branching out

What steps will your organisation take to grow?

Your financial service organisation provides information about financial abuse to employees.

Embarking

You have policies addressing financial abuse and family violence.

You identify how your system could be used to alert employees to risks of financial abuse.

Your employees have been trained to understand online harms and abuse, identify flags indicating financial abuse or opportunities systems may be used to abuse.

Services with experience and expertise in preventing and responding to financial abuse are invited to provide feedback on your services.

Emerging

Your employeeshave policies and protocols to guide them on how to act, and when to provide referrals to women to prevent or respond to financial abuse.

Detailed notes are recorded on a customer's file to reduce a customer repeating traumatic stories when interacting with different employees within vour financial service.

Your employees provide customers experiencing or at risk of financial abuse with referrals to specialist organisations for additional support with their situation.

An illustration:

When the executive team at BlueSpot Insurance decided that they were going to take steps to prevent financial abuse, the first action they took was to mandate training across the organisation.

The training covered: identifying risk factors for, flags of, and how to act on financial abuse. The training was required for everyone including board members and the executive, employees and professional tradespeople who were contracted to attend homes. Because this training was mandated from the leadership, employees understood this was an organisational priority.

the financial hardship and product design teams. To complement this training, employeeswere provided with tools and procedures to ensure flags were both recorded and actioned appropriately, according to company financial abuse policies. Data on the flags were later used

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to identify how products and systems

could be improved to prevent future abuse.

the culture of how **BlueSpot** perceived,

identified, prevented and responded to

financial abuse and brought it to a position

of leadership within the sector.

Over time, the training shaped



Be inclusive and accessible

Products, services and systems are designed to respond to the different needs, experiences and capabilities of individuals experiencing or at risk of financial abuse.

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Some of the people that we work with come from countries with non-banking systems. They could be growing up in refugee camps, right? So there is no sophisticated banking system.

- Lin, Financial Counsellor



2. Be inclusive and accessible

Interactions with your systems are not equal for everyone. People's background, systems knowledge, technological literacy, knowledge of rights, emotional capacity, access to services and community support vary for each individual.

Those experiencing or at risk of financial abuse may have limited to no control over their financial situation; they may experience coercion by their family or community to agree to disadvantageous financial arrangements or remain in the abusive relationship. Individuals may not even realise they are experiencing financial abuse. While the financial sector has taken some action to meet the needs of these individuals, many women still fall through the cracks. When designing a product, service or system, it is essential to consider the differing needs and experiences of individuals who are or could be susceptible to experiencing financial abuse so that future harms can be prevented.

How to be inclusive and accessible

1. Make your services accessible to people with different levels of English, financial comprehension, capacity, and technological literacy.

- Provide easily accessible information about financial abuse and warning signs.
- Routinely provide information about financial abuse when promoting or discussing products, such as joint bank accounts.
- Use plain English and translate information about financial abuse into community languages, including those of emerging or vulnerable communities.
- Communicate with visuals and graphics to support written messages and promote comprehension.
- Design your IT systems for a low level of English and technological literacy.
- Consider how to enhance accessibility for customers with a disability
- Ensure that information is easy to find without customers needing to click through multiple website pages.
- Appreciate that your customers will have different levels of understanding. Your teams have ongoing conversations with them about product safety and performance, system and service operations, and where to find support.
- Collect and use data on the harm prevention or safety performance of your products, systems, and services when financial abuse or risk factors come to light.

2. Integrate different perspectives into your product, service and policy designs to ensure diverse user needs are met in ways that will best prevent harms.

- Use insights from financial abuse, red flag and risk factor data that you have collected to inform the design of products, policies and services.
- Create and use tools such as composite or illustrative examples of women at risk of or experiencing financial abuse to illustrate and convey different customer needs, vulnerabilities and perspectives to staff across your financial service.
- Hire people from diverse backgrounds for roles across your organisation, including your executive and teams focused on policies and compliance, product design, employees training, customer service and financial hardship.
- Conduct audits of your policies and procedures to assess if they represent different customer needs, backgrounds and perspectives.
- Ensure that customers and specialist services are involved in the co-design of financial abuse initiatives.

To continue see next page >



2. Be inclusive and accessible

Further Reading

To learn more about the different factors and our understanding of those factors in family violence:

Australian Government (2011)
 <u>The National Plan to Reduce Violence</u>
 against Women and their Children

To learn more about implementing an intersectional approach to your organisational practice:

• Women's Health Grampians and Communities of Respect and Equality (2020).

Intersectionality Guide: A tool for CORE members How your organisation can address gender inequality and other forms of discrimination.

• J Chen (2017).

Intersectionality matters: A guide to engaging immigrant and refugee communities in Australia. Multicultural Centre for Women's Health. Melbourne. To learn more about engaging diverse communities such as People with a Disability or Culturally and Linguistically Diverse (CALD) communities:

 Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability (2020). <u>Culturally and Linguistically Diverse</u> <u>engagement principles.</u>

A guide for organisations to provide and understand the complexities of intersectional program development:

Women's Financial Capabilities Project (2021).
 Lens on, hands on: An intersectional
 Guide to financial capability
 program development.

To learn about safety for People with Disabilities in the online space:

eSafety Commissioner (2021).
 <u>Technology-faciliated abuse of women</u>
 with intellectual or cognitive disability.

To learn more about accessibility in your use of language:

- Centre for Inclusive Design (2020).
 Easy English versus Plain English.
- Plain Language Action and Information Network, US Government (2010). Plain Language Guidelines.

MF Story (2001).
 Principles of universal design.
 Universal design handbook.

To learn more about empowerment and inclusion in the online environment:

eSafety Commissioner (2021).
 Safety by Design: Principles and
 background

To learn more about the advantages of a diverse workforce:

L Sherbin & R Rashid (2017).
 Diversity doesn't stick without inclusion.
 Harvard Business Review.

She couldn't really speak English. And he took her into a bank to open up a joint bank account. And the teller only spoke to the husband, didn't speak to the wife. He didn't engage an interpreter to make sure that the client was part of the conversation.

Adele, Financial Front-line Worker

2. Be inclusive and accessible – Assess your progress



Embarking

Your policy information about financial abuse is easily located on your website, does not involve too many click-throughs to find, and is searchable using key words.

You collect performance data and feedback on the clarity, ease and speed of your response to reports of financial abuse and use these data to improve your services.

You promote workforce diversity, including gender, disability, and cultural diversity, through developing a diversity plan with hiring targets across all levels of your financial service organisation.

You use insights from financial abuse specialist services to identify who your customers are to guide policy makers, product designers and training managers in your financial service.

Emerging

You proactively build linkages with community organisations to identify and translate your product information and abuse prevention provisions into languages at most need of support.

Your policies and procedures are explained using simple language and employ visual graphics to communicate how these work.

Your product designers use diverse examples that illustrate financial abuse and its risk factors for women of different backgrounds and abilities and use these to prevent or mitigate financial abuse risks and harms.

You disseminate illustrative examples of customers' experiences across your financial service and offer training to help employees understand the complexity of situations for customers who are experiencing or are at risk of financial abuse.

Enacting

You provide translation services to customers, rather than relying on women to provide their own.

Your product information and abuse prevention provisions are translated into languages that accommodate needs in the communities your organisation serves.

You invite specialist financial counselling organisations that work with victim-survivors to be included in the design and development of your products and systems.



What steps will your organisation take to grow?

An illustration:

Linedale Banking already had translations for most major languages on their website and had distributed them to branches. They noticed a gap with no translations available for customers from emerging communities where there was high demand for translation services. Additionally, they had customer complaints when using community or familymember translators, where a translator had not conveyed information correctly, leaving women vulnerable to financial abuse.

Linedale Banking did an accessibility audit of their material, looking at their customers' information needs and barriers. They found that their materials were too complex for individuals who had limited systems knowledge or limited financial literacy.

Linedale Banking decided to offer translation services and simplified information provided, using graphics and easily understood language.

Over time, they engaged the Consumer Advocate to sense check their customer information to ensure that it was sensitive to the needs of diverse groups. Linedale Banking became known as a leader for providing an accessible service to Culturally and Linguistically Diverse (CALD) communities and helping women from emerging communities to make informed financial decisions.

Where to weat?

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The abuse just goes on after the relationship has ended, even if the person has managed to leave, so the right support is just so important. - Prue, Finance Sector Leader

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Prioritise safety

Once you have a greater awareness of the issue, design your systems, services and products with Safety by Design principles, violence prevention and wellbeing in mind.



It's not always as easy as 'Okay, well, that's my right I can do that.' Because the victim survivor is always thinking about 'how is the perpetrator going to respond?'

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- Christina, Financial Counsellor



3. Prioritise safety

Designing for safety can apply to any process or product intentionally created within your financial service organisation. Prioritising prevention begins with embedding safety principles into the design, development, release and review of products.

Prioritising women's safety might include ensuring informed consent when signing joint loans or intervening to ensure financial safety when relationships or contracts break down. It might also involve considering the way people interact with your website or their online account through to the coding and user experience of the website itself.

Designing for safety involves pre-empting how your product, service or system could harm or facilitate harm and continuously improving these products to combat any risks. In the context of financial abuse, the possibility of harm means that women's safety and security must come first. Preventing or mitigating financial abuse is complex and should minimise risks for current or potential victim-survivors. For example, requiring dual approval for withdrawals on joint transaction accounts may limit opportunities for a perpetrator to withdraw all of the funds, but this may also restrict a victim's access to funds or place them in danger due to the ongoing need to engage with the perpetrator.

Prioritising safety also includes designing products that support an individual's wellbeing, need to meet basic requirements like food and housing as well as exercising their agency.. It also means prioritising prevention and mitigation of harm not merely improving responses to financial abuse.

How to prioritise safety

1. Build and review systems and services to ensure they are safe and actively prevent perpetrators from using them for abusive purposes.

- Embed Safety by Design and risk prevention into all new products, services and systems from their inception.
- Stress-test systems and services to identify areas that may pose risks or functions that add to victim-survivors' trauma or abuse.
- Integrate Safety by Design into legacy systems.

2. Design safety features to change abusive behaviour at its source.

- With support from specialist services, understand perpetrators and their patterns of action to proactively include features in your products to prevent future abuse and protect victim-survivors.
- Design to discreetly discourage behaviour that may be a misuse of your system or service.

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We have had instances where the perpetrator of violence has found the new address by doing that. So, I know. I know that it doesn't work. I know it's not foolproof. 'I'll look for something sloppy'. The perpetrator goes, 'How can I find my partners new address? The bank might have it. The power company might have it. I'll ring around and see what I can find out'. - Samantha, Community Sector Leader

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3. Inform customers about their rights and obligations on an ongoing basis in an accessible format.

- Take steps to ensure individuals understand the product and that they know what they are signing, including what will happen should their relationship status change, such as on separation.
- Take opportunities to deliver information to individuals in multiple communication formats and forums to ensure the information is understood, received and reinforced.
- Provide accessible information about product risks, harms, obligations and rights on an ongoing basis, as information may only become relevant as abuse escalates or relationships change.

4. Design for safety, security and privacy as a priority.

- Remind or inform individuals of an account, transaction settings that may allow someone to locate them or use the system to perpetrate abuse.
- Prioritise women's safety by defaulting to the highest level of privacy for new products or switching to private settings at the first sign of abuse for existing customers.
- Prioritise safety in the design of new financial products or changes to existing offerings.

Further Reading

An assessment toolkit by the e-Safety Commissioner to guide organisations to assess how they respond to technologically enabled abuse:

eSafety Commissioner (2021).
 eSafety's Safety by Design assessment
 tools for industry

To learn more about how safety can be prioritised by energy retailers:

 Victorian Essential Services Commission (2018)
 <u>Providing family violence support:</u>
 <u>Exploring ways energy retailers can provide</u> family violence assistance that is safe and effective. To learn more about integrated service provision to address financial abuse:

WEstjustice and McAuley Community Services for Women Restoring Financial Safety Project (webpage) (Video)

To learn more about designing to support safety in the digital space:

E PenzeyMoog (2021)
 Design for Safety.
 A Book Apart

A case study into designing for safety:

UK Design Council (2018)
 Case Study - Design Economy, Monzo



3. Prioritise safety – Assess your progress



Enacting

For joint accounts, loans or co-signatories on contracts, your organisation provides separate passwords, logins and portals for each party.

Your organisation includes safety features in products and services to reduce perpetrator behaviour, such as additional checks to large withdrawals and the identifying of red flags that indicate potentially abusive behaviour.

You are implementing Safety by Design retrospectively into legacy systems; identifying how they can be upgraded to prevent abuse and prioritise victim survivor safety.

Branching out

What steps will your organisation take to grow?

Your financial service collects complaints data to detect and understand abuse in order to identify how to embed safety features into your system, services and products.

Embarking

Your financial service reminds or informs individuals of settings that may allow someone to locate them, or to use the system to perpetrate abuse, pre-emptively or over time.

You build Safety by Design into new products, services and systems. Emerging

You periodically review your products, systems and services to address and improve safety features and functionality to prevent and respond to financial abuse.

Your organisation collects and analyses use-data to detect and understand abuse of your systems, services and products to improve them.

You stress-test your systems and services to identify weak points that can be exploited by perpetrators or put women at risk of financial abuse.

An illustration:

MySense is an insurance provider that provided their design department with training on prioritising safety, preventing financial abuse and person-centred design principles based on their family violence policies. These principles were integrated into their regular product review cycles and formed part of their collection of use data. As a result, changes were built into their products to ensure customer safety and minimise the risk of financial abuse through their products.

Changes to their systems included: obscuring contact details of individuals flagged as at risk, so employees did not unwittingly provide location details to perpetrators; embedding products with push notifications to inform women on the safest account settings; automatically warning perpetrators when using the **MySense** system unacceptably; and altering service provision systems to provide avenues for customer concerns or employee-identified safety concerns, to be actioned.

MySense began to build more innovative and expansive initiatives due to their success and continued to review the financial provision and technology landscape for future endeavours. They began to embed stress testing into their product design using creative methods to bypass problematic aspects of legacy systems.

4.

Act with integrity

Use a values-based framework to guide employee, system and policy decision-making when engaging with regulatory requirements.

"

I think any credit product, as well as any joint facility, is an opportunity to make sure that both parties understand their liabilities.

- Raul, Essential Services Sector Leader





4. Act with Integrity

Regulations inform the practices of institutions. However, the circumstances around financial abuse can often be complex and require care in the application of regulations.

A values-based framework will support employees to guide strategic practice and prioritises their welfare and agency. Applying a values-based framework is especially important when working with women at risk of abuse as well as with victim-survivors.

A set of ethical principles will support employees and guide strategic practice in your organisation to respond to reports of abuse, red flags and risk factors. By documenting and demonstrating how integrity matters to your organisation and applying a values-based framework to regulatory reporting and policy practice, there are opportunities to ensure the safety of accounts, loans and transactions that a perpetrator may use to perpetuate financial abuse or undermine the financial wellbeing of their current or former partner.

How to act with integrity

1. Apply a values-based ethical framework to your organisational and personal practice in responding to and preventing financial abuse.

- Your financial service promotes fairness and ethical practice across the organisation and by third-party contractors.
- You allow employees flexibility to prioritise safety in product design and customer service.

2. Be aware of existing requirements of your organisation and strive to meet and exceed them.

- Your financial service offers a model of best practice for upholding and exceeding regulatory requirements.
- You provide resources to victim-survivors when an organisational error has inadvertently put them in danger or at risk of losing housing or other essential services.

Further Reading

To learn more about transparency and accountability in online service provision:

- eSafety Commissioner (2021)
 Safety by Design: Principles and
 background
- Robert Chesnut (2020).
 How to build a Company That (Actually)
 Values Integrity
 Harvard Business Review

To learn more about leading in a complex environment with complex topics:

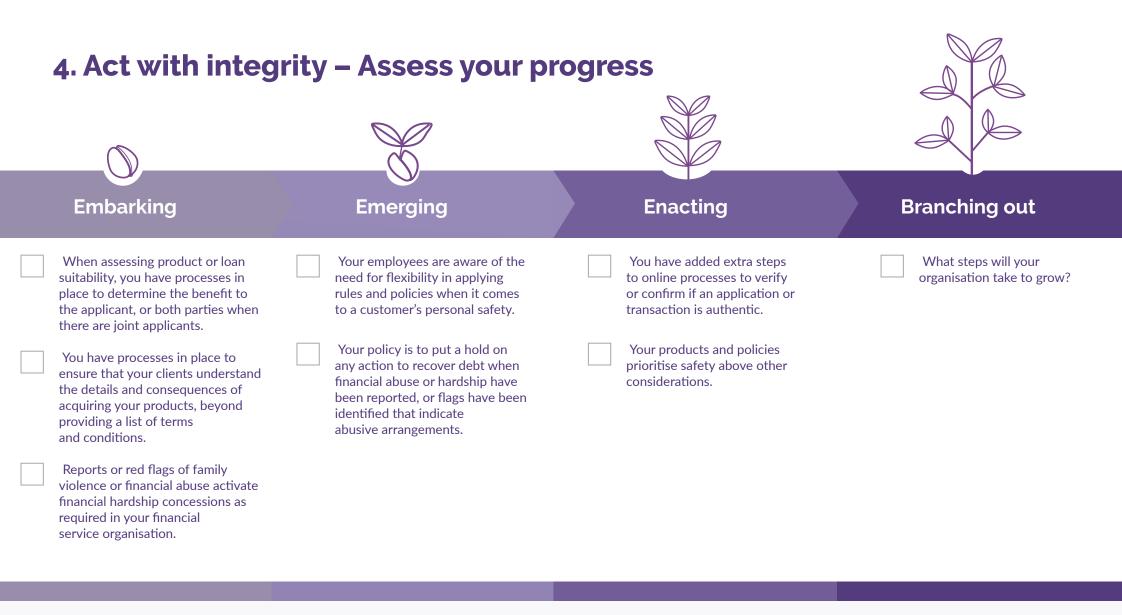
• The Ethics Centre. Ethical Leader Development training

To view a mechanism to support leaders to act ethically and apply best practice:

The Ethics Centre.
 The Banking and Finance Oath

The challenge is, of course, in a competitive credit environment, the emphasis is on speed... so we're talking about slowing down and doing checks.

- Hugo, Financial Counsellor



An illustration: OnePoint Gas and Electricity is a new energy provider with a small team and a new framework for service provision. When developing their service, they had not considered the need to design their products or service with financial abuse or safety in mind.

As **OnePoint** became more established, they discovered that some customers had contacted them about overdue notices and large debts for properties that they weren't living in. These customers had been threatened with disconnections and debt collection, but they should have been flagged as cases of financial abuse. **OnePoint** reached out to specialist financial abuse service organisations to workshop how their policies could apply fairly in such cases while recognising their limitations as a small provider. **OnePoint** set up policies for such cases that included faster customer service, training for employees, and allowing

employees to exercise flexibility in responding to cases that might involve financial abuse. They committed to reviewing how well these policies were applied over time and improving them to better support vulnerable customers.

"

You've got to keep continually reviewing your products and processes, or periodically review them, to make sure that they're used in the way that you'd anticipated when you designed them.

"

- Tina, Finance Sector Leader



Operate holistically

Guide customers throughout their service journey on the risks of financial abuse and how it can be best prevented and addressed to minimise harms.

"

There are lots of issues arising both in relation to debt, but also access to services being cut off, which obviously cuts off victim's ability to contact their support network, and can result in their partner continuing to use the fact that they might be an end user on their account as a way of controlling them.







5. Operate holistically

Financial abuse is enacted throughout customers' interactions with financial services. Institutions provide services essential to the joint lives of couples and are present throughout the relationship as financial abuse unfolds.

In some communities, including those from Culturally and Linguistically Diverse (CALD) communities, banks have a status of authority and their services are assigned meanings beyond the provision of financial services. This status of authority can hinder an individual from contacting their bank about financial abuse but could serve as an opportunity to be a trusted source of education.

The relationship that financial and essential services have with customers provides an opportunity to educate and plant seeds to prevent or mitigate the risks of financial abuse. Planting these seeds may benefit customers immediately but may also help change customers' understanding of rights and appropriate behaviour, more broadly.

These seeds can prevent future abuse or place victim-survivors in a better position to make choices about their situation, even if this impact does not occur in the immediate service context. Furthermore, educating all of your customers promotes community awareness and support mechanisms to identify flags of financial abuse within their community or family environments.

How to operate holistically

- 1. Take a holistic view of interventions and service provider responsibilities
- Understand financial abuse as a journey throughout a relationship and the life-cycle of your product, rather than an outcome.
- Create awareness about financial abuse among all of your customers, regardless of the products or services they use.

2. Assume that customers are not aware of what financial abuse looks like or how it is experienced. Remember that victims may experience abusive behaviour as normal over the course of a long-term relationship.

- Identify engaging ways to educate your customers about the risk factors and experiences of financial abuse.
- In consultation with specialist organisations working on financial abuse, identify how you can adapt your policies and procedures to prevent abuse and build trust and safety for vulnerable customers.

3. Identify and use customer touchpoints within your financial service organisation to prevent abuse or intervene early.

- Find innovative ways to reach out to customers with information or messages to demonstrate you care about the impact of financial abuse on people and are available to help.
- Promote your partnerships or association with specialist services to illustrate how you are a safe place for those at risk of or experiencing financial abuse.
- Implement numerous small communication, policy or service interventions to reach people at the right time, or the right way for abuse prevention and intervention.

Further Reading

To access a resource on best practice referral processes:

- Economic Abuse Reference Group (2017).
 Good practice for industry family
 violence guidelines Referral Options
- To learn about the success of partnerships:
- JE Austin & M Seitanidi (2017).
 <u>Collaborative value creation: A review</u> of partnering between nonprofits and businesses. Part 2: Partnership processes and outcomes. Nonprofit and Voluntary Sector Quarterly, 41(6), 929-968.

To explore how businesses look as a whole from a customers journey perspective:

 N Maechler; K Neher, & R Park (2016)
 From touchpoints to journeys: Seeing the world as customers do.
 McKinsey & Company.

What is a touchpoint?

B

A touchpoint is any point at which a customer interacts with your service.

Touchpoints can include items such as pamphlets, websites, customer service calls, or web portals.

So it's promoting to customers and letting them know that actually, there's heaps of stuff we can do to help you.

- Kate, Finance Sector Leader

5. Operate holistically – Assess your progress



Embarking

Your financial service maps out how financial abuse may occur along a customer's journey of using your services.

Your product design team provides services from a customer journey perspective, rather than from your system's perspective.

Your organisation uses multiple communication points for customers to receive information and updates about their loans, accounts, bills, products, contracts or payments.

You compile aggregate or deidentified examples of what financially abusive customer journeys can look like for a diverse range of customers and experiences.

Emerging

You design and provide services specifically from a customer journey perspective of financial abuse.

You have initiated education programs for customers, product designers and communications teams that aim to prevent abuse and promote safety through communication with customers.

You communicate expected use of products and behaviour of customers clearly across services in prominent positions on your website and promotional material.

You foster small scale innovations to systems across your organisation to achieve small wins which will feed into achieving your aspirational targets.

Your employees are equipped with resources to share with vulnerable customers and other organisational teams on how to lower the risk of financial abuse.

Enacting

Your organisation adopts an innovative approach to designing services and systems that puts safety, inclusion, and accessibility at the forefront. This includes creating an ongoing conversation with specialist support services and victim-survivors.

You draw on diverse data sets to design, trial and implement programs that work to prevent and intervene in financial abuse in unexpected yet effective ways.

You partner with specialist organisations working on financial abuse and regularly create joint messaging to minimise risks, prevent harms and provide safety.

You are viewed by your customers as a financial service that takes strong action to prevent financial abuse and mitigate its harms.



Branching out

What steps will your organisation take to grow?

An illustration:

Lucy, a financial hardship department manager at **Orange Finance**, spoke to a local community centre employee who shared how often individuals were unaware of what financial products they had signed up for, and the consequences of that lack of understanding for individuals when leaving relationships. As a result, Lucy raised this issue with the **Orange Finance Communications Team** who suggested adding prompts within emails and following-up customers two years after they commenced a new product. **Orange Finance** implemented the idea and collected data to measure success over time. Although the information and contact might not help women immediately, the assistance could allow them to be more prepared for the challenge of extricating their finances when leaving a relationship. Providing advice proactively became standard practice across the organisation and also addressed other inclusion and accessibility metrics. If a customer directly requested the information, it was readily available and in a format that was accessible and easily understood.

6 Take responsibility

Understand how the system can be misused. Take preventative action and build in ongoing reviews to update your understanding.

"

A lot of information could be captured as a backup, when issues are being noticed, for later on in the relationship. We could have evidence of the possible abuse.

- Joan, Finance Sector Leader





6. Take responsibility

Perpetrators are creative in searching for ways to exploit a system in order to exert control over a partner, commit fraud, withdraw or hide money or leave victim-survivors in debt or without the means to pay shared bills or mortgages.

Understand that perpetrators manipulate victim-survivors and will use your products and services to achieve this end.

The burden of dealing with abuse often rests with the victim-survivor to firstly identify that it is happening to them and then seek help or make a report. Perpetrators use systems that victim-survivors may not be familiar with, or independently control, to financially abuse them. Women are particularly vulnerable to this abuse as they typically have less of a financial safety net than men, especially in relationships where women do not have or control or a separate source of income.

It is your responsibility to prevent misuse of your products and services by taking a proactive approach. Your financial service can create processes or systems that detect abuse, respond to reports or red flags in a timely and sensitive manner, and prevent abuse from occurring. You should also provide support that is accessible, confidential, and safe. Barriers to financial service organisations taking action might include the challenge of retrofitting existing systems and the resources required to achieve change. This work will likely need continual and gradual improvement over time.

How to take responsibility

1. Be proactive rather than reactive to financial abuse occurring through your systems, services, and products.

- Teach and instruct employees at all levels of your organisation to proactively prevent, resolve and respond to financial abuse.
- Stress-test your systems, policies, and products, to explore their susceptibility to being used for financial abuse before launching new products or services.
- Periodically review your products, systems and services to detect flaws that allow for misuse.

2. Assume your systems, and thirdparty systems, will be used for abuse and build this assumption into organisational practices and designs.

- Collect information on perpetrator behaviour that occurs within your financial processes and systems to inform policy, programming or communication responses that can prevent such behaviour occurring in the future.
- Resolve customer concerns and reported issues which can be identified as financial abuse, including escalating them to the appropriate organisational team that can take action to prevent future harms.

3. Provide the option for robust inperson customer support as well as online avenues for support.

- Find ways to follow-up or check-in on customers experiencing financial abuse that doesn't put them at further risk.
- Provide a responsive, in-person customer service option to resolve complaints, including having a support person present or access to translation services.
- Provide specialist employees training in dealing with financial abuse to work with vulnerable or at-risk customers and victim-survivors.

Further Reading

Additional insights into community and business responses to financial abuse:

C. Bond, S. Tonkin and C. Sterling (2018)
 <u>Responding to financial abuse:</u>
 <u>Community, business and government</u>
 responses to the financial impacts of
 family violence in Victoria.

Economic Abuse Reference Group and the Victorian Women's Legal Service.

eSafety Commissioner (2021)
 Safety by Design assessment tools.

To find out more about prevention through designing for safety:

E. PenzeyMoog (2021).
 Design for Safety. A Book Apart.

We design our products and the way that they operatewith the potential for misuse in mind.

- Prue, Finance Sector Leader

6. Take responsibility – Assess your progress **Embarking** Emerging Enacting **Branching out** Your customer support and Your systems, services Your financial service partners What steps will your with specialist organisations resolution teams are accessible and policies are audited on organisation take to grow? and promptly provide an annual basis to detect who work with victim-survivors misuse for financial abuse. of financial abuse to receive in-person support. ongoing training about the ways Reports and red flags of abuse You have built continuous perpetrators misuse financial are escalated to organisational improvement into your policy systems to enact harm. teams that can design systemic, and product guidance principles. preventative responses. Your product design, legal, Your customer hardship communications and executive employees are trained in financial teams continuously seek to You audit your systems to abuse and family violence identify how they can be improve how financial abuse misused and take action to prevention, identification, prevention is incorporated into mitigate future risks. responses and interventions policies, products and services. appropriate to your organisation. You collect, review and You have trained all employees implement customer and Information is clear and to recognise and respond to red accessible for frontline employees employeefeedback to flags and risk factors of financial improve your responses to to seek advice for managing abuse and how they manifest financial abuse. financial abuse or family violence. within your products or are enabled by your terms and conditions. When Tarrandana

An illustration:

Council first designed their systems, they were unaware of the issue of financial abuse and the creative ways that perpetrators could use their systems to inflict harm. As a result, perpetrators found multiple ways to increase their ex-partners' debt without their

knowledge, which impacted on women's credit scores and their ability to move on with their life.

After their customer service team reported these issues. Tarrandana Council conducted a review of their complaints data and found

that these debts had resulted in numerous additional fines. They also found that their person-to-person response times and policies for resolving these issues were inadvertently aiding perpetrators, as long wait times and a lack of action meant that women often gave up seeking a resolution.

Tarrandana Council implemented a review of their product implementation and a cycle of continuous improvement to address financial abuse. They also designed new ways to proactively detect abuse occurring in their system before they were contacted by victim-survivors.



Champion for change

Lead by best practice and advocate for change within and beyond your organisation.

"

It's very hard to get change in this area. But, policymakers and organisations have now acknowledged that yes, that's an issue.

- Andrew, Finance Sector Leader



7. Champion for change

Systemic barriers can impede implementation of strategies to prevent abuse or enable further action on financial abuse. For example, the legal requirements of service contracts may not enable discretion to support a victim survivor or take action against a perpetrator.

Organisations are urged to advocate for change inside and outside of the financial service sector. Combined with the family and domestic violence sector and other organisational bodies, these messages can provide an opportunity to promote change.

Leadership on the issue of financial abuse within financial systems can emphasise the sector's unique social licence to operate, whether it is for financial service providers, government bodies, or the utility sector, as these are all financial services essential to the functioning of the Australian community. By forming partnerships with community groups, financial service providers can be part of advocacy coalitions that can improve the prospect of financial stability for victim-survivors while achieving win-win scenarios for their own organisations.

How to champion for change

1. Work beyond the financial service sector, with organisations such as utilities, councils, government, legal centres, financial counsellors and community groups.

• Find opportunities to partner with community and advocacy groups to benefit all parties, including victim-survivors

2. Drive the development and implementation of consistent standards across the financial service sector.

- Proactively engage with industry bodies to bring standards up across your industry.
- Share knowledge with other financial service organisations.

3. Lobby to resolve barriers facing your organisation in enacting change prevent or act on financial abuse.

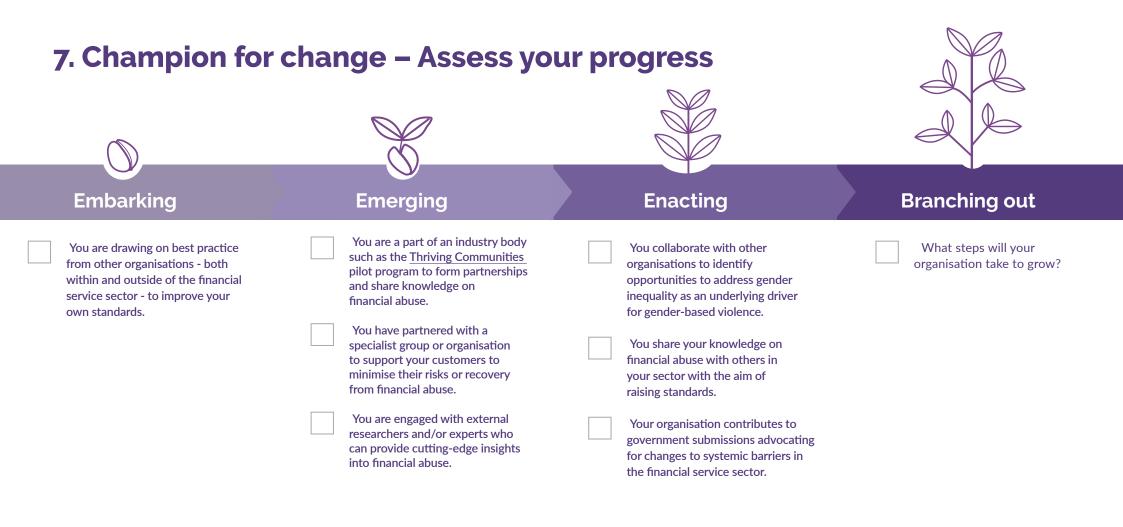
 Describe and ask for changes to laws, policies or programs needed to provide safety for your customers in your sector. **Further Reading**

To explore how the Champions of Change actively promote change with business:

Champions of Change Coalition (2020)
 Playing our Part: 16 days of activism
 toolkit.

I try and be there for others working in this space, because we're not really focusing on or competing with helping customers suffering financial abuse, right? It doesn't have to be at about competition. It is about working and looking at how to create safety for people who really need it the most.

Toby, Finance Sector Leader



An illustration: The financial

hardship department and thought leaders at *MoneyPal* paid to join the Thriving Communities Partnership pilot program to discuss and share knowledge about successes and challenges. They had implemented a program to reduce misuse of their system and improve how they maintain the safety and privacy of their customers.

Not only did they get support from this community to improve their systems, but they were also made aware of opportunities to reach out to a policy body putting a report out to a local government. Later, a *MoneyPal* speaker at a conference outlined the challenges of navigating privacy law and safety. They described their family violence and financial abuse response framework and the systemic challenges they faced.

This conversation inspired attendees to write to the relevant Minister on the issues facing customers.

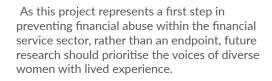
Developing the Principles

The Guide to Prevention and Action on Financial Abuse is the outcome of a collaborative research project between researchers from Swinburne University of Technology, RMIT University, South East Community Links (SECL) and Good Shepherd ANZ. The project was funded by the Office for Women within the Department of Prime Minister and Cabinet. Financial Abuse in this guide refers to how the service, systems and products provided by financial service organisations and other essential service providers are used as deliberate vehicles of abuse by perpetrators.

The Principles were developed as a means of providing financial service organisations with a set of guidelines that could drive strategy and action to prevent financial abuse from occurring during the use of their products and services.

The research was conducted through a series of co-design workshops, feedback sessions and interviews with participants ranging from financial counsellors, policymakers, lawyers, frontline financial service employees, and executives from the finance, essential service and insurance sectors. The workshops took place online as a result of the COVID-19 lockdowns. The original project methodology sought to begin from and foreground the experiences of women with lived experience of financial abuse and domestic family violence, in particular women from Culturally and Linguistically Diverse (CALD), rural and remote communities and women with disabilities. However, the likelihood of increased trauma as a result of the lockdowns, our online method of data collection, and the tight timeline of the project prevented us from learning from these women.

As we were unable to foreground the lived experiences of these women, we instead drew heavily on the experiences of the community research partners; in particular, their domestic family violence and financial counselling employees who work closely with victim-survivors and could represent their experiences.



In addition, subject matter experts from the eSafety Commissioner, domestic and family violence sector and economic abuse sector were consulted. The valuable contributions of stakeholders in these sessions provided ideas and perspectives to inform the principles.

Quotes in this document were sourced from workshop and interview participants. The names and positions of contributors have been modified to de-identify individuals.



Listen Understand Act





Further resources and support

Referrals

1800RESPECT

Safe Steps

Thriving Communities Partnership

Woman's Information and Referral Exchange

Orange Door, Victoria

Victorian Aboriginal Legal Service

Woman's Legal Service Victoria

Internal Training

<u>eSafety Commissioner</u> training for employees on technology-facilitated abuse:

A <u>Centre for Women's Economic Safety</u> guide to inform financial, utility, government, legal and gaming organisations to address economic abuse:

Employee domestic violence training available from the <u>Domestic Violence</u> Resource Centre. Victoria:

For the workplace

Resources from the <u>eSafety Commissioner</u> to support workplaces and carers to respond to technology-facilitated abuse

Resource for workplace equality and respect standards from <u>Our Watch</u>:

A <u>'Women and money</u>' toolkit for organisations on responding to women experiencing financial abuse:

<u>Economic Abuse Reference Group</u> for business to provide guidance and good practice on family violence:

For women and customers

<u>eSafety Commissioner</u> guide for women on domestic and family violence, technology facilitated abuse, safety planning and gaining support

eSafety Commissioner guide to support women in securing online banking:

<u>eSafety Commissioner</u> course providing help in setting up and conducting banking online provided in multiple languages:

A booklet for women experiencing financial abuse by <u>WIRE</u>:

<u>Centre for Women's Economic Safety</u>: An organisation that aims to connect women with tools they need:

Your Toolkit - A financial toolkit for women experiencing family violence and financial abuse:



With support from the Department of the Prime Minister and Cabinet's Office for Women

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