

A close-up photograph of a pink ceramic piggy bank being held gently by two hands. The piggy bank is the central focus, with its snout and eyes clearly visible. The hands are positioned on either side, supporting the piggy bank. Below the piggy bank, several coins are scattered on a surface with a grid pattern. The background is softly blurred, showing a person's arm and a red object. The top of the image has a decorative header with three colored segments: orange, pink, and teal.

FreeFrom's

Survivor Safety

Banking Guidelines



Overview

- About FreeFrom
- The Impact of Abuse on Survivor's Banking Experience
- The Opportunity for Banks
- An Overview of the Guidelines
- Following the Example of Elder Abuse Prevention Efforts
- Next Steps
- The Guidelines in Detail

1 in 4 women and **1 in 2** trans people will experience domestic violence in their lifetime.

#1

reason survivors don't leave and/or return to an abusive situation is financial insecurity

\$104k

is the CDC's estimate of how much domestic violence costs female survivors

99%

of survivors experience economic abuse as part of the domestic violence

Experiencing domestic violence is financially devastating for most people. Survivors can only secure long-term safety for themselves and their children if they can afford to leave, rebuild and heal.

Our Approach

FreeFrom's mission to create pathways to financial security and long-term safety with and for survivors of domestic violence.

We envision a world where survivors have **sustaining income, savings and credit with which to build wealth** and the resources to support individual, intergenerational and community healing.

Introduction to FreeFrom's Survivor Safety Banking Guidelines



“I remember frantically calling the credit card company and saying, ‘Please help me, please send me my bills. My ex-husband won’t let me see my bills. I’m happy to pay you.’ They told me there was nothing they could do.”

– Clem

“After I got away from the person causing domestic violence, he had my routing number and all my stuff and he would check my balance...he called and said, ‘oh I see that you have no money in the bank’. I said, ‘How do you even know that?’ He said, ‘I have your account information.’”

- Jean

“We had a savings account, a checking account, and a business checking account. And I had opened all three accounts. He went to the bank to sign the paperwork, but I opened the accounts and I did all the admin stuff for our business. I never signed any papers that I would be removed from the accounts, but somehow, he had taken me off. In the midst of the divorce and trying to hide and find somewhere to live, I didn’t have time to deal with it.”

- Tammy

|| The Cost of Economic Abuse

73%

of survivors cite financial insecurity as the reason for staying

\$1,280

is the average amount stolen from individual survivors each month

\$15,936

is the average amount of coerced or fraudulent debt a survivor is saddled with each year

Harm-doers are using economic abuse to wreak havoc on a survivor's finances. With damaged credit and no access to liquid assets, staying safe is simply impossible.

Survivors' CFPB Financial Well-Being Scores

In a 2020 survey of over 1300 survivors, the average CFPB Financial Well-Being Score reported by survivors was **38**, with **29** being the most frequently reported score.

The **average CFPB score for adults** in the U.S. is **54**, and scores below **50** are associated with a higher probability of struggling to make ends meet.

While only **4%** of the general adult population in the U.S. has a score of **30** or below, **16%** of surveyed survivors fell in that range.

The Impact of Abuse on Survivors' Banking Experience

1. The financial devastation of abuse makes **banking products unaffordable** for survivors
2. 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.
3. **Harm-doers are using banks to locate survivors** after they leave and to access **and monitor** their online bank accounts
4. Survivors must repeat their story to multiple bank employees and often get **inconsistent information**
5. Economic abuse is happening every day in branches across the US and **bank employees aren't trained** on how to detect and respond to it
6. Survivors often leave abuse **without their ID or a permanent address**
7. **Harm-doers are incurring debts in survivors' names** without their knowledge or consent
8. **Survivors need time to financially recover** without enduring further credit damage

There are approximately

28.4MM

survivors banked and underserved in the U.S.

||| The Opportunity

Banks have the opportunity to implement supportive systems, products, and training to help millions of customers across the U.S. build the assets they need to keep themselves and their families safe.

- **75%** of survivors have never sought support from banks as a survivor
- Of the **25%** who have sought support from banks as a survivor, only **16%** found the support they received “very helpful,” while **64%** reported that they received no help or the assistance provided was unhelpful
- **51%** of survivors would seek support from banks if they knew banks offered services for survivors

The Guidelines

1. Offer affordable checking and savings accounts
2. Keep survivors' contact information confidential and secure
3. Implement enhanced fraud protections on survivors' accounts
4. Offer Safety Accounts for survivors
5. Designate internal team to handle survivor accounts
6. Hire FreeFrom to train bank staff to detect, prevent and respond to economic abuse

|| The Guidelines cont'd

7. Allow survivors to open accounts with ID and address alternatives
8. Offer interest-free deferred payment emergency loans to survivors
9. Refrain from reporting defaults on coerced / fraudulent debt to credit reporting agencies
10. Offer flexible repayment plans for survivors in default
11. Provide survivor paid leave and other resources to employees

Following the Example of Elder Abuse Prevention Efforts

- **53% of banks offer products for elders with favorable terms** like low or no minimum balance requirements, reduced monthly maintenance fees, and discounted safety deposit boxes.
- **62% have dedicated staff to manage elder customer** programs
- **80% place holds on suspicious transactions** in elder customer's accounts
- **88% require training for all frontline and customer service staff** on how to detect and report elder financial abuse
- **43%** have procedures in place to **help elder customers control who can access their accounts**

Next Steps

- ✓ **Sign-on:** Commit to implementing some or all of FreeFrom's Survivor Safety Banking Guidelines
- ✓ **Work with FreeFrom:** We'll provide the subject matter expertise and support you need to successfully implement these Guidelines, including developing a training program for bank employees.
- ✓ **Participate in Press:** We'll be asking participating banks to partner with us in press releases and other outreach so we can build momentum for this exciting project



The Guidelines in Detail

1. Offer Affordable Checking & Savings Accounts

- **The Problem:** The financial devastation of abuse makes banking unaffordable for many survivors. Without access to banks, survivors are forced to use predatory check-cashing services and hide cash from their harm-doers, risking increased violence if discovered. Being unbanked and operating with only cash also prevents survivors from accessing resources that could help them flee abuse (e.g., renting a car, buying a plane ticket, or staying in a hotel).
- **The Solution:** Banks can make banking affordable for survivors by offering savings and checking accounts with the following features for a 2-year period:
 - ✓ No overdraft fees
 - ✓ No minimum balances
 - ✓ No dormancy / inactivity fees
 - ✓ Free and unrestricted use of ATMs
 - ✓ Free transfers between accounts
 - ✓ Minimum opening deposit of \$10 or less
 - ✓ Free debit and prepaid card options
 - ✓ Free check cashing

2. Keep Survivors' Contact Information Confidential and Secure

- **The Problem:** Bank policies that automatically include contact information on communications, forms, and other documents, or that make this information easily accessible in online profiles endanger survivors by inadvertently disclosing their location to harm-doers.
- **The Solution:** Banks can protect survivors by implementing enhanced measures to safeguard the confidentiality of survivor-customers' information. These measures should include:
 - ✓ Omitting addresses and other contact information from any externally transmitted materials
 - ✓ Adding an extra layer of verification (e.g., code word or verification question) to reveal contact information on online profiles
 - ✓ Confirming with survivors that email addresses and phone numbers are safe prior to their use

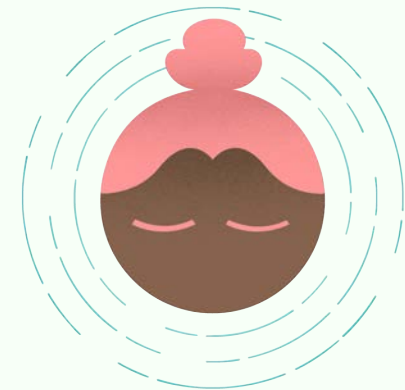


3. Implement Enhanced Fraud Protections on Survivors' Accounts

- **The Problem:** Most harm-doers control all the information necessary to access survivors' online bank accounts, including account and routing numbers, log-ins, PINs, passwords, and SSNs. This gives harm-doers unfettered access to survivors' accounts, allowing them to withdraw money, deplete or close those accounts, and apply for credit in a survivor's name without their knowledge or consent – even after a survivor has fled.
- **The Solution:** Whenever a customer discloses that they have experienced / are experiencing domestic violence, that customer's profile should be flagged and greater fraud detection measures implemented, including:
 - ✓ Creating specific "flags" based on the survivor's unique circumstances
 - ✓ Immediately contacting survivors when suspicious activity is detected
 - ✓ Placing holds on suspicious transactions
 - ✓ Requiring that any changes to accounts and loan or credit card applications be completed in-person

4. Offer Survivor Safety Accounts

- **The Problem:** 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.
- **The Solution:** Banks can help survivors save the money they need to leave more quickly and safely by offering Survivor Safety Accounts. These accounts 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 their important documents.



5. Designate Internal Team to Handle Survivor Accounts

- **The Problem:** When seeking support from their banks, survivors are often forced to repeat their story multiple times to different bank employees and are told inconsistent information. Details of a survivor's situation are often not recorded or retained, limiting the support that bank employees can offer and re-traumatizing survivors in the process.
- **The Solution:** Banks can better serve survivor-customers by designating an internal team to handle survivor-customer accounts and interactions. By doing so, banks can ensure they are up-to-date with a survivor's situation and needs. The creation of such a team would reduce the number of times a survivor must repeat their story, ensure that the survivor receives consistent information, and provide survivors the support they need more quickly and effectively. It would also build a deep well of institutional knowledge by experience for the bank on how to serve this customer subset.

6. Hire FreeFrom to Train Bank Staff to Detect and Respond to Economic Abuse

- **The Problem:** Bank employees are not trained to detect, prevent or respond to domestic violence or economic abuse. As a result, harm-doers can misuse banking products and systems to commit economic abuse against survivors undetected and unchecked – at times, even in front of bank employees.
- **The Solution:** FreeFrom is developing a comprehensive training that will give bank employees the tools necessary to identify domestic violence and economic abuse and respond appropriately. By training employees, banks can significantly reduce the financial devastation felt by survivors and thus also help them become financially secure enough to leave abuse, stay safe and be prosperous customers.



7. Allow Survivors to Open Accounts with ID and Address Alternatives

- **The Problem:** When survivors flee abuse, they often must do so without their personally-identifying documents, which are usually controlled by the harm-doer. Similarly, most survivors are unable to secure stable housing before they leave, and thus have no permanent address for some time after they do.
- **The Solution:** To help survivors build the assets they need to stay safe and never return to danger, banks should allow survivors to open accounts using ID and address alternatives. ID alternatives should include certifications from qualified third-parties (treating physician, therapist, counselor, domestic violence or sexual assault advocate, or religious leader). Similarly, banks should accept the address of shelters or other nonprofit organizations as an alternative to a permanent address. To quell any concerns about fraud or misconduct, banks can partner with shelters and other organizations to be trusted referral sources.

8. Offer Interest-Free Deferred Payment Emergency Loans

- **The Problem:** Survivors often don't have access to the cash necessary to cover the costs of leaving (e.g., transportation costs, motel costs, a deposit and first month's rent for a new apartment, new clothes for their kids, new furniture, groceries, etc.)
- **The Solution:** 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).



9. Refrain From Reporting Defaults on Coerced or Fraudulent Debt to Credit-Reporting Agencies

- **The Problem:** 52% of survivors experience coerced or fraudulent debt, which occurs when a harm-doer obtains credit and incurs debt in a survivor's name without their knowledge or consent. As a result, 46% of survivors report damaged credit with another 14% reporting that they haven't checked their credit score. In a 2020 survey, the average value of coerced and fraudulent debt reported per survivor was \$12,408.
- **The Solution:** Banks should refrain from reporting defaults by survivors on coerced or fraudulent debt. By doing so, banks can both protect survivors' credit and offer them much-needed time to financially recover without incurring further damage.



10. Offer Flexible Repayment Plans for Survivors in Default

- **The Problem:** The costs of domestic violence are so overwhelming that survivors often have trouble keeping up with their debts. Defaulting on outstanding debts further damages a survivor's credit, which in turn makes finding employment, insurance, and housing more difficult.
- **The Solution:** Banks should 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.



11. Provide Survivor Paid Leave and Other Resources to Employees

- **The Problem:** 1 in 4 women and nearly 1 in 2 trans people experience domestic violence in the U.S., and up to 60% of survivors lose their job as a result of the abuse. This means that every bank employs survivors and that those employees are likely struggling at work.
- **The Solution:** Banks should support their survivor-employees by providing 10 days of additional paid and protected leave designated to deal with the consequences of abuse as well as other resources that support them in building financial security and staying safe (e.g., access to an emergency fund, financial coaching, and peer support opportunities).



Clem's Story



“My husband wouldn’t allow me access to our bank accounts. Instead, he put me on a strict allowance which made it impossible for me to save money. When my mom wanted to give me money to pay my medical bills, my husband and I went to open a new joint account. He told the bank employee that under no circumstances was I to have access to the account, even though the money was meant for me. The bank employee did as she was told and opened an account just in my husband’s name. I couldn’t believe she actually listened to my husband. So my mom made the deposits and I never had access to them.

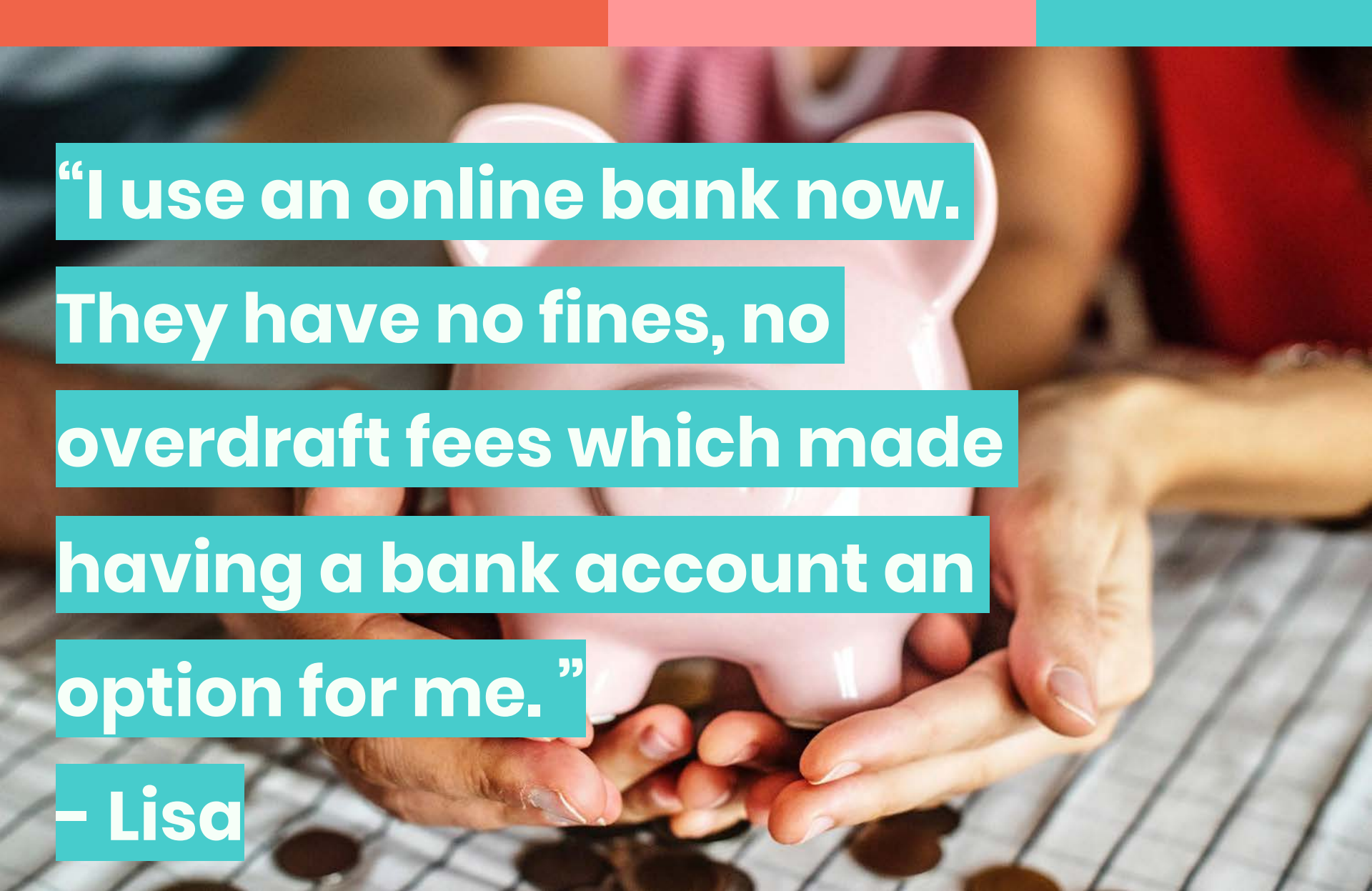
When I escaped, I had to leave behind my birth certificate, social security card, and logins for my bank and credit cards. I didn’t know where he hid them. But without them, I wasn’t able to open a new account. The day I left, he emptied all our joint accounts, leaving me with nothing. He also maxed out my credit cards.

Finally, I had his name removed from my accounts but he was still able to make withdrawals because he had all my personal information. The bank wouldn’t recognize it as fraudulent.”

How the Guidelines Could Help...



- 1. Offer secure accounts:** Clem could have safely and secretly saved money to leave and this money would have been protected from their husband.
- 2. Implement enhanced fraud protections on survivors' accounts:** The fraudulent transactions in Clem's account would have been detected and dealt with more quickly.
- 3. Designate internal team to handle survivor accounts and interactions:** Clem would have been more successful in stopping their husband's fraudulent activity if they'd been supported by a team trained to help and familiar with Clem's situation.
- 4. Hire FreeFrom to train bank staff:** Clem's husband was able to divert and control Clem's money with the help of an unknowing bank employee. With the proper training, the instruction to shut Clem out of the account would have been flagged and dealt with.
- 5. Offer emergency loans:** Clem stayed in the marriage longer than they wanted because they couldn't afford to leave. With an emergency loan, they could have gotten to safety sooner.
- 6. Allow survivors to open accounts with ID and address alternatives:** Clem had to leave their personally-identifying documents behind when they fled. Clem could have opened a new account and started saving sooner if they had the option to provide ID alternatives.

A close-up photograph of a person's hands holding a pink piggy bank. The piggy bank is positioned over a grid of coins, likely on a table. The background is blurred, showing a person wearing a red top. The text is overlaid on the image in white font on teal rectangular backgrounds.

**“I use an online bank now.
They have no fines, no
overdraft fees which made
having a bank account an
option for me.”**

– Lisa

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FREE
FRM

The logo for Free From features the word "FREE" in a light blue, sans-serif font above the word "FRM" in a darker blue, sans-serif font. The letter "R" in "FRM" is stylized with a white leaf-like shape above it and a white stack of three horizontal lines below it, resembling a stack of coins or a stylized "M".