



Chartered
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Standards. Professionalism. Trust.

Economic Abuse guidance

for General Insurance Providers

Table of contents

Foreword: Chartered Insurance Institute

Foreword: Surviving Economic Abuse

Economic abuse guidance for general insurance providers

- About the Chartered Insurance Institute
- About Surviving Economic Abuse
- About this guidance

About economic abuse

- General insurance and economic abuse
- Case study (Allianz Australia)
- Case study (Abuse of automated insurance processes)
- The regulatory framework

How insurers can respond effectively to economic abuse through their products and services

- Understand customers and encourage disclosures
- Case study (Annie's experience)
- Communicate and engage
- Good Practice (AXA Australia)
- Good Practice (AXA UK)
- Product and service design
- Good Practice (AXA France)
- Product delivery and customer service
- Case study (Financial Ombudsman UK)
- Skills, capability and leadership
- Good Practice (Aviva PLC)
- Good Practice (AXA Safe Spaces)
- Continuous improvement

Conclusion

Resources and training

References

Authors

Foreword: Chartered Insurance Institute

The prevalence of economic abuse is substantial, yet often overlooked. Research published by the charity, Surviving Economic Abuse (SEA) in 2025 suggests that one in six women in the UK experienced economic abuse in the previous yearⁱ. Research by Ipsos for SEA in 2025 also found that women “across all income levels experienced economic abuse at similar rates.”ⁱⁱ

To put this in context for insurance, over 2.5 million women in the UK who have home contents cover are likely to have experienced economic abuse in the last year.ⁱⁱⁱ

The scale of the problem is disguised by the barriers to identifying and supporting customers, many of whom may still be experiencing economic abuse even after a relationship has ended. A customer may not declare economic abuse in the same way that they may ask for extra support for other reasons. They may not even know that they are experiencing economic abuse, instead believing they are experiencing a normal relationship with what might feel like complicated financial interdependencies.

The work we are doing on economic abuse is part of an overarching strategy aimed at better understanding consumer vulnerability and delivering good outcomes for the whole of society. This guidance offers examples of our strategic approach in action, where insurers are already adapting products and services; identifying key moments in customer journeys; and empowering staff to use clear protocols and systems.

For example, we found that there are insurance firms offering thoughtful and effective responses to help victim-survivors, by introducing flexible claims handling that recognises how damage caused by an abuser may require exceptions to standard claims-handling rules.

With this guide, we hope to inspire greater awareness of this sort of good practice, collected in collaboration with SEA – the experts in this field. I offer my gratitude to them for their invaluable help.

Finally, I encourage readers to look at the *Resources and training* section at the end of this guide. The Chartered Insurance Institute will continue to review our resources and training, updating them whenever necessary, ensuring that you have what you need to offer the best possible response for those who need it most.

Matthew Hill, CEO, Chartered Insurance Institute

i <https://survivingeconomicabuse.org/news/spotting-the-signs/>

ii https://vision.city.ac.uk/wp-content/uploads/2025/10/Counting-the-Cost-of-Economic-Abuse_Surviving-Economic-Abuse.pdf

iii <https://www.fca.org.uk/financial-lives/financial-lives-2024>

Foreword: Surviving Economic Abuse

Economic abuse is a dangerous and vastly prevalent form of domestic abuse that is being perpetrated at an alarming scale. In the last year alone, 4.2 million women in the UK experienced economic abuse from a current or former partner, by controlling their access to money, and the things money can buy. Abusers use economic abuse to trap victim-survivors in dangerous situations, and to and destroy lives.

General insurance provides vital protections such as motor, home, travel and health insurance, safeguarding people against risk and uncertainty throughout key moments in their lives. Yet, for too many victim-survivors, our research shows how a product designed to offer protection is weaponised by abusers to isolate, control and harm, both during relationships and long after separation. In practice this can mean cancelling insurance policies without the survivor's consent, leaving them without vital cover, such as car insurance, which exposes them to the risk of driving uninsured and criminalisation; as well as preventing survivors from making legitimate claims, such as refusing to allow a claim for a broken washing machine that's flooded the kitchen.

When products, policies and processes do not take into account coercive and controlling behaviours, survivors can face further barriers to protection; from disrupted cover to inflexible claims processes and unsafe joint arrangements. This has devastating and, in some cases, life-threatening consequences for victim-survivors.

The role of financial services, including insurers, in responding to economic abuse has never been clearer. Economic abuse is now firmly recognised in law through the *Domestic Abuse Act 2021* and its statutory guidance. The Financial Conduct Authority's (FCA) Consumer Duty has set higher standards for consumer protection, particularly for vulnerable customers, and its *Guidance for firms on the fair treatment of vulnerable customers* (FG21/1) recognises domestic abuse, including economic control, as a life event that causes vulnerability. The UK Government has made a clear commitment to tackling economic abuse in its November 2025 Financial Inclusion Strategy, which includes a specific focus on raising awareness and embedding good practice responses to economic abuse across the insurance sector.

Present guidance, developed by the Chartered Insurance Institute in partnership with Surviving Economic Abuse, marks an important step in strengthening how the general insurance sector responds to economic abuse. By embedding this guidance, insurers can ensure that victim-survivors feel safe to disclose abuse, receive fair and positive outcomes, close gaps in policies and processes exploited by abusers to cause victim-survivors harm. We are ready and willing to work with firms to improve their approach and to provide practical solutions. Our team offers specialist training and consultancy services designed to help you implement best practice and deliver meaningful change.

Together, we can save lives and stop economic abuse forever.

Sam Smethers, CEO, Surviving Economic Abuse

Economic abuse guidance for general insurance providers

This guidance examines the safe design and delivery of insurance products and services to prevent economic abuse and support customers experiencing it.

About the Chartered Insurance Institute

The Chartered Insurance Institute is the UK's leading professional body for the insurance sector. It's dedicated to building public trust in the insurance and financial planning professions.

About Surviving Economic Abuse

Surviving Economic Abuse is the only UK charity dedicated to raising awareness of economic abuse and transforming responses to it. All its work is grounded in the lived experiences of economic abuse victim-survivors. The charity exists to save lives and stop economic abuse forever.

About this guidance

The Chartered Insurance Institute (CII) partnered with Surviving Economic Abuse (SEA) to develop this guidance. It aims to support good practice across general insurance, creating better outcomes for victim-survivors of economic abuse.

In recent years, commitment to tackling economic abuse has increased across government, the regulator, the Financial Ombudsman Service (FOS), financial services firms and their membership bodies. The vital role of insurance providers and the wider financial sector in responding to economic abuse is clearly set out both in guidance and regulation, including:

- *The Domestic Abuse Act 2021* and the statutory guidance underpinning it.^{iv}
- The Financial Conduct Authority *Guidance for firms on the fair treatment of vulnerable customers*,^v and its Consumer Duty.^{vi}
- SEA Good Practice Guide.^{vii}
- UK Finance's *Financial Abuse Code*.^{viii}
- The Government's *Financial Inclusion Strategy*.^{ix}

iv https://assets.publishing.service.gov.uk/media/62c6df068fa8f54e855dfe31/Domestic_Abuse_Act_2021_Statutory_Guidance.pdf

v <https://www.fca.org.uk/publications/finalised-guidance/guidance-firms-fair-treatment-vulnerable-customers>

vi <https://www.fca.org.uk/firms/consumer-duty>

vii https://survivingeconomicabuse.org/wp-content/uploads/2025/10/Good-practice-guide_Surviving_Economic_Abuse.pdf

viii https://www.ukfinance.org.uk/system/files/2025-08/Financial%20Abuse%20Code_0.pdf

ix https://assets.publishing.service.gov.uk/media/6909ed8db04a520c5051843f/Financial_Inclusion_Report.pdf

Economic abuse guidance for general insurance providers

Research published by SEA, with the support of the Aviva Foundation, found that perpetrators of economic abuse routinely restrict, exploit and sabotage victim-survivors' access to insurance products and services as a form of coercive and controlling behaviour.^x This has devastating and, in some cases, life-threatening consequences for victim-survivors. However, insurance providers have shown that they can equip themselves with the training, policies and processes to identify and support victim-survivors and disrupt opportunities for perpetrators to abuse their products and services. In doing so, insurers can offer a lifeline to victim-survivors.

In 2025, the government's *Financial Inclusion Strategy* set out the vital role that financial services firms can play in mitigating economic abuse.^{xi} It recognised the urgent need for the sector to address barriers faced by victim-survivors accessing insurance products, as well as dividing joint insurance products from an abusive ex-partner after separation. The strategy also recognised the need for industry-wide guidance that would inform consistent policies and processes across the insurance sector.

Building on these findings and recommendations, this guidance has been developed with the support of SEA and draws from:

- The insights of lived experience experts
- Examples of good and poor practice within the sector
- Relevant elements of the current regulatory framework, including recent cases published by the Financial Ombudsman

It aims to equip general insurance providers with guidance to prevent and respond to economic abuse across five key areas:

1. Understanding customers and encouraging disclosure.
2. Communicating and engaging with customers experiencing economic abuse.
3. Design and delivery of products and services that support good outcomes for victim-survivors and which prevent harms caused by abusive partners and ex-partners.
4. Supporting providers with the skills, capabilities and leadership to respond to economic abuse.
5. Supporting continuous improvements in their products and services to response to economic abuse.

By embedding this guidance into their own policies and practices, insurers can support victim-survivors to feel safe and be able to disclose abuse. Equally, by taking these steps, insurers will close the gaps exploited by abusers to cause victim-survivors harm.

x <https://survivingeconomicabuse.org/news/economic-abuse-what-can-the-insurance-industry-do/>

xi https://assets.publishing.service.gov.uk/media/6909ed8db04a520c5051843f/Financial_Inclusion_Report.pdf

About economic abuse

In 2025, research carried out by Surviving Economic Abuse with Ipsos UK found that within the previous 12 months one in six UK women experienced economic abuse from a current or former partner; equivalent to 4.2 million women.^{xii}

Economic abuse is a legally recognised form of domestic abuse as defined in the *Domestic Abuse Act 2021*. It involves someone's partner or ex-partner controlling their access to money and finances, as well as the things money can buy. Abusers often misuse financial products and services to exert control over victim-survivors. This can include:

- Controlling or monitoring spending, or withholding access to money.
- Restricting access to bank accounts, cards or statements.
- Cancelling or changing insurance policies without victim-survivors' knowledge.
- Building up debt in victim-survivors' names without their consent or knowledge, or through the threat of harm.

Abusive partners and ex-partners use this form of domestic abuse to create economic dependence and instability, so that victim-survivors cannot access the money and resources they need to leave a dangerous abuser and rebuild their lives safely.

This form of domestic abuse is criminalised under the “controlling or coercive behaviour in an intimate or family relationship” offence, as set out in Part 5, Section 76 of the *Serious Crime Act 2015*. This was amended by the *Domestic Abuse Act 2021* to include post separation offences, i.e. after a relationship between a victim-survivor and abuser has ended.

While economic abuse on its own is a form of coercive and controlling behaviour, abusers often use a range of domestic abuse behaviours, including physical, sexual and emotional abuse, to create a context of fear and isolation. This makes it increasingly dangerous and difficult for victim-survivors to flee and stay fled in safety. Research by SEA and Ipsos UK found that one in four victim-survivors (23%) said the perpetrator's economic abuse prevented them from leaving; equivalent to 940,000 women.^{xiii}

The impact of economic abuse on victim-survivors, including children, is devastating and lifelong. Victim-survivors are often left with insurmountable debts, housing and job insecurity and a destroyed credit file. Abusers do not require physical proximity to the victim-survivor to carry out economic abuse, and therefore, abusers can begin, continue or escalate economic abuse post-separation once the survivor has fled.

Abusive partners and ex-partners often use financial ties with victim-survivors as an opportunity for post-separation abuse. This can include ties to the abuser through joint insurance products and services, as well as the abuser's access to victim-survivors' personal information, which makes it easy for them to access or take out insurance products without their consent or knowledge.

xii <https://survivingeconomicabuse.org/news/spotting-the-signs/>

xiii <https://survivingeconomicabuse.org/news/one-million-women-trapped/>

General insurance and economic abuse

General insurance refers to insurance such as motor, home and travel. Victim-survivors face significant barriers in accessing and benefitting from these insurance protections as a direct consequence of economic abuse, both during the relationship and long after separation. Abusers will strategically restrict access to policy information or exploit a victim-survivor by taking out, amending or cancelling policies in their name without their knowledge or consent. Both during and after separation, abusers can sabotage victim-survivors' ability to make claims on their insurance by causing malicious damage to property, like a car or household items. They can also create fraudulent claims which can leave victim-survivors liable for fraud and exclude them from vital insurance cover in the future.

Surviving Economic Abuse, with the support of the Aviva Foundation, published the *Insurance and Economic Abuse* briefing paper in February 2023 to highlight the key challenges victim-survivors face in accessing and benefitting from insurance products.^{xiv} These were taken from final decisions made by the Financial Ombudsman Service and include:

- **Difficulty accessing insurance:** Victim-survivors struggle to access insurance due to their claims history. Previous claims, that may have been caused by an abuser, can result in higher premiums or even refusal of further cover.
- **Unfairly rejected claims:** Property and car insurance claims are sometimes unfairly rejected by insurance providers if they result from damage caused by someone in the 'household' or a person 'allowed' to enter a property or use a product. This can leave victim-survivors unable to claim for essential assets like their car or home. For example, the victim-survivor may grant access to a property or a car to an abuser under duress, but then have a motor or home insurance claim refused because it appears they gave permission to use the car or enter the property. These rejections can be unfairly applied when they do not account for circumstances of coercive and controlling behaviour, including economic abuse.

Case study (Allianz Australia)

Allianz Australia: 'Understanding family violence and the risks of insurance'.^{xv}

A victim-survivor had an insurance policy with their partner for a vehicle which was in their name. They both paid for the policy and the policy listed both parties as co-insured. The relationship broke down while they were still living together, and the perpetrator used their set of car keys and took the victim-survivor's car, purposely crashing it into a tree. The victim-survivor still had finance on the vehicle. Without special consideration, the victim-survivor would be left with the car debt and no vehicle, which was critical for the victim-survivor's work.

- **Joint policies lock victim-survivors into ongoing financial products with abusers.** One example, quoted in HM Treasury's *Financial Inclusion Strategy*, is of a policyholder who said:

xiv <https://survivingeconomicabuse.org/news/economic-abuse-what-can-the-insurance-industry-do/>

xv https://www.allianz.com.au/content/dam/onemarketing/aal/au_site/documents/about-us/understanding-family-violence-and-the-risks-of-insurance.pdf

“I had no choice but to go back to my ex-partner and grovel so that he would speak to the insurance company and give permission for the home insurance policy to be changed to just my name. I shouldn't have been put in the dangerous position of having to approach him.”^{xvi}

- **Difficulties accessing insurance information about their product:** Abusers often prevent victim-survivors from accessing information about financial products, including insurance products. After separation, victim-survivors may flee without paperwork, making it even more difficult to know what insurance they have or how to use its benefits. When victim-survivors do not have access to policy numbers or insurance details, they cannot make necessary changes or claims. Some insurers even refuse to speak to victim-survivors without this information, even if the victim-survivor is named on the policy.

Case study (Abuse of automated insurance processes)

A victim-survivor discovered her husband (without informing her) had applied for an insurance policy online and put the policy in her name with himself as the named driver. He stopped paying the premium and she received a notification from the insurance company that she owed them £700.^{xvii}

- **Interacting with insurers can be challenging:** Front-line colleagues may not understand or recognise signs of economic abuse. This means victim-survivors may have to repeat traumatic details to multiple frontline colleagues if disclosures are not recognised or not recorded properly and with care.
- **Inappropriate disclosure of information can put victim-survivors at risk:** For victim-survivors fleeing an abuser, keeping personal information private and confidential is vital to their safety. Yet, there have been cases where insurers wrongly disclosed details, such as a new address, to an abuser, especially when they are a joint policyholder. This can have devastating and life-threatening consequences for victim-survivors, including children, fleeing dangerous abusers.

xvi https://assets.publishing.service.gov.uk/media/6909ed8db04a520c5051843f/Financial_Inclusion_Report.pdf

xvii <https://survivingeconomicabuse.org/im-supporting-someone/information-for-financial-services/checklist-for-insurers/>

The regulatory framework

The Financial Conduct Authority (FCA) *Guidance for firms on the fair treatment of vulnerable customers* FG21/1^{xviii} and *Consumer Duty*^{xix} sets higher standards for protecting vulnerable customers, including those affected by domestic abuse and economic control, as identified under the 'Life Event' driver. Under these FCA rules and guidance, firms *must* act to deliver good outcomes for retail customers and ensure customers with characteristics of vulnerability can achieve outcomes as good as other customers.

This creates both a regulatory obligation and an opportunity for insurers to transform their responses to victim-survivors experiencing economic abuse. The FCA's March 2025 vulnerability review highlighted progress made by firms against the FG21/1 guidance in supporting vulnerable customers to achieve good outcomes but also found weaknesses.^{xx} These were in outcome monitoring, colleague training, communications and product design.^{xxi}

The CII recently produced a landmark guide, *Managing customer vulnerability in insurance and personal finance*^{xxii}, to help insurance firms to better identify, support and deliver fair outcomes for customers in vulnerable circumstances. This guide covers vulnerability more generally, including but not exclusively focused on victim-survivors of economic abuse.

The guide provides practical guidance, including checklists and real-world examples, covering:

- **Understanding vulnerability:** How potential harms arise from the interaction between customer circumstances and firm activities; the dynamic nature of vulnerability; and the severity grades of vulnerability that a customer might experience.
- **Operational frameworks:** A six-step vulnerability management framework (i.e. identify and classify, quantify, monitor, support, adapt, and report); mapping customer circumstances to harms and needs; risk assessments for addressing poor outcomes; and outcome reporting approaches.
- **Data and systems infrastructure:** Structured taxonomies, system requirements and good practice for data sharing.
- **Enabling elements:** Leadership commitment; culture change; training effectiveness; and creating disclosure-friendly environments.

xviii <https://www.fca.org.uk/publications/finalised-guidance/guidance-firms-fair-treatment-vulnerable-customers>

xix <https://www.fca.org.uk/firms/consumer-duty>

xx <https://www.fca.org.uk/publications/multi-firm-reviews/firms-treatment-vulnerable-customers>

xxi <https://www.fca.org.uk/publications/good-and-poor-practice/delivering-vulnerable-customers>

xxii <https://media.umbraco.io/ciigroup-dxp/eaedofqi/managing-customer-vulnerability-in-insurance-and-personal-finance-a-practical-implementation-guide.pdf>

- **Implementation pathways:** Proportionate approaches for firms of different sizes and complexity.

Insurance firms can use the guide as a useful tool when looking at improving their capabilities in addressing vulnerability, and it should be read alongside this report.

UK Finance's updated *Financial Abuse Code*^{xxiii} and *SEA's Good Practice Guide*^{xxiv} create frameworks to equip financial services firms, including insurers, to better meet the needs of victim-survivors. Both provide practical examples of how firms can embed good product and service design, strengthen customer support and enhance governance, while sharing positive actions already taken across the profession. Many of these good practice examples can be applied across insurance.

xxiii https://www.ukfinance.org.uk/system/files/2025-08/Financial%20Abuse%20Code_0.pdf

xxiv https://survivingeconomicabuse.org/wp-content/uploads/2025/10/Good-practice-guide_Surviving_Economic_Abuse.pdf

How insurers can respond effectively to economic abuse through their products and services

Based on Surviving Economic Abuse's (SEA) research of victim-survivor experiences—alongside existing regulation, guidance and Financial Ombudsman decisions—the CII has created guidance for insurance providers on how to embed effective economic abuse policies and practices across their organisations. By embedding this guidance, firms can ensure victim-survivors feel safe to disclose abuse, receive fair and good outcomes, and are supported by systems, policies and cultures that prevent harm, close gaps exploited by abusers, and place care and accountability at the heart of decision-making.

Understand customers and encourage disclosures

1. Raise awareness amongst colleagues: Firms should increase their understanding of what domestic (including economic) abuse is and its impact on customers. Colleagues should be able to recognise the signs of economic abuse, understand who is most at risk, and anticipate the challenges and harms victim-survivors are likely to face when accessing products and services. This requires comprehensive specialist training for all colleagues – frontline and back-office – developed and delivered in partnership with lived experience experts and specialists, such as SEA, to ensure it is trauma-informed and survivor-led. SEA offers specialised training designed for insurance providers in recognising and responding to economic abuse.^{xxv}

Case study (Annie's Experience)

Lived Expert, Surviving Economic Abuse (name has been changed for anonymity)

"I do remember that I passed my driving test in my late 30s. Without really discussing it, he bought a car with me and simply put me on his insurance as the second driver when the car was supposed to be mine saying it was cheaper that way.

I know insurance companies have no control over what happens in a relationship, but I think the joint thing can be an issue for those of us in dodgy relationships. My ex pretended we were married to some insurers and even put his initials and his surname with Mrs added on a membership form. I therefore had the wrong first name initial and couldn't even pretend that I was still using my maiden name if I'd been asked to verify who I was. He acted as if that didn't matter but I felt compromised in all legal and monetary dealings as a consequence."^{xxvi}

Annie's experience shows how economic abuse can manifest through joint insurance arrangements and misrepresentation of personal details, which is a potential red flag of coercive control, including economic abuse. With specialist training and safe disclosure processes, colleagues could recognise these as red flags and respond appropriately.

^{xxv} <https://survivingeconomicabuse.org/training/>

^{xxvi} <https://survivingeconomicabuse.org/what-we-do/experts-by-experience/>

- **Create safe environments for disclosure:** Firms must build environments that encourage victim-survivors to disclose their needs, minimise repeated disclosure, and equip colleagues with the skills and capabilities to record disclosure safely. This can be achieved by:
 - Adopting a ‘Tell us once’ approach so victim-survivors can disclose once, triggering a co-ordinated response across the business, regardless of where the disclosure was made.^{xxvii}
 - Recording information safely, factually and consistently. This should be supported by clear guidance so colleagues feel confident to do so and survivors understand how their information will be used, stored and shared.
 - Implementing robust systems for recording disclosures of economic abuse that prevent accidental disclosures to an abuser who may be a joint policyholder.
 - Providing clear safeguarding policies and guidance so colleagues know when confidentiality should be overridden to protect someone at risk of harm (e.g. a child) and how to safely escalate safeguarding concerns of a vulnerable adult internally and externally.

Communicate and engage

- **Make support clear and accessible:** Firms should make sure customers can easily find information on how to get help, both from their insurer and specialist domestic abuse services, when experiencing economic abuse. This can be achieved by making external information accessible to victim-survivors, so they understand how to seek help or report abuse-related misuse of their policies. Examples include outlining available support on your website, displaying a domestic abuse policy publicly, and offering multiple channels to access support, including independent language interpretation for those who need it.

Good Practice (AXA Australia)

AXA Australia has a clear, visible *Domestic and Family Violence Policy*.^{xxviii} This policy recognises abuse as more than physical; it includes emotional and economic abuse. Key commitments in the policy include colleague training on:

- **Privacy protections:** Especially for joint policies, to prevent sharing information that can put the victim-survivor at risk.
- **Flexible communication:** Allowing authorised third-party representatives to act on behalf of survivors.
- **Flexible claims handling:** Recognising that damage caused by an abuser may require exceptions to standard rules.
- **Financial hardship support:** Helping customers who need financial assistance.

^{xxvii} <https://www.fca.org.uk/publications/multi-firm-reviews/firms-treatment-vulnerable-customers>

^{xxviii} <https://axaxl.com/insurance/our-companies/-/media/axaxl/files/pdfs/about-us/our-companies/domestic--family-violence-policyapsapacaustraliaen.pdf>

2. Provide a supportive response after disclosure: If a customer discloses economic abuse, firms should consistently respond in a safe, supportive and believing way. This can be achieved by:

- Creating a specialist team or trained champions to whom frontline colleagues can escalate economic abuse cases, offering a single point of contact for consistent and effective support.
- Be confident in referring or signposting victim-survivors to external support when needs go beyond what a firm can offer. For example, signposting to refuges and specialist domestic abuse charities.
- Supporting frontline staff with training and clear guidance on how to provide a safe and supportive initial response, before escalating to a specialist team or champion, to reduce the risk of causing further harm.

Good Practice (AXA UK)

AXA UK has partnered with Women's Aid and Smart Works to provide support to victim-survivors who hold car or home insurance policies.^{xxix} AXA refers victim-survivors to Women's Aid or Smart Works, who can help them access vital support such as flee funding and employment skills workshops.

Design and delivery of products and services

1. Design with vulnerability in mind: Insurance providers should design products and services to consider vulnerability, including economic abuse, and understand how current offerings may cause harm. This can be achieved by:

- Investing time to review existing products, services and customer journeys with lived experience experts and specialist organisations, like SEA, to identify barriers and understand how these products may be deliberately weaponised by abusers to cause victim-survivors harm.
- When developing new products and services, involve people with lived experience and specialist organisations, like SEA, to test and design out risks of economic abuse from the outset – particularly in digital sales and servicing journeys.

Good Practice (AXA France)

AXA France's '3 word' initiative in which AXA added "and domestic violence" to its policies.^{xxx} AXA offered emergency housing relocation, legal and mental health support for victim-survivors, much like it did for those impacted by fire or flood. This change demonstrated how insurers can amend their products and services to bring meaningful protection and support for survivors.

xxix <https://www.axa.co.uk/about/inside-axa/domestic-abuse/>

xxx <https://www.publicisconseil.fr/en/axa-three-words-that-can-change-everything-work/>

2. Adopt a flexible approach: Frontline colleagues—supported by systems, processes and policies—should be empowered to adapt and respond flexibly to victim-survivors. This can be achieved by:

- Empowering claims handlers and frontline colleagues with the confidence and authority to apply flexibility in complex cases, avoiding rigid and punitive policies, which can lead to unfair outcomes.
- Applying flexibility in underwriting decisions when assessing risk, ensuring customers with negative claims or poor medical history are not unfairly penalised if those factors resulted from domestic, including economic, abuse. This can be achieved by considering the underlying cause of previous claims, and excluding them, where justified, when considering future insurance. This ensures victim-survivors are not penalised for circumstances beyond their control.
- Closing gaps in policy and product design which are exploited by abusers to coerce and control victim-survivors. This includes building into the terms and conditions of joint products a provision that, in exceptional circumstances such as economic abuse, the provider will separate or end the product without two-party consent. This will prevent abusers from trapping victim-survivors in joint policies.

Case study (Financial Ombudsman UK)

A recent Financial Ombudsman case study demonstrated that flexibility should have been applied in a victim-survivor's case.^{xxxii} The Ombudsman reviewed a case where an insurer denied a home insurance claim after an ex-partner, who was a joint policyholder, deliberately set fire to the property. The insurer cited a policy exclusion for deliberate acts by a policyholder, but the Ombudsman recommended paying 50% of the claim, which both parties accepted. The Ombudsman suggested 50% because, while the exclusion technically applied, the victim-survivor was not at fault and had taken reasonable steps to protect the property from the abuser.

Skills, capability and leadership

1. Equip colleagues to respond effectively: Colleagues must be able to recognise and respond empathetically to signs of economic abuse. Training is an essential first step, but firms must go further to align infrastructure, policies and processes to remove barriers and enable meaningful support.

- Firms can achieve this by creating domestic, including economic, abuse policies and processes alongside a safeguarding policy, so that once colleagues identify economic abuse, they can help victim-survivors overcome barriers and reduce foreseeable harm.

xxxii <https://www.financial-ombudsman.org.uk/decisions-case-studies/case-studies/consumer-contact-us-when-their-insurer-refuses-a-claim-for-damage-caused-by-their-ex-partner>

Good Practice (Aviva PLC)

Aviva PLC has launched a comprehensive programme to support customers and colleagues experiencing domestic, including economic, abuse. This includes accessible online training completed by around 1,500 colleagues; a network of over 150 trained champions who provide guidance and signposting; external signposting support; and a formal HR policy which underlines zero tolerance of abuse and practical assistance and guidance for line managers. These measures aim to raise awareness, enable empathetic responses, and provide tangible internal and external support to customers and colleagues who are experiencing economic abuse.^{xxxii}

1. Drive responsibility from the top: Senior leadership must embed a culture of care, safety and accountability by creating clear domestic abuse policies and processes and investing in training. This should all be done in consultation with lived experience experts and specialist organisations. These steps can help firms proactively reduce foreseeable harm and ensure that outcomes for economic abuse victim-survivors are as good as those for other customers.

2. Support employees experiencing abuse: Firms should adopt internal policies that provide practical and emotional support for colleagues who may be themselves victim-survivors of economic abuse. This can be achieved by creating a colleague domestic abuse and safeguarding policy and guidance on how to respond when an employee discloses abuse.

Good Practice (AXA Safe Spaces)

AXA launched a global training initiative, AXA Safe Spaces, to create safe and supportive workplaces for its employees impacted by domestic abuse and sexual violence, including economic abuse.^{xxxiii} The initiative is available to all colleagues, and AXA has extended it to other employers and individuals by making it free to access for all. It aims to help employers and colleagues *recognise* signs of abuse, *respond* with empathy and support, and help *referral* to specialist services.

Continuous improvement

1. Evidence and improve outcomes: Firms must demonstrate where they are delivering good outcomes for vulnerable customers, including victim-survivors of economic abuse, and have processes to remediate and improve where their needs are not met. This can be achieved by:

- Producing management information (MI) that compares outcomes for victim-survivors against non-vulnerable customers across key journeys, e.g. sales, claims and policy changes.
- Establishing clear escalation routes when victim-survivors are not receiving outcomes as good as those of other customers, to identify and address the risks and harms they face, ensuring timely and appropriate improvements. This may include collaborating with victim-survivors to co-design solutions that better support their needs.

^{xxxii} <https://survivingeconomicabuse.org/news/economic-abuse-what-can-the-insurance-industry-do/>

^{xxxiii} <https://safespaces-againstviolence.axa.com/en/>

Conclusion

Many insurance firms have already started to introduce ways to help victim-survivors of economic abuse. Our guidance builds on this solid foundation.

If you are new to this work, the best place to start is to consider the five key elements listed earlier on in the guide.

Understanding customers and encouraging disclosure can be achieved by raising awareness of economic abuse among staff and creating safe environments for disclosure. To do this, firms can develop clear guidance for colleagues that would enable them to record information safely, factually and consistently.

Communicating and engaging effectively with customers experiencing economic abuse is vital on a case-by-case basis. Interacting with insurers can be challenging; for example, it can be distressing for the victim-survivors to repeat traumatic details to multiple call handlers. Introducing an effective 'tell us once' system can enable better engagement.

Designing products and services with vulnerability in mind, in order to get good outcomes for victim-survivors and prevent further harm. This can be achieved by reviewing existing products and mapping the customer journey with experts. The key thing here is to involve people with lived experience and specialist organisations.

Colleagues need the **skills, capabilities and leadership** to respond to economic abuse. This has to be addressed at every level, from policies and processes to high quality training for relevant staff.

It's everyone's duty to **support continuous improvements**. This includes demonstrating good outcomes for vulnerable customers; producing and monitoring management information; and ensuring that colleagues are aware of escalation routes.

These will put insurance firms and professionals in the best place to provide support to those who need it most, when perhaps they are at their most vulnerable.

Resources and training

The Chartered Insurance Institute offers service providers training on customer vulnerability.^{xxxiv} This aims to empower customer-facing teams to support vulnerable customers. For more information visit the [website](#).

Surviving Economic Abuse offers training and expert consultancy to help firms embed safe, survivor-centred practice at every level. For more information visit their [website](#).^{xxxv}

xxxiv <https://www.cii.co.uk/learning/training/leadership-and-professional-development-skills/vulnerable-customers-training-for-customer-facing-staff/>

xxxv <https://survivingeconomicabuse.org/im-supporting-someone/information-for-financial-services/>

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Economic Abuse guidance for General Insurance Providers