
Statutory review of the Welsh language services of high street banks in Wales



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

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1 Foreword

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During the 1990s and the first decade of this century the banking sector in Wales was progressive in recognizing the value of providing services to individuals, businesses and organizations through the medium of Welsh. These services were welcomed by service-users in Wales and people became used to dealing with their money through the medium of Welsh.

However, in recent months and years the Welsh language services seem to have degraded. The banks have taken a step backwards rather than forward in terms of using the Welsh language; and they haven't included the language in any of the innovative developments which are rapidly replacing the traditional banking methods.

Service-users have certainly noticed this, and I have seen a significant increase in complaints from individuals and organizations who are disappointed with the lack of Welsh language provision by banks in Wales.

To learn what the barriers are and to find ways to resume the Welsh language services and to develop new services in Welsh, I decided to conduct a statutory review under Part 2 of the Welsh Language (Wales) Measure 2011.

This report examines the strengths and weaknesses of the Welsh language services offered by high street banks. More significantly, perhaps, it also identifies the opportunities for them to develop new services and be innovative in meeting the language choice of their customers.

I will use this report as a basis to work with the banks to ensure that they provide robust Welsh language services to customers in Wales.

A handwritten signature in black ink that reads "Meri Huws". The signature is written in a cursive style and is positioned above a horizontal line that extends to the right.

Meri Huws

Welsh Language Commissioner

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Context of the review

- 2.1 This statutory review was commissioned by the Welsh Language Commissioner following a significant rise in the number of complaints received regarding banking services during 2014.
- 2.2 The aim was:
- “to conduct a review of the strengths and weaknesses of the Welsh language services offered by high street banks operating in Wales and, based on the review, offer clear and practical recommendations in order to work towards solving any existing weaknesses.”
- 2.3 As well as the evidence and complaints received in 2014, the Commissioner announced that she would be inviting individuals, associations and other bodies to contact her and share their experiences of the banks’ Welsh language services.
- 2.4 Wyn Mears was appointed to conduct the review at the start of 2015.
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Methodology

- 3.1 102 responses were received to the Commissioner's invitation for further evidence.
 - 3.2 Twitter was the most popular method of responding mainly through the Welsh Language Society. A total of 14 letters or direct e-mails were received from Merched y Wawr branches. In interpreting the response for this report, individual comments - which could appear within the same response - were isolated, and therefore the conclusions are based on 134 comments
 - 3.3 Four face-to-face interviews were held with senior officers at the four main banks in Wales, and three other banks were invited to respond to a questionnaire regarding their Welsh language services.
 - 3.4 Useful advice was received by two members of academic staff from Bangor University during a face-to-face meeting and in subsequent e-mails.
 - 3.5 Whilst the banking sector in Wales has not been subject to a great deal of analysis, the basic changes to the way that services are provided are very relevant to the future of banks in Wales. Desk research was undertaken to try and understand the revolution in personal banking which has already taken place, and what is likely to happen over the coming years.
 - 3.6 A general observation was undertaken of the public image of high street banks in Cardiff, Swansea and Bangor, including the new 'Challenger Banks' which are rapidly creating competition for traditional banks.
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Banking in 2015

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1
The Way We
Bank Now
British Banking
Association
Report, 2014

2
The Way We
Bank Now
British Banking
Association
Report, 2014

- 4.1 Since the main banks adopted their first language policies under the Welsh Language Board, there has been a revolution in the banking sector in the UK.
- Even before the economic crisis which resulted from worldwide banking problems in 2007, there were changes to the way in which personal and commercial banking services were being operated, but we can now say that a revolution has taken place during this period.
- Technology**
- 4.2 There is no comparison between the way in which clients manage and move their money in 2015 and the usual practice at the turn of the century. Today, millions of customers are using mobile phone programmes or apps which allow more flexibility when dealing with money. It is estimated that apps offered by banks have been downloaded over 14m times in the UK¹. Banking apps are used over 2.6 million times a day in the UK, and nearly £1 billion is transferred via the internet every day. The trend of using mobile apps has progressed quicker than the use of online banking during the last decade, and the introduction of Paym, which enables customers to make payments from their mobile phones, is likely to accelerate these changes. Also, in the near future, “cheque imaging” will enable customers to make payments and pay bills without moving from their computers.
- 4.3 This means that there is no need to spend time visiting a branch or waiting in a phone queue. Banking is easier today and customers have more control over their resources.
- 4.4 Customers expect their banking services to be available via many different channels, and they expect to have different options for contacting their bank. In its report² the BBA exemplifies the process of applying for a mortgage, which could start with a message on Twitter, before moving on to a phone call, then to a branch visit, before the completion of the online application.
- 4.5 Banks respond to thousands of emails, Facebook and Twitter messages and, as a result, the number of phone calls to call centres is falling. Nationwide Bank alone responds to 190,000 e-mails a week, and NatWest/RBS responded to over 90,000 Twitter messages from their customers in 2013.
- 4.6 According to NatWest/RBS, the number of financial transactions in their branches has fallen 30% since 2011, and, over the same period, digital and online transactions have increased over 200%.
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Campaign for
Community
Banking,
September
2014

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Wales Online
28 August
2014

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www.
russellgeorge.
com/news/
local-am-
campaigns-
community-
banking-mid-
wales

6
Golwg 360 10
July 2014

7
Daily Telegraph,
28 October
2014

8
The Way We
Bank Now
British Banking
Association
Report, 2014

- 4.7 In 2014, 243 small rural branches closed across the UK and, according to the Community Banking Campaign³, 116 of these branches represented the last bank in their towns. Since 1989, the number of banks in rural areas has halved.
- 4.8 This trend is typical of rural Wales. NatWest Bank announced that its branches in Whitland, New Quay, Llanybydder and Llandysul would close at the end of 2014⁴, all in Welsh-speaking areas. Other branches were scheduled to close in Bala and Barmouth in March 2015. During the same month, the Barclays branch in Tregaron was scheduled to close. In Montgomeryshire, another rural area, RBS has closed branches in Llanidloes and Llanfair Caereinion. HSBC had already closed its Llanidloes branch in 2013. The NatWest bank in Montgomery closed in January 2015⁵. In July 2014, nearly 700 people signed a petition against HSBC's decision to close its branch in Penygroes⁶, Gwynedd, as part of its restructuring plan for North Wales which also poses a threat to branches in Beaumaris, Conwy and Llangollen.
- 4.9 Although Lloyds has not significantly reduced its number of branches so far, it predicts that the number of counter visits will halve over the next three years, leading to the closure of around 200 of its high street branches⁷, mainly in urban areas. According to the bank, its customers will benefit from an increase in digital banking services and it is committed to closing branches at a slower rate than its competitors.
- 4.10 Despite this, according to specialists in the field⁸, the remaining branches have a holistic role to play within banking services. Fewer branches will be available on the high street, or in communities, but staff will be expected to undertake advisory roles on matters such as loans, mortgages, investments, retirement options etc.
- As a result, the main banks have been investing in new facilities for confidential meetings and discussions with their customers, ensuring that convenient technology is available.
- Competition**
- 4.11 Since the financial crisis, significant mergers have been seen in the banking sector, with the four main banks continuing to claim the main share of the market. In 2013 these four banks were responsible for between 71-75% of current accounts in the UK, and between 75-89% of the small business market.

*Note:

1
The figures do not represent the percentage of accounts held by each company

2

The figures do not represent the whole of the banking market e.g. they do not include banking services provided by supermarkets and large shops e.g. Tesco, Sainsburys, M&S etc.

Table 1: Number of bank and building society branches in the UK and Wales*

Bank/Building Society	Number of Branches in the UK	Percentage %	Number of branches in Wales	Percentage %
Lloyds Banking Group (including Halifax)	2030	18.7	133	20.1
RBS/Natwest	1911	17.6	115	17.4
Barclays	1513	13.9	119	17.9
HSBC	1220	11.2	115	17.4
'Big four' total	6674	61.5	482	72.8
Santander	1006	9.3	45	6.8
Nationwide	708	6.5	29	4.4
TSB	638	5.9	15	2.3
The Co-operative Bank	317	2.9	16	2.4
Virgin Money	74	0.7	1	0.1
Principality	54	0.5	51	7.7
Other	1379	12.7	23	3.5
Total	10850	100	662	100

Sources Bangor University/SNL 2014/High Street Banks

4.12

It is likely that there will be significant changes in the market over the coming years as new competition challenges the traditional system. Supermarket and large shop groups have already established their own banks, e.g. Tesco, Sainsbury's, Marks & Spencer, and Challenger Banks such as Virgin Money, Metro Bank, Atom and TSB are expected to pose an additional threat to traditional banks. As expected, these new brands will favour the user, offering a better variety of products, more favourable fees and more flexible and convenient services. It is likely that these new organizations will find it easier to adapt in order to take advantage of the situations created by new technology and will be prepared to innovate in order to attract customers - especially the younger generation.

The Welsh Language

4.13 As these changes take place, there appear to be fewer opportunities for customers to use the Welsh language when dealing with their banks. It is therefore crucial that banks consider how they can offer digital services which will enable online or mobile banking through apps. The needs of Welsh speakers should be considered every time a new innovation is being planned, or they will be left with second rate and ineffective services.

There are clear messages from the Welsh Language Commissioner's previous research reports - 'The Value of the Welsh Language to the Food and Drink Sector in Wales' and 'The Benefits of Bilingual Marketing by Charities in Wales'.

Customers are favouring companies and charities that show respect towards Welsh culture and community, and show an understanding of how to operate in a country where the Welsh language has official status.

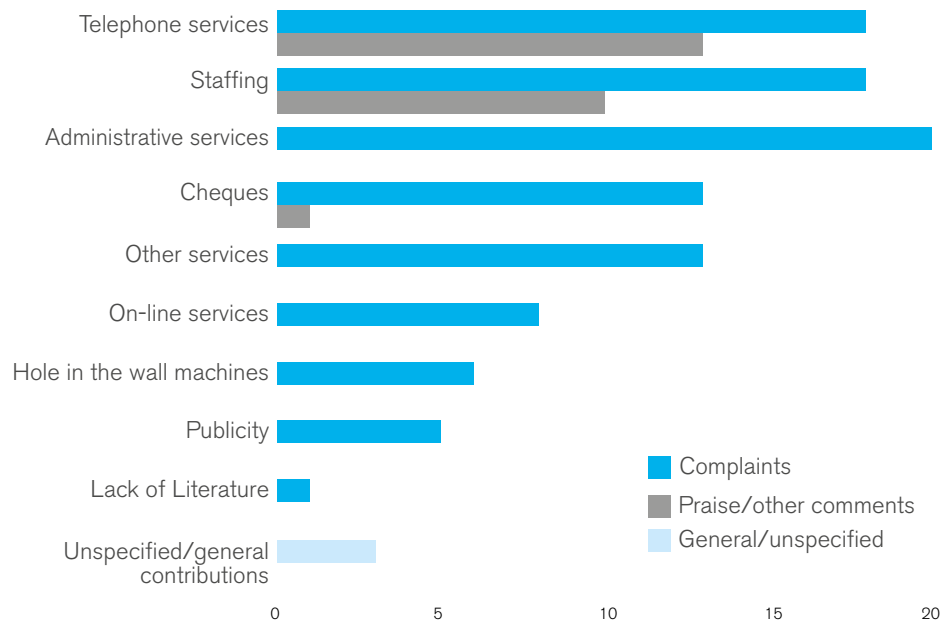
Good reputation appears to be an increasingly important issue, in attracting new customers, developing relationships with customers and improving their loyalty.

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Analysis of the response

- 5.1 As banks offer so many financial services to their customers, it is no surprise that comments were received on a wide range of issues. 79% of the comments were critical of the banks, 18% gave praise or were constructive and the rest were unspecified.
- 5.2. As seen in Chart 1, telephone services attracted the most comments, including complaints and words of praise, with general administrative services in second place in terms of numbers.
- 5.3 The most significant comments were those concerning administrative services and the lack of Welsh-speaking staff in branches. These were often connected in the same comment.

Chart 1: Response to the review

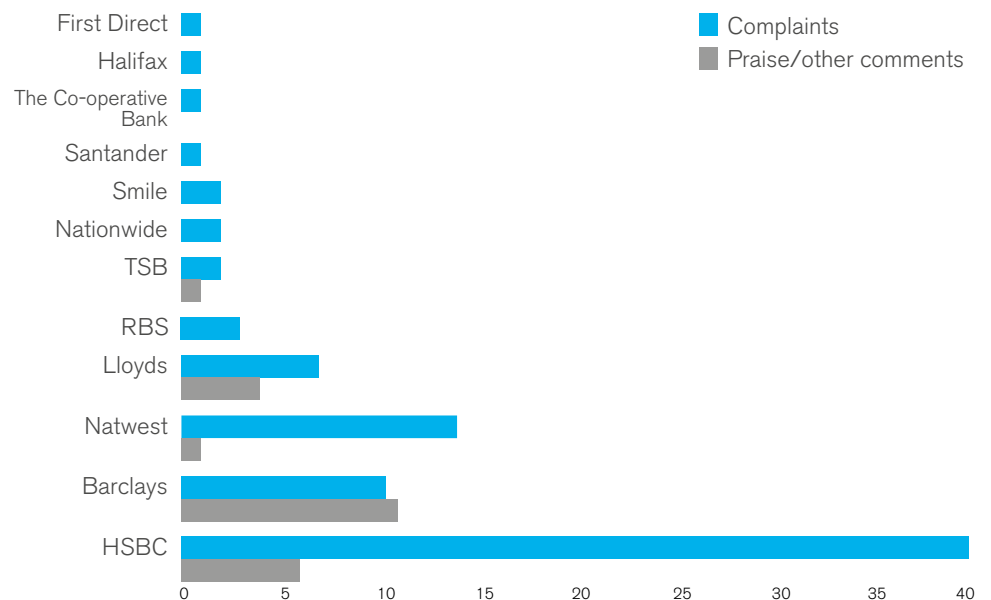


- 5.4 As expected, most of the comments (82%) concerned the main banks, reflecting the distribution of personal accounts across the traditional companies, which continue to be responsible for 77% of the UK market⁹. As shown in table 2, most complaints were regarding HSBC services, three times more than might be expected considering its percentage share of the market. Nearly 90% of all complaints were about the four main banks, with Barclays attracting the highest number of positive comments.

Table 2: Customer responses compared with the percentage of bank/building society and branches

Bank/Building Society	Percentage of branches in Wales %	Percentage of complaints received %	Percentage of praise/other comments %
Lloyds Banking Group (including Halifax)	20.1	9.5	18.1
RBS/Natwest	17.4	20.2	4.5
Barclays	17.9	11.9	45.4
HSBC	17.4	47.6	27.2
'Big four' total	72.8	89.2	95.2
Santander	6.8	1.2	
Nationwide	4.4	2.4	
TSB	2.3	2.4	4.5
The Co-operative Bank	2.4	1.2	
Virgin Money	0.1		
Principality	7.7		
Other	3.5	3.6	
Total	100	100	100

Chart 2: Response per bank: number of comments



Cheques

- 5.5 Eight complaints were received regarding Welsh language cheques. These comments were distributed across traditional and new banks. This could reflect the significant reduction in the number of cheques used in this day and age, as customers use credit and debit cards and transfer money online. This could also suggest that the majority of customers are satisfied with the availability of Welsh language/bilingual cheques and that they are generally accepted. Three of the complaints received related to RBS, which has not declared a Welsh language policy. In 2016, RBS will be rebranding and resurrecting the 'Williams & Glyn' brand. This might provide it with an opportunity to give consideration to the Welsh language as part of the new launch.

Telephone services

- 5.6 A total of 28 comments were received about the main banks' Welsh language telephone services, with over a third praising the quality of service they experienced e.g.
- “Barclays were great over the telephone - a Welsh language helpline with genuinely nice ladies from Pembrokeshire”.
- “NatWest's telephone service is usually very good”
- 5.7 Fourteen out of the 18 complaints received referred to HSBC's Welsh language telephone service e.g.
- “...my daughter phoned HSBC's Welsh language contact number. When she asked the person who answered if they spoke Welsh, they replied that they couldn't speak in Welsh and that they didn't have enough staff to operate the telephone line through the medium of Welsh!!”
- “The telephone service treats the Welsh language as inferior”
- “I'm really sorry we currently don't have anyone that speaks Welsh that I could arrange a callback with”

Therefore, it appears that HSBC need to look at the way in which the quality of their Welsh language telephone services is maintained. Across the banks there is a suggestion that there is a lack of knowledge about the existence of Welsh language numbers and the services they offer.

Administrative services

- 5.8 Complaints were received regarding the lack of Welsh language administrative services in all main banks and, in particular,, their inability to acknowledge Welsh language mandates by clubs and societies. This evidence was mainly sourced from Merched y Wawr branches across the country:

“I have been on the phone with Barclays’ Mandate Change Team this morning. They do not offer a bilingual Mandate Change form, let alone a Welsh language only form!”

“They refused to open an account because the constitution was in Welsh (HSBC)”

“Clybiau Gwawr: HSBC_UK Not possible to open an account in Welsh”

“Problem transferring account to new officers. Only English forms were available (NatWest)”

- 5.9 One of the main banks suggested that the problem is caused by a legal obstacle, and that its central corporate department cannot deal with any language except for English. But the same problem was also typical of the smaller banks:

“Asked for a payslip when making a mortgage application - but refused to accept it because it was written in Welsh (Santander)”

“Don’t accept a Welsh language constitution as evidence (The Co-Operative Bank)”

From the evidence received, it appears that no Welsh language services are available outside of the four main banks -

“Nothing is bilingual (Nationwide)”

“Consistently disgraceful. They make no effort whatsoever with the Welsh language (Smile)”

“In reality, there is no Welsh-medium provision (Santander)”

- 5.10 Further research needs to be undertaken with the banks to try and get to the root of this problem which is common across the sector.
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Lack of online services

5.11 Welsh medium online services are not offered by any banks, although, only five respondents referred to this weakness:

“Need to make it possible for people to bank online in Welsh. Banks on the European continent consistently provide multilingual online services.”

“I believe that Welsh-medium services need to be made available for the following:

1 - Online banking

2 - iPhone and Android apps

There is a real need for Welsh-medium online banking. There is no excuse not to do this when the technology is available.”

Staffing

5.12 Evidence was received from across Wales about the lack of Welsh-speaking staff at branches of all four of the main banks:

“Lloyds - We are concerned about the service we receive at our local branch in Lampeter. The clerk who dealt with our enquiry just before Christmas could not speak Welsh and did not offer to call a Welsh-speaking member of staff over to us.”

“There are no Welsh-speakers in the Barclays banks in Denbigh or Abergele”

“A number of our members mentioned the reduction in the number of Welsh-speaking counter staff at HSBC bank in Carmarthen.”

“There has been an increase in the number of non Welsh-speaking staff at the NatWest branch in Aberystwyth.”

- 5.13 On the other hand, Barclays was thanked for its services, especially in south Wales:
- “The Welsh language service provided by Barclays bank is generally good. There are Welsh-speakers at its branches in Pontardawe, Clydach and, more recently, at its new branch in Swansea.”

And a number of Lloyds customers noted their appreciation of Welsh-speaking staff in branches in the North and South:

“As part of this review, I would, as a private individual, like to add my voice to commend the staff at the Lloyds bank branches in Bangor, Caernarfon and Llangefni, who are always willing to speak Welsh and provide Welsh-medium face-to-face services.”

“Pontarddulais - the Lloyds bank in the town provides us with a very good Welsh language service.”

Cash/hole in the wall machines

- 5.14 Five respondents highlighted failings with regard to cash machines:
- “Some cash machines (HSBC) cannot provide a Welsh language service for customers of other banks”
- “No Welsh language service for paying in (NatWest)”
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Language Policies

- 6.1 A comparison of the language policies of the main four banks shows a similarity between them, which is likely to reflect the guidance provided by the Welsh Language Board during the last decade. Many bank officers commended the advice they received, the willingness to respond to questions and the guidance on current issues.
- 6.2 Despite this, a number of differences can be seen between individual banks and, from face-to-face discussions with senior officers, there is a sense that the emphasis placed on Welsh language policies has changed in recent years, with two banks changing for the better and two banks changing for the worse. To some extent, this is also reflected in the public response received, with a high percentage of complaints and criticism directed at HSBC, the bank which, it would appear, has not been able to maintain its services for Welsh-speaking customers.
- 6.3 Two banks namely Lloyds and NatWest, updated their policies, during 2014, and according to Barclays, its policy is monitored annually. HSBC could not provide an explanation as to how their policy would be monitored.
- 6.4 Although it is encouraging to learn that there is a sustained effort to review and update policies, it does not appear, from reading the documents at least, that the banks have been able to include digital banking developments in their policies. As a result, there is no Welsh language service available to most customers who, by now, are banking online or through a mobile phone app. In essence, the banks have not succeeded in expanding their Welsh language banking services significantly since they launched their schemes at least a decade ago.
- 6.5 Lloyds and Barclays have succeeded in making their policies accessible in Welsh and English on one of the pages of their corporate websites. The link to the relevant HSBC page isn't working, although there is a list of some of their services appearing on www.hsbc.co.uk/cymru, the site advertised as the first bilingual bank website in 2007¹⁰. A similar experience was identified searching for NatWest Cymru's policy online, despite its Ymroddiad i Gymru homepage suggesting that there was a link to further information on the bank's Welsh language services.
- 6.6 In general, it appears that all of the banks are keen to continue to offer a range of Welsh language customer services, and indeed, one could say that NatWest and Barclays are enthusiastic about the language. However, in every case, we must acknowledge the influence of the banks' main corporate offices, and the need for all Welsh directors to argue in favour of investing in the language. According to two of the directors, one must face the "commercial reality", which is quoted in two of the policies, which can stand in the way of their ability to introduce new developments.
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Profiles of the four main banks

Barclays

- 7.1 Barclays Bank's language policy was created in 2006, in association with the Welsh Language Board. The policy has not been reviewed in full for five years, despite an occasional expansion of the bank's Welsh language services.
- 7.2 Barclays has 127 branches in Wales and five were closed over the last year. Customers affected by the closures are referred to Post Offices services, call centres, as well as digital banking.
- 7.3 The enthusiasm of Barclays staff in Wales for their language policy was noted and is reflected in their intention to promote the language and offer a service to their customers.
- 7.4 Barclays' language policy can be found easily using a search engine and customers are clearly informed of the bank's Welsh language, free and direct telephone number. According to officers, around 250 Welsh language phone calls are received every week at the centre in Haverfordwest, which is open from 9am to 5pm from Monday to Friday. Feedback noted that staff offer a service that goes beyond expectations, promising to research queries with other departments at the bank and then returning the customer's phone call.
- 7.5 The bank will start to introduce bilingual digital counters at its branches in Roath (Cardiff), St David's Centre, Cardiff and Swansea during Summer 2015, with Neath and Carmarthen to follow.
- 7.6 It is acknowledged that one of the main weaknesses of the Welsh language service is the absence of mandate documents in the bank's branches, but there will be an effort to overcome this deficiency in the near future. Customers are offered Welsh language PDF copies of all printed items on request, but there is not a wide range of items available in branches.
- 7.7 The bank in Wales can offer a full Welsh language service to customers who wish to secure a mortgage, with seven members of Barclays Home Solution (Mortgages), whose office is based in Cardiff, willing to deal with Welsh-medium applications.

NatWest

- 7.8 NatWest's language policy in Wales was reviewed following the appointment of its new director. According to the bank, the current scheme reflects the business' intention to build its business locally and meet the needs of its customers across the country.
 - 7.9 According to the bank, a copy of the scheme is available at every branch, but it is not easy to find an online copy. Any access to the Welsh language NatWest website is denied beyond the homepage, and, as a result, a full statement on its commitment to the language cannot be found.
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- 7.10 The bank's main image is its corporate name, which has now been rebranded as "NatWest Cymru", and as it carries out work to refurbish its branches across the country, this is the brand that can be seen on every building. Plans are underway to revamp twenty branches in the near future and in doing so, bilingualism will be prioritised in the presentation of its services. There are currently a hundred NatWest branches in Wales.
- 7.11 Like all other banks, NatWest has been forced to close branches in all areas of Wales, especially in rural areas. NatWest's policy is to maintain service provision in areas affected by bank closures, either through Post Offices, hole in the wall machines, and in particular, through mobile banking units which will visit communities on specific days of the week.
- 7.12 Seven of these mobile banking units are located in north Wales. There are another four in Swansea, and two others will be located in north west and north east Wales in due course. The main purpose of these mobile units is to provide face-to-face services and, whenever possible in north Wales, these services are provided by Welsh-speakers.
- 7.13 A Welsh-language telephone service is offered from Parc Menai near Bangor, where 25 members of staff are employed to deal with phone calls in Welsh and English.
- 7.14 A complete supply of Welsh literature relating to products is not available to customers in all branches, but Welsh versions can be downloaded from the bank's website. Unfortunately, there is no evidence that this is possible as the public cannot go beyond the homepage of the website.
- 7.15 The management team in Wales should be commended for acknowledging their duty to introduce Welsh language services to their customers, and efforts are made to persuade the NatWest/RBS headquarters to invest further in the language. The bank sees the commercial and competitive advantages of doing this.

Lloyds

- 7.16 Lloyds' language policy needs to be interpreted in a corporate context, rather than in the context of practical devolution for Wales. As a result, the chair of its executive committee in Wales is also responsible for a range of commercial departments across the business within Lloyds Banking Group and in one of its main centres in Cardiff. The business employs around 5,000 workers in Wales, including branch staff, with the majority working on loans and support for small businesses.
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- 7.17 There are a total of 133 branches in Wales (including Halifax/HBOS) and any closures have been postponed during the last three years. However, with a decline in their use, Lloyds will have to look for more digital solutions to meet their customers' needs. It is inevitable that the future solution will be a multi channel strategy with fewer local branches.
- 7.18 The management structure of the high street banking business includes regional directors and local managers who can recommend their business' language needs according to customer demands in each area. A greater emphasis on Welsh language services is therefore seen in areas where the language is stronger, with decisions on issues such as signage, publicity and availability reflecting the Welshness of each area. According to the Chair, confirmation on any language developments must be sought from the bank's senior officers.
- 7.19 Lloyds' language policy can be seen clearly on the bank's corporate website, and it appears to have been relaunched in April 2014. According to the Chair, the policy was re-presented following the division of Lloyds and TSB.
- 7.20 Compared with the other banks, the policy is brief and includes fewer Welsh language services. There is no commitment to a bilingual corporate image, with the policy focusing solely on how Welsh-medium services can be offered to customers. There is no reference either to the way in which staff and their training needs are supported, nor internal communication networks which could inform staff of any new language changes. It is the managers' responsibility to ensure awareness of the policy across the network.
- 7.21 Welsh language phone calls are answered via the bank's general Telephone Banking service. Callers can then be transferred to a "dedicated Welsh language line" or are given the number in order to call it themselves. It is understood that Lloyds does not have a dedicated Welsh language centre, but that it can respond to phone calls through a matrix across its branches. As a result, any Welsh-speaking member of staff can pick up the phone and deal with a call.

HSBC

- 7.22 A meeting was held with the Deputy Director of HSBC in Wales but she was unable to discuss any aspect of the bank's language policy. As a result, she was sent a questionnaire including a number of questions which we also asked the other banks. No response had been received by the date that this report was completed (9 March 2015).
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Responses from other banks

- 8.1 Three of the smaller banks, The Co-operative Bank, TSB and Santander, were asked complete a questionnaire to explain their language policies and whether or not they have any plans relating to the Welsh language.

TSB

- 8.2 TSB gave a very constructive response to the questionnaire on the language policy of the new bank, which was created as a result of restructuring within Lloyds Bank, and the need by Lloyds to dispose of a number of its branches. The Regional Director, who works from Swansea, welcomed the opportunity to explain how they have taken up the challenge of introducing Welsh language services, and displaying the language at the bank's branches.
- 8.3 Over half of TSB staff in Wales have received Welsh language awareness training, acknowledging its significance in trying to improve their service. Phone calls are answered locally within branches, using a bilingual greeting, and the ability to hold a further conversation was strengthened after TSB recruited four fluent Welsh speakers out of the six appointments made so far in 2015.
- 8.4 TSB's Swansea based Call Centre is developing plans for a bilingual service for phone calls and social media, and it is already offering a Welsh-medium mortgage service.
- 8.5 In Wales, TSB's aim is to develop its plans further and it is keen to receive advice and support from the Welsh Language Commissioner.

Santander

- 8.6 Santander was also keen to contribute to the review, and wanted to show its willingness to develop a Welsh image through the presentation of its banking services.
- 8.7 Santander joined the UK's banking market in 2004 after procuring Abbey. The procurement of Alliance & Leicester and Bradford & Bingley followed in 2009. As a result, it obtained a significant share of the market's accounts and mortgages, putting it in a position where it can compete with the "big four". It is committed to offering local banking, with a definite focus on a service that is based on a close relationship with the customer.
- 8.8 Today, Santander has 45 retail branches in Wales and two corporate business centres in Cardiff and Swansea, employing over 500 people across the country. According to its statistics, it is responsible for 9.7% of personal current accounts in Wales, and has seen a growth of 597% in its loans to small businesses in Wales over four years. In addition, Santander has a strong relationship with a number of Welsh universities through the 'Santander Universities' programme, which is financing 50 students this year.
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- 8.9 Although Santander does not yet have a formal Welsh language policy, it has shown its commitment to developing services and, according to the bank, a number of arrangements are in place to allow the use of Welsh in its business:
- Permanent internal signs in Welsh and English in its branches across Wales
 - Customers can write clear cheques in Welsh
 - A language option is offered on hole in the wall machines
 - There are bilingual teams in a number of branches
 - The ability to speak Welsh is considered as part of a skill set when assessing applicants for posts in Wales
 - There are a number of Welsh-speakers at the Swansea business centre, which allows the bank to provide services to customers in west Wales
- 8.10 According to the bank's statement, it regularly reviews its operations to ensure that it is meeting the needs of its customers. It has also been communicating constructively with Welsh "authorities" to increase further its support to businesses and individuals in Wales.

The Co-operative Bank

- 8.11 A questionnaire was sent to a representative from The Co-operative Bank which included a number of questions we had also asked the other smaller banks. The questionnaire wasn't completed, however a statement was received that the bank offers the following:
- Cheque books are available in Welsh.
 - We also provide signage in Welsh in our branches in Wales.
 - We try to have Welsh speaking staff in our branches in Wales.
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9

Conclusions and recommendations

- 9.1 There is no evidence from the review to suggest that the main banks have conducted a comprehensive review of their language policies since their creation during the last decade. It appears that Barclays and NatWest have occasionally paid attention to their policies on a practical level and that they continue to pay attention to their obligations. However, the same assurances were not given by Lloyds or HSBC.
- 9.2 Each one of the banks, along with the challenger banks, must assess how their language policies reflect the reality of the services available today, but, more importantly, how they will be able to respond to the needs of Welsh-speaking customers in the future. They should focus mainly on the provision of digital/online Welsh language services, which will develop further during the second half of this decade, but which are already an essential part of worldwide banks' customer offering. Banks can receive guidance from the Welsh Language Commissioner by using the Information Technology Guidance available.
- Recommendation 1: The language policies of the main banks should be reviewed in order to reflect the reality of the services available and the ways in which they can benefit from digital technology which will develop further during the second half of the decade.**
- Recommendation 2: As the number of banking service providers increases, in branches and online, they are encouraged to prepare language policies which will help them to compete effectively for a share of the Welsh-language market.**
- 9.3 There will be competitive benefits for any bank which is able to offer online Welsh language services, especially if they are able to develop Welsh language apps to enable mobile banking. Innovation in this area will appeal particularly to young people, who are opening their first accounts, as well as Welsh-speakers who are currently being forced to operate in English only.
- Recommendation 3: Banks are invited to set a timetable for establishing Welsh language services online, including the development of Welsh language apps which could facilitate mobile banking and online banking.**
- The Welsh Language Commissioner's Welsh Language Progress Plan and promotion website are an ideal source of guidance and support to help banks create a practical action plan to enable them to increase their Welsh language service provision.
- 9.4 Alongside any review of their policies, banks need to consider how they communicate their policies to customers and prospective customers. Primarily, the banks' main websites should be reviewed and presented in Welsh and English. Despite the fact that a search engine can be used to find the language policies of some banks, not one of the main four offers a clear Welsh link to a comprehensive translation of its corporate website. As a result, users are expected to search through various pages to find just an explanation of a policy, where detailed descriptions of services should be available.
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Recommendation 4: Banks' websites should be reviewed, providing a language option to users who want to find information about the services available, as well as the content of their language policies.

- 9.5 Similarly, banks should not have to explain to customers which Welsh language services are available at a branch. A proactive offer must be made to inform customers immediately that they can use and access a Welsh language service. Until the banks extend their commitment, it is suggested that a clear and visible statement should be made in branches regarding the Welsh language services that are available - including which Welsh-speaking staff are available at any time. In making such a declaration, customers will feel more confident using the language when visiting branches.

Recommendation 5: In each branch, banks should make a statement regarding the Welsh language services that are available - including which Welsh-speaking staff are available at any time.

It is good practice to promote a Welsh language service alongside, or in the same way as other services. Using the Working Welsh badge is a simple and inexpensive way of promoting a Welsh language service and some banks, Barclays in particular, are already making use of the Working Welsh resources.

- 9.6 One of the main complaints raised during the review was the weaknesses in banks' administrative and legal services. In general, they find it difficult to respond effectively to applications from individuals, associations and companies for Welsh language documentation, and applicants are often forced to complete forms in English only, or wait for translations from the banks themselves. If both languages are equal in the eyes of the law, then banks should be able to accept applications in Welsh or English as required.

Recommendation 6: Banks are encouraged to develop and maintain systems which will enable customers to conduct all aspects of their business/contacts in Welsh, without treating the language as inferior because of internal administrative deficiencies.

- 9.7 As the number of those using rural branches falls, often in areas where there is a high percentage of Welsh-speakers, it is inevitable that more branches will have to close. Rather than leaving a vacuum, some banks are ensuring some kind of service for their customers, e.g. NatWest mobile units, Barclays Welsh language phone services and banking arrangements through the local post office. All banks should prepare for the closure of branches and publish their schemes in advance.

Recommendation 7: All banks should consider how to maintain their Welsh-language service in areas affected by branch closures, focusing on the wide range of customers who could lose direct contact with their providers.

9.8

Although the main banks have long since announced that they are fully committed to giving the Welsh and English languages equal treatment, there was evidence of a wide variation in the corporate and external images of all of the “big four”. It appears that a successful bilingual revamp programme has been implemented in a number of places in south Wales in particular. However, in other areas e.g. Bangor, investment is needed in terms of internal and external signs and many branches are not complying with language policies in terms of marketing material.

Recommendation 8: Banks are invited to aim at standardising the images of individual branches across the country in order to introduce brands which are clearly recognised as bilingual businesses.

The Welsh Language Commissioner has published Bilingual Design Guide, a resource which shows good practice and ways of ensuring that the Welsh language is treated no less favourably than the English language.

Annex 1

The image on the High Street

There is a lack of consistency in the way the banks' images are presented on the High Street, sometimes ignoring the guidance in their own language policies as presentations vary from place to place. As previously suggested, Lloyds has not adopted a Welsh language corporate image, and, as a result, "Lloyds Bank" is seen above every branch:



Bangor



Queen Street, Cardiff

NatWest has rebranded its branches as "NatWest Cymru" but it appears that its new signage programme hasn't reached north Wales yet:



Bangor



Queen Street, Cardiff

Despite Barclays' efforts to revamp its branches in south Wales by introducing the Welsh language clearly, the image is not as good in their Bangor branch, an area with a higher percentage of Welsh speakers:



Bangor



Bangor

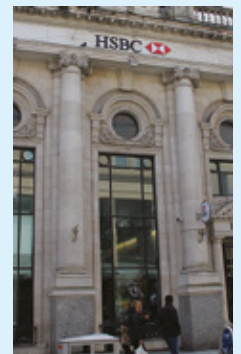
On the other hand, HSBC's Welsh language presentation is very consistent in Cardiff, Swansea and Bangor, both outside and inside their branches:



Bangor



Bangor



Queen Street, Cardiff

Halifax Building Society / HBOS are part of the Lloyds Group, but except for the new branch in the St David's Centre, Cardiff, there is no other evidence that they have made an effort to use the language practically in the other branches, seen in Cardiff and Bangor:



Bangor



Cash machine Cardiff

Santander in Bangor currently has an English only exterior image:



And the same with Nationwide in Cardiff and Bangor:



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