The ABI
Together Driving Change

A guide to *supporting customers* experiencing economic abuse

September 2026

Foreword

As an industry that exists to provide protection, peace of mind and financial security, we must understand how economic abuse can affect the customers we serve, and how the products, services and processes designed to support them can sometimes be used in ways that cause harm.

That is why the ABI has developed this guide. It reflects a shared commitment across our membership to strengthen the way firms identify and respond to economic abuse, and to help ensure that customers affected by it are treated with care, consistency and practical understanding.

Many firms have already taken important steps to improve support for victim-survivors and reduce opportunities for harm. This guidance is intended to build on that progress. It brings together regulatory expectations and examples of good practice to help firms consider where risks may arise, how safe disclosure can be enabled, and how customer journeys, communications, governance and controls can be designed with economic abuse in mind.

It is not intended to prescribe a single approach. Firms differ in size, structure, products, distribution models and customer base. The examples included here are intended as a practical foundation which firms can adapt and tailor to their own circumstances, building on them as their understanding and experience develops.

This guidance also forms part of the industry's contribution to the Government's Financial Inclusion Strategy. More fundamentally, it reflects a shared determination across our sector to continue improving the support available to customers affected by economic abuse.

I am grateful to Surviving Economic Abuse, to those with lived experience, and to the ABI members who have contributed their expertise and insight. Their contributions have helped ensure this guidance is grounded in practical experience as well as specialist knowledge.

We believe our sector has both the opportunity and the responsibility to make a meaningful difference. By working together, sharing good practice and continuing to learn, we can build a more consistent, compassionate and effective response for customers affected by economic abuse.

Hannah Gurga
Director General
The ABI

Foreword

Insurance protection is vital to economic abuse victim-survivors achieving financial inclusion and security. This Guide to Good Practice, developed by the ABI and insurers with expert input from survivors and Surviving Economic Abuse (SEA), is an important step towards ensuring insurance provides protection and cannot be misused to cause harm.

Economic abuse is a devastating and often hidden form of domestic abuse that affected over four million UK women in the last year alone. Perpetrators misuse insurance policies to control victim-survivors and to cause harm. They do this by, for example, maintaining financial ties, submitting false claims, withholding important documents, preventing victim-survivors from making a claim or changing a policy, or cancelling cover without consent, leaving survivors uninsured and at risk.

In some cases, joint life policies can be used to threaten serious harm or create a financial motive for a perpetrator to kill, causing significant fear and psychological harm. This is why insurers' response to economic abuse is a matter of life or death.

We are proud to work alongside the ABI and insurance firms to support the industry in transforming its response to economic abuse and delivering on the commitments made in the Government's Financial Inclusion Strategy. This Guide brings together the expertise of the insurance sector and victim-survivors to show how abusers can misuse insurance products and what insurers can do to prevent this.

While progress has already been made across the financial services sector, there is more to do. No victim-survivor should be forced to contact an abuser to amend a policy, nor repeatedly be asked to relive traumatic experiences to access support.

Frontline colleagues must be equipped with the knowledge and processes needed to recognise the signs of economic abuse, respond safely to disclosures and offer tailored support to meet survivors' individual needs.

We encourage firms to go beyond regulatory requirements and lead the way by working with experts like SEA to embed good practice, strengthen staff training and redesign products and services to close down opportunities for perpetrators' abuse. We look forward to working with the ABI, Government and the wider industry to monitor progress and develop solutions to address insurance economic abuse, including the risks associated with joint products.

We are grateful to the victim-survivors who courageously shared their lived experience to inform this work. Their voices have shaped this Guide and provide a powerful reminder of why this work is so urgently needed. Together, we can save lives and stop economic abuse.

Sam Smethers
CEO
Surviving Economic Abuse

Contents

About us

The ABI is the definitive voice of the UK's world-leading insurance and long-term savings industry, which is the largest sector in Europe and the third largest in the world.

We represent more than 300 firms within our membership including most household names and specialist providers, providing peace of mind to customers across the UK.

Our sector is productive, inclusive and essential to the UK economy and together, we are driving change to protect and build a thriving society.

Find out more at **abi.org.uk**

1. Introduction

Economic abuse is a serious and often hidden form of domestic abuse that can cause profound and lasting financial, practical and emotional harm. For those experiencing it, the effects can extend far beyond immediate finances, shaping safety, independence, wellbeing and the ability to rebuild. For firms, this is not a niche issue or one that can be treated as separate from wider customer and employee vulnerability. It can affect product access, servicing, claims, communication, data security, financial resilience and a person's ability to act freely in their own interests. If firms do not recognise the signs of economic abuse and respond appropriately, they may unintentionally compound harm, create barriers to safety and recovery, and fail to deliver good outcomes by leaving affected customers without the support they need to avoid further harm.

1.1 What is Economic Abuse?

Economic abuse is any behaviour used against someone (aged 16 or older) by someone with whom the victim-survivor is personally connected, to control their access to money, assets, services and other economic resources. It is defined as a form of domestic abuse in the Domestic Abuse Act 2021 and often occurs alongside coercive and controlling behaviour, which is criminalised under the Serious Crime Act 2015. It can also intersect with fraudulent behaviour under the Fraud Act 2006, e.g. fraud by false representation, and financial crime risks, including misuse of claims processes. Economic Abuse can escalate, or persist long after separation, especially in contexts involving joint financial arrangements.

1.2 Who can be affected by economic abuse?

Economic abuse can affect anyone, regardless of age, gender, income, or background.

However, research[1] shows that some groups face a higher or intersecting risk because of structural inequalities, financial dependence, discrimination, disability or insecure immigration status, isolation, caring responsibilities, or other barriers to support. For these reasons, individuals at particular risk include, but are not limited to:

- Women, particularly in intimate partner relationships
- Adults with children
- Older people
- Disabled people
- Migrants and people with insecure immigration status
- Young adults entering their first serious relationships
- People from minority ethnic communities
- LGBTQ+ people

1.3 Why firms should treat this as a priority

Economic abuse is widespread, under-recognised and frequently hidden in ordinary financial activity. Many people affected may not identify their experience as abuse at first, may be managing significant risk, or may be unable to disclose safely.

Official statistics published by the Office for National Statistics in November 2025 show that approximately one in four (25.8%) people aged 16 and over (12.5 million) had experienced domestic abuse at some point since the age of 16, and the Financial Conduct Authority's (FCA) Financial Lives 2024 survey found that 4% of adults reported experiencing economic control in the previous five years. Domestic abuse is also identified by the FCA in its Guidance for Firms on the Fair Treatment of Customers in Vulnerable Circumstances (FG21/1) as a driver of vulnerability. Firms should therefore be prepared to recognise circumstances in which abuse may be shaping a customer's ability to make decisions, manage finances, access services or remain safe.

Economic abuse is not only a financial harm issue; it can be directly connected to personal safety and risk of serious harm. Insurance, protection and long-term savings products can be misused as tools of coercion, surveillance, control, financial entrapment or retaliation, particularly where products are jointly held or where one party can influence access, communications, claims, benefits or policy changes. Firms should therefore treat economic abuse as a potential safeguarding and safety issue, not solely as a customer vulnerability or servicing concern. Recent research by Surviving Economic Abuse (SEA) highlights the severity of this risk, finding that an economic abuse victim is killed by an abuser at least every 19 days[2].

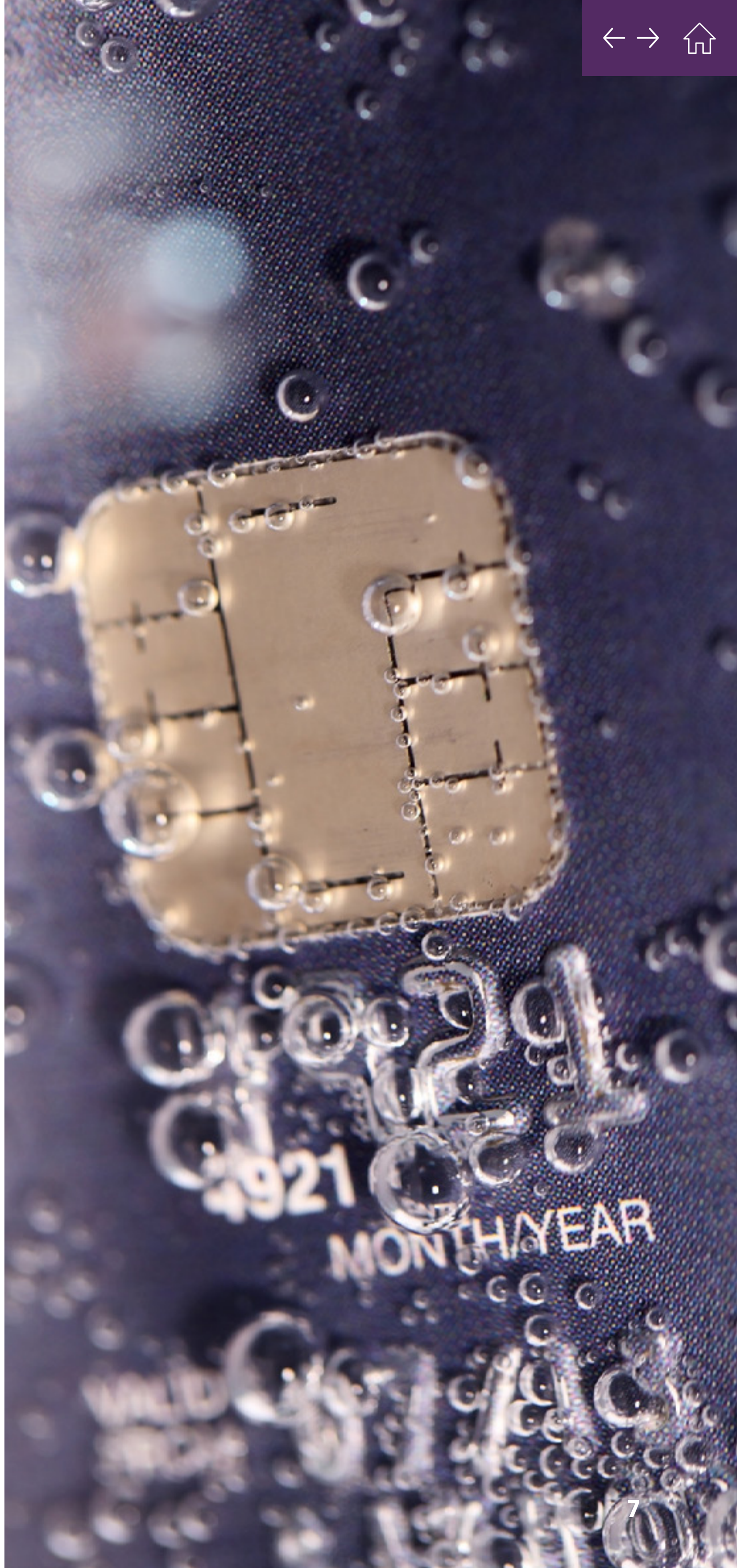
This underlines why firms should understand the connection between domestic abuse, economic abuse, insurance products and safety, and why safe, timely and proportionate responses matter.

For regulated firms, this is both a customer and workforce issue. Economic abuse may intersect with product design, onboarding, account access, servicing, claims, communications, fraud controls, collections, bereavement processes and employer support. A failure to identify and respond appropriately can increase harm, undermine trust and create poor outcomes for people who are already facing abuse.

1.4 Regulatory focus on economic abuse

The regulatory direction is clear. The FCA highlights the "vital role"[3] that financial services firms have to play to break the cycle of abuse. The FCA's framework on vulnerability recognises domestic abuse as a life event that can create significant harm, and firms should understand economic abuse as a related form of vulnerability requiring a tailored response. The broader legal and regulatory landscape is also evolving, with growing expectations on firms to avoid foreseeable harm in line with the Consumer Duty, support safe disclosure, and deliver fair treatment and good outcomes.

The wider social and economic case for action is strong. The Domestic Abuse Commissioner has cited an estimated annual cost of £85 billion to society, based on the Home Office's economic and social cost analysis updated to 2024 prices. Beyond this, abuse contributes to lost productivity, instability, ill health and long-term financial exclusion. For firms, responding well is therefore not only a matter of compliance and risk management, but part of meeting their wider responsibilities to customers, employees and society.



1.5 Aims of the guide

This guide has been developed by the ABI's Economic Abuse Working Group with input from ABI members across general insurance, health and protection, and long-term savings, alongside lived expert insights facilitated by the charity Surviving Economic Abuse. It is intended to help firms turn awareness into action: to take practical steps to prevent, detect and respond to economic abuse, reduce opportunities for perpetrators, support safe disclosure, and improve outcomes for customers affected by abuse.

The guide is relevant across the insurance, health and protection and long-term savings lifecycle and intended to support all relevant functions, from product and proposition teams to operations, servicing, claims, compliance, risk, HR and leadership. It provides ideas on which to build good practice, but we welcome innovation from firms building on these ideas and developing and sharing new approaches to tackle the issues.

1.6 How to apply the guide

Firms are encouraged to apply this guide in a proportionate and context-specific manner, taking account of their business model, distribution arrangements, products, customer base and risk profile. The examples are divided between key regulatory expectations and enhanced good practice examples. By setting out the key regulatory expectations, the guide intends to help firms consider how existing obligations, including the Consumer Duty, the FCA's expectations on vulnerable customers, data protection requirements and relevant product-specific rules, may apply in the context of economic abuse.

The good practice examples are voluntary, non-exhaustive and intended to support firms that wish to go further in developing practical, tailored and trauma-informed approaches. Firms may choose to adopt, adapt, combine or build on the enhanced good practice examples where appropriate, recognising that good practice may look different across firms while still supporting good and appropriate outcomes for customers. Firms are encouraged to build on their learning as they implement good practice.

In applying the guide, firms should also recognise that implementation of good practice examples should take care to not inadvertently treat legitimate support arrangements by people in close relationships as suspicious, create other operational or conduct risks, or result in poor outcomes for customers.

2. *Understanding economic abuse* in the context of general insurance, health and protection and long-term savings

What does economic abuse look like in the context of general insurance, health and protection and long-term savings?

Perpetrators deliberately and strategically misuse and manipulate general insurance, health and protection, and long-term savings products to cause harm or damage to the things that matter to the victim-survivor, and the things that are most commonly protected by insurance and long-term savings products: their home, belongings, car, health, a holiday, their loved ones, pets, business, and so on.

In some cases, the product or process itself may become a route through which harm is created or escalated. For example, joint policy rules, contact arrangements, claims processes, beneficiary or trustee structures, telematics, medical information flows, payout destinations or consent requirements may allow a perpetrator to monitor, locate, pressure, obstruct or financially exploit a victim-survivor. Firms should therefore consider not only whether a customer is experiencing economic abuse, but whether the product, process or interaction could increase the risk of harm if handled in the usual way.

Perpetrators' tactics can be understood across three broad categories: restrict, exploit and sabotage[4], as set out by Dr Sharp-Jeffs, founder of the UK charity Surviving Economic Abuse (SEA). These categories often overlap in practice, but they can help firms identify how insurance, protection and long-term savings products and processes may be misused to create or maintain economic abuse.

Restriction

Limiting the victim-survivor's access to insurance protections, information, services, choices or safe routes to support, e.g.:

- Restricting access to insurance protections, information and services.
- Using joint policy, ownership, trustee, beneficiary, payee, consent or servicing rules to maintain control, block changes, force contact or prolong financial ties.
- Changing contact details, intercepting post, controlling digital access or monitoring communications to block safe contact and keep the victim-survivor uninformed.
- Using standard servicing, evidence or consent requirements to prolong control, block changes or force repeat disclosure.

Examples

- A perpetrator may remain named on a household or home insurance policy after separation and use joint policy rules to block the victim-survivor from accessing information, transferring cover or making changes needed to protect the home.
- In protection products, a joint life or critical illness policy may require both parties' consent before changes can be made, leaving the victim-survivor unable to separate their financial arrangements safely.
- A perpetrator might also change contact details, intercept post or control online account access so that important policy information, renewal notices or claim updates do not reach the victim-survivor.
- Where firms require repeated disclosure, evidence or consent across different teams, this can create further barriers and may force the victim-survivor to re-engage with the perpetrator or repeatedly explain the abuse. Trustee nominations or other ownership arrangements may also prevent the victim-survivor from removing an abusive ex-partner or safely ending financial links after separation.

Exploitation

Using products, policies, benefits, claims or long-term assets for the perpetrator's own advantage, or to deepen economic dependency. Tactics are also used post-separation and can become a mechanism by which perpetrators maintain contact, control and/or financial dependency. These actions may appear to firms as ordinary customer instructions, even where they are made under pressure, coercion or without the victim-survivor's full knowledge and consent, e.g.:

- Taking out, changing or cancelling policies without the victim-survivor's knowledge or consent.
- Impersonating the victim-survivor, forging consent or using coerced instructions to make changes, submit claims or redirect payments.
- Diverting claim proceeds, withdrawals, pension payments, critical illness payouts or other policy benefits for the perpetrator's use, or to entrap or deepen dependency.
- Using beneficiary, trustee or payee arrangements to control who receives policy benefits or to block changes after separation.
- Pressuring the victim-survivor into withdrawals, transfers, surrenders, equity release, early pension withdrawals, beneficiary changes or pension-sharing decisions that benefit the perpetrator, reduce the victim-survivor's future financial security or conceal assets during separation or divorce.

Examples

- A perpetrator might misuse a claims process by impersonating the victim-survivor, coercing them into giving instructions, or redirecting claim proceeds into an account the perpetrator controls.
- A perpetrator might take out, maintain or change life, protection or savings products so that the perpetrator benefits financially, including by controlling beneficiary, trustee or payee arrangements.
- In long-term savings and pensions, a victim-survivor may be pressured into early withdrawals, transfers, surrenders, beneficiary changes, pension-sharing decisions or equity release that benefit the perpetrator, reduce the victim-survivor's future financial security, or conceal assets during separation or divorce.
- In single life policies held in trust, a perpetrator may be named as a trustee and refuse to retire after separation. This can leave the victim-survivor unable to make practical changes or regain control without seeking legal advice or taking steps under trust law, which may be inaccessible, costly and time-consuming.
- A perpetrator may also remain the primary policyholder on a home insurance policy after separation, even where the victim-survivor is living in the insured home and paying the premiums from their own account. If the insurer applies policy rules rigidly, the victim-survivor may be unable to transfer the policy into their sole name, make changes, file claims or manage the cover without the perpetrator's consent. This can leave them exposed to the risk that the perpetrator could make claims, amend the policy or otherwise misuse the cover without their knowledge or consent. It may also force unsafe contact if the victim-survivor is told to approach the perpetrator directly to ask them to remove themselves or act on their behalf, despite having disclosed economic abuse and safety concerns.

Sabotage

Causing loss, instability, fear or practical barriers by damaging the victim-survivor's financial protections, future options or ability to access support, e.g.:

- Making fraudulent claims or sabotaging benefits to cause loss or block future cover.
- Using insurance interactions and processes to monitor, intimidate, force contact, create stress or prevent access to support or care.
- Cancelling mortgage protection or home insurance and destroying the uninsured home to cause financial loss and housing insecurity.
- Forcing the victim-survivor to take responsibility for premiums, excesses, arrears or charges on products they cannot safely use, control or exit, or claims arising from the perpetrator's actions.

Examples

- A perpetrator might cancel or amend home, motor, health, protection or mortgage-related cover without the victim-survivor's knowledge, leaving them exposed to loss, debt or practical barriers when they later need to claim.
- A perpetrator might withhold documents, refuse consent or obstruct evidence requirements so that a legitimate claim cannot progress, or so that the victim-survivor has to make repeated contact with the perpetrator.
- A perpetrator might destroy property or belongings of the victim-survivor, making it hard for the victim-survivor to make a successful claim as it has been caused deliberately.
- A perpetrator might leave the victim-survivor responsible for unpaid premiums, excesses, arrears or charges on policies they cannot safely use, control or exit. In some cases, cover might be deliberately cancelled before damage is caused to the home or another insured asset, creating financial loss, housing insecurity and additional fear or instability for the victim-survivor and any dependants.

In addition, perpetrators often behave in a way that seems normal[5], so that victim-survivors are not aware, cannot acknowledge and are not able to report to firms that they are being abused in this way, and which also exploit a lack of awareness or understanding by firms meaning their behaviour goes unchecked.

Their actions cause a range of detrimental effects on victim-survivors during and after the abusive relationship has ended. Victim-survivors are often left homeless, unemployed, destitute, and in debt. According to research[6], nearly three quarters (72%) of women who experienced economic abuse reported serious harm to their livelihoods, health, finances, or safety in the year before the Autumn 2024 survey. For the victim-survivors who experienced economic abuse alongside other forms of domestic abuse, this rose to 93%.

Perpetrators do not always gain financially from their economic abuse – it is often used as a way to exert control and economic dependence, create fear, uncertainty, costs and other economic harm to the victim-survivor, and to undermine the freedom, stability, safety, security, health and wellbeing of the victim-survivor (and any dependents). Sometimes the economic abuse is perpetrated solely with a view to trapping them into a financially reliant and dependent relationship with the perpetrator.

3. Key regulatory expectations and good practice examples for firms to *support customers*

The following examples can apply across all types of providers (general insurance, health and protection, long-term savings).

In this guide, **regulatory expectations** set out key steps firms are expected to take to identify foreseeable harm, support customers in vulnerable circumstances, protect personal data, communicate safely, escalate safeguarding concerns and monitor outcomes in line with existing legal and regulatory obligations. **Good practice** examples refer to more tailored, specialist or product-specific measures that go beyond this baseline, such as specialist case handling, "tell us once" models, economic-abuse-specific tools, automated communication controls and additional safeguards for higher-risk products or scenarios.

This distinction is intended to help firms understand what should be embedded as part of core customer protection arrangements, while also encouraging proportionate innovation and stronger support where firms can go further. In implementing the guide, firms will need to assess their own products, customer journeys, distribution arrangements and customer base against applicable requirements, including the Consumer Duty, the FCA's expectations on vulnerable customers, data protection law, complaints handling and any product-specific rules.

A: Understanding economic abuse as a vulnerability

Issue

Low awareness levels and understanding of economic abuse by firms can enable perpetrators to exploit products and services to cause deliberate harm to the victim-survivor. Without the right levels of understanding and awareness, frontline staff may miss the signs of economic abuse, inadvertently aiding the perpetrator. Perpetrators isolate and erode the confidence of victim-survivors, making it hard for them to recognise and put a name to what is happening to them. It is therefore important that firms make efforts to spot the signs of economic abuse, even when it is not reported to them

Aim

Equip staff to recognise and respond to the signs of economic abuse and make the support offered on economic abuse visible, available, accessible and transparent to customers.

Key regulatory expectations and good practice examples

Key regulatory expectations

- Making information about economic abuse support visible, accessible and safely signposted across customer and staff channels, so customers and employees understand what economic abuse can look like and how to access help safely.
- Where appropriate, signposting victim-survivors to specialist services.

Good practice examples

- Providing enhanced, trauma-informed and role-appropriate training on economic abuse, vulnerability, coercive control indicators, safe disclosure, safe questioning, escalation expectations and flexible, empathetic responses in complex or higher-risk cases. Training should cover more than verbal indicators and customer conversations, including account activity, policy servicing, product misuse, barriers to disclosure, safeguarding risks and how insurance products can be weaponised.
- Drawing on specialist domestic and economic abuse organisations to support training, given the complexity, nuance and safeguarding risks associated with economic abuse.
- Ensuring training extends beyond frontline, customer-facing and claims teams to all relevant specialist functions, including product, underwriting, operations, risk, compliance and senior leadership, reflecting their role in identifying and responding safely to economic abuse.
- Providing practical economic-abuse-specific tools such as playbooks, scripts, decision trees, video training tools, and detailed guidance on safe contact preferences and information-sharing.
- Providing practical and emotional support to staff supporting victim-survivors of economic abuse, including options to step away from traumatic cases while maintaining consistent and respectful service.

B: Recognising indicators of economic abuse

Issue

Economic abuse and coercive control often present through patterns rather than a single incident, and the indicators may appear subtle, routine or disconnected. Customers might describe money problems, confusion, access difficulties or practical issues without identifying abuse, while perpetrators might exploit standard processes, digital access, joint arrangements or routine servicing interactions to maintain control. Without the right awareness, staff may miss indicators, treat them as ordinary customer-service or financial issues, or fail to recognise when behaviour, product activity or communication concerns point to a wider pattern of harm.

Aim

Adopt a trauma-informed, victim-survivor-centred approach, including treating disclosures of economic abuse or domestic abuse as credible, and prioritising the safety and wellbeing of the victim-survivor.

Enable staff to recognise possible indicators of economic abuse early, look beyond isolated transactions or behaviours, and respond in a way that supports safe identification, appropriate escalation and better outcomes for customers.

Key regulatory expectations and good practice examples

Key regulatory expectations

- Helping staff identify customer-level indicators of financial control, including restricted access to money, policy benefits or savings; pressure to seek permission for spending; wages being redirected or taken; being prevented from working; or unexplained financial hardship that does not align with known income.
- Building awareness of operational and product indicators, such as unexplained policy changes; repeated contact-detail or beneficiary changes; unusual cancellation, withdrawal or surrender requests; disputed claims or payout instructions; intercepted post; confusion about cover, servicing activity or transactions the customer did not authorise; or language that might mask abuse, such as “my partner handles everything”, “I’m not allowed to”, “we’re having money problems”, or uncertainty about policy or payment changes that might reflect control or coercion.
- Training frontline and specialist staff to recognise common indicators of economic abuse and coercive control, including patterns of behaviour, communication and product activity that might indicate foreseeable harm.

Good practice examples

- Equipping staff to identify more complex coercion or control indicators during live interactions, including where a customer cannot speak openly, and to use safe questioning techniques or specialist referral routes where appropriate.
- Providing clear guidance on when identified indicators should prompt further supportive enquiry, safe handling, referral to a specialist team, or use of a screening checklist to explore risk more systematically.

Prompts to help staff identify risk of economic abuse during conversations with customers:

Behavioural indicators

- Does the customer seem distressed, fearful, or unusually nervous when discussing finances?
- Is someone else speaking on their behalf or preventing them from answering freely?
- Does the customer appear reluctant or unable to explain policy decisions, servicing activity, claims activity or changes to their cover?

Control over access, decisions and money

- Has the customer said they cannot access their own policy information, account, pension, claim or benefit payments?
- Do they mention needing permission to make changes, access funds, claim, withdraw, surrender or make other product decisions?
- Have they indicated that someone else controls their policy documents, online access, passwords, verification steps or key records?

Signs of coerced, unauthorised or fraudulent activity

- Are there policies, beneficiary changes, withdrawals, surrenders, claims or payout instructions the customer cannot explain or did not consent to?
- Have they reported transactions, claims activity, policy changes or benefit movements they did not make or understand?
- Are there repeated requests to reset online access, change contact details, redirect communications or alter payout destinations that could indicate interference or impersonation?

Work, income and financial pressure

- Has the customer said they are prevented from working, had income taken, or cannot access insurance, protection or savings benefits intended to support them?
- Do they describe financial hardship or pressure that does not align with known income, benefits or policy circumstances?

Communication and safety

- Has the customer said their post is intercepted or that they do not receive policy, claim, pension or benefit communications?
- Do they express concerns about being monitored through phone, email, apps, online servicing, telematics or other digital tools?
- Are they worried about someone finding out they contacted the insurer, provider, adviser or claims team?

Languaage cues

Listen for phrases that may reflect control, uncertainty or restricted autonomy, such as:

- “My partner deals with all the money”
- “I’m not allowed to…”
- “I’m not sure why that policy or payment changed”
- “We’re having money problems”
- “I can’t talk right now” (said with fear or urgency)

C: Enabling safe disclosure

Issue

Customers experiencing economic abuse may be unable to disclose safely, may be repeatedly asked to retell distressing information, or may be exposed to further harm (including unsafe data disclosure) if firms rely on standard processes, don't recognise coercion, or don't respond to or record and use vulnerability information consistently.

Aim

Encourage greater disclosure and handle disclosures of economic abuse safely, record them appropriately, and apply extra safeguards to protect customers from perpetrator-related harm.

Where a disclosure or indicator suggests a risk of harm, firms should have clear processes to assess the level of risk, record relevant safety needs appropriately, and escalate promptly to trained colleagues or specialist teams.

Key regulatory expectations and good practice examples

Key regulatory expectations

- Raising awareness about the benefits of disclosure through clear, consistent messaging across multiple channels that include human interaction, making information on disclosure both accessible and prominent.
- Ensuring personal data relating to customers affected by economic abuse is handled in line with UK GDPR and Data Protection Act 2018. This includes appropriate handling of vulnerability-related information, applying strict safeguards to special category data, and ensuring any data sharing is lawful, necessary, and proportionate in line with the Information Commissioner's Office's (ICO) guidance.
- Protecting privacy, contact details and account information, and ensuring communications and servicing arrangements do not create additional safety risks or unsafe disclosure.

Good practice examples

- Training frontline staff to understand the barriers that may prevent customers from disclosing economic abuse, and how to respond safely, sensitively and without requiring unnecessary repeat disclosure.
- Applying reasonable flexibility where circumstances warrant it, for example in claims, contact changes, evidence requirements, timescales or policy amendments, and documenting the rationale for any departure from standard process.
- Implementing a "tell us once" approach, with consent from the survivor, and using specialist case-handling models, so victim-survivor customers are not repeatedly asked to share sensitive information or repeat their story.
- Developing economic abuse-specific safety tools, such as decision trees, screening checklists, playbooks and specialist scripts, to support consistent handling in higher-risk cases.

D: Safe, trauma-informed, flexible support and communications

Issue

One-size-fits-all communications can lead to avoidable harm. In economic abuse cases, unsafe channels or poorly timed messages can significantly increase risk of harm to the victim-survivor if they have fled the abuser and their new address is disclosed (e.g. where communications are sent to joint policyholders or intercepted), and unclear information can prevent customers from understanding options and making informed decisions.

Aim

Provide tailored communications and safe channels for customers experiencing economic abuse.

Key regulatory expectations and good practice examples

Key regulatory expectations

- Handling cases promptly, respectfully and sensitively, minimising unnecessary repeat disclosure and providing clear next steps and timeframes.
- Reviewing communications to check they are safe, confidential and do not inadvertently alert perpetrators, disclose sensitive information or increase risk to victim-survivors.
- Taking steps to review and improve the clarity of messages to customers relating to economic abuse, tailoring communications, and providing these in a timely manner to make sure customers understand product information.
- Agreeing, recording and following safe contact preferences (channel, timing, content), and treating them as safety critical. It should be noted that these flags should be carried across all systems (that are used to support individual customers) as there have been examples of consumers notifying firms of their preferred communication channel/time/content but these aren't effectively shared across all systems or the entire customer journey and as a result harm has occurred.
- Using plain English and provide clear next steps, timeframes and options (including how to access specialist support).

Good practice examples

- Empowering staff to apply appropriate flexibility within legal, regulatory and policy constraints, including avoiding unnecessary requirements for victim-survivors to contact or rely on perpetrators where a safe and lawful alternative is available.
- Establishing clear, safe referral and escalation routes across customer touchpoints, with defined criteria for escalation, case ownership, safe contact controls and access to suitably trained colleagues where needed.
- Setting clear safeguarding processes for cases involving immediate or significant risk of harm, including urgent referral criteria and guidance on when specialist support or emergency services signposting may be appropriate.
- Providing specialist case-handling teams, defined service levels and dedicated case ownership for higher-risk or complex economic abuse cases.
- Building controls to suppress or reroute automated communications where an economic abuse flag or safe-contact instruction exists.
- Providing opportunities to disclose domestic (including economic) abuse on all channels, for example on a customer-facing website, on call waiting menus, with information on who to contact and how, if they are experiencing abuse.
- Avoiding unnecessary gaps in cover or support where the victim-survivor has had to flee the home or cannot safely engage through standard channels.
- Using a tell-us-once approach where appropriate, supported by safe record keeping, specialist response pathways and clear handovers so customers do not have to repeat traumatic information unnecessarily.
- Testing communications and digital journeys against economic abuse and vulnerability scenarios, using complaints, incidents and customer insight to improve templates, prompts and processes.

E: Safe end-to-end product and journey design to avoid foreseeable harm (including "appropriate friction"), including via third parties and distribution chain (outsourcing, third party administrators and intermediaries)

Issue

If products and customer journeys are not designed with vulnerability in mind, they can risk creating foreseeable harm or unsafe outcomes - especially in economic abuse contexts where coercion, impersonation, account takeover, and forced "consent" can be used to exploit standard processes.

Where distribution or servicing is delivered through third parties e.g. intermediaries, financial advisers, outsourced call centres, third-party administrators, or reinsurers' insurance partners, there may be gaps that perpetrators can exploit that can create unsafe outcomes for customers experiencing economic abuse.

Where standard contractual, policy or joint-party arrangements would ordinarily require the involvement, consent or cooperation of another party, firms should assess whether applying those requirements in the usual way could create or increase foreseeable harm. Where there is known or suspected economic abuse, firms should consider what proportionate, lawful and risk-based alternatives may be available to avoid placing the victim-survivor in a position where they must engage with, obtain consent from, or otherwise rely on the perpetrator.

Aim

Design products and customer journeys through the lens of economic abuse and integrate a safety-first approach across the whole distribution chain: incorporate customers' experiences into product and service design, recognising that apparent "consent" or routine servicing requests may occur in a coercive context and that standard processes can increase risk if they do not prioritise safety.

Key regulatory expectations and good practice examples

Key regulatory expectations

- Building vulnerability considerations into product and journey design and review (idea development > testing > launch > ongoing review), focusing on preventing foreseeable harm to vulnerable cohorts.
- Setting clear minimum standards for handling economic abuse across the distribution chain. This includes safe disclosure and contact practices, secure data handling, appropriate escalation, defined timeframes, and cooperation with investigations or remediation. All activity involving the handling of personal data must comply with UK GDPR, the Data Protection Act 2018, and ICO guidance.
- Defining clear escalation routes for safety-critical incidents, including potential or actual personal data breaches such as inadvertent disclosure. This requires immediate reporting, prompt containment to limit any impact on individuals, and appropriate investigation and learning reviews to prevent recurrence, in line with UK GDPR, the Data Protection Act 2018, and ICO guidance.

Good practice examples

- Ensuring that automated journeys include clear routes to human support where customers may be at risk, and that those journeys can identify, pause or adapt to vulnerability or distress signals, while also providing alternative channels for communication such as enabling call backs at the time of a caller's choosing.
- Assessing whether automated journeys are appropriate for safeguarding-risk scenarios and ensuring they do not create barriers to disclosure or access to support.
- Building requirements into contracts and Service Level Agreements, including training completion, Quality Assurance, Management Information, incident reporting and learning reviews.

Good practice examples (continued)

- Assuring end-to-end outcomes through regular monitoring, such as file reviews, call listening, complaints themes and customer feedback, rather than relying only on operational Key Performance Indicators.
- Considering policy roles, such as joint policyholder, life assured, administrator, trustee and named drivers or travellers, and understanding how each role interacts and where there is potential for harm.
- Sharing relevant risk indicators, such as safe-contact preferences, between firms and third parties where lawful and necessary, with clear handover processes to specialist teams.
- Using data and technology to proactively identify behavioural changes, unusual account activity and other potential indicators of economic abuse.
- Applying product-specific safeguards for joint-life, joint policyholder, trustee, beneficiary, named driver, telematics or linked-party arrangements where standard processes may create unsafe contact, forced consent or control risks.
- Asking third parties what training, governance and quality controls they have in place for vulnerable customer and economic abuse cases, and providing or signposting training where gaps are identified.

Product-specific good practice examples

Motor and telematics

- Building in telematics safety controls, for example where a customer indicates that telematics data, app access or shared credentials may create a safety risk: providing a clear route to change credentials, restrict visibility, disable app-based access where possible, or move to a non-telematics product without requiring contact with the perpetrator.
- Using claims handling as a safeguard against coercion or misuse: training claims teams to check who was driving, who is providing information, who controls the policy or vehicle, and where any claim payment should go. Where another person appears to dominate the interaction, disputes the account, or seeks to redirect proceeds, escalating for specialist review before relying on their instructions or making payment.

Home insurance

- Including, where appropriate, domestic abuse support within home insurance policy terms and conditions.

Travel insurance

- Designing overseas-assistance and emergency-medical processes so firms can distinguish safely between the patient, policyholder, travelling companion, payer and person controlling contact or documents.
- Treating requests about repatriation, bedside access, accommodation, payment destinations, guarantees of payment, translation support and onward travel as potentially safety-critical where abuse or coercion is suspected.
- Avoiding assuming that a travelling companion or joint policyholder is a safe point of contact or should automatically receive medical, location or assistance updates where this could expose the victim-survivor to harm.

Joint policies, life protection and trusts

- Reviewing whether joint products, dual-life structures, trust arrangements, beneficiary rules and terms and conditions create avoidable dependency or prevent safe separation.
- Treating joint-life, joint policyholder, trustee, beneficiary and other linked-party arrangements as potentially safety-critical where domestic or economic abuse is known or suspected. Firms should assess whether standard requirements for joint consent, disclosure, correspondence or cooperation could increase the risk of harm, force unsafe contact, delay protective action or give the perpetrator further control, and should consider lawful, proportionate alternatives where available.

- Where there are indications of immediate or significant safety concerns, prioritising safeguarding and risk escalation over routine servicing pathways, ensuring that decisions are handled by appropriately trained colleagues and that communications, evidence requests and next steps do not alert the perpetrator or increase risk to the victim-survivor.
- Reviewing the suitability and prominence of joint-life offerings in marketing and advice journeys compared with single own-life cover.
- Providing routes out of rigid digital-only or standard joint-policy journeys where abuse-related circumstances require manual review, proportionate evidence, legal input or specialist handling.
- Applying appropriate controls to trusts, trustees, beneficiaries and other third-party rights. This is to ensure that an abusive individual cannot obstruct necessary changes, retain access to personal data, or exert control over policy proceeds after separation where a safe and lawful route is available.
- Where products may pay out significant sums, such as equity release, life protection or long-term savings, requiring part of the advice or verification process to take place with the customer alone so firms can assess understanding, pressure and whether the product is genuinely in the customer's interests.
- Confirming payout destinations and disbursement arrangements in a way that reduces the risk of funds being diverted to a perpetrator or placed under joint control.
- Explaining clearly how benefits can be protected and used for treatment, recovery or financial stability rather than becoming another route for extraction or control.

Pensions and long-term savings

- Providing routes to verify that significant pension or long-term savings decisions reflect the customer's own understanding and interests, especially where another person appears to be controlling the interaction, documentation or destination of funds.

Critical illness, health and medical-related cover

- Using product design, disclosure and medical-information processes that reduce the risk of a customer being pressured into inaccurate disclosures, unaffordable cover or cover structures that increase dependence on the perpetrator.
- Avoiding assuming that a partner, family policyholder or joint policyholder is a safe contact or should automatically receive information about appointments, authorisations, treatment pathways or medical correspondence.

F: Governance, culture, outcomes monitoring, escalation, and continuous improvement

Issue

Tackling economic abuse requires firms to embed it into governance, culture, product oversight and day-to-day decision-making, rather than treating it as an exceptional customer issue.

Senior leaders should set clear accountability for identifying and reducing foreseeable harm, ensure staff are empowered to respond safely and flexibly, and create a culture in which economic abuse is understood as a vulnerability that can affect access, autonomy, safety and financial resilience. Firms should define what good outcomes look like for affected customers, monitor whether those outcomes are being achieved through Management Information, complaints, incidents, quality assurance and customer insight, and use this evidence to identify unsafe patterns, escalate risks and improve products, journeys, communications and controls over time. Continuous improvement is essential: as perpetrator tactics, customer needs and regulatory expectations evolve, firms should regularly review whether their approach remains effective, trauma-informed and capable of preventing avoidable harm.

Aim

Embed economic abuse as a vulnerability into governance and culture, with clear policies and processes relating to accountability, monitoring, escalation and continuous improvement.

Key regulatory expectations and good practice examples

Key regulatory expectations

- Setting a clear strategy and ownership for supporting customers experiencing economic abuse, with named senior and operational owners, practical senior leader commitment, clear decision rights and appropriate records of key decisions.
- Treating economic abuse as a foreseeable harm across governance, the product lifecycle and customer journeys, and mapping this to the Consumer Duty and other relevant legal and regulatory requirements.
- Defining clear safeguarding responsibilities, escalation routes and decision-making authority for economic abuse cases, including how staff should identify potential risk of harm, when cases should be escalated, who owns safety-critical decisions, and how learning should be fed back into product, journey and control improvements.
- Establishing clear accountability across the first line, specialist functions and second-line oversight, with governance, controls and Management Information that can evidence good outcomes and support continuous improvement.
- Defining and monitoring metrics to assess what good outcomes look like for customers experiencing economic abuse, including those with additional needs. These may include disclosure rates, timeliness of safeguarding case resolution, customer satisfaction following support, complaints and incident themes, and evidence that personal data is shared only where necessary and proportionate.
- Using Management Information, complaints, incidents, disclosure rates, quality assurance, customer feedback and other insight to monitor outcomes, identify gaps or unsafe patterns, investigate root causes and improve products, processes and controls.
- Ensuring governance arrangements cover third-party and distribution-chain activity where relevant, so that outsourced or intermediary journeys are subject to appropriate oversight, assurance and escalation.

Good practice examples

- Applying an economic abuse lens to oversight and controls, including tracking unsafe contact risks, potential coercion or forced consent, barriers to account or contact changes, repeat disclosures, high-risk product roles, and indicators emerging from complaints, incidents and near misses. This may include undertaking specific economic abuse scenario testing as part of product governance and regulatory compliance reviews and could include scenarios relating to separation, joint policy arrangements, and situations where disclosures of abuse have been made.
- Using periodic thematic reviews or deep dives to test whether controls are working in practice across servicing, claims, digital journeys, third-party arrangements and product-specific scenarios. Using lived experience to support ongoing development of processes and procedures.

4. References

(1) Refuge: Know Economic Abuse Report 2020

(2) SEA: Hidden risks, fatal consequences: Economic Abuse in Domestic Homicide Reviews, March 2026

(3). FCA: The hidden cost of domestic financial abuse: working together to improve outcomes

(4) Sharp-Jeffs, N. (2022) Understanding and Responding to Economic Abuse, Emerald Publishing, UK.

(5) Economic Abuse Toolkit

(6) Wilson-Garwood, R (2025). Counting the Cost: The Scale and Impact of Economic Abuse in the UK, London: Surviving Economic Abuse and Ipsos UK

5. Legal and regulatory overview

This overview sets out some of the key legal and regulatory requirements for firms in their role as providers for consumers, in the context of economic abuse. It is not an exhaustive list.

FCA expectations

Relevant legislation and regulations

- **FCA Consumer Duty guidance:** applies across the distribution chain. Firms that can materially influence outcomes must ensure good outcomes are delivered.
- **FCA Consumer Duty CP26/23: Scope and proportionality:** a consultation particularly relevant to those that have a role early in the distribution chain, work with other firms to manufacture a retail product or service, are part of a complex distribution chain, and who conduct retail business for retail customers outside the UK.
- **FCA Final Guidance FG21/1** (Guidance on fair treatment of vulnerable customers): aims to help firms understand needs, take practical action (including systems/processes that support disclosure), and ensure customers in vulnerable circumstances receive outcomes as good as others. Includes expectations on embedding vulnerability across the customer journey, including when third parties are involved.
- **Joint FCA and ICO statement on regulatory expectations regarding firms' approaches to vulnerability related data:** aims to help firms understand and apply the FCA's expectations for delivering good outcomes for retail consumers in vulnerable circumstances, in line with the Consumer Duty, while also maintaining confidence in the lawful, fair and responsible use of personal information in line with the ICO's expectations.
- **Final Guidance 22/5 (FG22/5)** (Consumer Duty guidance): reinforces outcome monitoring and the need to act where customers (including vulnerable cohorts) receive worse outcomes.
- **FCA Dispute Resolution Rules (DISP):** provides guidance to ensure outsourced complaints handling supports fair, timely and appropriate outcomes.
- **Senior Managers and Certification Regime (SM&CR):** tackles economic abuse through broader conduct rules, fitness and propriety requirements, and prescribes a duty of responsibility to treat customers fairly and act with integrity.
- **FCA Non-Financial Misconduct (NFM):** as of December 2025, the FCA has strengthened its approach to NFM, which includes behaviours by all staff that can manifest as economic abuse.

Financial Ombudsman Service

- Financial Ombudsman Service (FOS) Information for consumers about complaints involving economic and domestic abuse: The FOS website includes a range of information and details of wider support available for consumers when complaints involve a firm's approach to cases involving economic and domestic abuse. It also includes case studies on some of the common things they see in their casework. The FOS considers complaints on the basis of what is fair and reasonable in all the circumstances of the case and shares learning from complaints to help industry and firms improve practice.

Data Protection Act 2018 and UK General Data Protection Regulation (GDPR)

- Under the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR), organisations are required to handle personal data lawfully, fairly and securely. Organisations must also have appropriate policies, procedures, and technical measures in place to safeguard personal data at all stages, including when it is collected, recorded, used, shared, and stored. Failure to comply with these requirements may result in regulatory action. The ICO, the UK's independent regulator for data protection, can be contacted for guidance.

Domestic abuse and coercive control (UK)

Perpetrators of economic abuse can be prosecuted under the following laws (please note this is not a full list):

- **Domestic Abuse Act 2021 (Section 1):** Defines economic abuse as part of controlling or coercive behaviour where the victim-survivor is "personally connected" to the perpetrator. It includes restriction, sabotage and exploitation of a victim-survivor's economic resources.
- **Serious Crime Act 2015:** Economic abuse often sits within a wider pattern of coercive control, and in England and Wales controlling or coercive behaviour in an intimate or family relationship is a criminal offence under the Serious Crime Act 2015. In Scotland, domestic abuse legislation similarly recognises coercive and controlling behaviour, including economic abuse, within a course of conduct.

Fraud, impersonation and financial crime considerations

- **Fraud Act 2006:** Economic abuse can involve impersonation, account takeover, coerced instructions, or non-consensual transactions (e.g. changes to payment details, withdrawals, surrenders, or beneficiary nominations). It can also involve misuse of claims processes. The Fraud Act 2006 Section 2 defines fraud by false representation as dishonestly making an untrue or misleading representation, knowing it might be untrue, with the intent to gain for oneself, cause loss to another, or expose another to risk of loss. The offence is complete upon the representation being made, regardless of whether the gain or loss occurs.

6. Signposting to sources of help

This is a non-exhaustive list of sources of support relating to economic abuse, which firms may want to use themselves, or to which firms may want to signpost customers for support.

Category	Organisation or service	Details	Contact
Immediate/ general support	**National Domestic Abuse Helpline**	Free, confidential 24/7 support.	0808 2000 247
Immediate/ general support	**Victim Support**	Free, independent support for victims and survivors of abuse or crime, whether or not reported to police.	0808 168 9111 victimsupport.org.uk Live chat/My Support Space
Financial/ economic abuse support	**Surviving Economic Abuse (SEA)**	Information and resources on economic abuse; signposts to specialist support rather than providing direct advice.	survivingeconomicabuse.org
Financial/ economic abuse support	**The Insurance Charity**	Supports current and former insurance employees facing financial hardship, including where abuse contributes.	theinsurancecharity.org.uk
By group/ circumstance	**Refuge / Women's Aid**	Refuge runs the National Domestic Abuse Helpline; Women's Aid provides a UK support-service directory, live chat and the Survivor's Handbook.	Refuge/NDAH: 0808 2000 247 Women's Aid: womensaid.org.uk
By group/ circumstance	**Men's Advice Line / ManKind Initiative**	Confidential support for male victims of domestic abuse.	Men's Advice Line: 0808 801 0327 ManKind: 0808 800 1170 / 01823 334244
By group/ circumstance	**Galop**	Emotional and practical support for LGBTQ+ people experiencing abuse.	0800 999 5428 help@galop.org.uk

Category	Organisation or service	Details	Contact
By group/ circumstance	**Hourglass**	Support and information for older people, and for those worried about an older person experiencing abuse.	0808 808 8141
By group/ circumstance	**Karma Nirvana/Forced Marriage Unit**	Support on honour-based abuse and forced marriage.	Karma Nirvana: 0800 5999 247 FMU: 020 7008 0151
Apps/practical tools	**Bright Sky**	App and website for people experiencing abuse, or those worried about someone else.	brightskyapp.org
Apps/practical tools	**Hollie Guard**	Can alert chosen contacts, share location and send audio in an emergency.	Hollie Guard app
Legal advice/ representation	**Citizens Advice**	Local services can offer legal advice and help find a local lawyer.	citizensadvice.org.uk
Legal advice/ representation	**DARA (Domestic Abuse Response Alliance)**	Supports survivors through a referral network; does not take direct referrals.	Referral via partner organisations
Own behaviour support	**Respect Phoneline**	Confidential support for people concerned about their own abusive behaviour, and those supporting them. Mon–Fri, 10am–5pm.	0808 802 4040
Own behaviour support	**AVP Britain (Alternatives to Violence Project)**	Workshops on alternatives to violence and better ways to manage anger and conflict.	avpbritain.org.uk
Employer resources	**EIDA (Employers' Initiative on Domestic Abuse)**	Tools, training and resources to help employers embed good practice and act effectively on domestic abuse.	eida.org.uk
Employer resources	**DAWS (Domestic Abuse Workplace Solutions)**	Workplace-focused domestic abuse support, training and resources for employers.	daworkplacesolutions.com
Employer resources	**We Thrive**	Workplace-focused domestic abuse support, training and resources for employers.	we-thrive.co.uk

The **ABI**
Together Driving Change

Disclaimer

This document has been produced by the ABI for general information purposes only. While care has been taken in gathering the information and preparing the document, the ABI does not make any representations or warranties as to its accuracy or completeness and expressly excludes to the maximum extent permitted by law all those that might otherwise be implied. The ABI accepts no responsibility or liability for any loss or damage of any nature as a result of acting or refraining from acting as a result of, or in reliance on, any statement, fact, figure or expression of opinion or belief contained in this document. This document does not constitute legal or financial advice of any kind.

The ABI, 30 Fenchurch Street
London EC3M 3BD

0207 600 3333
info@abi.org.uk

abi.org.uk