

STOP THE TRAFFIK
PEOPLE SHOULDN'T BE BOUGHT & SOLD



STOP THE TRAFFIK

Survivor Bank Accounts Report



A review of the case for survivor bank accounts, the successes from the scheme and operational insights to consider in design and delivery

With thanks to HSBC, The Salvation Army, Hestia and Kalayaan for their contributions



1. Introduction

Human trafficking is a widespread and devastating crime, often leaving survivors unable to integrate into society once they have been identified, even with support provided by Governments and NGOs. Survivors are often excluded from the financial system due to barriers that prevent them from opening a bank account. The inability to access financial services can have serious implications for their recovery, preventing them from fully integrating into society and potentially leaving them vulnerable to re-exploitation. HSBC recognised these issues and the barriers to banking which survivors often face, creating a scheme to try to address this issue.

HSBC developed the Survivor Bank Account scheme in consultation with The Salvation Army, conducting a pilot between June 2018 and March 2019 in Glasgow and Nottingham which supported 24 survivors to set up accounts. After the success of the pilot, HSBC collaborated with The Salvation Army and their subcontractors, such as Hestia and Kalayaan, to roll out the scheme to individuals who have been identified as having experienced modern slavery by the UK's National Referral Mechanism (NRM).

The scheme works with survivors who are currently being supported by one of the designated charity partners. Survivors are referred by the charity partner to the bank for a meeting to discuss opening an account. The scheme enables survivors to open a basic bank account without any proof of identity or address. The accounts are then monitored for the first year to mitigate the potential of fraud, and survivors are supported with any banking queries or financial management understanding. Staff in 41 branches across the country have been trained on how to provide support to survivors, opening over 500 accounts for survivors, with the scheme continuing to expand.

In 2019, the FAST (Finance Against Slavery and Trafficking) Survivor Inclusion Initiative¹ was launched by the Liechtenstein Initiative. Recognising the valuable impact of HSBC's programme, the FAST programme worked with HSBC to put the survivor programme at the heart of what banks could do and use HSBC's experiences to help others overcome obstacles. The Initiative provides a blueprint for financial institutions on how to offer basic financial services and products to survivors. The Initiative has also been piloted by Scotiabank, with 12 further banks around the world interested in taking part.

STOP THE TRAFFIK has consulted with HSBC, The Salvation Army, Hestia and Kalayaan, in order to explore the successes of the scheme. Based on this analysis, STOP THE TRAFFIK would encourage all retail banks to consider adopting similar survivor bank account schemes.

This briefing outlines the case for survivor bank accounts, the positive impact they can have, and operational insights to consider in design and delivery.

2. The Barriers That Survivors Face

“[For survivors] even that step of walking into a bank can be very challenging...not knowing who you can trust, who is genuinely going to help you and that fear of being quizzed over documentation” -
Maxine Pritchard, the Head of Financial Inclusion and Vulnerability at HSBC UK².



Survivors are excluded from opening a bank account by a range of barriers. These include:

- A lack of identification documents due to having them stolen by traffickers
- No proof of address, due to not having a fixed address or staying in a safe house
- An incomplete address history, often due to sofa surfing or having no fixed abode
- Fraud or immigration offences committed in the survivors' name by traffickers
- Low credit scores due to accounts previously being accessed by traffickers
- Language barriers and unavailability of interpreters
- A lack of trust in banking services due to experiencing personal accounts being exploited by traffickers

Banks should be aware that the issue of a lack of trust in banking services can be compounded by negative responses from banks to their specific needs. The Director of Kalayaan, Rita Gava, commented that 'Kalayaan has accompanied several of our clients to banks along the high street but have always been turned away. The impact this can have on victims can be hugely damaging to their recovery'³.

3. Problems with Not Having an Account

- 3.1. **Unable to Get a Job** – Having a bank account is a requirement for most payroll and so without it, survivors are unable to be employed and can face uncomfortable questions about why they do not have one.
- 3.2. **Risk of Re-Exploitation** - Survivors may hand cash to a friend or relative to look after or provide someone else's bank details to an employer or for payments such as Universal Credit. This often leads to complications and undermines the survivor's financial independence, heightening the risk of re-exploitation. Taking control away from a survivor who has been exploited is highly damaging and potentially detrimental to the survivor's recovery.
- 3.3. **Less Secure to Carry Cash** - Survivors who do not have a bank account may be given payments via cash-in-hand, which is a lot less safe than a bank transfer. Carrying cash around often leads to people spending it faster as it is unsafe to carry around. This is a common problem as the NRM provides survivors with financial assistance. Survivors who do not have a bank account need to be provided with cash payments, putting both those providing support and the survivors at risk from having to move around large amounts of cash.
- 3.4. **Blocked from Daily Transactions** - In an already increasingly cashless society, the impact of COVID-19 has meant that cash is rarely in use due to fears of spreading the virus. Without a bank account it is incredibly difficult to make payments for shopping, travel or medical supplies, making daily transactions and living extremely difficult.

4. Benefits of Having an Account

- 4.1. **Employment** – Opening a bank account can help survivors to rebuild their lives after the trauma of modern slavery by enabling survivors to search for jobs. It is an important step to help survivors to escape the cycle of poverty, helping them to find a job and present as a strong candidate.



- 4.2. **Financial Independence** - It provides the ability for survivors to receive payments that they may not have been able to receive otherwise, such as benefits, bursaries or child maintenance services and removes the reliance on third parties.
- 4.3. **Empowerment** - Lucia is a sex trafficking survivor and was helped to open a bank account with the HSBC scheme. She said that having a bank account helped to improve her self-esteem as without one she felt she was often treated 'not like a person'⁴. It is empowering for survivors to have a bank account, card and statements with their name on. Being officially recognised by a financial institution is a positive form of recognition for survivors who might have had their identification documents stolen by traffickers.
- 4.3.1. **Integration** - Survivors are often receiving asylum support and will be given an 'aspen card' for payments which is a clear way for them to be identified by others as an asylum seeker. Having a generic bank account supports feeling integrated into society by giving survivors back their choice of what they disclose. The bank statements can also be used as a form of identification which can be an important practical step for a survivor in 'reclaiming' their life and helping to build self-esteem.
- 4.3.2. **Improvements to Mental Health** - Charities who have experience of HSBC's scheme have reported improvements to survivors' self-identification of their mental wellbeing due to gaining financial independence.
- 4.3.3. **Financial Management** - The bank account helps to teach service users about budgeting and financial management, increases the ability for saving and reduces vulnerability. It is important that their money is safe and secure and that they can see what is coming in and going out. Our partner feedback emphasised the importance of control for a persons' recovery.

5. The Importance of Branch Staff Training

Trained staff are a significant contributing factor to the success of the HSBC scheme and are essential to supporting service users' wellbeing. Partner charities reported that HSBC's staff are caring and sensitive to survivors' needs, confident when working with interpreters, and create a professional environment for the survivors. It is key that branch staff ensure that service users are informed, supported and comfortable throughout the process.

A trauma-informed response is paramount when working with survivors as it avoids the risk of re-traumatisation or distress⁵. It recognises the need to create a mutual relationship of trust with the survivors and to work to increase their confidence. Banks are advised to use an appropriate setting for the meetings in which the survivor feels comfortable, maintaining a consistent sense of calm, security and safety. Staff should be trained to not ask for background information and refrain from asking for any details which may be difficult for the service user.

In addition to staff expertise, HSBC have produced a video which talks survivors through how the bank account works. This video is accessible to the service user after they have left the bank, if they ever want to be reminded of the advice. This ensures that survivors are well informed and can understand clearly how the accounts work. Staff should not assume that what they know about banking is common knowledge. Information should be provided about how to use their cards, accounts, mobile and online banking and fraud, as many survivors may not have had a bank account before. STOP THE TRAFFIK would further advise that such resources should be available in a range of languages for survivors whose first language is not English or those with accessibility needs.



6. Operational Insights

STOP THE TRAFFIK encourages all high-street banks to introduce a survivor bank account scheme similar to HSBC's. For advice in setting up such a scheme, STOP THE TRAFFIK recommends using The Lichtenstein Initiative's [Blueprint](#) for the FAST Survivor Inclusion Initiative⁶.

Building on the FAST Blueprint, STOP THE TRAFFIK have outlined 8 issues which should be considered when introducing such a scheme. These issues are based on the insights offered by partner charities that currently refer into HSBC's scheme.

- 6.1. **Accessibility.** One major critique of HSBC's scheme centred on the accessibility of the service as initially only one branch in London offered the accounts. Survivors may not be able to travel far due to the cost, language barriers, uncertainty around the complex public transport system and fear of travelling to an unknown place, and so these branches may be difficult to access. HSBC listened to the feedback from charity partners and preceded to make the accounts available in several other branches, additionally considering the accessibility for safe house residents. Increasing the range of branches offering the service will increase the availability of the scheme for more survivors.
- 6.2. **Individual Prioritisation.** Survivors' experiences and recovery processes differ greatly, meaning that a bank account may be important for some people quickly to establish a sense of identity and to find work. Whilst for others, it might be longer before they are ready to open an account and re-enter the workplace. As soon as a survivor feels ready to open an account, banks should make it available to them. When the account can be opened should not be determined by an arbitrary step in a survivors' rehabilitation journey.
- 6.3. **Providing Choice.** Specific cultural or personal choice issues should be considered. For example, survivors should be given the choice of the gender of the person they meet with where possible and assumptions should not be made around this. For example, some survivors may want to work with someone from the opposite gender to them if they have been trafficked by someone of the same gender.
- 6.4. **Application Process.** Banks should create an application process that actively avoids traumatising the survivor. Best practice is to only ask purposeful questions and to always consider how you would feel if asked the same question by a stranger. Survivors often have to repeat their stories and anytime this can be avoided, it should be. The HSBC scheme provides a tailored application process in line with the NRM which works with individuals on a case-by-case basis.
- 6.5. **Trust Building.** Each case should be taken on an individual basis, listening to each survivor to present the most appropriate support. Consistency is important throughout the process, ensuring that staff who deal with the service users are aware of the complexities of trafficking, do not ask for proof of identification or address and do not keep having to go over repetitive details. It is also crucial that the information service users are given is consistent, avoiding mixed messages to build trust.
- 6.6. **Scheme Awareness.** It is important that for each banking point of access, appropriate vulnerable persons expertise is available and that all stakeholders are informed of the



process involved in the accounts. This will increase the number of survivors supported to open accounts and ensure that they receive consistent information about their options from all stakeholders. Staff who are customer facing in branches should be provided with information about the scheme and relevant pathways to follow, so if approached by a survivor who is interested in an account, they can signpost them to the appropriate charity to begin the process.

- 6.7. **Charity Partnerships.** Charities are used as trusted sources to refer service users who are going through the NRM and are a survivor of human trafficking. The HSBC scheme utilises the care of address, using the charity's address for verification on each account, and sends clients' bank statements and correspondents to the charities if they are not able to provide a permanent address for the bank to use. Therefore, it is vital that any scheme is established in coordination with local charity partners and with potentially with local authorities.
- 6.8. **Internal Team Coordination.** Internal coordination is important in developing the scheme. The development of the process should involve compliance teams to deal with regulatory challenges, the vulnerable person's team and teams involved with customer interactions. The survivor bank accounts may raise unusual activity reports, flagging potential money-laundering or human trafficking concerns due to the accounts using the same charity address. This highlights the vital need for successful coordination and communication between teams about these accounts.
- 6.9. **Future Offerings.** Currently the HSBC scheme only offers a basic bank account, without the ability to send money abroad. Given the reduced documentation necessary to open an account, it is common practice for HSBC to closely monitor the account for a year. Future considerations are being made as to whether once the preliminary period is over, survivors may be offered other banking opportunities such as the ability to send money abroad. STOP THE TRAFFIK recommends that banks consider further offerings which could support survivors' integration into society. We recognise that further offerings present a higher risk of financial exploitation and so relevant safeguards would need to be put in place.

7. Summary: Inclusive Banking for Survivors

This report has highlighted the significance and importance of having secure banking for survivors. Through listening to the experiences of survivors and understanding the barriers that many survivors face, HSBC has led the way in shaping banking which works for survivors. STOP THE TRAFFIK encourages banks and financial institutions to replicate the scheme initiated by HSBC, taking into consideration the points raised in this report to create an empowering system which works for survivors.

References

¹ Fast Initiative. *Finance Against Slavery And Trafficking*. [online] Available at: <https://www.fastinitiative.org/>

² Shearman, S., 2020. *Banks Globally Eye UK Scheme Giving Accounts To Trafficking Survivors*. [online] Reuters. Available at: <https://www.reuters.com/article/us-britain-slavery-banking-trfn/banks-globally-eye-uk-scheme-giving-accounts-to-trafficking-survivors-idUSKBN20R0J1>

³ HSBC, 2019. *HSBC UK Provides Support For Survivors Of Human Trafficking*. [online] Available at: <https://www.about.hsbc.co.uk/-/media/uk/en/news-and-media/190628-hsbc-uk-provides-support-for-survivors-of-human-trafficking.pdf>

⁴ Shearman, S., 2020. *Banks Globally Eye UK Scheme Giving Accounts To Trafficking Survivors*. [online] Reuters. Available at: <https://www.reuters.com/article/us-britain-slavery-banking-trfn/banks-globally-eye-uk-scheme-giving-accounts-to-trafficking-survivors-idUSKBN20R0J1>.

⁵ Witkin, R and Robjant, K., 2018. *The Trauma-Informed Code of Conduct*. Helen Bamber Foundation. [online] Available at: <http://www.helenbamber.org/wp-content/uploads/2019/01/Trauma-Informed-Code-of-Conduct.pdf>

⁶ Fast Initiative. *Finance Against Slavery And Trafficking Goal 4*. [online] Available at: <https://www.fastinitiative.org/the-blueprint/goal4/>



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Since 2013, STOP THE TRAFFIK has partnered with businesses and financial institutions who want to address the risk of modern slavery in their operations, supply chains, and customers. We offer bespoke solutions that enable your organisation to manage the risk of modern slavery, protecting your brand and supporting your organisation to be an ethical market leader. By partnering with STOP THE TRAFFIK, businesses and financial institutions not only benefit from specialist advisors and practical solutions, but also contribute to our wider work on disrupting human trafficking globally.

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