



Australian Banking
Association

Every Customer Counts

Better banking for vulnerable customers

Australian Banking Association

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Consultation on Better Banking for Vulnerable Customers

1. Purpose

This consultation is intended to seek stakeholders' views to assist the Australian Banking Association (**ABA**) and its members to develop a new industry guideline on supporting vulnerable customers (**Guideline**). This Guideline is intended to complement the new Banking Code of Practice (**the Code**). All ABA members have committed to implementing the Code in full by 1 July 2019.

This Guideline is intended to outline ABA members' commitment to ensuring that all customers can access appropriate banking products, services and support and that banking products and services are suitable and fair. It should also assist customers to feel comfortable telling their bank if they are experiencing vulnerability and/or financial hardship and feel confident that they will be treated with sensitivity, respect and compassion.

The new Guideline will also address some of the recommendations of the Royal Commission.

2. Consultation Process

The ABA will be consulting directly both bilaterally and multilaterally in organised roundtables with a range of stakeholders including our members, consumer groups and community organisations, governments both state and federal and regulators.

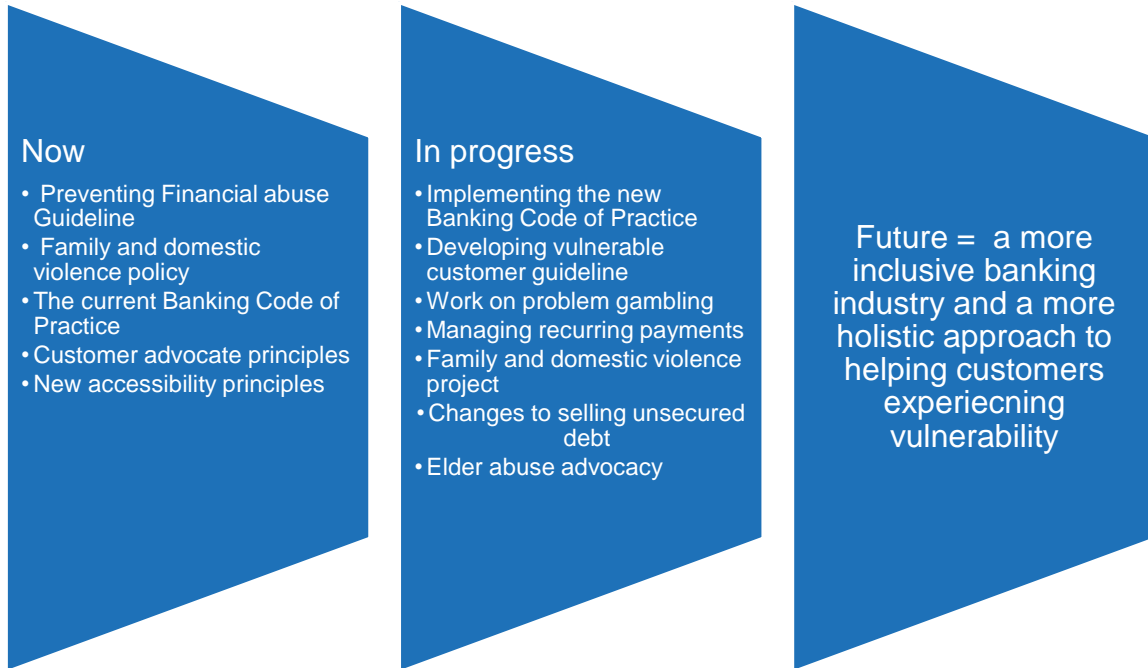
The ABA also welcomes written responses to this consultation paper which should be submitted to submissions@ausbanking.org.au. Written consultation responses are due by **10 May 2019**.

This consultation is designed to be broad in scope to generate discussion and give stakeholders a chance to raise any issues that might be relevant to the development of this Guideline. In addition to responses to the questions in this consultation we would also welcome case studies from both banking and other industries that demonstrate both good and poor practice.



3. Executive Summary

The ABA and the banking industry are in the process of making several significant changes which together will lead to a more inclusive banking industry and a more holistic approach to supporting vulnerable customers.



The ABA believes that the key issues that the paper should consider can be broadly categorised as follows:



Communications

Communicate with customers in simple and plain language and accessible formats.

Empower customers to make safer and informed banking choices.



Product and service design

Design products and services that are fair, suitable and inclusive.

Appropriate flexibility for customers in vulnerable circumstances.



Data and systems

Balance a customer's right to privacy, with the objective of supporting customers and ensure they don't have to repeat their story.

Ensure banks properly explain why/how the data will be collected and used.



Staff / competence

Equip staff with the knowledge, skills and competencies to support customers experiencing vulnerability.



4. Background and framework of guideline

4.1 Existing framework of industry guidelines and other self-regulatory instruments

The banking industry already has a significant body of self-regulation relating to customers experiencing vulnerability and financial hardship as well as policies promoting greater accessibility of banking services for all customers. The development of this Guideline is not intended to change or override any of the existing framework, but rather complement it. The existing body of self-regulation includes but is not limited to:

- The Banking Code of Practice (commencing 1 July 2019)¹
- ABA Accessibility Principles for Banking Services²
- Financial abuse and family and domestic violence policies (ABA industry guideline)³
- Remote Indigenous community – Fee free ATM initiative⁴
- Promoting understanding about banks' financial hardship programs (ABA industry guideline)⁵
- Basic, low and no fee bank accounts⁶
- Protecting vulnerable customers from potential financial abuse (ABA industry guideline)⁷
- Responding to requests for a power of attorney or court-appointed administrator (ABA industry guideline)⁸, and
- Guiding Principles – Customer Advocate⁹.

4.1.1 Statement of Guiding Principles

The Code is underpinned by a Statement of Guiding Principles (see Appendix 1). These principles, shared by all member banks, provide an ethical, customer-oriented and sustainable framework. They guide banks in decision-making and when performing their work and serving customers.

4.1.2 Proposal

The ABA proposes that the statement of Guiding Principles from the Code provide an overarching lens for the Guideline and underpin any other related guidelines and self-regulatory instruments governing the industry's dealings with vulnerable customers.

4.1.3 Questions

- 1) Do you agree with our proposal to use these Guiding Principles to underpin the Guideline?

¹ http://www.ausbanking.org.au/images/uploads/Banking_Code_of_Practice_2019_web.pdf

² https://www.ausbanking.org.au/images/uploads/Accessibility_Principles_for_Banking_web.pdf

³ http://www.ausbanking.org.au/images/uploads/ArticleDocuments/207/ABA_Industry_Guideline_-_Financial_Abuse_and_Family_and_Domestic_Violence%20Nov%202016.pdf

⁴ <http://banking.treasury.gov.au/content/atms.asp>

⁵ http://www.ausbanking.org.au/images/uploads/ArticleDocuments/206/Updated_financial_hardship_guideline_Nov_2016.pdf

⁶ <http://www.ausbanking.org.au/customers/affordable-banking/>

⁷

http://www.ausbanking.org.au/images/uploads/ArticleDocuments/207/Industry_Guideline_Protecting_vulnerable_customers_from_potential_financial_abuse2.pdf

⁸ http://www.ausbanking.org.au/images/uploads/ArticleDocuments/207/Industry_Guideline_Responding_to_requests_from_a_power_of_attorneys_or_court-appointed_administrator2.pdf

⁹ <https://www.ausbanking.org.au/images/uploads/ArticleDocuments/149/ABA-Customer%20Advocate%20Guiding%20Principles-FINAL.pdf>



5. Communications

5.1 Definition

5.1.1 Definition of vulnerability

Chapter 14, section 38 of the Code says:

We are committed to taking extra care with vulnerable customers including those who are experiencing:

- *age-related impairment;*
- *cognitive impairment;*
- *elder abuse;*
- *family or domestic violence;*
- *financial abuse;*
- *mental illness;*
- *serious illness; or*
- *any other personal, or financial, circumstance causing significant detriment.*

In addition, Royal Commission Recommendation 1.8 proposes the following amendments to Chapter 14:

“The ABA should amend the Banking Code to provide that:

- *banks will work with customers:*
 - *who live in remote areas; or*
 - *who are not adept in using English, to identify a suitable way for those customers to access and undertake their banking;*
- *if a customer is having difficulty proving his or her identity, and tells the bank that he or she identifies as an Aboriginal or Torres Strait Islander person, the bank will follow AUSTRAC’s guidance about the identification and verification of persons of Aboriginal or Torres Strait Islander heritage;*
- *without prior express agreement with the customer, banks will not allow informal overdrafts on basic accounts; and*
- *banks will not charge dishonour fees on basic accounts.”*

The ABA and its members support this proposal and are working with the Australian Securities and Investments Commission (**ASIC**) and the Australian Consumer and Competition Commission (**ACCC**) to have the amendments drafted and approved.

5.1.2 Language

The banking industry acknowledges there are different views about the use of the language ‘vulnerable customers’ and ‘experiencing vulnerability’. For example, the UK Financial Conduct Authority (**FCA**) defines a vulnerable customer as:

“...someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.”

The term ‘vulnerable customers’ has been used within the Code (above), and for purpose of consistency we propose retaining this term in the Guideline. In using this definition, the industry notes that:



- Anyone can be vulnerable and vulnerability can be temporary, permanent or situational.
- Banks should be careful not to assume that just because a customer is for example, elderly, they are vulnerable.
- It is not the role of the bank to solve a customer's underlying problem however banks acknowledge our actions can contribute to customer circumstances.
- Banks want to use the concept of vulnerability to ensure they are helping their customers.

The ABA notes that any definition of vulnerable customers should be sufficiently broad to ensure that it does not exclude any customer who should be included.

5.2 Questions

- 1) Are there additional issues relating to 'vulnerability' that should be considered in a definition of vulnerability? Note, we encourage stakeholders to provide examples and case studies that assist interpretation.
- 2) Are there other terms in this context which you think would benefit from an agreed definition, for example "extra care"? Note, we encourage stakeholders to provide examples and case studies that assist interpretation.

5.3 Communicating with customers

In general, banks have a range of different ways to communicate with customers, with specialised resources available to some groups of customers. Banks should, at a minimum, make available the following information to customers in a simple and accessible format and using plain English:

- Key terms and conditions
- Clear descriptions of service levels that customers can expect to receive
- Fees and charges
- Billing and payment information
- Contact information
- Information on how to protect themselves financially through informed choices and decisions
- Processes and contacts for Internal Dispute Resolution (IDR) and External Dispute Resolution (EDR), and
- Information on how to access the Customer Advocate.

Banks should consider whether they could use visual presentation techniques like tables, infographics or traffic lights, to make information easier to understand.

Banks should take reasonable care to ensure that customers have received and understood the necessary information, and to inform customers of changes to information that was provided in the past.

Banks should ensure their websites meet the Web Content Accessibility Guidelines (**WCAG**). Features which can improve accessibility include:

- For blind people, text rather than images, for translation by screen reading devices.
- For partially sighted people, large format text, images and appropriate colour contrast.
- Plain English and simple page layouts.
- For people with manual dexterity impairments, an option to navigate with a keyboard rather than a mouse.



Banks should endeavour to design and use forms that are clear to customers and, where relevant, contain a clear explanation of what the customer agrees to by signing the form.

5.3.1 Proposals

The ABA proposes that the Guideline should require banks to make available to customers, an easy to understand explanation of their commitment to vulnerable customers.

The ABA proposes that some examples of the things that could be included in this commitment document are:

- The bank's communication approach for customer's experiencing vulnerability.
- Support services available and how to get more help and information.
- Any basic, low or no fee banking products offered by the bank and the relevant criteria to access those products.
- The bank's approach to financial hardship assistance and where customers can go for help.
- An easy to understand explanation of what information the bank may record about any vulnerable situation a customer may be experiencing and what it does with that information.
- Customer complaint channels.

5.3.2 Questions

- 1) Do you support the proposal that the Guideline should commit banks to make available an easy to understand explanation of their commitment to vulnerable customers?
- 2) Do you have any additional suggestions about what else this document should include?
- 3) What practical measures or examples should be included in these protocols?

6. Product and service design

6.1 Making products suitable and fair

Banks are committed to ensuring all customers can access suitable and fair banking products. Banks want to make sure that their apps, contact centres, ATMs, online services, in branch services and any other banking related products are accessible and inclusive to all Australians.

One of the keys to addressing vulnerability and inclusion is to design inclusive products and services using robust customer feedback and monitoring of effectiveness.

The seven Principles of Universal Design¹⁰ are recognised by banks as the foundation of the ABA's Accessibility Principles for Banking and banks have committed to observing them in their strategy and approach to accessibility. These principles are:

- Equitable use
- Flexibility in use
- Simple and intuitive use
- Perceptive information
- Tolerance for error
- Low physical effort

¹⁰ <http://universaldesign.ie/What-is-Universal-Design/The-7-Principles/>



- Size and space for approach and use

Banks should design products and services, following an inclusive design process, which ensures that, wherever possible, their products and services are accessible to all customers.

The goal is for customers to be able to access banking products or services which are suitable to their needs. By making access to services easier for consumers generally, the need for further information and disclosure may be reduced. However, there can also be a need to consider bespoke remedies or additional protections for different groups of vulnerable consumers where appropriate. Banks could also consider designing specific products to meet the needs of vulnerable customers.

6.1.1 Proposals

The ABA is considering whether the Guideline should also include some practical steps for considering vulnerable customers in product design, which banks can put into operation. These practical steps should encompass the full life cycle of a product, including what happens when things go wrong.

6.1.2 Questions

- 1) Do you think practical measures for considering vulnerable customers in product design should be incorporated in the Guideline? If yes, do you have any suggestions about what these measures could be?

6.2 Proactive identification of vulnerable customers

Banks need to have in place effective and appropriate approaches to identifying, recognising and managing vulnerability to ensure delivery of good customer outcomes. The new Code has more commitments from banks about the proactive identification of customers experiencing financial difficulty or hardship. Chapter 40 notes that your bank may contact you if they think you are experiencing financial difficulty.

The steps to proactively identify customers have not in the past, and generally do not currently, extend to the proactive identification of customers who may be vulnerable. This is for several reasons:

- Although a customer may be experiencing circumstances or fit one of the criteria which could make them vulnerable, they are not necessarily vulnerable.
- Vulnerability can be permanent, but it can also be temporary.
- There are significant privacy challenges to recording information about circumstances which may be making a customer vulnerable, particularly when there is health or other sensitive personal information involved.
- Traditionally the industry has understood that customer and community expectations are such that banks will not use customer data in this way.

As part of this consultation process the industry would like to test what customer expectations are about proactive identification.

6.2.1 How banks may be able to help if they proactively identify customers

There are a range of possible actions a bank may be able to take if they identify that a customer may be vulnerable. While this kind of data analysis is still quite new some examples could include:

- Contacting a customer with information on how to access products and services specific to their needs. For example: basic banking products, ATM features for customers with a vision impairment, information on budgeting tools available for a customer whose financial circumstances have changed.
- Referring customers to specialist internal teams who can provide additional and more specialised assistance.



- Contacting a customer to ask if they may need a referral to an outside support service, for example a financial counsellor.
- Contacting a customer with information about scams and how to protect them self from scams or potential financial abuse.

6.2.2 Data security

If banks take the steps to proactively identify vulnerable customers, how that information is recorded and used will be critical. This issue is dealt with in the next section but where the bank has collected the information without the input or consent of the customer there may be additional considerations.

6.3 Questions

- 1) Where a customer is identified as potentially being vulnerable, what actions should banks take (i.e. what would constitute “extra care”)?
- 2) What ethical and privacy issues should banks consider where deploying data analysis techniques to proactively identify customers who may be vulnerable?

7. Data and systems

Customer circumstances are varied and unique. There is substantial existing regulation relating to the collection of personal information, especially information which relates to health and sensitive information. Bank staff may be wary of recording information about a customer’s personal circumstances believing that it would be a breach of the Privacy Act.

The ABA seeks input on the collection, use and management of information, about customer circumstances, but notes that customers should never be required to disclose, and data should not be collected, that is more than what the bank requires to deliver an inclusive and appropriate service. Customers are under no obligation to share this information and may choose not to do so.

Consideration will also need to be given to how a bank can identify when a customer is no longer vulnerable and how this approach can be made consistent across banks.

7.1 Purpose of data collection

The ABA believes that the aim of data collection about customers’ vulnerability, is to ensure the bank delivers the best possible service to the customer, taking into consideration their personal circumstances and to reduce the number of times a customer is required to tell their story. Customer consent is crucial and should always be voluntary, expressly informed and limited to what the bank is recording about them, and what that information will be used for.

The aims of this data collection need to be balanced with maintaining customer privacy, ensuring we do not label customers and minimising the number of bank staff who have access to potentially sensitive information about a customer.

Banks should ensure access to information about customer vulnerabilities is restricted to staff who need it and that this data is appropriately stored and protected.

The ABA will ensure appropriate legal reviews are undertaken prior to finalising the Guideline.

7.1.1 Proposals

Each bank should set out a policy which at a minimum includes the following:

- Information about relevant legislation and where staff can seek further information and advice.



- A commitment to deal with information about a customer's vulnerabilities in a sensitive manner.
- What type of information the bank wants their staff to collect about customers vulnerabilities and how staff should collect that information
- How staff should seek customer permission to record this information.
- What that information can be used for within the bank and how it can be used.
- Validation, access, update, retention, privacy and protection of any data collected for this purpose.
- Protocols for dealing with third parties representing customers with vulnerabilities.
- How data should be managed when the bank finds out that the customer is no longer vulnerable.

Banks should ask customers when they open an account a series of standard questions which include whether the customer identifies as Aboriginal or Torres Strait Islander and whether the customer receives a Commonwealth pension or concession.

7.1.2 Questions

- 1) Should banks, with the explicit permission of customers, record vulnerabilities that banks discover or customers disclose in their internal records e.g. through flags / notes in the internal bank system? If yes, how should banks use that information?
- 2) How should banks balance the desire to support customers fully and ensure they don't have to repeat their story, with the customer's right to privacy?
- 3) Should banks ask customers questions when they open an account whether the customer identifies as Aboriginal or Torres Strait Islander?
- 4) Are there any other questions banks should ask customers when they open an account to assess if they may be at risk of being vulnerable?
- 5) Are there any further measures or principles which should be included in the Guideline with respect to data collection?

8. Staff training

8.1 Current practice

Banks have tailored training to help their staff support potentially vulnerable customers and this training is rolled out to staff depending on their role within the bank. This is particularly important for customer facing roles, but other roles should also receive training with respect to potentially vulnerable customers, for example staff involved with product design and testing. Organisational training should also include appropriate 'escalation pathways' so staff can support customers to find appropriate solutions to their circumstances.

8.2 The Code¹¹

There are several relevant obligations relating to staff training in the new Code, in particular Chapter 4 – *Trained and competent staff* which commits bank to train staff to understand the Code and how to comply with it.

Chapter 13 – *Being inclusive and accessible* obligates banks to,

- train our staff to treat customers with sensitivity, respect and compassion; and

¹¹ Relevant Code sections from: Chapter 4, 13, 14 and 16 are set out in full in Appendix 1.



- provide cultural awareness training to staff who assist customers in remote communities;

Chapter 14 – *Taking extra care with customers who may be vulnerable*, obligate banks to:

- train our staff to act with sensitivity, respect and compassion if you appear to be in a vulnerable situation.

8.2.1 Proposals

The ABA believes that the provisions of the Code provide a clear mandate for banks to ensure staff are trained to work appropriately with vulnerable customers. The ABA proposes that the Guideline includes additional principles of staff training which commit banks to ensuring that staff:

- have sufficient knowledge of good practice for providing inclusive service
- are equipped with the knowledge, skills, competencies and information to sensitively and discretely help customers when there is 'disclosed' or 'suspected' financial abuse
- understand appropriate escalation points to provide effective resolutions to complex scenarios
- have the knowledge and skills to fulfil all requirements relating to vulnerable customers including those from their bank's policies, legislative obligations and the obligations in the new Guideline, and
- are provided appropriate 'debriefing process' to help manage the wellbeing of staff supporting customers through particularly vulnerable circumstances.

8.2.2 Questions

- 1) Do you agree with inclusion of the proposed provision in the Guideline?
- 2) Do you think any additional guidance or provisions for staff training should be included in the proposed Guideline?

9. Other

9.1 Formal arrangements

Banks encourage the use of formal arrangements, such as a Power of Attorney (**PoA**), by customers. While these arrangements provide the bank with clear instructions, and ensure banks are able to better service their customers' needs, these instruments can be misused. The ABA believes the implementation of the Australian Law Reform Commission Report Elder Abuse—A National Legal Response (ALRC Report 131) ¹²recommendations (5.3 and 14.7) would provide additional protections for vulnerable customers, specifically:

- Make Power of Attorney arrangements consistent nationally. Although the laws are broadly similar there are differences that cause unnecessary complexity and confusion for staff and in communications to customers
- A national online register that would enable banks and other financial institutions, organisations, companies and service providers to more easily establish the authenticity and currency of the instrument. The lack of a national register exposes people to the risk of financial abuse as banks are unable to check if the PoA is the most current legal document.
- Finally, banks and other professionals including financial counsellors should be able to make 'good faith' reports to a safe guarding entity with appropriate powers to investigate

¹² <https://www.alrc.gov.au/publications/elder-abuse-report>



suspected cases of financial abuse. The ABA thinks consideration should be given to adopting a model similar to the Queensland Public Guardian.

9.2 Bank third-party authorisation forms

Bank third-party authorisation forms give customers the ability to authorise a third party to operate their account. While banks have different practices, in general this means that the third party may be able to operate the account including: see the account balance and transaction details, make payments, withdraw funds and close the account.

Third party authorisation is widely used and, in some cases, provide a mechanism for customers who need assistance with their banking and provides them with greater financial freedom without the need to put in place a power of attorney. Often arrangements require two people to sign to transact on an account.

Third party authorisations do not however provide the customer with any protections, as there is no obligation on the third party to deal with the account / funds in a way that is for the benefit of the customer. In some cases third-party authorisation forms could be used to financially abuse a vulnerable customer.

9.2.1 Proposals

The ABA proposes including the following in the Guideline:

- Third-party authorisation forms should be simplified as much as possible, so they can be understood by customers, including those with cognitive impairments.
- Banks should consider options for customers to limit the authorisations that are provided by third party authorisation forms – for example, transaction limits or open an alternative bank account with automated transfers to manage specific needs.
- Banks must produce documents which provide a simple explanation of what a third-party authorisation form allows the third-party to do.
- Banks should consider if third party authorisations should be stopped if the bank is provided with medical confirmation that the customer has lost capacity.

9.2.2 Questions

- 1) Do stakeholders support the implementation of the recommendations of the Australian Law Reform Commission relating to power of attorney reforms, a national register and an organisation to investigate 'good faith' reports of financial abuse?
- 2) Do you agree with our proposed inclusions relating to third party authorisation forms in the Guideline?
- 3) Are there any changes or additional commitments relating to third party authorisation forms which you think should be included in the Guideline?

9.3 Unsecured debt and collections

Different banks have different practices with respect to the sale of unsecured debts. Some commitments have already been made by the industry with respect to sale of debt, in particular, the Financial abuse and family and domestic violence industry guideline which says:

Where a bank is made aware that a customer's debt involves family and domestic violence the debt will not be sold onto third party debt collection agencies.

Where a debt has been sold to a third party collection agency and the bank becomes aware that this debt involved family and domestic violence, banks will work with the collections agency to provide the best outcome for the customer. This may include repurchasing an existing debt



from a collection agency. This will be assessed on a case by case basis. Note, Section 32 of the Code of Banking Practice requires that collection agents or representatives comply with the ACCC and ASIC Debt Collection Guidelines. Banks should ensure that their contracts with agents and debt purchasers include a requirement to comply with this guideline.

The industry is considering whether these kinds of protections should be expanded across other categories of vulnerable customers.

9.3.1 Questions

- 1) Should collections arrangements be included in this Guideline?
- 2) If yes, what do you think are the appropriate parameters that should be applied to collections arrangements for vulnerable customers?
- 3) If yes, should these arrangements be applied to all categories of vulnerable customers?

9.4 Scams

Scams can occur when a third party deliberately sets out to falsely gain a person's trust in order to defraud them, steal their money or induce them to commit crimes including money laundering. Scams can take many forms and often target vulnerable people. Banks should help customers to protect themselves against potential scams.

9.4.1 Questions

- 1) Do you support including industry level guidance on preventing scams in the Guideline?



10. References

- <https://www.fca.org.uk/publication/occasional-papers/occasional-paper-8.pdf>
- <https://www.fca.org.uk/publication/research/vulnerability-exposed-research.pdf>
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- <https://www.ausbanking.org.au/images/uploads/ArticleDocuments/149/ABA-Customer%20Advocate%20Guiding%20Principles-FINAL.pdf>



Appendix 1 – Relevant Banking Code of Practice sections

Guiding Principles

Trust and confidence

- We are committed to earning and retaining the trust of our customers and the community.
- We are committed to making promises and keeping them to deliver good customer and community outcomes.
- We will comply with all laws relating to banking services.
- We will protect your privacy.
- We recognise our role in society and our impact on the wider community

Integrity

- We will act honestly and with integrity.
- We will be fair and responsible in our dealings with you.
- We will build and sustain a culture based on strong ethical foundations.

Service

- We will deliver high customer service and standards.
- We will ensure banking services are accessible, inclusive and provided to you in a fair and ethical manner.
- We will raise awareness of the basic (low, or no fee) banking products that we may offer.
- We will take a responsible approach to lending.
- We will work to help you if you are experiencing financial difficulty.

Transparency and accountability

- We will communicate with you in a clear and timely manner.
- We will be accountable in our dealings with you.
- We will be transparent in our communications with you.

Chapter 4

Trained and competent staff

Our staff and representatives will be trained and competent — including about the Code

9. We will make sure that our staff and our representatives are trained so that they:

- a. can competently do their work; and
- b. understand the Code and how to comply with it when they are providing banking services. How our staff will engage with you

10. We will engage with you in a fair, reasonable and ethical manner.

Chapter 13

Being inclusive and accessible

We believe in inclusive banking services

32. We are committed to providing banking services which are inclusive of all people including:

- a. older customers;



- b. people with a disability; and
- c. Indigenous Australians, including in remote locations.

33. We will train our staff to treat our diverse and vulnerable customers with sensitivity, respect and compassion.

We are committed to providing banking services which are accessible.

34. We are committed to improving the accessibility of our banking services for people with a disability and older customers. We will take reasonable measures to enhance their access to those services.

When providing banking services to remote customers

37. We will provide cultural awareness training to staff who regularly assist customers in remote Indigenous communities.

Chapter 14

Taking extra care with customers who may be vulnerable

We will take extra care with vulnerable customers

38. We are committed to taking extra care with vulnerable customers including those who are experiencing:

- a) age-related impairment;
- b) cognitive impairment;
- c) elder abuse;
- d) family or domestic violence;
- e) financial abuse;
- f) mental illness;
- g) serious illness; or
- h) any other personal, or financial, circumstance causing significant detriment.

We may become aware of your vulnerability only if you tell us about it.

39. We will train our staff to act with sensitivity, respect and compassion if you appear to be in a vulnerable situation.

Chapter 16

Basic accounts or low or no fee accounts

We will raise awareness of basic, low or no fee accounts and give you information about them

48. We will train our staff to help them to recognise a customer, or potential customer that may qualify for a basic, low, or no fee account.

Chapter 40

We may contact you if you are experiencing financial difficulty

We may contact you if we think you are experiencing difficulty

165. We will employ a range of practices that can identify common indicators of financial difficulty. If we identify that you may be experiencing difficulty paying what you owe under a loan (or are experiencing financial difficulty), then we may contact you to discuss your situation and the options available to help you. We will do this on a case-by-case basis.

166. If we are able to contact you and discuss your situation under paragraph 165 and we offer basic bank accounts, and you are eligible, we will offer this product to you.