

## **Protocol for the Care of Domestic Violence in the Management of Mortgage Processes**

*Guideline to promote their adoption and implementation*

### **I. Introduction**

From 2013 to 2021, more than 130 women were murdered in Puerto Rico due to gender-based violence, according to the Gender Equity Observatory.<sup>1</sup> Another 57 suspicious deaths are under investigation. This crisis has provoked different responses from State institutions, including the declaration of a State of Emergency demanded by organizations that watch over women's rights.<sup>2</sup> Although progress has been made in designing protective public policies, a multisectoral effort is essential to deal with this systemic and social malady. Protecting survivors' housing, education, health, and economic stability require comprehensive care. The entities that offer, finance, or manage mortgage loans are part of an ecosystem that shares the responsibility to act in the face of any indication of domestic violence.

Since 1968, the federal government has maintained regulations against discrimination in housing, applicable to instances such as the sale, rental, or financing of housing. The categories protected by the Fair Housing Act include domestic violence, as interpreted within protections based on sex. This legislation serves as a brake on practices that, directly or in their application, have a detrimental impact or revictimization against survivors of domestic violence. More recently, with the federal Violence Against Women Act (VAWA) reauthorization, economic violence – including

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<sup>1</sup> Gender Violence Observatory of Puerto Rico. Retrieved on September 9, 2022, from <https://observatoriopr.org/feminicidios>

<sup>2</sup>OE-2021-013, Declaring a State of Emergency Given the Increase in Cases of Gender Violence in Puerto Rico.



housing-related violence – was recognized as a form of violence against women.<sup>3</sup> This legislation is novel regarding the flexibility and agency acknowledged to survivors when identifying a potential domestic violence situation.

In July 2022, the United States Department of Housing and Urban Development (HUD) updated Manual 4000.1 of Policies on Single-Family Homes applicable to federally authorized loans<sup>4</sup> to include guidelines for the loss mitigation process where the co-signer is in a situation of domestic violence. Some of these changes include allowing the financial institution to excuse the presence of a co-signer during loss mitigation and authorizing the financial institution not to require a co-signer in a domestic violence situation. These changes will come into force on September 26, 2022. This Protocol builds on the developments mentioned above.

## **II. Justification**

### *Domestic violence is a social problem*

Domestic violence is a problem that affects all spheres of our society. The different manifestations of this violence have a profound and detrimental impact on all family members. It involves the labor, economic and social development of both the survivor and those who share emotional ties. Because its negative effect multiplies, domestic violence also impacts the communities and institutions that serve and interact with the aggressor, the victim/survivor, and their families.

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<sup>3</sup> Violence Against Women Act (Reauthorization Mar. 2022) 42 USC § 13931, et seq.

<sup>4</sup>FHA Single Family Housing Policy Handbook 4000.1. (In particular, this regulation applies to loans from the Federal Housing Administration.)



In Puerto Rico, domestic violence is a rampant problem. In the fiscal year 2020-2021, 9,976 *ex parte* protection orders were requested in our jurisdiction under Law 54-1989, as amended, of which 7,888 were requested by women (79%). 87% of the protection orders finally issued were granted to women and 12% to men.<sup>5</sup>

### *Understanding economic violence*

Domestic violence can be expressed in multiple ways, including physical and sexual assaults, threats and intimidation, stalking, restriction of freedom, and emotional and psychological damage. One of the manifestations of domestic violence is economic violence. Law 54-1989, as amended, contemplates it as part of emotional abuse and contains provisions that seek to remedy the damage caused to the victim/survivor during the situation of domestic violence.

In this type of domestic violence, aggressors seek to exercise control over the victim/survivor by limiting or preventing their access to economic resources, financial information, decision-making regarding assets and liabilities, and access to goods, among others. Camilleri and other researchers (2012) define it as a "form of domestic violence that negatively impacts a person financially, undermining their efforts to be economically

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<sup>5</sup> Judiciary Branch of Puerto Rico. Document entitled: Applications for protection orders and protection orders issued. Fiscal Year 2020-2021. under Law No. 54-1989 for the Prevention and Intervention with Domestic Violence. Recovered from <https://poderjudicial.pr/documentos/informes/OP-2020-2021.pdf> on August 16, 2022.

independent. It constitutes long-term abuse that can continue after the couple's relationship ends.<sup>6</sup> The behavior exhibited by the abusive party is controlling and may include conduct such as the following:

- prevent the victim/survivor from working
- control access to victim/survivor money
- coerce or trick them into taking loans
- preventing them from making financial decisions at home and taking control of their money
- prevent them from having bank accounts
- prevent them from accessing joint bank accounts and information related to them
- withhold wages from the victim/survivor
- force them to take on all the house payments
- making them feel that they are unable to manage money properly
- request that the victim/survivor present receipts and evidence of all expenses incurred and demand explanations and justifications for them
- prevent the victim/survivor from buying things they want and need

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<sup>6</sup> Camilleri, O., et al, (2015). Restoring financial safety: legal responses to economic abuse. <https://apo.org.au/sites/default/files/resource-files/2015-04/apo-nid303790.pdf>. Our translation.

- use joint money without the knowledge or consent of the victim/survivor
- failing to provide basic sustenance needs to the victim/survivor and their children
- affect the stability of the victim/survivor and their children in relation to their home, either by putting at risk the purchase, acquisition, financing, payment of rent, or mortgages.

Victims/survivors of economic violence find themselves in a situation of significant vulnerability and fear. Silva-Martínez and Vazquez Pagán (2015) explain that on many occasions, women remain in violent relationships for fear of not having the resources to support themselves and their children.<sup>7</sup> This financial insecurity keeps the victims/survivors dependent on the aggressor.

Financial institutions are in a particular position concerning cases of economic violence. This manifestation of violence directly affects the ordinary way in which business is conducted. First, it interferes with the relationship between the institution and its clients. Second, it causes losses that, if there were no situations of economic violence, would not exist.

One way in which economic violence manifests itself is through financial products in which the aggressor and the victim/survivor share responsibility.

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<sup>7</sup> Silva-Martínez, E., & Vázquez-Pagán, J. M. (2019). El abuso económico y la violencia de género en las relaciones de pareja en el contexto puertorriqueño. *PROSPECTIVA. Revista De Trabajo Social E Intervención Social*, (28), 121–143. <https://doi.org/10.25100/prts.v0i28.7264>



This is the case with mortgages. The organization Surviving Economic Abuse explains that in mortgages where the victim/survivor and the aggressor are co-signers, the aggressor usually, among other things:

- stops paying the mortgage
- refuses to participate in loss mitigation processes, frivolously objecting to the terms, or causing extensive delays in the process
- appears to compulsory mediation processes in bad faith
- refuses to consent to a refinancing, causing an increase or no decrease in payments
- applies for a first or second mortgage on the property and forces or tricks the victim/survivor into consenting to it
- forces or tricks the victim/survivor into agreeing to mortgage the primary residence as collateral for another loan (e.g., a business loan)
- refuses to sell the mortgaged property
- fraudulently applies for a mortgage in the name of the victim/survivor
- hinders and sabotages efforts to sell the property through efforts to insist the real estate agent overvalues the property, causes damages to the property, or withholds maintenance to cause deterioration

According to data compiled by Ayuda Legal Puerto Rico, from December 30, 2019, to the present, 44.9% of foreclosure cases in our jurisdiction have been

filed against co-signers men and women. Another 24.3% of lawsuits are filed against women only. In other words, women are defendants or co-defendants in a least 69.2% of foreclosure cases <sup>8</sup>, so they are at greater risk of losing their homes than men.

Financial institutions can play an important role in supporting victims/survivors of economic violence to regain control of their financial lives and mortgage situations. <sup>9</sup>They have the capacity to offer adequate mechanisms and provide sensitive attention to victims/survivors.

**It is suggested that financial institutions establish a protocol that guides the action of officials when they notice that a mortgage co-signer is in a situation of domestic violence. This Protocol would make it possible to make procedures more flexible in identifying a victim/survivor, to respond to their immediate needs as a client of the financial institution, to prevent revictimization or risk to their safety, and respect their decision-making capacity.**

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<sup>8</sup>Data collected by Legal Help Puerto Rico. Retrieved from: <https://datastudio.google.com/u/0/reporting/d3504452-6c15-4473-a9b7-4018c9b1ca4d/page/Inh1C?s=gvfCqr9jZkg>, on September 12, 2022.

<sup>9</sup>This is established by the Financial Abuse Industry Guideline of the Australian Banking Association (ABA) Financial Abuse Industry Guideline, reiterating that “[B]anks have a role in working with their customers to help them with their banking needs when are affected by family and domestic violence.” Retrieved August 16, 2022, from <https://www.ausbanking.org.au/wp-content/uploads/2021/03/ABA-Financial-Abuse-Industry-Guideline.pdf>.

These actions benefit the institution itself, making it easier for customers to meet their obligations, assist the survivor/victim in this delicate and decisive period in their life, and for the advancement of society in general. This Protocol is a way to comply with the moral imperative imposed by a corporate social responsibility to positively impact the community served by financial institutions.

Other jurisdictions around the United States and the world have seen financial institutions take affirmative steps against domestic violence. In the United Kingdom, the UK Finance organization, a collective of banking organizations and the financial industry, established in 2018 the Financial Abuse Code of Practice, establishing six principles to follow if financial institutions that are members of the group identify situations of financial violence among their clients. These principles are 1. Staff awareness and outreach; 2. Staff training; 3. Identification and appropriate response; 4. Minimizing the need to retell the story within the financial institution; 5. Help regain control of finances; and 6. Referrals.<sup>10</sup>

In Australia, the Australian Banking Association has established the Banking Code of Practice and, in addition, an Industry Guideline: Preventing and Responding to Family and Domestic Violence. Both documents recognize the role that financial institutions play in supporting clients whose families

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<sup>10</sup>UK Finance. Financial Abuse Code of Practice. <https://www.ukfinance.org.uk/system/files/Financial-Abuse-Code-of-Practice.pdf>



are affected by domestic violence and establish in detail the industry's good practices in serving this vulnerable population.<sup>11</sup>

In the United States, economic violence has begun to be identified as a manifestation of domestic violence and has been incorporated into federal regulations.<sup>12</sup> In addition to the legislative developments already mentioned, organizations such as FreeForm have created a policy oversight map on financial security in the country, showing how difficult it is for victims/survivors to get out of the dangerous situation they find themselves in <sup>13</sup>. Puerto Rico can be part of these efforts, prioritizing the comprehensive health of victims/survivors and joining those who face domestic violence through these acts.

### **III. Legal basis**

- Article II, Section 1 of the Constitution of the Commonwealth of Puerto Rico, provides that the dignity of the human being is

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<sup>11</sup> Industry Guidelines Preventing and Responding to Family and Domestic Violence. Australian Banking Association. Retrieved August 16, 2022 from: <https://www.ausbanking.org.au/wp-content/uploads/2021/03/ABA-Financial-Abuse-Industry-Guideline.pdf>.

The Banking Code of Practice, Australian Banking Association. Retrieved August 16, 2022 from: <https://www.ausbanking.org.au/wp-content/uploads/2021/10/2021-5-Oct-Banking-Code-WEB.pdf>

<sup>12</sup>Kelly, S. (2022) Bankers are on the front lines in fighting against domestic violence. American Bankers. Retrieved on August 16, 2022 from: <https://www.americanbanker.com/opinion/bankers-are-on-the-front-lines-in-fight-against-domestic-violence>

<sup>13</sup>The National Survivor Financial Security Policy Map And Scorecard. FreeForm. Retrieved on September 12, 2022 from: <https://mapandscorecard.freefrom.org/>

inviolable, that all persons are equal before the law, and prohibits all types of discrimination.<sup>14</sup>

- Law No. 54 of August 15, 1989, known as the Law for the Prevention and Intervention of Domestic Violence, as amended, establishes the public policy on domestic violence, provides civil remedies, and criminalizes actions constituting domestic violence.<sup>15</sup>
- Law No. 23 of May 29, 2013, to amend Law No. 54-1989 to extend its protections to all people regardless of marital status, sexual orientation, gender identity, or immigration status.<sup>16</sup>
- The *Violence Against Women Act of 1994* (VAWA), as amended, is a federal law that creates and supports comprehensive responses to domestic violence, sexual assault, dating violence, and stalking. Since their enactment, VAWA programs, administered by the US Departments of Justice (DOJ) and Health and Human Services (HHS), have dramatically improved federal and state responses to these crimes.<sup>17</sup>
- The Fair Housing Act (FHA) prohibits discrimination in selling, renting, or financing housing and other housing-related

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<sup>14</sup>CONST. PR art. II, § 1

<sup>15</sup>8 LPRA sec. 601, et seq.

<sup>16</sup> id

<sup>17</sup>42 USC § 13925, et seq.

activities based on race, color, religion, sex, disability, familial status, or national origin. Although "domestic violence" is not explicitly listed as a protected class under the Fair Housing Act, the law has been used repeatedly to protect survivors of domestic violence.<sup>18</sup>

- Executive Order Declaring a State of Emergency Given the Increase in Cases of Gender Violence in Puerto Rico.<sup>19</sup>
- Other applicable local and federal legislation.

#### **IV. Definitions**

For this Protocol, the following words have the meanings expressed below:<sup>20</sup>

- Cohabiting – This means maintaining a consensual relationship like that of spouses.<sup>21</sup>
- Serious emotional damage – arises when, because of domestic violence, the person who is the object of the conduct recurrently manifests one or more of the following characteristics: paralyzing fear, feelings of helplessness or hopelessness, feelings of frustration and

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<sup>18</sup> 42 USC §§ 3601 - 3619

<sup>19</sup>OE-2021-013

<sup>20</sup> These definitions are not necessarily the same as those contained in Act No. 54, *ante*.

<sup>21</sup>Manual for the development of a protocol for the prevention and proper management of situations of domestic violence in the workplace, Office of the Women's Ombudsman.

failure, feelings of insecurity, isolation, weakened self-esteem or other similar behavior, when it is the product of repeated acts or omissions.<sup>22</sup>

- Financial Institution – Refers to any institution that does business in Puerto Rico, including private or public entities that grant or manage mortgage financings, such as banks, mortgage houses, cooperatives, and corporations or public agencies.
- Intimidation – Means any action or word that, manifested recurrently, has the effect of exerting moral pressure on the spirit of a person who, for fear of suffering some physical or emotional damage to their person, property, or another person, is forced to carry out an act contrary to their will.<sup>23</sup>
- Appropriate notification of the situation of domestic violence- This means the action through which the victim/survivor informs the financial institution that there is a situation of domestic violence between themselves and the mortgage co-signer. Proper notification results in activation of the Protocol. Such notice may be verbal or written. Once the Protocol is activated, they must include as a supporting document a Protection Order Certification issued in their favor or a personal statement proving their status as a victim or survivor. It will not be necessary for the victim/survivor to have a Protection Order issued in their favor or the filing of a complaint in order to activate the Protocol.

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<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

- Protection Order – This means any mandate issued in writing under the seal of a court, in which orders are issued to a person who incurs in acts of domestic violence to refrain from incurring or carrying out said acts.<sup>24</sup>
- Persecution or persecute – This means keeping a person under constant or frequent surveillance in the immediate or relatively close places to the home, residence, school, work, or other places that person frequents or in the vehicle in which the person is, in such a way that it can instill fear in the mind of an average person.<sup>25</sup>
- A person who commits acts of domestic violence – A person who uses physical force or psychological violence, intimidation, or persecution against their partner.<sup>26</sup>
- Protocol for the care of domestic violence in the management of mortgage processes – Refers to the Protocol to be approved and implemented by financial institutions to identify that there is a victim/survivor among the joint applicants or cosigners of a mortgage loan; respond to their immediate needs as a client of the financial institution, preventing revictimization or risk to their safety and respecting their decision-making capacity.
- Couple relationship – Means the relationship between spouses, ex-spouses, people who cohabit or have cohabited, those who have or

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<sup>24</sup> *Id.*

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

have had an intimate consensual relationship, those who have procreated children with each other and those who have or have had a dating relationship. Includes relationships between people of the opposite sex and people of the same sex.<sup>27</sup>

- Victim/Survivor – Any person who has been subjected to acts constituting domestic violence.<sup>28</sup>
- Domestic violence – The use of physical force, psychological or sexual violence, intimidation, or persecution against a person by their partner to cause physical damage to their property or third parties to cause them serious emotional harm.<sup>29</sup>
- Economic violence – a pattern of constant conducts exercised with the purpose of undermining the present or future financial capacity, economic stability, or housing and housing security through threats, coercion, fraud, restriction or deprivation of access or use of accounts, assets, financial information, identification or credit cards, money or government assistance, concealment of information related to the payment of rent or mortgages, forced evictions, undue influence on the decisions or behavior or the financial and economic decisions of a person or interference in their work relations or their own business. It includes misusing people's financial resources, including money, assets, and credit, for personal gain.

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<sup>27</sup> *Id.*

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

- Psychological violence – Means a pattern of constant behavior exercised in dishonor, disrepute or contempt for personal value, unreasonable limitation to access and management of joint property, blackmail, constant surveillance, isolation, deprivation of access to food or adequate rest, threats to deprive of the children’s custody, or destruction of objects valued by the person.<sup>30</sup>

## **V. Policy implementation**

Every financial institution must write, approve, and implement a *Policy Statement on the management of mortgage processes in cases that present situations of domestic violence* where it expresses that there is a protocol for the management of these situations. This statement must be made public and will be posted where it is visible to all staff and visitors. Additionally, it will be discussed with all staff including newly recruited staff. This document must have the following components:

### A. Definitions

- The terms included in the preceding section on definitions will be defined.

### B. Legal Basis

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<sup>30</sup> *Id.*

- Applicable local and federal laws and regulations will be mentioned. The list of laws that appears in the previous section of this Protocol on the Legal Basis can be used as a guide and adapted according to the nature of the institution.

#### C. Statement that domestic violence is not tolerated

- It will be announced that guidelines and regulations will be implemented to be used in accordance with this Protocol.
- The commitment of the financial institution that all transactions related to a mortgage be carried out free of discrimination for reasons of domestic violence will be reaffirmed.
- It will be stated that the financial institution will not take any adverse action toward a client or potential mortgage client because they are facing a situation of domestic violence.
- The financial institution will establish, according to its internal regulations, the disciplinary consequences that will be applied to the officials who fail to activate the Protocol.

#### D. Support Services for Victims/Survivors of Domestic Violence

- It will be stated that the information obtained will be kept in complete confidentiality. The the victim/survivor of



domestic violence will be consulted when deciding the security measures to be adopted.

- Available resources for survivors outside of the financial institution will be listed. See, for example, the Directory of free legal services and the one of support in cases of domestic violence.

## **VI. Guidelines for the development of the protocol for the care of a victim/survivor**

### 1. Staff Appointment

The financial institution will designate personnel from the mortgage area, particularly those in charge of qualifying and originating mortgage loans, as well as loss mitigation, to attend and handle cases in which a victim/survivor claims to be experiencing a situation of domestic violence. The team must be trained to understand the problem of domestic violence and have tools that allow them to work with victims/survivors in an empathetic manner, as well as to handle their cases with confidentiality and free of discrimination or prejudice.

### 2. Protocol Disclosure



The financial institution will deliver written information on the existence of this Protocol to any applicant for a mortgage loan or loss mitigation process. In addition, there will be visible information on posters in the customer service areas.

### 3. Confidentiality

All personnel of the financial institution must consider the ethical criteria to carry out interventions with victims of domestic violence. Confidentiality and respect for the privacy of the victim/survivor should be emphasized. It is imperative that staff protect the victim/survivor's contact information, primarily if the victim/survivor is residing elsewhere, be it in an emergency shelter, with a family member or friend, or in a new home. Likewise, their telephone number and email address must not be revealed to the aggressor or their representative.

### 4. Consent

The victim/survivor must consent at every stage of the process, including the request to activate this Protocol. Financial institution staff should not force the victim/survivor to take any specific course of action. We must remember that this Protocol must ensure that the rights of the victim/survivor are protected without re-victimization. Imposing a course of action against their will goes against the objective being pursued.

## 5. Case Management

- Interview with the victim/survivor
  - If the person has expressed being a survivor of domestic violence, they should do the following:
    - Respect their right to privacy and assure them that oral and written communications regarding their situation of domestic violence will be handled confidentially.
    - The interview should be conducted in a space where the privacy of the conversation is guaranteed.
    - Listen to the person without judging and validating their experience.
    - Ask them if they are at imminent risk, if they have been physically attacked and if they need medical help. In that case, the person doing the interview should call 911.
    - Explore whether the assaults have produced any temporary or permanent impediment for the victim/survivor to make their mortgage payment.
    - Explore if the victim/survivor has received threats or intimidation that prevents them from deciding on their mortgage.
    - Explore whether the threats or intimidation consist of taking away the house or causing them to lose it.

- Explore what the victim/survivor knows (how informed they are) about their mortgage situation and if they have access to the correspondence sent by the financial institution.
  - Find out if the victim/survivor has a current protection order. If so, request the survivor a copy of the Certification and inform the security personnel of the financial institution.
  - Find out if the victim/survivor is interested in having the police called and placed in an emergency shelter to protect their life and physical integrity.
  - The greatest amount of information that the victim/survivor wants to offer about their situation will be collected in the file to avoid them having to repeat the facts and the situation unnecessarily.
  - The staff must share with the victim/survivor the alternatives offered by the financial institution in this type of case, as well as provide a directory of external services where they can obtain the necessary help to address their situation adequately. At all times, the victim/survivor must give their explicit consent.
  - Evaluate if the help provided does not put the victim/survivor at greater risk
- Referrals for support services in situations of domestic violence:



You can use the Directory, where you can find information on transitional shelters, legal aid, psychosocial support, re-education programs, and others.

## 5. Individual help and protection plan in mortgage cases

Once there is information about the situation of domestic violence of the victim/survivor, it is necessary to establish a support and protection plan that allows them security and decision-making capacity in relation to their mortgage loan. This may include:

- Allow additional time: The victim/survivor is in a difficult emotional state that may make it difficult to understand the mortgage process, so they may need additional time to make informed and intelligent decisions:
  - if the victim/survivor is in court proceedings related to their domestic violence situation, they will need to invest time and resources in appearing at hearings and preparing with their attorney
  - the victim/survivor could be receiving socio-emotional support and psychological and psychiatric therapy, so they need to invest time and resources in these processes
  - the victim/survivor may need longer meetings and functions explained in a more straightforward and more detailed way so

that they can understand the possible consequences of their decisions

- the victim/survivor may need additional time to make the decision, so the financial institution should not require immediate decisions but they should defer decision-making to a later date, giving the victim/survivor reasonable time to consider the situation appropriately.
- Presence of support resources: The victim/survivor may need to be accompanied by family members, friends, or support professionals to assist them in the process, so they may request that they be present in meetings with the staff of the financial institution.
- Avoid direct contact between the victim/survivor and the aggressor: The financial institution will avoid holding meetings between the victim/survivor together and the aggressor, but they should hold separate meetings with each of them. If a joint session is essential, the first alternative will be to have said meeting virtually to prevent the aggressor and the victim/survivor from being in the same physical space.
- Facilitate the transfer between branches: If the situation of the victim/survivor warrants it and they have the option of transportation, transferring the case to another branch of the banking institution may be considered, which will not be disclosed to the aggressor.

- Remote access: If the situation of the victim/survivor warrants it and they have technological possibilities, they can consider holding the meetings virtually.
- Previous communications: The financial institution may give the victim/survivor a copy of the earlier letters and communications that were sent concerning the mortgage and to which the victim/survivor did not have access due to the situation of domestic violence.
- Future Communications: The financial institution must send all correspondence to both co-signers.
- Documentation: In whatever way they can, the financial institution should assist the victim/survivor in compiling the necessary documents for their case. In addition, depending on the case, they can omit requiring certain documents to facilitate the processes for the victim/survivor.
- Victim/Survivor Security on Financial Institution Premises: Financial institution staff will alert security personnel when the victim/survivor physically visits the financial institution. The security staff will treat the matter confidentially, and free of prejudice and will refrain from informing the aggressor that the victim/survivor is on the premises of the financial institution. It will also take special preventive measures such as observing the victim/survivor through the security cameras, accompanying them to their vehicle, among others.
- Alternate Addresses: The financial institution may use confidential alternate addresses to address correspondence to the

victim/survivor, whether from family members or friends of the victim/survivor or an emergency shelter.

- **Alternative means of identification:** The financial institution may authorize the use of non-traditional means of identification if the victim/survivor does not have a driver's license, state identification, or passport, either because they were lost, lost due to a situation of domestic violence or because they have applied for them. In this sense, the financial institution may accept the electoral card, medical plan card, debit card, water or electricity bills, or a combination of these.
- **Debt Increase Prevention:** The financial institution could consider helping customers prevent their debt from increasing by reconsidering or waiving late charges, penalties, and other fees.
- **Moratoriums:** The financial institution could consider offering the victim/survivor a moratorium on payments for a specific number of months, allowing the victim/survivor some breathing room while they can stabilize their situation.
- **Collection procedures:** The financial institution may consider carrying out mortgage collection procedures against the aggressor.
- **Empirical credit:** The financial institution may consider amending the credit score of the victim/survivor for missed payments due to the domestic violence situation, for them to qualify for other financial products.





- The flexibility of processes: The financial institution may flexible the processes and take other specific measures as required in each particular case, as approved by the financial institution's mechanism or procedure established for these purposes.