

**INSIGHT BRIEFING:**

# **Lessons from the Survivor Inclusion Initiative (SII) in the UK, US, and Canada**



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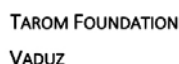
**FAST**

FINANCE AGAINST  
SLAVERY & TRAFFICKING  
— THE LIECHTENSTEIN INITIATIVE —

# Acknowledgments

The Survivor Inclusion Initiative Expert Review was undertaken by **Sarah Dohoney Byrne**, an attorney with Moore and Van Allen who support human trafficking survivors in the US PLLC. This briefing draws upon the findings of that Review.

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# Contents

<b>4</b>	<b>Introduction</b>
<b>5</b>	<b>Executive Summary</b>
5	Key Lessons
6	Meeting Survivor Needs
6	Moving Forward
<b>7</b>	<b>Section One: The Importance of Financial Inclusion for Survivors</b>
<b>9</b>	<b>Section Two: Survivor Inclusion Initiative Expert Review Findings</b>
9	What is Working Well?
13	What are the Challenges?
17	Case Study: SII Participating Bank Approach to Simplified Customer Due Diligence
<b>18</b>	<b>Section Three: Moving Forward</b>

# INTRODUCTION

The Survivor Inclusion Initiative (SII) is a financial access project launched in September 2019 in the UK, US, and Canada by the Finance Against Slavery and Trafficking (FAST) Initiative at the United Nations University Centre for Policy Research.

SII brings together financial institutions and survivor support organizations (SSOs) to work towards a shared aim of facilitating survivors' access to basic banking services, such as checking and savings accounts. This close collaboration enables safe and reliable engagement with survivors, and has resulted in changed banking practice such as trauma-informed practices and simplified or alternative customer due diligence. Examples of this include developing bespoke financial products ('survivor accounts') as well as, when survivors do not have standard documentation, allowing for SSOs to help verify and confirm survivors details, including identity, status and proof of address to banks. FAST supports the knowledge exchange required for developing this work through gathering and sharing resources, giving direct support and enabling peer-to-peer learning for participating entities.

The premise of the SII is that when survivors have access to financial services this enables their financial recovery and reintegration into their communities (see Section One), increases their protection from re-victimisation and enables their access to payments of financial compensation/remediation.

The SII has experienced success, growth, and challenges as each financial institution<sup>[1]</sup> (FI) implemented individual programmes, as survivor support organizations became aware of SII and made referrals, and as survivors built trust and navigated FI services.

Since 2019, the SII has grown to include fourteen participating FIs (eight in the US, two in the UK, one in Austria and three in Canada) and thirty SSOs (twenty-six in the US, two in the UK, and two in Canada). FAST has provided secretariat support to the SII during this period. To date, approximately 2,000 accounts<sup>[2]</sup> have been opened from referrals by SSOs across the three countries. This is an encouraging and rewarding validation of the initiative.

The SII is now in its third year of operations. To mark this anniversary and learn from challenges and successes so far, an independent Expert Review was commissioned by FAST and took place between November 2021 and April 2022. The Review aims were to help advance the SII's goals of **achieving financial inclusion of human trafficking survivors and increasing stakeholder participation**. The following briefing highlights some of the insights that were gathered.

# EXECUTIVE SUMMARY

To find out more about how the SII has been experienced, the Expert Review gathered information from two surveys and 10 interviews with key stakeholders.

There were 14 SSO (all US-based) and 10 FI survey respondents (seven US, two Canada, and one UK). The survey data provided insights into some of the successes and the barriers to participation.

To gain a deeper understanding, interviews were undertaken with key personnel from SSOs (five), FIs (two), and with survivors (three)<sup>[3]</sup>. The insights gathered are summarized here and detailed further in the second section, with case study examples.

## Key Lessons

### What Works Well?

- Good relationships and knowledge sharing between FIs and SSOs, which impacts referral rates
- Most referred survivors are being successfully onboarded as customers
- Gender data about referred survivors being collected by FIs and SSOs
- Survivor needs and experiences being addressed in the onboarding process
- Survivor needs and experiences being accounted for in compliance and due diligence processes at and after account opening
- Financial literacy training offered alongside access to basic banking
- Special assignment of trained banking personnel as 'single point of contact' for survivors and SSOs

### What are the Challenges?

- Increasing the volume of referrals
- Collecting demographic data across different characteristics and using this to target services at marginalized survivors
- Exploring the reasons behind declined survivor customers and account closures
- Understanding the products/services offered and how each FI manages the SII onboarding compliance and due diligence processes
- Perceived 'de-risking' policy and regulatory obstacles for onboarding and account management
- Survivor needs are reported as being beyond basic banking services/products
- Supporting survivor accounts through the life of the account, e.g., through flagging<sup>[4]</sup>

# Meeting Survivor Needs

According to SSO survey respondents, these are the priority needs of survivors in the SII:

## Survivor Basic Banking Needs

- Non-documentary Identification (identification through other means than traditional ID)
- Waive credit check (especially negative results from previous banking history)
- No minimum balance required
- No monthly fees on accounts
- Waive fees/penalties

## Trauma-Informed Service Needs

- Trained personnel
- Single point of contact for survivor accounts (more than one is preferable)
- Support with account management
- Accounts flagged as 'vulnerable' or customer 'with specific needs' for life (this flag may be attached to a customer or account for the life of the relationship)

# Moving Forward

FAST will work with stakeholders to;

- Strategically integrate SII participation within FIs environment, social, and governance (ESG) community and financial inclusion work;
- Explore new ways for sharing SII practices and knowledge between participating FIs and SSOs;<sup>[5]</sup>
- Monitor SII account openings and maintenance policies, especially to improve understanding of how the process is working for different groups of survivors;
- Learn from examples of international good practice of regulatory permissions for financial products/services and explore the interaction of regulatory obligations and financial inclusion policy for survivors of slavery and human trafficking;
- Consider different country-specific<sup>[6]</sup> and regulatory contexts for SII implementation and expansion;
- Explore opportunities for country-specific collaboration and knowledge sharing to develop and grow referral pathways and develop needs-led responses in relation to the SII 'offer';
- Discuss how account 'flags' can help survivors and FIs in relation to supporting survivor account management; and
- Establish information sharing protocols for safeguarding practice when suspicious or problematic activities occur in survivors' accounts.

# SECTION ONE

## The Importance of Financial Inclusion for Survivors

Financial exclusion exacerbates vulnerability to modern slavery and human trafficking. For survivors, financial inclusion can assist with their financial recovery and reintegration into communities. This is an example of how this happened to Survivor Z:

Survivor Z was trafficked from Hungary to Canada when they were 20 years old. In Hungary, Z had experienced a traumatic childhood; they lived with their brother in the family home and struggled to pay their bills. They were facing repossession of their home and could not access any credit to help them.

Z was offered the opportunity to go and work in Canada by someone who said they were part of a family recruitment agency. This seemed to be the answer to their problems. It was said to be only a three-month position in an office, and they could earn CAD 1500 per month. This would allow them to pay off their debts and save their family home.

Within 12 hours of arrival in Canada, Z was abused and trafficked by a group of criminals into commercial sex. Z could not speak English, and they were starved, forced to work, and made to hand over at least CAD 40,000 in cash earnings to their traffickers. After surviving three months of this, they were helped to escape by people in the local community. However, they were facing intimidation by the organized crime organization and criminal prosecution for sex work.

This traumatic experience may appear short in time, but it had long-lasting impacts on Z – emotionally, physically, and financially. It took over 20 years to rebuild their financial life.

In the immediate period after being trafficked, they worked four to five different jobs to survive in this new country and send money home. They could not open a bank account because they did not have proper documentation in Canada – a direct result of being trafficked.

They knew people who would cash a cheque for them, but this was a dangerous transaction due to operating in the 'black market' space. So, they cashed their monthly pay cheques in financial institutions, but these businesses still took up to 30 per cent of their wages in fees.

Z said that during this time, they felt like they were not a full person in society. Even though they were living and working there, Z felt like a ghost, a “nobody” in the financial system. This feeling was based on not being able to get somewhere to live independently and not being able to get credit. More generally, they did not feel that they were being given a ‘first shot’ to improve their life after the trauma they had endured. Z had to rely on friends, boyfriends, and bosses to sign paperwork on their behalf. This was a vulnerable position but fortunately Z was not financially exploited in those relationships.

Z taught themselves to speak English. Z was refused study loans but still paid for their education. Z had been trafficked at 20 years old but was 35 before a landlord did not ask for a co-signer because they had been able to open and manage a bank account to prove ‘credit-worthiness’ and reliability. This was the first time Z felt like they were no longer classed as a “nobody” and a victim. Z built up their credit and, by 44, could buy their first car independently without a co-signer.

*Even though they were living and working there, Z felt like a ghost, a “nobody” in the financial system.*

– Survivor Z

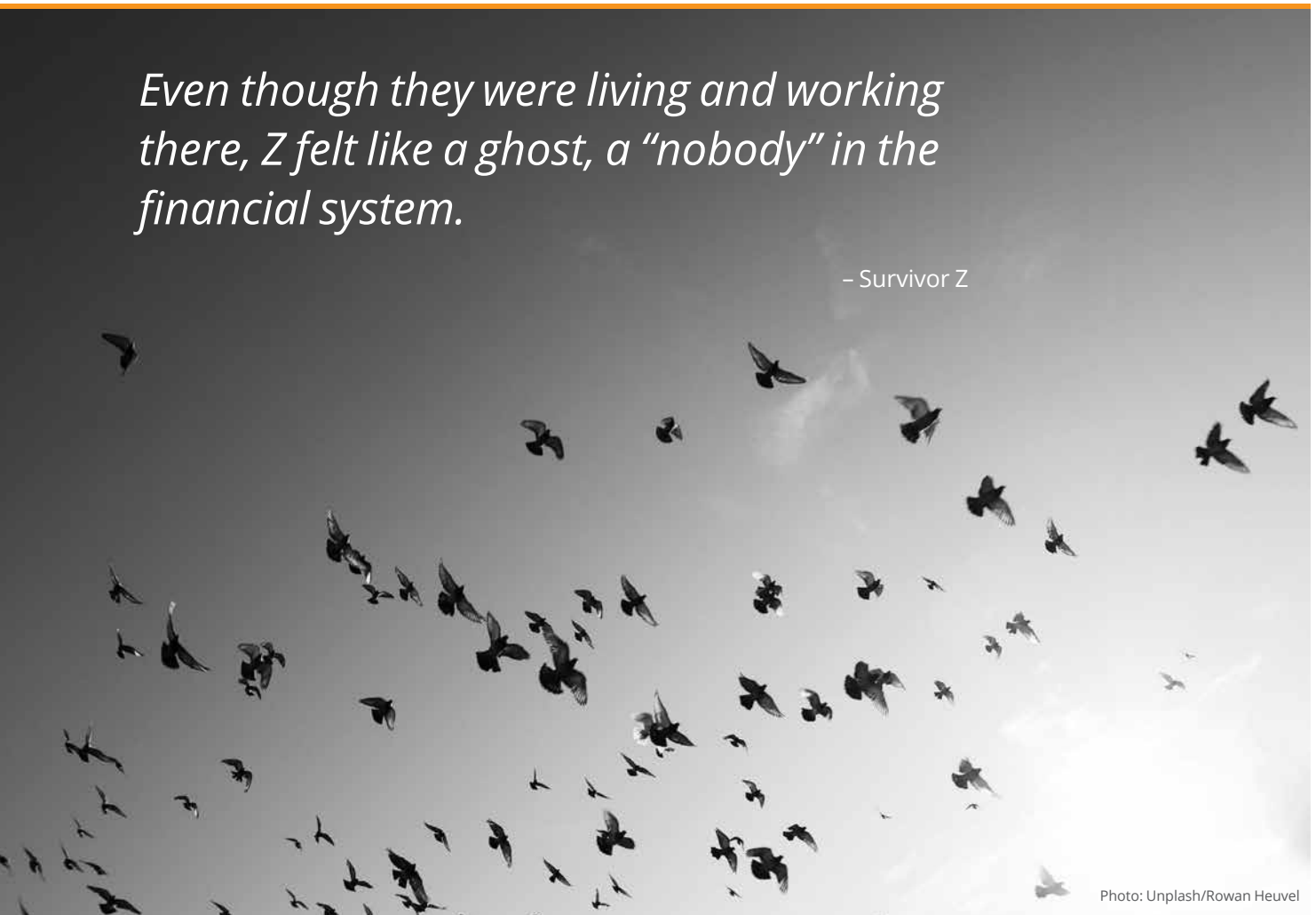


Photo: Unplash/Rowan Heuvel



# SECTION TWO

## Survivor Inclusion Initiative Expert Review Findings

The Expert Review gathered information from two surveys and 10 interviews with key stakeholders. There were 14 SSO (all US-based) and 10 FI survey respondents (seven in the US, two in Canada, and one in the UK). Out of the 10 FI respondents, six were anti-money laundering/financial crime/risk management officers.

The Expert Review found that SII lies on a strong foundation to address the need to provide survivors of trafficking with access to banking products and services otherwise unavailable to them. This is important from a number of perspectives. It supports their financial reintegration into society. It supports protection from re-victimization and enables their access to financial compensation/remediation. It also identified the specific aspects of SII that are currently working well and where challenges remain.

### What is Working Well?

- **Good relationships and knowledge sharing between FIs and SSOs which impact referral rates**

While only a limited number of SII participants were surveyed, FI survey respondents reported 36 referrals processed in the period. SSO survey respondents reported they had referred 59 survivors for account opening. Eight out of 14 SSOs said that all the survivors referred became customers, and only one out of 14 said some became a customer. Eight out of 10 FI survey respondents noted that SSO referrals were critical to the initiative's success. Nine out of 14 SSOs cited FI responsiveness to referrals as a feature of what works well.

- **Most referred survivors are being successfully onboarded as customers**

Eight out of 14 SSOs said the survivor they had referred became a bank customer.

# Survivor Story

Allen is a survivor participant who was labour trafficked on a fishing boat from his home country in Africa to the United States. Having been in US-detention for years because of his trafficking experience, and without work authorization, he was left with no financial security. Allen is dependent on non-governmental organization support for basic human needs. Like many survivors, he also has legal needs and was connected to a pro bono lawyer. Upon realizing Allen's lack of financial security and need for a peer-to-peer payment platform to receive financial support, his pro bono attorney suggested he consider the SII. Allen did not think he could ever get a bank account because of his lack of identification documents and personal history. Through the SII, he was referred to the FI of his choice by his lawyer and that FI accommodated his limited form of identification. Allen said to his lawyer, "getting a bank account was a miracle!" He can now safely receive and save monetary support as he works to rebuild his life.



- **Gender data being collated by FIs and SSOs of referred survivors**

All FI and SSO survey respondents reported that they collect gender data relating to referrals.

- **Survivor needs and experiences being addressed in the onboarding**

FI survey respondents outlined the ways in which survivors' needs and experiences are addressed in the onboarding process:

- Five FIs allowed for 'non-documentary forms of identification' (alternative forms of ID) in the onboarding process.
- Four FIs dismissed any adverse information resulting from a credit or other check in the KYC process for confirmed trafficking victims.
- Five FIs waived minimum balance requirements for SII clients.
- Six FIs waived monthly banking fees.
- One FI allowed for online account opening

Eleven out of 14 SSO survey respondents said that "*no minimum balance*" or "*no monthly fees*" are the most critical aspects of survivor bank accounts. An SSO participant stated that "unknown transaction fees feel like a pimp tax" and acts as a trauma trigger for survivors. A survivor said, "being vulnerable, we survivors can still be taken advantage of, even by banks."

*“We survivors can still be taken advantage of, even by banks.”*

- **Survivor needs and experiences being accounted for in compliance and due diligence processes on and after account opening**

Six out of 10 FI survey respondents stated that accounts are internally flagged as ‘survivor’ on opening, and a further three stated they are flagged for the life of the account. Eight out of 14 SSOs said that accounts should be flagged for life and 10 out of 14 said support with account management was essential for survivors.

Two out of 10 FI respondents allow for (manual) overrides of auto-closures for violations of the overdraft policy and debt forgiveness on accounts with a charge-off status.

## Survivor Story

Hannah, a trafficking survivor, shared that the traffickers’ greatest weapon was to use her previously “good credit” to line their pockets and further exploit her. Free from the traffickers and earning a good income in steady employment, Hannah still could not access credit due to the previous identity theft and coerced debts by the traffickers. She kept her significant employment income in her bank account, but she wanted to access credit and she knew she needed to build “good credit” to undo all the “bad credit” thrust upon during her exploitation. Understanding that Hannah deserved access to credit, a participating SSO that supports her facilitated a referral to the bank with which Hannah had her checking account. The FI appropriately responded to the negative results of the credit check, which would otherwise have rendered her ineligible for an account, by working closely with the SSO to understand that this was related to her trafficking experience. After the survivor demonstrated steady income through proof of employment, the FI approved her credit card application, and she can now begin to build “good credit.”



Photo: Unplash/Jukan Tateisi

## [What is Working Well?]

- **Financial literacy training engagement offered alongside access to basic banking**

The survey shows that financial literacy and skills training is currently offered to survivors by SII stakeholders. Five out of 10 FI survey responses indicated that they provided financial literacy education to survivors. Similarly, 11 out of 14 SSOs provide survivors with this support, showing awareness of a high-level of need to empower survivors with the tools to manage their money successfully to enable financial independence.

- **Special assignment of trained banking personnel for survivors and SSOs for 'single points of contact'**

Eleven of 14 SSOs indicated that trained personnel and single points of contact at the FI make the survivor experience of customer service more trauma-informed and supportive. Seven out of 10 FI survey responders indicated that the personnel onboarding survivors for the SII receive training. This is important since seven out of 14 SSO survey responders said their SSO does not accompany survivors to onboarding at the FI.

One FI participant explained that all front-line workers at financial centres receive training and another FI participant reported that personnel who work with SII customers receive materials on trauma-informed support and language and receive a 90-minute video training.

*Survey respondents said that financial literacy and skills training are currently offered to survivors in the SII*

## What are the Challenges?

- **Increasing the volume of referrals**

Increasing referral rates was a common theme in the survey and interviews. An SSO interview participant said that a participating FI has continually asked her SSO for more referrals. A survey response from an FI said it “would help to get more referrals from SSOs.” Another SSO participant said that she wished all SSOs made the SII part of their wrap-around services model (this includes housing, mental health, and legal aid).

- **Collecting demographic data across different characteristics and using this to target services at marginalized survivors**

No data beyond gender was captured by SSOs or FIs relating to referred survivor characteristics (e.g., citizenship/status, ethnicity, disability). There is an opportunity to discuss how data can be used, for example, to target specific SSO referrals to reach populations who may have additional needs for accessing essential banking services.

- **Exploring the reasons behind declined survivor customers and account closure**

SSOs and survivors report that some referred survivors have been declined services in the past, without explanation. In addition, three SSO survey responses said none of their referred survivors had become an SII customer.

FIs reported that five survivor accounts had been closed after opening: one because it had never been funded, another one because the survivor switched to another bank, and the other three were for reasons unknown. In relation to auto-closure, eight out of 10 FIs did not say they allowed for manual override of auto-closure on survivor accounts.

Eight out of 10 FIs asked for information sharing protocols for suspicious or problematic activities on survivors’ accounts, which may be linked to this issue. An FI participant asked for guidance on permission around disclosure when a FI has reason to believe that an SII customer has been revictimized.



## Survivor Story

Two SSOs that co-support Tamika, a survivor, participate in the SII and suggested she be referred for a bank account once she began to receive pay cheques and pay bills. Tamika was hesitant at first because her trafficker had coerced her into opening and mismanaging bank accounts, credit cards, and prepaid cards. Money and credit had become a sword used against her, not a shield to protect her. However, Tamika had the courage to try and re-enter the financial sector, this time on her own terms and with support. Because Tamika did not have reliable transportation, she chose a bank and branch closest to her home. An SSO volunteer agreed to accompany her to the account opening. The onboarding process was positive and certain account opening requirements were waived in her favour. She chose an account with features she thought would best accommodate her needs. Tamika felt validated that the FI took her on as a customer despite a poor banking history. But just having a bank account did not render Tamika financially savvy and secure. Tamika's income became sporadic with job loss. She called the referring SSO a few months later to say that she just received notice that her SII bank account had been closed by the FI because she had maintained overdraft status in violation of the FI policy. Tamika had experienced financial sector exclusion, hidden fees, and coerced debts in the past, so closure of the account was devastating. However, as an illustration of her resilience, she rebanked with the same FI and carefully considered what type of account best fit her needs. Tamika committed to developing her financial literacy so that this does not happen to her again. Several lessons can be learned from Tamika's experience including the importance of FI consideration of SII accommodations prior to account closure. Doing so may have avoided survivor retraumatization and maintained customer continuity.



Photo: Unplash/Miguel Bruna

*Tamika had the courage to try and re-enter the financial sector, this time on her own terms and with support.*

– Survivor Support Organization

## What are the Challenges?

- **Understanding the products/services offered and how each FI manages the SII onboardings**

Three of the 10 FI survey responders reported that internal management of the SII works well, indicating that there is room for improvement.

SSOs discussed being confused about the account types, fees, and accommodations for different onboarding processes offered by other banks within the SII. An SSO participant said that they habitually refer survivors to credit unions because banks have been known to impose fees.

- **Perceived 'de-risking' policy and regulatory obstacles for onboarding and account management**

Some FIs reported making accommodations to support survivors in account opening and account management. However, many perceived rigid policy or regulatory restrictions relating to required identification at account opening and transacting, as part of Anti-money Laundering (AML), and Know Your Customer (KYC) standards for account management. Specifically, five out of 10 FI responses cite compliance policy and regulation as the main challenge for the SII. Some have distinct AML/KYC processes for these accounts (two out of the 10), but most do not (seven out of the 10) and one was unsure.

One FI survey responder noted that an “overly aggressive approach to requirements makes it challenging for [FI] to provide access to banking for as many survivors as possible while continuing to manage regulatory requirements.” Another FI participant explained that the most significant challenges with the SII comes from “the bank having to follow the normal requirements” and that “making exceptions to bank de-risking policy is a challenge.” This was reinforced by other FI responses that “all products are available following the same guidelines as non-survivors” and that the process is most helpful when the survivor has legal documentation in accordance with bank policy. Otherwise, they must consult the legal department on what meets the regulatory standards. Eight of the 10 FI survey responders indicated that establishing an SII protocol for information sharing regarding suspicious or problematic account activity would be helpful.

Nine of the 14 SSO survey responders indicated that identification requirements pose challenges for survivors they serve, and 10 of the 14 SSOs reported that allowance for non-documentary forms of identification benefits survivor access to the SII.

## What are the Challenges?

- Survivor needs are reported as being beyond basic banking services/products.

FIs said the following financial products and services are offered through SII

Checking accounts	8
Savings accounts	7
Credit cards	4
Digital Finance	2
Debt Forgiveness	2
Financial Education	3
Other	2 (don't exclude any products/will provide products as requested)

Some FIs went beyond offering basic checking and savings accounts to survivors, as shown above. SSO and survivor participants said that to advance the financial inclusion and security of survivors, small business loans, business bank accounts, peer-to-peer transaction platforms, as well as auto, education, and home loans needed to be offered. No FI reported these as a specific part of the SII 'offer'.

One SSO participant creatively suggested that SII encourage FIs to consider monetary incentives for SII accounts that remain "in the black" and grow to facilitate wealth-building further. Measurement of lending outcomes to survivors over a multi-year period was also recommended.

For survivors and SSOs, the opportunities to build "good credit" through SII following trafficking-related credit damage was very important. Ten of the 14 SSO survey responders said that "waiver of credit or other checks, or dismissal of any resulting adverse information" works well for the SII.

- **Flagging survivor accounts through the life of the account**

Six of the 10 FI survey responders indicated that they flag SII accounts to ensure accommodation or specialized attention, and three indicated that the flag remains for the life of the account.

A survivor participant said, "of course, bank accounts should be marked as 'vulnerable customer' [and granted certain accommodations], that decreases [the chances of being revictimized]." Another SSO participant suggested that the decision to identify/flag an account as SII should be left to each survivor.

# CASE STUDY:

## SII Participating Bank Approach to Simplified Customer Due Diligence

For survivors, lack of appropriate, verifiable identification documentation is the most significant barrier to accessing financial services. This example shows how banks can facilitate financial access for survivors by taking a simplified customer due diligence (SDD) approach that meets both survivor needs and robust risk-based approaches to KYC policy.

The bank is piloting, in conversation with their country regulator, an SDD approach that separates the KYC elements of 'identification' and 'verification' into two distinct processes over a grace period of up to 12 months. To enable this approach the bank has partnered with established SSOs, who are also subject to the Bank's third party risk assessment. Once established as a partner, these SSOs can provide documentation to satisfy the "identification" requirement for a survivor who lacks appropriate identification. SSOs are also asked to assess the suitability of any interested applicant before making a referral to the SII programme, to mitigate concerns about potential misuse of banking products and services.

The bank accepts the following three documents to satisfy "identification" of an individual:

- a. **SSO Referral Letter:** Survivors must present a wet signature original SSO referral letter signed by a director/principal of the referring SSO. The referral letter must include the following information about the survivor: a) name, b) date of birth, c) address (if applicable), d) length of time in the care of the SSO, e) intended use of the bank account, and f) confirmation that the survivor is the ultimate beneficial owner.
- b. **Record of Personal Reference Form for Account Opening ("Personal Reference Form"):** This standard form is signed by the survivor's case manager (an employee of the referring SSO) on behalf of the survivor. The form must be signed in the presence of a bank employee. Therefore, this step can be completed in the branch at onboarding. The same individual cannot sign the Personal Reference Form as the signatory of the SSO referral letter.

During the 12-month grace period, the bank branch that facilitated the onboarding makes reasonable attempts to contact the survivor and remind them of their obligation to provide appropriate identification. Once the survivor returns with such documentation, the advisor will conduct a KYC refresh, thus satisfying the 'verification' step.



# SECTION THREE

## Moving Forward

Photo: Unplash/Pablo Heimplatz

SII is making a significant positive impact on survivors' lives. FAST is committed to growing the initiative in scale, in impact and in geographical reach over 2022/23. To address the identified challenges, FAST will continue to assist in supporting stakeholders to;

- Strategically integrate SII participation within FIs Environment, Social and Governance goals as well as their Community and Financial Inclusion work;
- Explore new ways for sharing SII practices and knowledge between participating FIs and SSOs; <sup>[5]</sup>
- Monitor SII account openings and maintenance, especially to improve understanding of how the process is working for different groups of survivors;
- Learn from international good practice examples of regulatory permissions for financial products/services and explore the interaction of regulatory obligations and financial inclusion policy for survivors of slavery and trafficking;
- Consider different country-specific <sup>[6]</sup> and regulatory contexts for SII implementation and expansion;
- Explore opportunities for country-specific collaboration and knowledge sharing to develop and grow referral pathways and develop needs-led responses in relation to the SII 'offer';
- Discuss how account 'flags' can help survivors and FIs in relation to supporting survivor account management; and
- Establish information sharing protocols for safeguarding practice when suspicious or problematic activities occur in survivors' accounts.



## Endnotes

[1] Financial institution (FI) includes banks and other financial service providers, but in this report, findings from FI denotes banks.

[2] Most of these accounts have been opened in the UK.

[3] Data limitations: There were 10 FI and 14 SSO responses to the online survey, and not all respondents answered every question. All responses were anonymous, so multiple responses from the same organization are possible. 100 per cent of SSO survey responders and 70 per cent of FI responders are US-based. Participant interviews were mostly with US-based participants with limited exception.

[4] ‘Flagging’ means giving accounts special designation as survivor accounts.

[5] Six out of 10 FIs would like a “community of practice” forum to communicate about SII management and best practices.

[6] FAST has begun to address the bespoke implementation of survivor inclusion projects in the Global South.

[7] It should not be inferred that this data in each column refers to the same survivors.



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