

POLICYBRIEF

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Lessons from the Survivor Inclusion Initiative

Providing financial access for survivors and other communities
vulnerable to modern slavery

Alice Eckstein, Maha Khan, Jill Huinder, and Leona Vaughn

Recommended actions:

- Financial authorities should provide clear leadership on financial inclusion of survivors and other vulnerable groups, including formal guidance on Know-Your-Customer policies.
- Senior management of financial institutions should demonstrate buy-in to ensure survivors' financial access.
- Survivors and other vulnerable groups should be made aware of their right to access financial services, and the capability of survivor leaders should be boosted to support inclusion.
- National Referral Mechanisms should enable survivors' access to a range of financial service providers, financial products, and education.
- Financial education should be provided for survivors and vulnerable populations to improve use of products and services.

Introduction

Since its launch in 2019, the Finance Against Slavery and Trafficking (FAST) initiative has been dedicated to activating the financial sector to apply its significant leverage to counter human trafficking and other forms of modern slavery. FAST has focused on how investors can identify, mitigate, and prevent risk in their investments and across value chains; the effective use of investigations to detect illicit flows of finance related to human exploitation; guidance for stock exchanges to report more extensively on social risks in Environmental, Social, and Governance (ESG) disclosures; and investigating how vulnerability to modern slavery connects to financial exclusion across diverse contexts. In these efforts, FAST has promoted its founding document – *Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking*¹ – and engaged the financial sector in activities to implement its recommendations.

The Blueprint outlines five primary goals that comprise a framework for the financial sector to accelerate effective actions against human trafficking and other forms of modern slavery. Goal 4 (“Providing and enabling effective remedy for modern slavery and human trafficking harms”) focuses on prevention of the re-exploitation of people who have exited situations of trafficking or other forms of modern slavery. Providing financial access and empowerment to survivors has been identified by survivors themselves as essential to their reintegration into society.

¹ James Cockayne, *Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking* (New York: United Nations University Centre for Policy Research, 2019). Accessible at: <https://collections.unu.edu/view/UNU:7487>.

The issue has been addressing the barriers to this reintegration: for banks and other financial service providers (FSPs), survivors may appear to be prohibitively high-risk clients. In many cases, survivors of modern slavery have endured financial exploitation by traffickers, including the theft of key identity documents, compromise of their credit histories, and use of accounts opened in their names for illicit activity. Additionally, survivors may have criminal histories related to their exploitation, may have been moved across borders illegally, or may lack permanent addresses in the jurisdiction in which they are seeking support. These circumstances, arising from their experiences, can cause financial institutions (FIs) to refuse them as clients.

Survivors often face structural inequalities related to poverty, race, class, or gender, leading to uncertain incomes that hinder their ability to open and sustain bank accounts, save, and access financial services. Additionally, survivors, who come from various backgrounds and experiences, may encounter language barriers, isolation, and anxieties when dealing with authorities, especially if they lack official documentation.

Many survivors of modern slavery may have experienced FIs as sites of their exploitation by traffickers, such as having been forced to open accounts for illegal activity or make deposits into accounts under their name, but to which they have no actual access. These disempowering experiences, combined with anxiety arising from having to explain their history to banking officers, can increase survivor distrust toward these institutions.

FAST developed the Survivor Inclusion Initiative (SII) to address these barriers and close the gaps for survivors to access financial services. As one of the first activities launched within FAST, the successes of SII and the challenges it has faced offer useful lessons for both FSPs and frontline response organizations on how to directly mitigate vulnerability through financial access for survivor clients.

SII has had significant success as a pilot programme, showcasing its ability to create value for FIs, survivor support organizations (SSOs), and, most importantly, the survivors they serve. Incubated by FAST since 2019, SII has integrated into the operational frameworks of FIs and SSOs. This success has positioned SII as a sustainable solution for survivors of modern slavery to access financial services. Consequently, FAST will

transition from its current role as a matchmaking intermediary to a research-focused entity, which will empower FIs and SSOs to independently manage their relationships, ensuring the continued success and scalability of SII.

This policy brief distills four years of experience into insights for those considering how to develop financial inclusion interventions for survivors and other vulnerable communities.

Putting the Survivor Inclusion Initiative into Practice

SII was launched in Canada, the United Kingdom (UK), and the United States (US) with a small group of interested FIs and SSOs. Using guidance developed with survivor inputs, FAST developed introductory training for FIs to understand and meet the unique needs of this client base, and built a network of SSOs and FIs with a common understanding of survivor client needs developed through a trauma-informed approach.

Since its launch, 4,451 survivor accounts have been opened through SII networks, with 53 institutions participating as of 2024. Beyond the three initial jurisdictions, the original SII model has informed FAST research and interventions to increase protection for populations vulnerable to modern slavery, suggesting that practices to extend financial services to survivors can also be usefully applied to prevent modern slavery risk.

Expanding the SII Model

Following the expert review² of SII in the UK, US, and Canada, FAST expanded its work to pilot financial access for survivors in different contexts and geographies. In Austria and South Africa, FAST worked with banks, supervisors, and regulators to explore how they could develop services for survivors based in their respective countries. In Mexico,³ this evolved into a partnership of government, banks, regulators, supervisors and victim/survivor shelters that developed bespoke information and support for survivors to help them understand their rights to access financial services and products. In partnership with TRIBE Freedom Foundation, FAST supported the development of the Survivor Financial Empowerment Hub,⁴ an online tool to promote long-term financial well-being, freedom, and stability for survivors of modern slavery. In the US, a pilot intervention⁵ supported by Western Union identified the needs of migrant survivors with regard to sending and receiving money inter-

2 Leona Vaughn and Janina Pescinski, "Lessons from the Survivor Inclusion Initiative (SII) – the UK, US, and Canada," UNU-CPR Insight Briefing (New York: United Nations University, 2022). Accessible at: http://collections.unu.edu/eserv/UNU:8937/UNU_FAST_SIIReview.pdf.

3 Janina Pescinski and Leona Vaughn, "Developing a Public Private Partnership Approach to Increase Inclusion for Modern Slavery Survivors in Mexico," UNU-CPR Insight Briefing (New York: United Nations University, 2024). Accessible at: http://collections.unu.edu/eserv/UNU:9487/financial_inclusion_mexico.pdf.

4 See: <https://tribesurvivorempowerment.org>.

5 See Finance Against Slavery and Trafficking, Lutheran Services Carolinas and Restore NYC, "Exploring Migrant Survivors' Remittance Needs in the United States: FAST Survivor Inclusion Pilot Programme," UNU-CPR Insight Briefing (New York: United Nations University, 2024). Accessible at: https://collections.unu.edu/eserv/UNU:9482/survivor_remittance_needs.pdf.

nationally. In response to the war in Ukraine, FAST supported banks and authorities across Europe, the UK, and Liechtenstein in simplifying access to financial services to protect forcibly displaced persons from exploitation.⁶

Additionally, Scotiabank has independently extended its programmes to reach domestic and sexual abuse survivors and HSBC has extended its services to unhoused people and Ukrainian refugees, based on the SII model.⁷ Concurrently, initiatives similar to the SII model have been developed for indigenous people and migrants, creating tailored programmes designed to address their distinct needs.

Addressing Implementation Challenges

Developing Effective Referral Mechanisms

Participating organizations of SII have faced challenges in bridging the gap between SSOs and FIs, especially when there is no overarching National Referral Mechanism (NRM) in place that helps countries identify survivors and victims to refer them to support services.

Research conducted between 2021 and 2023 with SII participants highlighted gaps in SSO-to-FI referral mechanisms. Despite growing awareness and collaboration, the research indicated that compared to the overall numbers of trafficking survivors and referrals to FIs by SSOs, only a limited number of banking accounts and related financial services were provided. This suggests that significant gaps remain in scaling these services to meet the needs of a broader survivor population. FIs may also be receiving lower referral numbers than expected from SSOs, which may be related to issues of trust and awareness.

The findings highlight the significant challenges FIs face in collecting or reporting comprehensive demographic data, largely due to privacy protocols and regulations, which in turn limit SII's capacity to effectively tailor financial services to the specific, diverse, and intersectional needs of survivors. FIs articulated the difficulty in providing precise figures for accounts opened by survivors, as they incorporate these accounts into their "business-as-usual" banking procedures without distinguishing them for explicit tracking. Notably, two US SII participating banks have dedicated bank agents for each survivor account, which helps them monitor their accounts closely to overcome some of the "business-as-usual" challenges, while recognizing that this is resource intensive. The SII Expert Review recommended that FIs develop an internal monitoring system so that survivor accounts are identifiable and not subject to auto-closure until contact is made with the client. Currently, one SII participating bank offers such a product.

In interviews with FIs, respondents emphasized the critical role of SII in enhancing their capacity to support survivors and the importance of partnering with SSOs to understand survivors' needs and receive referrals. FIs noted the importance of addressing referral volume challenges through better marketing of available services to an enhanced network of partner SSOs, and the potential use of technology in overcoming identification issues. Several FIs cited the significance of engagement with SSOs to increase financial literacy among survivors through dedicated programmes to help them achieve their financial goals. Similarly, SSOs highlighted the importance of a proactive approach to promoting financial services for survivor empowerment, including briefing caseworkers on SII. These responses indicate a reliance on informed intermediaries to navigate the complex landscape of financial services for survivors.

Anti-Money Laundering and Know-Your-Customer Compliance

At an operational level, the absence of appropriate, verifiable identification documentation presents a significant barrier to accessing financial services for survivors, as well as other vulnerable populations such as forcibly displaced persons and refugees. This gap is exacerbated by FIs' perception of tensions between meeting regulatory requirements such as Anti-Money Laundering (AML) and Know-Your-Customer (KYC) policies and responding to survivor customers' needs. However, effective anti-financial crime compliance and an inclusive approach are not incompatible; they are essential to reduce vulnerability to exploitation. The Financial Action Task Force (FATF) standards allow for flexibility, enabling countries to apply simplified customer due diligence (CDD) measures and offer products exempt from some AML/Combating the Financing of Terrorism controls or benefiting from simplified due diligence regimes.

The resolution of these difficulties often requires innovative approaches, such as leveraging alternative forms of identification or advocating on behalf of clients to bypass traditional banking requirements. Two SII participating banks have spearheaded the novel approach of employing attestation/verification letters from an SSO as an alternative form of identification. This approach helped to establish guidance by Canada for other FIs on onboarding survivors. Additionally, one survivor was able to set up a bank account using a Safe at Home address (a confidential address programme), demonstrating the potential for flexible banking solutions tailored to the unique circumstances of survivors. However, these individual success stories emphasize the need for a more coordinated approach to addressing the financial inclusion of survivors, one that requires collaboration among FIs, SSOs, and regulatory bodies.

⁶ Leona Vaughn and Simon Zaugg, "Strengthening Financial Inclusion to Protect Against Modern Slavery: Applying Lessons to Bank Forcibly Displaced Persons/Refugees," UNU-CPR Insight Briefing (New York: United Nations University, 2023). Accessible at: https://collections.unu.edu/eserv/UNU:9141/financial_inclusion_insight_brief.pdf.

⁷ See: <https://www.hsbc.co.uk/help/money-worries/no-fixed-address/>.

FIs and SSOs may also grapple with navigation of complex national regulatory requirements, such as the US Debt Bondage Repair Act and the Canadian Protection from Coerced Debts incurred in relation to Human Trafficking Act (Bill 41),⁸ which prohibit the reporting of adverse credit information of trafficking survivors. Moreover, clear outcome management is essential for successful partnerships among stakeholders, considering regulatory limitations, customer perceptions, and FIs' fiduciary obligations.

Client Perspective Challenges

The lack of access to basic banking services and products can impede survivors' ability to recover and successfully reintegrate financially into society. Survivors can face financial exclusion due to past exploitation, such as being coerced into opening and mismanaging multiple bank accounts and credit cards, which may have resulted in a criminal record. This not only leads to limited credit history (i.e. thin-file credit) but can also foster mistrust in FIs, uncertainty about the benefits of banking services, and low financial literacy levels regarding suitable account types. The challenges survivors face may also be compounded by the fear of re-exploitation and re-traumatization, which can be triggered by engaging with FIs. These factors can significantly hinder survivors from approaching FIs, a crucial step in their financial recovery. Moreover, survivors may not even realize they have the right to access these services, which is the first step in obtaining banking services.

Another challenge is survivors' low financial literacy levels, which makes it difficult for them to understand the financial products and services that suit their income levels, financial needs, and preferences. SII participating SSOs have worked closely with survivors and SII participating banks to address these challenges by providing financial education and guiding survivors on suitable products and services. Moore & Van Allen has developed financial education training to address this challenge in the US and works with survivors to help them understand not only their rights, but also the diversity of their options. However, it is important to note that it takes time to achieve trust, and to build survivor confidence that they will not be re-traumatized or triggered by the financial ecosystem, such as by having a bank account closed due to inactivity after having overcome hurdles to open one.

Lastly, both the SII Expert Review and feedback indicate that survivors often require access to more sophisticated financial services beyond basic banking, such as credit facilities, entrepreneurship support, and investment opportunities. Some SII participating banks in the US have provided loans and mortgage options to longer-term survivors. This shift from basic banking to tailored services that meet the unique needs of survivors is also a challenge for other vulnerable populations. Ultimately, the transformation of financial services requires products and services to respond and adapt to clients' needs to enable meaningful engagement.

Areas for Additional Consideration

While SII has already seen some expansion beyond its original jurisdictions and intended beneficiaries, experiences from the pilot suggest further areas for refinement and expansion. One promising area is in the inclusion of more sophisticated financial products, such as mortgages or other services, tailored to survivor needs. Another area for future development is understanding and meeting the diverse and intersectional needs of survivors, accounting for diverse sexual orientation, gender identity and expression, racialized minorities, and migrants.

Young survivors, particularly older teens, have been identified as a group that requires access to banking and financial education. This is especially true for survivor minors who are entitled to monetary compensation and remedy for crimes committed against them. Both SII and the remittance pilot FAST delivered demonstrated FSPs' flexibility in providing minors with access to finance using various models. These can include emancipated minor accounts with the appropriate documentation, or a trusted legal, trauma-informed guardian to help oversee a trustee account that could apply to non-national or unaccompanied minors. Each country will have its own regulations: for instance, Canada already allows young adults over 16 to access finance, in which case FSPs can extend the SII alternative identification model.

As processes for restitution and remedy are developed, financial access provisions should be integrated to ensure that survivors receiving restitution are also offered appropriate financial services and education.

⁸ See: <https://www.ola.org/en/legislative-business/bills/parliament-43/session-1/bill-41>.

Recommendations From the SII Pilot

The SII pilot programme has shown that survivors can access financial services with the right support, including trauma-informed approaches and simplified CDD. Through its research, SII has highlighted success stories and challenges, and this section presents recommendations that underscore the need for collaboration among stakeholders to scale financial services to survivors and other vulnerable groups more effectively.

Recommendation 1: National and regional financial supervisors and regulators should provide clear leadership, including formal guidance on Know-Your-Customer policies and their application to survivors and other excluded and vulnerable groups

FAST research found that although FIs want to offer financial services for those vulnerable to modern slavery, they are worried about the extent to which they can simplify the KYC process and still comply with AML rules. Canadian banks (namely Scotiabank, the Bank of Montreal, and the Royal Bank of Canada), along with the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), have been integral to the development and continuing success of the implementation of SII. Canada employs a risk-based approach to increasing survivor financial inclusion. The Financial Consumer Agency of Canada published a guidance in 2023 that outlines the expectations placed on FIs to facilitate financial access for people without standard identity documentation, including survivors of human trafficking.⁹

Financial exclusion is a risk multiplier for modern slavery. Financial inclusion therefore should be a core component of national and regional protection and prevention strategies as per the Palermo Protocol.¹⁰ Integrating financial inclusion activity targeted at populations exposed to such vulnerability, such as survivors, migrant workers, and displaced persons, is an identified gap in National Financial Inclusion Strategies around the world. Explicit incorporation into these strategies is a tangible way for government to motivate FIs, regulators, and supervisors to focus on easing access for those excluded from the formal system and exposed to increased risk of exploitation.

Recommendation 2: Ensure survivors and other vulnerable groups are aware of their right to access financial services

SII learnings demonstrate that it is common for survivors to be unaware of their right to access financial services and products. This may be due to several factors, such as lack of awareness on the part of FIs and SSOs. However, survivors may also be fearful of approaching FIs due to experiences of financial exploitation, which may have resulted in bad credit status or being locked out of the financial ecosystem.

It would be prudent for national and regional financial supervisors and regulators to conduct communication campaigns and build partnerships with relevant stakeholders that can help improve the awareness of survivors, SSOs and FIs. Awareness is the first step in a customer's financial journey to adopting products and services.¹¹

In parallel, governments should ensure that SSOs have the capacity and capability to communicate and educate on survivors' right to access financial services, as well as the resources to build partnerships with FIs to ensure they are trauma-informed and can engage with survivors with the required sensitivity and guidance.

Recommendation 3: National Referral Mechanisms should enable survivors' access to a diverse range of financial service providers, financial products, and education

One of SII's biggest operational challenges is the low number of referrals banks receive. An NRM, such as the one in the United Kingdom,¹² is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support, which can include financial access. The benefit of an NRM is that it establishes a clear referral process for verified statutory and non-statutory organizations and public authorities to submit referrals of an adult or child whom they believe is a victim of modern slavery. NRMs can assess the needs, including financial, of victims and survivors and provide them with access to support such as legal advice, shelter, protection, counselling, and financial access.

⁹ See: <https://fintrac-canafe.canada.ca/new-neuf/1-eng>.

¹⁰ See: <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>.

¹¹ For example, see: <https://www.afponline.org/ideas-inspiration/topics/articles/Details/customer-journey-user-journey-based-financial-planning>.

¹² See: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#Section-6>.

In the UK, the Salvation Army, as a statutory organization in the NRM, refers survivors to partner FIs, such as HSBC UK, also a SII participating bank, to provide basic banking services. To date, HSBC has opened more than 3,000 survivor accounts. Similarly, the US funds Polaris, a non-governmental organization that works to prevent and address sex and labour trafficking, operates the National Trafficking Hotline.¹³ A different model from that in the UK, the hotline is a 24-hour service that provides victims and survivors access to a safe space to make reports and seek services such as shelter. FAST worked with Polaris in 2019 to add financial services to this hotline so that survivors understand their rights to financial access and are referred to SII participating FIs.

It is important that survivors have the choice to engage with a diverse range of FIs in the NRM structure, including the increasingly popular formal digital finance providers. This may be particularly critical for non-national survivors who may not be allowed to access full banking services due to regulatory constraints. The choice of diverse FIs can empower them to select relevant and affordable products and services, as well as choose physical branches convenient for them or financial service agents they can trust and who speak their language.

Recommendation 4: Financial institutions’ senior level buy-in and leadership are a prerequisite to ensuring survivors’ financial access

FAST research¹⁴ on capital market actors (including FIs) found that senior-level buy-in, capacity, and capability are prerequisites that can determine an institution’s approach to addressing social impact and risks. This finding resonates with SII learnings that senior level buy-in is critical to provide survivors’ financial access, coupled with leadership to implement and sustain financial access programmes. Traditionally, buy-in begins with senior-level awareness of the value proposition of offering financial access programmes and making this a priority, followed by the required capacity and resources to implement

such programmes – namely by providing trauma-informed, trained financial officers and product or compliance teams dedicated to social impact or financial health programmes, and having the capability (the knowledge, systems, and data) in place to monitor and adapt financial access programmes.

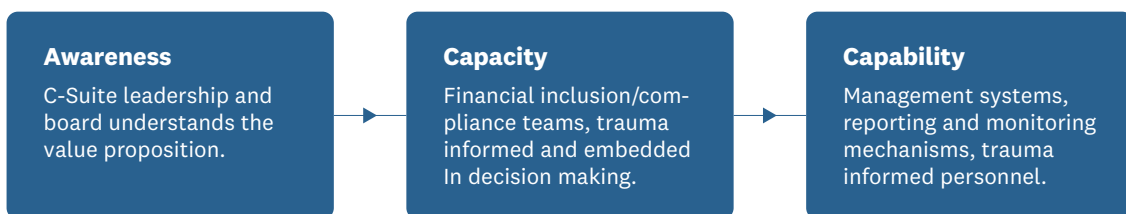
SII experiences demonstrate that teams can often face resource constraints to fully implement SII and conduct outreach to increase referrals or expand products and services, as they may often only be operating with one to two people. This may limit their ability to, for instance, collect and disaggregate data on survivor account openings and usage. Data is critical to monitoring and evaluating the effectiveness of a programme, adjusting it based on needs (e.g. ensuring accounts are not closed because of inactivity or erroneous findings of suspicious activity), and expanding services to meet survivor customers’ needs. Senior level buy-in and the required capacity also ensure that an SII programme is sustainable, shifting it from a pilot programme to one that is fully streamlined in the business.

It is therefore essential to engage leadership in the development of financial access and inclusion policies that can be implemented effectively. This is typically followed by building capacity (dedicated human capital and resources) and capability (management systems) to effectively implement and monitor policies.

Recommendation 5: Provide financial education for survivors and vulnerable populations to improve usage of products and services

A growing body of evidence¹⁵ shows that people with financial education can invest more, be less prone to over-indebtedness¹⁶ and bankruptcy, more frequently engage with financial products, and take better decisions during uncertain times. SII learnings indicate that survivors may be accessing formal financial services without basic money management education and awareness of financial concepts, including financial

Figure 1: Capital Market Actors’ Governing Structures can Determine their Approach to Human Rights Risks.



13 See: <https://polarisproject.org/national-human-trafficking-hotline/>.
 14 Maha Khan, Dr Sofia Gonzalez de Aguinaga, and Deborah Drake, “Accelerating Change: The Potential of Capital Market Actors in Addressing Modern Slavery,” UNU-CPR Insight Briefing (New York: United Nations University, 2023). Accessible at: https://collections.unu.edu/eserv/UNU:9269/accelerating_change.pdf.
 15 See, for example: <https://www.journals.uchicago.edu/doi/abs/10.1086/690950>.
 16 See: <https://www.centerforfinancialinclusion.org/embedded-education-taking-financial-education-to-scale>.

products and how they may be used, limiting their ability to maximize the usefulness of these services. This can have a negative impact on any remedy or compensation payments received and may hinder survivors from achieving financial health and well-being.

Extending financial education to consumers is crucial for empowering them to make informed decisions about their financial services usage, including avoiding over-indebtedness and unused accounts. It is critical that FIs find practical ways to ensure that their clients receive financial education in an accessible and practical manner.

Options include partnering with civil society organizations that provide marginalized communities with financial education or fintechs that are gamifying and simplifying education for diverse audiences, or embedding education into delivery of other services. For instance, SII participating SSO Moore & Van Allen developed a basic financial literacy course¹⁷ for survivors after realizing that its clients were not fully grasping the risks and benefits of the suite of financial services it offered. Collaboration among diverse stakeholders can lead to innovative solutions and educational initiatives that address specific gaps in financial knowledge, tailored to the diverse needs of consumer segments, including survivors. This collaboration can also extend to FIs' internal programmes, as many have social impact or financial access programmes that may be focused on a certain segment of the population, the learnings and content of which can be easily transferred to other marginalized or low-income populations.

Lastly, it is important for FIs to understand that survivors are not a homogenous group, but comprise diverse demographics (i.e. across age, gender, disability, and ethnicity), experiences (e.g. forced labour and sex trafficking) and sexualities, which can in turn affect their unique needs and challenges in accessing and using financial education materials and financial

products. The more FIs can segment their clients, the more effectively they will be able to serve them and thus encourage uptake of meaningful products and services.

Recommendation 6: Build capability in survivor leaders to address financial access and financial inclusion

FAST integrates survivor leaders' expertise in all aspects of its work, from programme development to delivery, and FAST partners have attested to tangible improvements in their operations regarding modern slavery, thanks to the practical insights provided by survivor leader consultants. While survivor leader consultants offer invaluable expertise rooted in their lived experiences, their presence within the financial sector remains limited, posing a significant challenge to achieving Sustainable Development Goal Target 8.7 to end modern slavery.

It is essential that governments and the financial sector collaborate to bridge this gap and strengthen survivor leaders' capacity and capability to address issues of financial inclusion. This collaboration can take the form of public-private partnerships and peer-to-peer survivor networks that facilitate mutual learning between survivors and the finance sector.

This innovative approach offers survivor leaders the opportunity to acquire essential skills and resources. Once armed with such skills and resources, survivor leaders can educate other survivors and affected communities on engaging with FSPs. These interactions amplify diverse survivor voices, enhance access to financial services and support the development of customized, customer-centric products. This model not only responds to survivor leaders' calls¹⁸ to place survivor leadership at the forefront of the anti-human trafficking movement, but will also lead to innovations in how the financial sector can reshape its financial inclusion products and strategies to support populations vulnerable to modern slavery while meeting regulatory requirements.

About the Authors: Alice Eckstein is Project Director for the FAST initiative at UNU-CPR; Maha Khan is Financial Sector Lead for the FAST initiative; Jill Huinder is Operations Manager at the FAST initiative; and Leona Vaughn is Vulnerable Populations Lead at the FAST initiative.

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¹⁷ See: <https://www.mvalaw.com/news-11241>.

¹⁸ For example, see: <https://www.survivoralliance.org/action-plan-1>.