



Inquiry into Financial Services Regulatory Framework in Relation to Financial Abuse

Parliamentary Joint Committee on Corporations
and Financial Services

14 June 2024

Acknowledgements

We acknowledge the Traditional Owners of Country, recognise their continuing connection to land, water, and community, and pay respect to Elders past and present.

We acknowledge the victim-survivors of domestic, family, and sexual violence who we work with and their voices and experiences which inform our advocacy for justice, equality, and safety for women.

About Women's Legal Services Australia

Women's Legal Services Australia (**WLSA**) is the national peak body for 13 specialist Women's Legal Services in each state and territory across Australia, including two First Nations Women's Legal Services. We provide a national voice for Women's Legal Services to influence policy and law reform, and advocate to increase access to gender-specialist, integrated legal services for women.

About Women's Legal Services

Women's Legal Services provide high quality free legal services for women, including legal advice and representation, support services and financial counselling, community legal education, training for professionals, and engage in advocacy for policy and law reform. Some Women's Legal Services have operated for more than 40 years.

WLSA members include:

- Women's Legal Service Victoria
- Women's Legal Service Tasmania
- Women's Legal Service NSW
- Women's Legal Service WA
- Women's Legal Service SA
- Women's Legal Service Queensland
- North Queensland Women's Legal Service
- First Nations Women's Legal Service Queensland
- Women's Legal Centre ACT
- Wirringa Baiya Aboriginal Women's Legal Centre NSW
- Top End Women's Legal Service
- Central Australian Women's Legal Service
- Katherine Women's Information and Legal Service

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Contents

Executive summary	4
Introduction	5
The prevalence and impact of financial abuse	6
The impact of the shift of financial products to online platforms	11
Closure of bank branches in regional, rural and remote (RRR) communities	12
The effectiveness of existing legislation, common law, and regulatory arrangements that govern the ability of financial institutions to prevent and respond to financial abuse	12
Debt collectors taking advantage of victim-survivors	13
Other potential areas for reform, such as prevention, protection, and proactive systems	13
Existing financial product design and emerging financial product design	14
Employee training	14
Culturally appropriate responses	15
Any other appropriate response, for example, mandatory reporting	17
Steps that might be taken to support financial institutions to better detect and respond to financial abuse	17
The role of government agencies in preventing and responding to financial abuse	17
Australian Taxation Office	18
Services Australia	18
The funding and operation of relevant advisory and advocacy bodies	20
Any other related matters, including comparative information about arrangements in relevant overseas jurisdictions	21



Executive summary

1. Women's Legal Services Australia (**WLSA**) welcomes the opportunity to contribute to the Parliamentary Joint Committee's Inquiry into Financial Services Regulatory Framework in Relation to Financial Abuse.
2. Women's Legal Services provide legal assistance and wraparound support services to women, including social work and financial counselling, to provide a trauma-informed, multidisciplinary, and integrated approach to service delivery. Many of the women assisted by Women's Legal Services are experiencing economic or financial disadvantage, alongside a range of other issues including domestic, family, and sexual violence, sexual harassment or discrimination at work, risk of homelessness, engagement with child protection, or precarious visa status. Many Women's Legal Services employ financial counsellors or financial abuse prevention workers who help women to regain financial control and economic security, particularly where they have been prevented from leaving violent or abusive relationships due to economic insecurity and are rebuilding their lives post-separation.
3. Women are twice as likely to experience financial and economic abuse as men.¹ Financial abuse is a gendered issue because women face unique structural and systemic barriers to economic and financial security. Financial and economic systems were designed within a patriarchal system that does not centre the needs of women, and these systems have failed to recognise and respond to the unequal power distributions between men and women.
4. The financial services industry often fails to meet the needs of women due to gendered blind spots.² Financial products and methods of household money management that seem benign on the surface can easily lead to control of women and financial abuse. As noted by the Centre for Women's Economic Safety:

*"The starting point is to identify the ways products are weaponised to cause harm and to consider potential design options to prevent, disrupt and respond that also address the underlying drivers of gendered violence against women."*³
5. The National Plan to End Violence against Women and Children 2022–2032 (**National Plan**) identifies financial and economic abuse as one of six key areas of focus for addressing gender-based violence.⁴ It outlines an expectation that financial institutions actively work to prevent abuse through their products and services.⁵
6. In conducting this Inquiry, we recommend the Parliamentary Joint Committee focus on the misuse of financial products in the context of domestic and family violence and make recommendations focused on reducing harms to women, particularly victim-survivors of domestic and family violence.

¹ Australian Bureau of Statistics (2023), *Personal Safety, Australia (2021–2022)*, Canberra: ABS <<https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release>>.

² Mariya Rosberg, 'Serving Women As Financial Services Customers – Women in Financial Services', Oliver Wyman (Blog Post, 2020) <[Serving Women As Financial Services Customers \(oliverwyman.com\)](#)>.

³ Catherine Fitzpatrick (2022), *Designed to Disrupt: Reimagining banking products to improve financial safety*, Centre for Women's Economic Safety – CWES Discussion Paper 1, p. 18 <[CWES_DesigntoDisrupt_1_Banking.pdf](#)>.

⁴ Department of Social Services, *National Plan to End Violence against Women and Children 2022–2032*, Commonwealth of Australia <[National Plan to End Violence against Women and Children 2022-2032 \(dss.gov.au\)](#)>.

⁵ Department of Social Services, *First Action Plan & Outcomes Framework 2023–2027 under the National Plan to End Violence against Women and Children 2022–2032*, Commonwealth of Australia, p. 16 <[First Action Plan 2023–2027 \(dss.gov.au\)](#)>.

7. This submission provides insights into the experiences of Women's Legal Service clients in relation to financial abuse, and a range of ways the current financial system and regulatory framework including financial institutions, financial products and services, impact women who have experienced financial abuse and enables the perpetration of financial abuse.
8. Women's Legal Services staff including lawyers, caseworkers and financial counsellors have unique insights into financial abuse and its impacts on women and children, particularly victim-survivors of domestic, family and sexual violence, and can play an advisory role in relation to efforts to improve the financial services regulatory framework, but must be adequately funded to do so.

Introduction

9. Financial institutions have a responsibility to engage in the prevention of, and response to, domestic and family violence and financial abuse. This falls under their broader mandate to avoid systemic harm.⁶
10. Many financial institutions already invest in responses to 'customer vulnerability'. Customer vulnerability is defined as a "state in which customers are subject to harm because their access to and control over resources are restricted in ways that significantly inhibit their ability to function in the marketplace."⁷
11. Many of the factors that put people at risk of financial exploitation are unique to women. Women in lower paid jobs and unemployed women with children are already forced to negotiate access to financial resources from an inequitable position. Women are more likely to be uninsured, invest more of their wealth in cash rather than stocks and bonds, less likely to be approved for mortgages and other retail credit, and post-separation are more likely to underpaid or not paid child support.⁸
12. The First Action Plan and Outcomes Framework 2023–2027 under the National Plan provides guidance for improved workforce capability for financial institutions, including trauma-informed practices that enable safe, respectful, compassionate and culturally appropriate responses for victim-survivors, including a better understanding of economic abuse.⁹
13. We note that in the past year, over 16 banks, insurers and super funds have updated their terms and conditions to prohibit the misuse of their products and services by perpetrators of financial abuse, and 10 banks have expressly held that abusive behaviour is a reason for closing an account.¹⁰ However, further work is needed. Financial institutions must take responsibility for preventing and responding to financial abuse in all aspects of service delivery, from screening to response, and must prioritise women's safety and wellbeing.

⁶ Ayesha Scott (2023), *Financial Abuse in a Banking Context: Why and How Financial Institutions Can Respond*, *Journal of Business Ethics*, Vol. 2, 1–16, <[Financial Abuse in a Banking Context: Why and How Financial Institutions can Respond - PMC \(nih.gov\)](#)>.

⁷ Ronald Paul Hill and Eesha Sharma (2020), *Consumer Vulnerability*, *Journal of Consumer Psychology*, Vol. 30(3), 551–570, p. 551.

⁸ See: Women's Legal Services Australia, 'Non-Payment of Child Support as Economic Abuse: A Literature Review', May 2024 <[Womens-Legal-Services-Australia-Child-Support-Literature-Review-May-2024.pdf \(wlsa.org.au\)](#)>.

⁹ Department of Social Services (as above n 5).

¹⁰ See: Catherine Fitzpatrick (2023), *Action on financial abuse and banking: 12-month snapshot*, Centre for Women's Economic Safety <[CWES Financial-abuse-banking_07122023.pdf](#)>.

The prevalence and impact of financial abuse

14. Financial abuse is a feature of economic abuse and involves behaviours which restrict or exploit women's access to broader economic resources such as housing, food, technology and transport.¹¹
15. Clients of Women's Legal Services experience a range of behaviours that constitute financial abuse. Examples include:
- Control over day-to-day household finances and material wellbeing, including:
 - Denying access to any money, to the family's money or to bank accounts,
 - Denying access to income support payments,
 - Being forced to beg for money,
 - If they operate a family business, being paid in cash, not being paid at all and/or not being paid superannuation,
 - Unilaterally setting an inadequate figure to cover household expenses (and forcing women to use 'Buy Now, Pay Later' to supplement household expenses), and
 - Denying access to financial information and decision-making.
 - Denying accumulation of personal assets or eroding those assets which generates further economic costs, including:
 - Exerting power and control over their (the women's) salary, savings, debt, credit and employment through actions or threats,
 - Using their COVID-19 Early Release of Super Scheme withdrawal amount,
 - Using joint funds to gamble, and
 - Destroying personal possessions.
 - Manipulating credit and debt, including:
 - Putting debt in their name which impacts on credit rating (e.g. expensive gym memberships as a novel but rising example), and
 - Registering utilities, loans and insurance in their name only (but often removing them as a beneficiary of the insurance policy).
 - Blocking access to social and economic participation, including sabotaging education or employment through tactics such as denying access to transport, the internet or social networks. This can be especially prevalent amongst newly arrived migrant women with little family or community connection.
 - Refusing to contribute financially, including:
 - The perpetrator not being accountable for his own spending,
 - Refusing to work or claim income support,
 - Refusing to pay bills,
 - Refusing to contribute to the costs of raising children during the relationship, and
 - Refusing to pay child support or underpaying child support post-separation.

The impacts of these behaviours are often only realised by the victim post-separation. Women's Legal Services often assist women who have been forced into accumulating further

¹¹ Dr Nicola Sharp-Jeffs (2015), *Money matters: Research into the extent and nature of financial abuse within intimate relationships in the UK, The co-operative bank working in partnership with the Refuge*, p. 11 <[Money-Matters-Research.pdf \(setdab.org\)](#)>.

debt to survive or feed their children or have been forced to declare bankruptcy because of their perpetrator's debts.

Case Study – Penelope's Story

Loan in vicim-survivor's name – car in perpetrator's name

Penelope sought assistance from a Women's Legal Service in relation to a situation where she was granted a loan for a vehicle by a finance provider in circumstances where the car was put into the perpetrator's name.

The perpetrator pressured Penelope to get the loan as he was not able to get a loan due to his financial situation.

Shortly after the vehicle was purchased with the loan in Penelope's name, the short-term relationship ended after incidents of physical violence of the perpetrator against Penelope.

Penelope was not able to pay the loan after separation and the perpetrator had the vehicle. Penelope was worried that the perpetrator was going to damage the vehicle to make it even more difficult to try to pay out the loan.

Due to the nature of the relationship and the family law system, the relationship was not likely to be considered De Facto and therefore, that was not likely to help.

The lawyer gave advice and the in-house Financial Counsellor negotiated with the finance provider and with the perpetrator to have the car provided to Penelope so she could sell the car to try to reduce the money owing under the loan. Negotiations were then conducted regarding the balance funds outstanding.

16. A key element of financial and economic abuse is that it does not require physical proximity to occur, and therefore it is a common tool for post-separation abuse.
17. Many clients of Women's Legal Services experience ongoing financial abuse through legal systems by violent or abusive ex-partners. Women are often burdened with the financial costs of protracted family court proceedings and vexatious litigation. The resulting financial insecurity is often exacerbated by men who refuse to pay, or underpay, child support, or are attempting to hide or withhold their income or assets to reduce their contribution to the property settlement.
18. In early May, WLSA released our report 'Non-Payment of Child Support as Economic Abuse of Women and Children: A Literature Review' (**Non-Payment of Child Support Literature Review**).¹² Australia has an outstanding child support debt of around \$2 billion, which has exacerbated financial inequality and insecurity for many women.¹³ The Literature Review highlighted a range of financial systems and government agencies that have enabled financial or economic abuse of women through the non-payment or underpayment of child support.

¹² Women's Legal Services Australia (as above n 8).

¹³ 'Child support failure costs children and Budget', National Council for Single Mothers and their Children and Anti-Poverty Week (Media Statement, 18 August 2022) <<https://antipovertyweek.org.au/wp-content/uploads/2022/08/20220818-Child-Support-failure-costs-children-and-Budget.pdf>>.

Case Study – Emily's Story

Family violence – underestimating and non-payment of child support

Emily was receiving zero child support from her ex-partner who declared a nil income despite owning a house and running a business with 3 employees. A Women's Legal Service lawyer advised her and assisted her in lodging a Change of Assessment in Special Circumstance to increase his income and so he could provide financially for his child.

However, Emily, traumatised by the past history of endless court proceedings and the fear of ongoing psychological abuse, felt compelled to withdraw her application.

She told us:

"After some thinking, I have decided not to proceed with this. I can feel my stress levels increasing as its triggering the trauma I have been through with this horrible person before. I'm sorry if I have wasted your time. However, I feel this will be a waste of time anyway, as he has made sure to hide everything so meticulously. And we are racing against time. Unfortunately, the system is not doing enough for single mothers who are being financially abused by irresponsible fathers. I hope you can pass on this feedback to your superiors and you one day there will be a change for single mothers and their children who struggle every day while the fathers are enjoying their luxury life. Thank you so much for your efforts to try to help me and my son, I really do appreciate it."

Case Study – Mary's Story

Non-acceptance of paternity and the Child Support Agency

Mary gave birth to a child approximately a year ago. The father is not on the birth certificate. The father has had inconsistent involvement with the child but has not denied paternity and Mary is clear in her position as to the identification of the father.

Mary applied for a Child Support Assessment through the Child Support Agency. The Child Support Assessment has been rejected as the father did not accept paternity upon enquiry being made by the Child Support Agency. The Child Support Agency sent Mary a letter and did not provide any further assistance to Mary to obtain child support. With assistance from a Women's Legal Service, a Notice of Intention to Proceed letter was sent to the father on behalf of Mary but that was ignored by the father.

Due to the father's failure to confirm the paternity of the child, Mary will now need to apply to the Federal Circuit and Family Court of Australia for orders requesting that a paternity test be done and the father be assessed for child support.

19. Women's Legal Service clients have also experienced ex-partners stealing their Escaping Violence Payments (EVP).¹⁴

Case Study – Stolen Escaping Violence Payment

A Women's Legal Service has been assisting a client with an extensive history of experiencing family and domestic violence, including significant financial hardship because of historical and on-going economic abuse. The client was able to obtain an EVP of \$5000, the payment was given in vouchers and a "Weel card" which is a cash card that is uploaded to the client's apple wallet. Like all EVP payments, the payment options are received via email and can only be utilised with a tech device. The client was separated from the perpetrator and living in her own accommodation. The perpetrator located the client, broke into her home, seriously assaulted her, and stole her phone before fleeing. He was able to then access her phone and transferred all accessible value from EVP cash cards to his own account and a gambling account. This financially devastated the client, as those funds were effectively all she had access to fund purchase of vital necessities.

Case Study – Stalking, Fraud, Theft and Coercion

A Women's Legal Service client who had been receiving legal support had their Google account hacked by the perpetrator. The perpetrator and the client had been separated for months, and there was a family violence order in place. The client began receiving emails from her Gmail account regarding changes to her Google account. The perpetrator had accessed the client's Google account and changed security and privacy settings, such as the account password and recovery email. The client was receiving emails notifying her of the change in recovery email with a message stating, "Guess who?" This was the perpetrator taunting the client.

The perpetrator's access to her personal and sensitive information included the client's application for the EVP via her Gmail account. The perpetrator then made a fraudulent application for the EVP using the client's details.

20. Most Women's Legal Service clients have experienced economic abuse (as a co-occurring tactic) by a current or former intimate partner. They often co-report physical violence, sexual violence, intimidation or the threat of violence, psychological abuse, emotional abuse and/or isolation from family, friends or culture.
21. As WLSA advised the Senate Standing Committees on Community Affairs on their Inquiry into the Worsening Rental Crisis in Australia in 2023, a large proportion of Women's Legal Services clients are living "separated under the one roof", where they live in the same home as their ex-partner or

¹⁴ Claudia Long, 'Government defends strict eligibility requirements for escaping violence payment', ABC News (Online, 2 May 2024) <[Government defends strict eligibility requirements for escaping violence payment - ABC News](#)>.

spouse after separation for economic reasons due to a lack of affordable housing alternatives.¹⁵ Many of these women are in untenable and unsafe environments, often with children and often experiencing ongoing family violence. Women also face a "triple whammy" of discrimination after leaving a financially abusive relationship – reduced income due to caregiving, stricter rental terms from landlords based on unfounded assumptions of unreliability and the challenge of rising living costs.¹⁶ First Nation women and women on temporary visas who are experiencing violence have their own unique barriers to accessing affordable housing, with First Nations women overrepresented among specialist homeless service clients.¹⁷

22. Women's Legal Service clients have often been victim-survivors of a range of violent and abusive behaviours which overlap with financial abuse and need to engage with multiple areas of law to address the issues they have experienced. The below case study provides an example of financial abuse experienced in the context of domestic and family violence and overlapping employment law issues, migration law issues and family law issues.

¹⁵ Women's Legal Services Australia, *Submission to the Senate Community Affairs References Committee's Inquiry into the worsening rental crisis in Australia*, 4 August 2023, p. 5 <[WLSA-submission-Inquiry-into-the-worsening-rental-crisis-in-Australia-August-2023-FINAL.pdf](#)>.

¹⁶ Libby Hogan, 'Single parents and domestic violence victim-survivors squeezed out of the tight rental market', ABC News (Online, 22 May 2024) <[Single parents and domestic violence victim-survivors squeezed out of the tight rental market - ABC News](#)>.

¹⁷ Australian Institute of Health and Welfare (2024), *Specialist homelessness services annual report 2022–23*, Australian Government <[Specialist homelessness services annual report 2022–23. Clients, services and outcomes - Australian Institute of Health and Welfare \(aihw.gov.au\)](#)>.

Case Study – Financial Abuse in the Context of Overlapping Legal Issues

A Women's Legal Service was assisting a young woman from Southeast Asia with family law parenting matters. Her ex-husband threw her out of the matrimonial home and withheld their son, who is 6 years old. The client's ex-husband (John) and the ex-husbands ex-wife (Karen) own a small business together. When the client relocated to Australia approximately 10 years ago, she was on a spousal visa. She was told that she needed to start working immediately for John and Karen. The client was never given any payment. The client worked 10-12 hours per week for free.

The client was given a credit card but was only allowed to use this for emergency household bills. There was also a joint account which the client could access but it was only for household expenses. If the client bought anything for herself, such as clothes, she would need to give John and Karen the receipt. If they thought that the client had spent too much money, they would get very angry with her.

Approximately 5 years ago when the client obtained Australian citizenship, she asked John and Karen if she could get another job where she could earn some money, they said no and that she must work for them. The client begged them to give her some money and so they started giving her \$90 each week.

The client needed a phone and so she asked them if she could get a phone, John and Karen said yes and that she can use the credit card to buy the phone. However, they would keep \$20 from the \$90 per week as repayment for the phone. Therefore, the client was only just receiving \$70 per week. Approximately two years ago, John and Karen told the client that she had completed the payment of the phone. Last year, the client needed a new phone. John and Karen agreed to this, and the condition was that the client would now get \$60 per week as she needed to pay back \$30 until the phone was paid off.

All finances and assets are in John's name. The client is unaware if she has superannuation or if tax was paid. John did not share any information about the finances with her. The client wasn't allowed to have a bank account. Approximately 4 years ago, the client secretly opened one. When John and Karen found out they were very angry. Karen started shaking the client and called her stupid.

The impact of the shift of financial products to online platforms

23. We are concerned that online platforms (including banking apps) not only aid financial control and stalking behaviours, but they give rise to new methods of abuse because of a lack of checks and balances and the speed at which artificial intelligence (AI) is developing. It is concerning that credit cards and personal loans can be applied for within minutes (as often advertised) online in a woman's name, and without her knowledge or consent.
24. Clients of Women's Legal Services experience a range of behaviours that constitute financial abuse through online platforms, identity theft and fraud. Examples include:

- Accessing our client's online banking accounts, often by duress. Clients report that they are forced to share passwords, pins and passcodes with their partners,
- Opening online accounts in our client's name without knowledge or consent,
- Applying for credit cards in our client's name without knowledge or consent,
- Applying for multiple Buy Now Pay Later accounts in our client's name and refusing to repay the debt,
- Stalking, monitoring of location and tracking real time spending via online banking apps' 'real time transaction notifications'. Similarly, records of transactions that show the ATMs and branches that our client has accessed, is then used by a perpetrator (their ex-partner at this point) to find them.

Closure of bank branches in regional, rural and remote (RRR) communities

25. Bank branches are a critical service in the detection of financial and economic abuse; the closure of these services in RRR communities further disadvantages victim-survivors and other vulnerable customers who want to avoid using online banking due to age, disability or language barriers.
26. Women's Legal Services provide assistance in RRR communities across Australia, including in the Northern Territory and far north Queensland. Staff from Women's Legal Services that work with women from RRR communities report the benefits of in-person banking services for their clients, including:
- Personalised support from branch front-line staff. Staff can play a role in detecting financial abuse or coercion by identifying the signs of abuse. This also comes from increased familiarity and developing of relationships over time.
 - Customers who lack confidence to use electronic banking or phone app can have access to another method of transacting.
 - Customers who keep more physical cash have access to a safe deposit space.
27. Victim-survivors of abuse or customers who have fallen victim to fraud can raise this in person with the bank, rather than seek help online. This is particularly important for victim-survivors whose phones or other devices may be tracked by their abusers.

The effectiveness of existing legislation, common law, and regulatory arrangements that govern the ability of financial institutions to prevent and respond to financial abuse

28. Existing law, regulations and guidelines that govern the ability of financial institutions to prevent and respond to financial abuse will be limited unless they are properly enforced and there are penalties for non-enforcement.
29. Rather than simply relying on the good faith of financial institutions, enhanced legal and regulatory frameworks send a strong message to financial institutions and perpetrators that financial abuse is not tolerated. WLSA supports legislation that mandates that financial institutions must exercise

discretion to support a victim-survivor and, where appropriate, take action against a perpetrator of financial abuse. Existing legislation, common law, and regulatory arrangements must also reflect contemporary understanding and data on domestic and family violence and financial abuse.

30. Women's Legal Services routinely hear from clients that their ex-partners have unilaterally cancelled or altered policies to remove them as a co-insured or third party beneficiary, damaged property or threatened to damage property risking claim denial due to policy exclusions, controlled all insurance payments, withheld critical information or coerced them to pay for policies so they carry the debt.

Debt collectors taking advantage of victim-survivors

31. Clients of Women's Legal Services often report being harassed or taken unfair advantage of by debt collectors. This is despite the Australian Competition & Consumer Commission's Debt Collection Guideline for Collectors and Creditors listing a range of circumstances where contact from a debt collector becomes unreasonable or unacceptable, including if the debtor is experiencing family violence.¹⁸
32. Some clients of Women's Legal Services who carry substantial debt have entered into debt agreements with small businesses who offer to 'consolidate' their debt at 'low interest rates'. Women's Legal Services have seen a substantial rise in these types of businesses advertising their services on social media platforms. Victim-survivors may be coerced into these agreements or enter into these agreements without being advised of, or understanding, the alternative options available (such as having their debt waived). In our experience, these businesses are unlikely to have policies in relation to domestic and family violence.

Other potential areas for reform, such as prevention, protection, and proactive systems

33. All financial institutions should have a family violence response framework and policy as a minimum standard. These frameworks and policies should have a standalone provision that says they will exercise discretion in favour of victim-survivors of domestic and family violence, including where they have experienced financial abuse.
34. Financial institutes should also explore how their policies and procedures can be improved to better identify situations where there is a risk of financial abuse and intervene to support victim-survivors. Since 2018, the Victorian Government has adopted a 'Multi-Agency Risk Assessment and Management Framework' which serves as an overarching framework for Government, Government agencies and the public service in Victoria.¹⁹ These agencies have a shared understanding of family violence and financial and economic abuse. The banks, insurers and super funds could separately develop a shared framework to prevent victim-survivors falling through the

¹⁸ Australian Securities and Investments Commission and Australian Competition and Consumer Commission (2021), *Debt collection guideline: for collectors and creditor*, pp. 9–10 <[Debt collection guideline: for collectors and creditors \(acc.gov.au\)](https://www.accc.gov.au/debt-collection-guideline-for-collectors-and-creditors)>. Other

¹⁹ Family Safe Victoria (2018), *Family Violence Multi-Agency Risk Assessment and Management Framework – A shared responsibility for assessing and managing family violence risk*, Victorian Government <[Family Violence Multi-Agency Risk Assessment and Management Framework | vic.gov.au \(www.vic.gov.au\)](https://www.vic.gov.au/family-violence-multi-agency-risk-assessment-and-management-framework)>.

gaps. This would also mean continuity in safe responses when the victim-survivor changes from one provider to the other.

35. Family violence policies should distinguish between financial abuse that is the result of family violence and other types of 'financial hardship' which is often framed as being the person's fault.

Existing financial product design and emerging financial product design

36. There should be a greater focus on prevention of financial abuse through financial products that embed a 'Safety by Design' approach. In our Non-Payment of Child Support Literature Review, we support Catherine Fitzpatrick and CWES' call for 'Safety by Design' principles across banking platforms that place user safety and rights at the centre of the design and development of products and services.²⁰
37. Safety by Design anticipates, detects and eliminates risks before products and services reach the market and throughout their lifecycle.²¹ It is intended to be trauma-informed. Safety by Design must be a whole-of-business response that is embedded into the culture, leadership and operation of the entire institution.²²
38. To assist with the development of emerging financial products (and improve on existing financial product design), financial institutions should engage directly with victim-survivors and experts in domestic and family violence and financial abuse.
39. The Women's Economic Equality Taskforce also recommended that banks and financial services "continue to develop financial products and services specifically for the needs of women across their life course, that are free or very low cost. This includes for women escaping domestic and family violence, buying a home, experiencing divorce and/or retirement planning."²³

Employee training

40. Financial institutions should commit to ongoing and improved training for frontline staff on domestic and family violence, including financial abuse. Training should be designed in consultation with frontline women's services, specialist domestic, family and sexual violence services, and specialist financial abuse and counselling organisations. Training should also be delivered by these organisations.
41. Women's Legal Services routinely hear from clients that when they contact financial institutions they are asked to meet numerous conditions and provide substantial evidence to prove the financial abuse and financial hardship they are experiencing. This may include a statement of financial position, evidence of employment, evidence of medical circumstances, evidence of loss, evidence of expenditure and identity documents (such as a driver's licence, Medicare card and passport).
42. Similar issues have been noted with the Escaping Violence Payment (**EVP**) trial. Victim-survivors struggle to demonstrate financial hardship because they do not have a bank account in their name

²⁰ Women's Legal Services Australia (as above n 8), p. 44.

²¹ Kay Cook, Pauliina Mattila and Rachna Madaan Bowman et. al. (2022), *Supporting Women's Financial Safety: A Guide to Prevention and Action on Financial Abuse within the Financial Service Sector*. Canberra: Department of Prime Minister and Cabinet's Office for Women, p. 5 <[Supporting Womens Financial Safety \(pmc.gov.au\)](#)>.

²² *Ibid.*

²³ Women's Economic Equality Taskforce (2023), *A 10-year-plan to unleash the full capacity and contribution of women to the Australian economy 2023 - 2033: Recommendation 6.4*, Department of Prime Minister and Cabinet, Australian Government <[Recommendation 6 | A 10-year-plan to unleash the full capacity and contribution of women to the Australian economy 2023 - 2033 | PM&C \(pmc.gov.au\)](#)>.

or are unable to access bank statements. Where a victim-survivor had been staying with family or friends or living in temporary accommodation, it is difficult to provide evidence of a recent change of address. Showing or demonstrating an 'intention' to leave is also challenging for those who are living with the perpetrator. There is also a general concern that organisations will not protect their privacy and inadvertently release details to the perpetrator, making victim-survivors wary of sharing personal information.²⁴

43. In FY2017–2018, 70% of banking applications for financial hardship were rejected because supporting documents were either 'not supplied' or there was 'insufficient information'.²⁵ Institutions must recognise that financial abuse carries its own stigma in reporting – victim-survivors fear that they might not be taken seriously in the absence of physical abuse. Yet without a police or doctor's report, we know that victim-survivors often struggle to produce the evidence required to show eligibility.
44. When a victim-survivor contacts their financial institution, the process must always start with believing them. Frontline staff should use their professional judgement and exercise flexibility. This should include limiting the amount of information requested, especially if this information – for example, evidence of income – is contained in other documentation, such as Centrelink income support payments. While some banks have policies that expressly relax documentation requirements in certain circumstances, most commonly family violence, family separation, natural disasters and mental ill-health,²⁶ this should be standard across the board.
45. Women's Legal Service clients report that there is no consistency in staff who assist them, meaning that they are having to repeat their story or experience multiple times. Some clients have been allocated male claims assessors when they have specifically requested a woman. It can be retraumatising for some victim-survivors to be asked to invite a man into their home or to be forced to repeat the harrowing details of their abuse to a man.
46. We recommend frontline staff in all financial institutions should:
 - Participate in training on domestic and family violence including financial abuse, trauma-informed practice, and cultural safety,
 - Be assigned to the same customer to ensure continuity of services and to avoid victim-survivors having to retell their stories or experiences multiple times and to reduce re-traumatisation,
 - Be provided with up-to-date referral information to specialist services to support a customer at risk of, or subject to, financial abuse.

Culturally appropriate responses

47. Culturally appropriate responses are vital when working with victim-survivors from diverse backgrounds including First Nations, culturally and linguistically diverse and migrant women, particularly as their help-seeking behaviours may differ from the general population.²⁷

²⁴ Department of Social Services Report (2023), Evaluation of the EVP, Commonwealth Government, p. 28 <[1609-5481_final_evp_report_050723.pdf \(dss.gov.au\)](#)>.

²⁵ Banking Code of Compliance Monitoring Committee (2018), Assisting customers in financial difficulty: PART 1, Australian Banking Association, p. 15 <[Assisting customers in financial difficulty \(bankingcode.org.au\)](#)>.

²⁶ Ibid, p. 16.

²⁷ We note that there is ongoing debate around whether 'culturally and linguistically diverse' is the correct term. Some of the arguments against 'CALD' include that grouping 'CALD' status as one variable often means that cultural differences and nuance can be lost. While we recognise the diversity of

48. Many Women's Legal Services have migration law practices that are funded by the Department of Social Services to provide legal assistance and support services to women on temporary visas who are experiencing violence. These Women's Legal Services have expertise in the range of legal and systemic issues impacting migrant women, including in relation to migration law and family law for parenting arrangements. Some Women's Legal Services have piloted health justice partnerships specifically for culturally and linguistically diverse and migrant women.
49. In addition to the general experiences and impacts of financial and economic abuse, Women's Legal Services know that First Nations, culturally and linguistically diverse or migrant women can experience tactics specific to their familial and cultural context or visa status. This can arise from a range of factors, including:
- Cultural norms and expectations around shared wealth and resource, and other forms of accepted cultural obligation,
 - Traditionally gendered management of household finances and clear lines of division of labour are more pronounced in some cultures, reinforcing men's dominance and control over money,
 - Expectations about paying a dowry, repaying immigration expenses or overseas remittances,
 - Multi-generational households can mean a woman is facing abuse from multiple perpetrators (e.g. from extended family, kinship members or in-laws),
 - Temporary visa holders are not able to access emergency or long-term housing support, welfare support, childcare subsidies and other critical assistance at all (or without a lengthy delay) because of their visa status.
50. Victim-survivors are often hesitant to disclose family violence and seek support for very understandable reasons, including:
- Stigma and shame: First Nations women may be pressured to remain with their abusive partners and not pursue financial-related matters, disclosure risks being ostracised from community, and separation or divorce is unfavourable in particular cultures or tight-knit communities,
 - Mistrust of authorities,
 - Lack of financial literacy and awareness on how to access and enforce rights, particularly for migrant women who have moved to a country with different financial and legal systems, and
 - Persistent use of temporary visa status as a threat may also prevent help-seeking. Our clients have reported that their partners (or ex-partners) have threatened to have them deported (without their children), to withdraw sponsorship, provide misinformation about their visa (and rights under it) and hide their passports.

opinion in debate, for the purposes of this submission we will use 'CALD' or 'migrant'. See: Supriya Singh and Jasvinder Sidhu (2020), Coercive control of money, dowry and remittances among Indian migrant women in Australia, South Asian Diaspora, Vol. 12(1), 35–50; Marie Segrave and Naomi Pfitzner (2020), Family violence and temporary visa holders COVID-19, Monash Gender and Family Violence Prevention Centre, Monash University, Victoria, Australia <[apo-nid308985.pdf](#)>; Jan Breckenridge, S Singh, Georgia Lyons and Mailin Suchting (2021), Understanding Economic and Financial Abuse Across Cultural Contexts. Sydney: Gendered Violence Research Network, UNSW Sydney <[Report 3: Understanding Economic and Financial Abuse Across Cultural Contexts \(commbank.com.au\)](#)>.

51. A 'one-size-fits-all' approach will not work for victim-survivors from First Nations, culturally and linguistically diverse or migrant backgrounds.²⁸ First Nations communities in particular generally face significant barriers in accessing financial services and products because of geography, the cost of services and long-wait times.²⁹
52. Financial institutions should invest in culturally appropriate financial literacy programs and plain language product descriptions or ways of talking about financial abuse to promote financial awareness and help-seeking.³⁰ For example, some First Nations women may not identify with the term 'financial abuse' but may identify with 'the withdrawal or extraction of money or goods as a way of hurting someone'.³¹ Similarly, 'financial mismanagement' may be terminology that is more appropriate for migrant women.³²
53. All financial institutions should have up-to-date referral information to specialist Women's Legal Services who can advise or offer guidance on complex matters relating to family law, child protection and migration law.

Any other appropriate response, for example, mandatory reporting

54. WLSA does not support mandatory reporting by financial institutions for adult victim-survivors of financial abuse. This could lead to overreach by the financial services industry into areas that they do not have the expertise in. This position is supported by the Australian Law Reform Commission.³³ Instead, financial institutions should have up-to-date referral information to specialist frontline domestic and family violence services and legal assistance services if there are other concerns.

Steps that might be taken to support financial institutions to better detect and respond to financial abuse

55. With additional funding, Women's Legal Services can provide advice to financial institutions on the unique and varied experiences of women engaged with their services and how best to respond to their unique needs. Financial institutions should engage directly with specialist frontline services, specialist family violence financial counsellors, and experts in domestic and family violence, including financial abuse, to inform their efforts to better detect and respond to financial abuse.

The role of government agencies in preventing and

²⁸ Anna Cody, 'Our response to domestic violence cannot be a one-size-fits-all approach', *Women's Agenda* (Online, May 2024) <[When it comes to domestic violence, the response cannot be a one-size-fits-all approach \(womensagenda.com.au\)](https://www.womensagenda.com.au)>.

²⁹ UNSW Gendered Violence Research Network, *Understanding Economic and Financial Abuse in First Nations Communities*, p. 28 <[apo-nid318579.pdf](#)>.

³⁰ *Ibid*, p. 4 and Jan Breckenridge, S Singh, Georgia Lyons and Mailin Suchting (2021) (as above n 27), p. 38.

³¹ Audrey Bolger, *Aboriginal Women and Violence, 1991*, Australian National University North Australia Research Unit: Darwin, Northern Territory cited in UNSW Gendered Violence Research Network, *Understanding Economic and Financial Abuse in First Nations Communities*, p. 14 <[apo-nid318579.pdf](#)>.

³² Jan Breckenridge, S Singh, Georgia Lyons and Mailin Suchting (2021) (as above n 27), p. 37.

³³ Australian Law Reform Commission, *Elder Abuse – A National Legal Response (ALRC Report 131)*, Chapter 9. Banking – The Reasonable Steps, Australian Government <[The reasonable steps | ALRC](#)>.

responding to financial abuse

56. Government agencies have an important role to play in preventing and responding to financial abuse, however they can also enable abuse through misuse and weaponisation of their systems. Consultation and engagement with frontline services and experts in domestic and family violence, including financial abuse, is important to avoid or minimise harm at the earliest opportunity.
57. Many Women's Legal Service clients continue to report that certain government agencies are apathetic or non-responsive to their experiences of financial and economic abuse, including the Australian Taxation Office (ATO) and Services Australia.

Australian Taxation Office

58. Many Women's Legal Service clients who run family-owned businesses report that their partners (and ex-partners) use the tax system to perpetrate financial and economic abuse. This can include:
- Fraudulently applying for ABNs and ACNs under their name,
 - Falsifying information on tax returns or BAS statements,
 - Using their personal tax file number to withdraw funds from the business,
 - Claiming GST refunds (that would otherwise go to our client),
 - Making them directors of companies without consent, but then subsequently denying them any decision-making powers or access to financial information. It is relatively easy for people to do this online. Our clients may be liable to the ATO and ASIC for outstanding debt or breaches of directors' duties if the company goes bankrupt.
59. Current and future financial and economic standing is severely compromised by each of these tactics. Notably, even after separation, ex-partners can perpetrate financial abuse by phoenixing companies in the victim survivor's name, leaving them to bear the liabilities when the company fails. Many victim-survivors see no other option but to declare bankruptcy as a result of the financial abuse. In our experience, victim-survivors are often hesitant to disclose abuse to the ATO for fear that they may be found complicit in fraud, given their relationship with the perpetrator.
60. The financial counsellors employed by Women's Legal Services report migrant women registering for ABNs to operate as rideshare or delivery food drivers after escaping family violence because their visas limit other employment, and they are not eligible for income support. These women often do not understand the tax implications of holding an ABN making them potentially liable to the ATO for breaches.
61. Many victim-survivors are also not able to afford the legal fees for resolving debts; clients often need a family law property settlement to legally resolve financial abuse, but many do not qualify for legal aid and community legal centres are chronically underfunded and often constrained and unable to provide long-term legal assistance.

Services Australia

62. Our Non-Payment of Child Support Literature Review exposed failure by Services Australia and the ATO to respond appropriately to the non-payment or underpayment of child support as a form of economic abuse. Government agencies including Services Australia place most of the

administrative burdens of the child support system on mothers.³⁴ While Services Australia has various methods to recover child support without proceeding to court,³⁵ the system is set to favour the fathers who continue to avoid paying child support.

Case Study – Sarah's Story

Family violence – systems abuse with multiple internal and external reviews of child support assessments

Sarah has been through numerous internal and external reviews multiple times as her former partner kept applying for reviews to minimise his income and avoid paying child support. His reviews were unsuccessful each time and Sarah thinks that Services Australia and the Administrative Appeals Tribunal (AAT) (now Administrative Review Tribunal) should not have accepted and listed all his review applications in light of his history of multiple unsuccessful reviews.

Sarah obtained a few successful outcomes in the AAT, but this was not before the trauma of the two-step internal review process. Her former partner has now lodged another review internally with Services Australia's Child Support Agency. She fears this later review will not be investigated thoroughly enough, given her former partner has been permitted to lodge so many reviews, both internally and in the AAT, in the past.

Sarah sees her former partner's behaviour as a sustained example of family violence and financial control. She says that she cannot rectify the situation through the ART, as she cannot afford legal representation for an appeal and is too unwell to represent herself due to having advanced cancer.

63. Many mothers feel that the child support system upholds men's financial interests and facilitates economic abuse against their children and themselves.³⁶ For example, a number of mothers in Kristin Natalier, Kay Cook and Torna Pitman's (2016) study 'Payee mothers' interactions with the Department of Human Services – Child Support', interpreted the lack of access to caseworkers (or the same case worker), the lack of compassion from caseworkers and the complexity of child support information on the Services Australia website as an indication of the low priority Services Australia placed on acknowledging their claims and needs.³⁷ Similarly, respondent mothers to Kristin Natalier's (2017) study 'Micro-aggressions, single mothers and interactions with Government workers', considered some Services Australia workers as perpetuating "micro-invalidations" when they challenged standardised child support costs, which the mothers perceived as unsympathetic to their actual financial experience of raising children.³⁸

³⁴ Kay Cook (2021), *Gender, Malice, Obligation and the State: Separated Mothers' Experiences of Administrative Burdens with Australia's Child Support Program*, *Australian Journal of Public Administration*, Vol. 80(4), 912.

³⁵ For example, include contacting the liable parent to discuss payment strategies, garnishing the liable parent's wages, garnishing tax refunds, deducting payments directly from the liable parent's bank account, deducting payments from Government income support and issuing a section 72A Notice to collect the outstanding debt.

³⁶ Women's Legal Services Australia (as above n 8), p. 7.

³⁷ Kay Cook, Kristin Natalier and Torna Pitman (2016), *Payee mothers' interactions with the Department of Human Services-Child Support: A summary of recent qualitative findings*, *Family Matters: Newsletter of the Australian Institute of Family Studies*, Vol. 97, 30, p. 40.

³⁸ Kristin Natalier (2017), *Micro-aggressions, single mothers and interactions with Government workers: The case of Australia's child support bureaucracy*, *Journal of Sociology*, Vol. 53(3), 622.

64. Without the support of Services Australia, many mothers accept substantially reduced child support or pursue payments from ex-partners on their own. The risks are heightened for mothers who have been in controlling relationships. As we said in our Literature Review, “Mothers are put in the position of having to make an active move to seek finances from their ex-partner, who mostly always has access to their children. Contacting ex-partners for any reason with respect to child support can be fraught with re-traumatisation and risk to safety for both mothers and children. For mothers who have experienced violence, collecting evidence of non-compliance or their ex-partner’s financial position is often, at the very least, psychologically harmful and at times, simply untenable.”³⁹

The funding and operation of relevant advisory and advocacy bodies

65. Women’s Legal Services have expertise in supporting women experiencing financial and economic abuse, and an in-depth understanding of the barriers to justice and economic security experienced by women across Australia. The national advocacy of Women’s Legal Services through WLSA ensures that the voices and experiences of Women’s Legal Service staff and clients are being highlighted to relevant financial institutions and government agencies, and are contributing to progressive system reform.

66. Consecutive reports on the state of legal assistance services, including community legal centres, point to unmet legal need, chronic underfunding, and workforce issues.⁴⁰ Women’s Legal Services will be forced to turn away an estimated 52,000 women this year due to lack of adequate resources, and many of those women will be victim-survivors of domestic, family and sexual violence.⁴¹

67. Women’s Legal Services work directly with victim-survivors of financial abuse but without additional funding are limited in their ability to advise on ways to create better outcomes for their clients, or to advocate for policy, law reform and systemic change to address financial abuse. At the national level, Women’s Legal Services contribute to WLSA’s advisory and advocacy work, however WLSA is funded by its members and therefore limited resources for Women’s Legal Services mean that WLSA also has limited resources.

68. The 2024-25 Federal Budget was a step backwards for legal services that support Australian women fleeing violence. Due to the National Legal Assistance Partnership (**NLAP**) agreement expiring on 30 June 2025, which is the main source of funding for Women’s Legal Services, and the lack of ongoing funding for legal assistance services in the Budget, many community legal centres, including Women’s Legal Services, will now have to start planning to wind down their services.

69. The recent report of the Independent Review of the National Legal Assistance Partnership recommended an additional \$459 million for the legal assistance sector in 2025-26 and quarantined

³⁹ Women’s Legal Services Australia (as above n 8), p. 10.

⁴⁰ See: Community Legal Centres Australia (2024), ‘A sector in crisis’ < [State of the Sector – CLCs Australia](#); National Legal Aid (2023), ‘Justice on the Brink – Stronger Legal Aid for a Better Legal System’ < [Justice on the Brink - National Legal Aid](#)>.

funding for Women's Legal Services that is separated from other funding streams under the NLAP. The report also recommended additional funding of \$0.25 million, commencing from 2024–25, should be provided to WLSA so it can function as the national women's legal assistance peak. Additional funding would enable WLSA to function more effectively as an advisory and advocacy body on financial abuse and other issues impacting women.

70. Women's Legal Services also work with the peak bodies for financial counsellors and this is an important avenue for financial counselling staff to work collaboratively with other financial counsellors and engage in advisory and advocacy work, and these should be funded appropriately as well.

Any other related matters, including comparative information about arrangements in relevant overseas jurisdictions

71. We provide the below case study as an illustration of the significant financial abuse experienced by Women's Legal service clients, and the legal assistance and support services provided to women through our integrated model.

Case Study – Angela's Story

Family violence – Financial abuse, multiple interventions and holistic response needed

Angela is a 55-year-old woman, originally from Papua New Guinea, living in a town in Western Australia. Angela met her now ex-husband in Papua New Guinea, before moving to Australia in the early 2000s. Angela and her ex-husband each gained Permanent Residency and then Australian Citizenship in 2009. Throughout their marriage, Angela endured significant and ongoing family and domestic violence from her ex-husband, including physical, psychological, technology facilitated, cultural and financial abuse and coercive control. Angela rarely called police and did not want any support services involved, as she felt this would increase risk to her safety.

Since their arrival in Australia, Angela and her ex-husband lived in Perth until approximately seven years ago, when her ex-husband gained employment on a mine site in the North West. They relocated and lived in company housing, which was provided through her ex-husband's employment. Angela is a qualified nurse, however resigned from her position when they moved north, in order to care for their son and two (now adult) daughters while her ex-husband was working away.

Angela's ex-husband requested all utility bills be listed under Angela's name, saying this was fair as the company house was listed under his. Angela's ex-husband earns over \$225,000 a year, and while they were together, the family subsisted relatively comfortably on his income alone.

Prior to separating, Angela and her ex-husband decided to build a home in Perth, and took out a home-loan under both of their names. Only Angela's ex-husband's bank account was associated with this loan, which Angela's ex-husband said was normal, given he was the sole income earner.

In 2021, Angela's ex-husband physically assaulted her so badly that WA Police attended the scene and Angela and her son fled to crisis accommodation. Angela chose not to press charges, nor apply for a Family Violence Restraining Order, as she was concerned her ex-husband may become angry, put their lives further at risk and cease contributing to their financial stability.

Shortly after this event, Angela and her ex-husband officially separated, and Angela and her son lived in crisis accommodation for some months. Angela and her son were then able to return to the home, living with her ex-husband, separated under one roof. It appeared Angela's ex-husband had been deterred from using physical violence against her after police involvement, and Angela felt she was able to keep her and her son safe in the home.

Unfortunately, Angela's ex-husband did choose to perpetrate another act of physical violence which required police attendance, and rather than have Angela leave, her ex-husband went to stay with a friend for a short while.

When managing their separation, Angela did not wish to make an application to the Family Court of WA, as she knew her ex-husband would likely become aggressive, and endanger her and her son's lives.

As part of their informal separation agreement, Angela agreed to contribute 50% of the mortgage repayments each month, in the hopes that one day she could leave the remote mining town, get a nursing job and move into the property that was being built in Perth. Because only one bank account was associated with the home-loan, Angela had to transfer the monthly repayment directly into her ex-husband's bank account.

During this time, Angela successfully applied for Child Support, to be paid by her ex-husband on a regular basis. Cost of living in the North West is significantly higher than in non-regional areas, and without Child Support, Angela would struggle to shop for food and fuel, purchase school uniforms and supplies, and support her son to engage in community activities such as joining a sporting club.

For a little while, it appeared as if Angela and her ex-husband had come to a manageable agreement, and Angela felt empowered to work on recovering from the trauma she had experienced due to her ex-husband's violence. Angela's ex-husband even agreed to have she and her son move into the house in Perth once it had been built – due to be completed in early 2024.

Following this, Angela's ex-husband coerced her into cancelling the Child Support payments, stating this was a reasonable trade-off.

In December 2023, Angela's mother became ill, and she travelled to Papua New Guinea on compassionate grounds to care for her. When she arrived back in Australia, she received a text message from her ex-husband, saying he had moved back into the company home where she had been living, and that she was not welcome to return to their home in the remote mining town.

Angela was unemployed, was not receiving any government benefits, and now had no Child Support payments. Angela experienced homelessness, staying on a friend's couch until she could figure out a way to get back to her hometown and care for her son.

Upon her return, Angela had no home, no income and no way of obtaining any of her belongings from the property without being at risk of violence. All the while continuing to pay her ex-husband's utility bills and transferring her ex-husband the money for mortgage repayments every month.

Soon after this, Angela was contacted by the bank, who told her the mortgage repayments were three months in arrears, and she would need to make the repayments within 21 days, or they would start accruing interest at a high rate. Angela's ex-husband was unable to be contacted, refusing to respond to emails from the builders, avoiding calls from the bank, and Angela was forced to ask her daughters to liaise with him on her behalf. Angela's daughter's reported experiencing verbal abuse from her ex-husband when this occurred, and that he denied any wrongdoing, accusing Angela of lying, not transferring him the money and that she was responsible for the arrears.

The level of intervention required for Angela to just remain afloat was very high. In addition, police have attended Angela and her ex-husband's home many times. Services available to women in the North West are highly limited and siloed, meaning Angela had to juggle multiple local and non-local services in the attempt to have each of her fundamental needs met.

Angela sought assistance from Women's Legal Service Western Australia (WLSWA). Through an integrated approach:

- *The Financial Counsellor helped her to apply for hardship and liaise with her bank to have a new bank account associated with the home loan,*
- *She received a one-off legal advice appointment through the WLSWA Property Clinic,*
- *She has required assistance from a local crisis accommodation service on multiple occasions, as she has been lived on the living room floor of her daughter's one bedroom apartment for months,*
- *Assisted Angela's application for the Escaping Violence Payment through Uniting WA, which she received,*
- *She was provided with additional food and fuel vouchers as emergency relief,*
- *She has sought legal advice from a consumer credit legal service,*
- *She has applied for the Jobseeker payment and sought out advocacy from the Shire Council in search of employment,*
- *She has had to borrow money from family overseas, and*
- *She has requested support from Anglicare for Family Mediation services,*

The WLSWA social worker has been engaged with Angela for many months now to provide ongoing psychosocial support and case management.

Angela's ex-husband is now threatening to have her family in Papua New Guinea and her killed if she ever returned. Angela knows what her ex-husband is capable of those actions. Angela's ex-husband is also aware of loopholes in the Australian law and manages his behaviour strategically around them. At the moment there is little avenue for our services to intervene legally.

Throughout this process, there have been little to no mechanisms available to hold Angela's ex-husband accountable for the ongoing violence. Angela is left with no choice but to make the full mortgage repayment each month, keep paying the utility bills even though she no longer lives in the company house, pay for all daily costs like food, fuel, school supplies and those relating to her son's wellbeing, liaise with multiple proprietors and services in the hopes they can help assist in keeping her afloat, search for employment and search for stable housing. Without perpetrator accountability mechanisms, Angela is forced to live in a perpetually traumatised state, unable to escape the ongoing cycle of power and control.