

Access to Banking Protocol

Summary of current activity

Following consultation with the banking industry, the Department of Business, Innovation & Skills have published guidelines on access to banking for banks that are closing branches. See below for how RBS and NatWest currently compare against the guidelines.

Protocol	Our approach
<p>Access to Banking</p> <p>Banks are committed to supporting access to banking and financial inclusion in the community, aligning with HM Government's public policy objectives, by:</p> <ul style="list-style-type: none"> • offering an alternative way to bank that helps customers and small businesses to continue to bank locally; and • rebuilding trust and confidence in the sector. <p>While ensuring that customers are treated fairly, decisions on branch closures are ultimately commercial decisions for banks to take.</p>	<p>We're pleased to sign up to the Access to Banking protocol as we believe it's the right thing to do for our customers and fits with our commitment to engage and support the local community when a branch closes. There are a number of these actions we already take when we make the difficult decision to close a branch.</p>
<p>Pre-closure assessment</p> <p>Before the decision has been made to close a branch, a bank will undertake an internal analysis to understand:</p> <ul style="list-style-type: none"> • the potential impact on branch users; and • the availability and suitability of alternative ways to bank for branch users who live locally or travel to use the branch. 	<p>We make the difficult decision to close each branch on a case-by-case basis, and considering a wide range of factors. This includes branch usage by personal and small business customers, and alternative ways to bank in the local area.</p> <p>Before we close a branch, we always make sure our customers have access to alternative ways to bank including:</p> <ul style="list-style-type: none"> • free-to-use ATMs • distance to our nearest branch • distance to the local Post Office • the introduction of a Mobile Bank service if appropriate.

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<p data-bbox="119 230 518 302">Community engagement and impact assessment</p> <p data-bbox="119 338 750 560">After a bank has decided to close a branch and having first advised impacted branch staff, the bank will engage with other key local stakeholders (these may include the local authority, local business associations and local advice agencies). The purpose of the engagement will be to develop a further understanding of:</p> <ul data-bbox="119 562 694 716" style="list-style-type: none"> • the potential impact of the closure on the community • the potential impact on branch users; and • the availability of alternative ways to bank for branch users. <p data-bbox="119 752 678 813">Issues considered during this engagement will include:</p> <ul data-bbox="119 815 766 1131" style="list-style-type: none"> • the number of personal and small business branch users affected • the age profile of branch users (i.e. both older and younger users) • the number of vulnerable and other branch users who are more dependent on their branch than others (e.g. because they are disabled, older, digitally excluded and/ or lower income customers); and • an analysis of potential future service users 	<p data-bbox="825 338 1468 398">When we decide to close a branch, we always let our impacted staff know first.</p> <p data-bbox="825 434 1476 589">We then write to all customers who hold their account at the branch and/or who are using the branch, and to the local media and politicians, 12 weeks in advance of the closure date. We also display posters in the branch throughout this period.</p> <p data-bbox="825 624 1468 813">There are 12 weeks between the announcement date and the actual closure so we have time to engage with our customers and the local community on why the branch is closing, and to make sure they are aware of the alternative ways to bank with us in the local area.</p> <p data-bbox="825 815 1460 943">For vulnerable customers we provide different forms of communication, such as braille or large print letters, and phone calls in addition to the letter if customers are actively using the branch.</p> <p data-bbox="825 978 1460 1196">We actively engage with the local community and key local stakeholders, including attending Parish Council and Resident Association meetings, meeting with MPs and local councillors, and meeting with customers and communities at ‘town hall’ events to discuss the impact of the closure and the alternative ways to bank in the area.</p>
<p data-bbox="119 1211 574 1243">Publication of impact assessment</p> <p data-bbox="119 1294 766 1482">Banks will publish the results of their engagement and impact assessment, and the considerations taken into account in assessing the impact of the branch closure, subject to the removal of commercially sensitive information. The results will be made public before the closure of the branch.</p>	<p data-bbox="825 1294 1468 1422">We are open and transparent when we communicate why we have taken the difficult decision to close the branch and what alternative ways our customers can bank in the local communities.</p> <p data-bbox="825 1458 1460 1547">In the future, this information will be openly available in the closing branch for our customers and local communities to access.</p>

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<p data-bbox="121 232 699 304">Ensuring continued provision of alternative ways to bank</p> <p data-bbox="121 309 767 658">Where banks determine there is a continuing need for services, suitable alternative ways to bank will be put in place before the branch is closed. The nature of this alternative provision will be informed by the bank's impact assessment and the community engagement described above. Consideration will be given in particular to ensuring the continuity of small business relationship management (e.g. telephony, internet), and enabling branch users to check balances, make cash withdrawals, and make cash and cheque deposits.</p> <p data-bbox="121 689 695 752">In the consideration of alternative ways to bank, account will be had in particular to:</p> <ul data-bbox="121 757 759 1263" style="list-style-type: none"> • Proximity to: <ul style="list-style-type: none"> • Alternative branch(es) • Free to use ATMs • Post Office branch(es), including local capability and capacity • Nearer alternative bank's branch(es) • Alternative outlets (such as cash back/Pay Point outlets) • Credit union and community finance providers; and • The availability of additional banking channels, such as: <ul style="list-style-type: none"> • Partnership arrangements with the Post Office • Telephone banking • Mobile banking • On-line banking; and <p data-bbox="121 1294 767 1388">Banks will also take into account the local availability of broadband and access to alternative ways to bank for vulnerable customers.</p> <p data-bbox="121 1420 762 1482">The existence of an alternative bank's branch alone will not be considered an appropriate suitable alternative.</p>	<p data-bbox="826 309 1461 434">Before we close a branch, we always make sure our customers have suitable alternative ways to bank in the local area, which may include one or more of the following:</p> <ul data-bbox="826 465 1469 689" style="list-style-type: none"> • free-to-use ATMs • our nearest branch • the local Post Office • the introduction of a Mobile Bank service • a courier service, or our new 'Bank to You' service, to help with cash drop off and pick up for business customers. <p data-bbox="826 721 1461 815">And of course our customers can access our online, mobile and telephone banking services 24 hours a day, seven days a week.</p>

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<p data-bbox="121 232 536 264">Communication Arrangements</p> <p data-bbox="121 309 759 591">Banks will notify branch users by direct communication at least 12 weeks before a branch is moved or closed. In addition to providing notice of closure, the notice will also explain how the bank intends to continue to provide banking services and how alternative ways to bank will be provided. This includes providing micro-enterprise customers with information on any inter-bank agency agreements that exist.</p> <p data-bbox="121 629 772 750">If, following completion of the community engagement and impact assessment, the bank decides to modify the alternative provision, those modifications will also be communicated to branch users.</p> <p data-bbox="121 788 767 880">In particular, banks will consider the most appropriate communication channel(s) to use when notifying vulnerable branch users.</p> <p data-bbox="121 918 732 974">In all cases, a prominent notice will be displayed in the relevant branch.</p> <p data-bbox="121 1012 748 1133">In addition to direct communication with customers and information in the branch to be closed banks will use other channels to notify branch users, which might include:</p> <ul data-bbox="121 1137 722 1258" style="list-style-type: none"> • Notice in the local media • Notice on the bank’s website; or • Other electronic banking channels used by the branch user. <p data-bbox="121 1296 727 1417">Banks will ensure that staff at contact points for customer enquiries (e.g. relevant branches and call centres) will be trained to enable them to answer customer enquiries.</p> <p data-bbox="121 1456 751 1547">Banks will also engage at an early stage with the Post Office to coordinate communications, operational planning and use of brand.</p>	<p data-bbox="828 309 1474 497">We write to all customers who hold their account at the branch and/or who are using the branch 12 weeks in advance of the closure advising them of the alternative ways to bank with us in the local area, and including a leaflet on the services the Post Office can provide.</p> <p data-bbox="828 535 1453 624">We also write to the local media and politicians to make them aware. We display posters in the branch throughout the 12 week period.</p> <p data-bbox="828 663 1457 880">For vulnerable customers we provide different forms of communication, such as braille or large print letters. Our Local Chief Executive Officers (LCEOs) and Business Relationship managers call active customers of the branch, with a particular focus on vulnerable customers and those who are more dependent on the branch.</p> <p data-bbox="828 918 1466 1070">Our LCEOs go through a comprehensive training session on supporting customers impacted by a branch closure. We also produce training material for them to conduct with their branch staff following the announcement.</p> <p data-bbox="828 1108 1474 1296">Our communications include details of the alternative ways to bank specific to that local community. Branch staff speak to relevant customers about the interbank agency agreement (a specific service where business customers who don’t have an account with us can use our services).</p> <p data-bbox="828 1335 1426 1424">We make sure that regardless of the channel customers contact us through, staff are trained to support and help customers.</p> <p data-bbox="828 1462 1445 1615">Our LCEOs engage with the local Post Office immediately following the announcement, and work through an action plan of activity with the local post master to ensure they have the capacity and capability for an increase in customers.</p> <p data-bbox="828 1653 1474 1841">When we have made changes to alternative ways to bank (for example, leaving an ATM behind or introducing a mobile branch following customer feedback), we communicate these to customers, the local media and politicians and through posters in the branch.</p>

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<p data-bbox="119 226 517 259">Necessary Exceptions Section</p> <p data-bbox="119 275 679 338">This Protocol relates to permanent closure, not temporary closures (e.g. due to branch refits).</p> <p data-bbox="119 371 743 495">This does not apply where branches merge and are close together or where a branch is relocated to a within walking distance, providing customers do not experience the following service reductions:</p> <ul data-bbox="119 501 751 719" style="list-style-type: none"> <li data-bbox="119 501 751 562">• all counter services in a branch are replaced with automated provision; <li data-bbox="119 568 751 656">• branch opening hours are reduced by 30% or more (measured by reference to the branch's opening hours over the previous year); or <li data-bbox="119 663 751 719">• access to a branch becomes restricted to a particular group or groups of customer(s). <p data-bbox="119 757 759 846">This protocol also applies to branch agencies and firms should ensure that they are contractually bound to comply with them.</p> <p data-bbox="119 884 751 1008">In exceptional circumstances, such as where there have been life-threatening raids, aspects of this protocol may be reduced or waived by the firm, although notification should still be given to customers.</p>	<p data-bbox="825 275 1469 398">We do not apply our approach to temporary closures, but where we have had branches in close proximity or in the event of life threatening raids, we have still, wherever possible, followed the same approach.</p>
<p data-bbox="119 1081 308 1115">Effective Date</p> <p data-bbox="119 1137 767 1261">This protocol will apply to all bank branch closures announced after 1 May 2015. However, any existing plans for branch closures will be reviewed in the spirit of this protocol.</p> <p data-bbox="119 1294 767 1395">By 1 May 2015, the BBA will ask the Financial Conduct Authority to consider confirming this protocol as Confirmed Approved Industry Guidance.</p>	<p data-bbox="825 1137 1469 1238">We have confirmed we are supportive of the protocol, and would like to apply the protocol with immediate effect, before the 1 May launch date.</p>

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<p data-bbox="121 232 507 264">Post Implementation Review</p> <p data-bbox="121 275 758 369">BBA will engage with BIS, HMT and FCA when appointing an independent reviewer to carry out a “one year on” review of the operation of the protocol.</p> <p data-bbox="121 405 758 719">The review will consider the way banks have applied the protocol in practice, and the extent to which pre-closure assessment, community engagement and local impact assessments have informed the identification of suitable alternative ways to bank. The review will also seek to identify instances of best practice in the way in which the protocol has been implemented and may, if appropriate, make recommendations for the amendment of the protocol to ensure it continues to meet its objectives.</p> <p data-bbox="121 754 742 880">The review will include engagement with key stakeholders such as consumer and small business groups, and the banking sector, and will be published.</p> <p data-bbox="121 916 767 1198">BBA may also undertake a review of this protocol as appropriate, in light of regulatory or legislative developments, such as following the results of the Competition Markets Authority retail banking market investigation, or if the Financial Conduct Authority confirms this protocol as Approved Industry Guidance. Such a review will also include engagement with key stakeholders such as consumer and small business groups, and the banking sector.</p>	<p data-bbox="828 275 1442 369">As part of our usual record keeping processes, we retain the documentation on decision making and engagement for future access.</p> <p data-bbox="828 405 1461 499">We have confirmed we would welcome an independent “one year on” review, and will be happy to co-operate with the appointed body at that time.</p>