



# Abandoned Communities:

The Crisis of UK Bank Branch Closures  
and their Impact on Local Economies

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# Summary

The number of British bank and building society branches has been declining since the demutualisation wave of the late 1980s, but the pace of branch closures has accelerated rapidly in the last few years. In total, Britain has lost 53% of its bank branches since 1989, leaving 1,500 communities with no bank, and another 840 with only one bank remaining. More than 600 branch closures have occurred in the last year alone, and the Swiss bank UBS has predicted that the UK is set to lose another 50% of its total branch network in the next ten years.

Britain's major banks would have you believe that this is due to a precipitous collapse in demand for bank branches, and the rise of online and mobile channels for people to access their money. Digital services have undeniably changed the way we engage with our bank, but all the available evidence suggests that not only is there clear and consistent demand for branches declared by the British public, but also that this preference is also born out by people's actual behaviour too. This is a point that has been roundly ignored by the current research literature on this topic.

Instead, current research largely focuses on the financial pressures that banks are under regarding bank branches, and the strategies around which they should "rationalise" their branch networks – or, in other words, how, where, and why they should cut their branch numbers. Studying these industry-focused reports is instructive, because they suggest that **far from responding to demand pressures, the major UK banks are simply closing branches in poorer areas and opening or retaining them in more affluent areas** – often regardless of demand, or of the impact that a branch closure would have on that area or its population.

Far less researched is the actual impact that these closures are having on the abandoned communities and the people they leave behind. This paper seeks to begin to redress that imbalance, by bringing those on the front line back to the centre of the debate.

Move Your Money has been campaigning with local communities affected by branch closures for the last year, and we have seen first hand the negative impacts of bank branch closures for communities, which includes closed businesses, failing high streets, and cash shortages. In this paper we demonstrate that it is predominantly the elderly and those on lower incomes who are adversely affected by bank branch closures. We also show that the majority of bank branch closures are happening in areas with large demographics of the poor and/or the elderly. In other words, we find that **bank branch closures are consistently occurring in those areas that are most dependent on bank branches, and most likely to be adversely affected by their closure.**

By mapping bank branch closures against the British Bankers Association postcode lending data, we show that bank branch closures dampen **SME lending growth by 63% on average** in postcodes that lose a bank branch. This figure grows to **104% for postcodes that lose their last-bank-in-town**. On average, postcodes that lose their last-bank-in-town receive almost **£1.6million less lending over the course of a year** - a significant and damaging drop in funding for areas that are already under commercial and economic pressure.

We have found consistent and widespread accusations that Britain's major banks are manipulating branch usage figures to justify pre-determined closure decisions. Banks do not take into account

the public interest or the likely damage a closure will have on the local level when making these decisions. As a result, **we find the Access to Banking Protocol wholly inadequate** in protecting local branches from closure, in protecting the public interest, and in ensuring adequate banking provision on the local level.

As a result, we find that **the dominant paradigm of competition in banking and financial services has abjectly failed** to provide the key functions of bank branch provision and facilitating access to the financial system for the public.

We conclude that **bank branch provision and access to the financial system for underserved communities is a public good**, and that the **Government should take an active role in the public provision of such banking and financial functions**. We then make a series of policy recommendations that will help to explore and facilitate this solution.



## Recommendations

### 1. To strengthen the Access to Banking Protocol by:

**Forcing banks into data transparency on branch closure locations and dates**

Allowing for greater scrutiny of branch closures, assessment of their local economic impact, and to formulate appropriate policy responses to the evolving bank branch landscape.

**Implementing a rigorous public interest assessment before closing a branch**

Closure decisions must be genuinely influenced by the needs and likely impact of a closure on local communities, to avoid further abandoned communities.

**Meaningfully consulting local communities in advance of closure decisions**

So that those who would be most affected by a bank branch closures have the ability to influence the bank's closure decision.

### 2. To recognise and investigate the case for banking in the public interest

**Undertake a full independent and public review into the case for state provision of banking in the public interest**

To explore where, how and why private competition is failing in the adequate provision of banking and financial services, and to investigate the feasibility of direct Government intervention to plug those gaps.



# 1. Introduction

When it comes to bank branches in the UK retail banking market, the one certainty is that they are closing at an unprecedented rate. Over 1,100 branches closed over the course of 2014 and 2015,<sup>[1]</sup> whilst the largest study into branch closures to date found that the UK also lost 40% of its total branch network between 1989-2012.<sup>[2]</sup>

In recent years, the Royal Bank of Scotland - still 73% owned by the taxpayer - has been the worst offender, having been responsible for more than one in every three branch closures over the last two years, and more than one in every two “last bank in town” closures over the same period.<sup>[3]</sup> Prior to this, Barclays and HSBC were the “pace-setters” in shrinking their branch networks.<sup>[4]</sup>

The landscape of British high-street banking is irrevocably changing, with commentators and banks alike spending much energy justifying this phenomenon, making bold predictions about the future role and size of branch networks across the country, and celebrating the rise of digital services that are cutting costs and allegedly replacing branches.

Far less discussed, however, is the impact that these branch closures are having on individuals, communities, and local economies, or what this can tell us about the nature of the UK banking system and its ability to serve the needs of society and the UK economy.

This paper seeks to begin to redress this imbalance.

Firstly, we argue that despite some decline in bank branch usage, both the declared desire and actual behaviour of bank customers suggests that bank branch access is not only desirable for the vast majority, but also continues to be essential for a significant minority. This point has been consistently and coherently shown in the findings of the research literature, yet has largely been ignored by both researchers and policy makers.

Secondly, we examine the justification and reasoning given for the mass closure of branches, and find that the arguments for closure do not stack up to scrutiny. Claims that suggest that closures are driven by low demand or high operating costs are wholly unconvincing. On the contrary, branches are valuable sources of revenue for banks that operate them.

Instead, we find that branch closure decisions are more likely to be driven by banks’ desire to maximise profits. This is particularly the case in the current context of high cost-to-income ratios, which are caused by extreme executive pay and record levels of fines and compensation for criminal activity rather than by bank branch provision.

Thirdly, we examine the impact that bank branch closures are having on communities, and find that closures are having the worst impact on the very types of communities that are most at risk of current and further closures.

Finally, we argue that the current policy paradigm of “competition” in the banking sector has proven wholly inadequate to deal with the problems of bank branch closures, or the damage that they cause to the abandoned communities that are left behind. We find that banks regularly manipulate branch usage figures to fit predetermined decisions on branch closures, and do not take into consideration

the opinions of communities, the impact a closure will have on its local economy, nor the public interest case for continued branch provision.

Consequently, Government and policy makers should actively intervene in the banking sector to ensure that provision of essential banking infrastructure, including bank branches, is being advanced and afforded to all. Where the market is failing to do so, Government should provide this provision directly, particularly through banks that are already majority owned by the public.

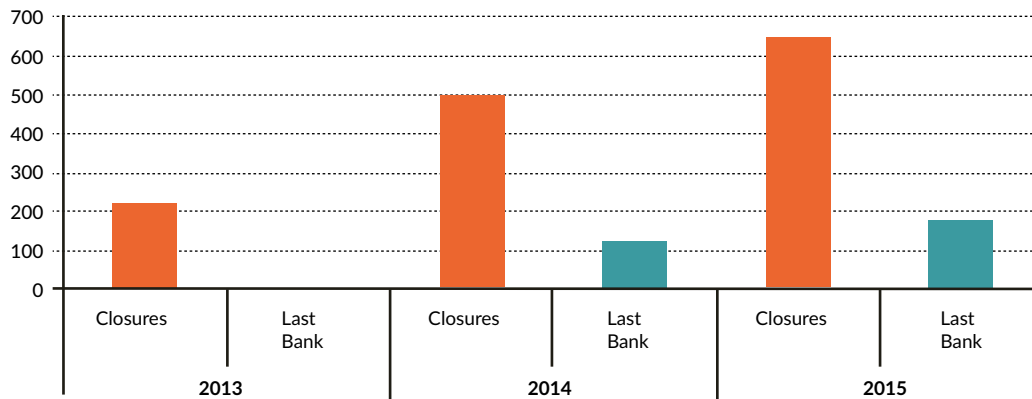
Throughout this paper we maintain the position that where banks are owned by the public (either wholly, majority or partially), those banks have an explicit moral and financial duty to serve the public interest, which includes ensuring continued banking provision for vulnerable and underserved communities.



## 2. Branch closures and the rate of change

In 1989, Britain was on the verge of the wave of demutualisation that was to change the UK retail banking sector forever. At that time, British citizens enjoyed access to 17,831 bank branches across the country.<sup>[5]</sup> By the end of 2015, this number had fallen by around 9,500 – a reduction of 53%.<sup>[6]</sup>

Figure 1: UK bank branch closures and 'last bank in town' closures, 2013-2015



Source: Campaign for Community Banking Services / Unite the Union

This reduction has continued well into 2016, leaving over 1,500 communities with no bank at all, and over 840 precariously placed with only one bank remaining.

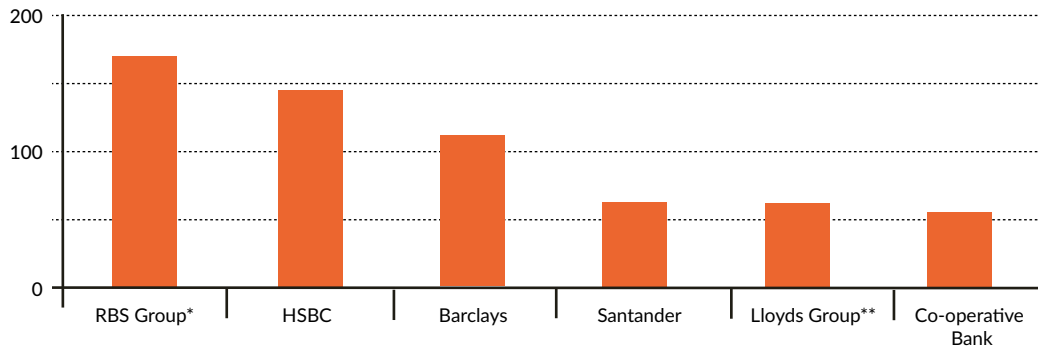
Most of these communities number in the several thousands of residents, but some are particularly sizeable. For example, in Leigh Park (Portsmouth), the closure of a NatWest branch left 27,000 people without a bank in their community. UK citizens now have fewer branches per capita than our European neighbours in Spain, Italy, France and Germany.<sup>[7]</sup>

Recent research from the BBC suggests that the rate of change to UK branch networks is unlikely to slow. Around 600 branches have closed across the country from April 2015 – April 2016, with major lenders particularly targeting rural areas for closures.<sup>[8]</sup>

In addition, taxpayer-owned RBS recently pledged at its 2016 AGM to reduce its operating costs by a further £800 million per year, on top of savings previously made by divesting “non-core” parts of its business. The bank claimed that this is so it can cut its cost-to-income ratio. But with executive pay remaining unjustifiably high, and with fines and compensation for criminal activity at their highest level in at least 5 years,<sup>[9]</sup> cost-to-income savings are only likely to take the form of job cuts and further branch closures over the coming year. For its part, the giant Swiss mega-bank UBS predicted in January 2016 that over the next ten years Britain is set to lose a further 50% of bank branches.<sup>[10]</sup>



Figure 2: Which banks have closed the most branches? April 2015 - April 2016



\*Includes NatWest, \*\* includes Halifax and Bank of Scotland

What is clear is that bank branches are closing at a phenomenal rate, and will continue to do so for the foreseeable future. As a result, it is important to understand the forces that are driving this seismic change in the UK retail banking market, and to mitigate and reverse any adverse effects this is having on people and their communities.

### 3. Branch usage – Perception

This dramatic reduction in branch networks is often assumed to be a mere consequence of a wholesale collapse in demand for physical high street banking, which is consistently and repeatedly argued to be the case by the big banking groups.

To a certain extent this is true. Since 1989 the advent and meteoric rise first of online banking and later mobile banking has fundamentally disrupted the way in which we engage and interact with our financial service providers.

It is also indisputable that branch usage is not as high as it once was (although it is still higher than the biggest banks make out, as discussed in chapter 7). RBS' often-repeated quip that because of mobile banking their "most popular branch is the 7:01 from Reading to Paddington" may be ridiculous, not to mention risible for those communities abandoned by RBS, but it is hard to argue with their claim that online banking usage has trebled since 2010.

All that said, all available evidence suggests that the drop in demand for branches has not been nearly as pronounced as the actual decline in the number of branches. Instead, the vast majority of evidence shows a continuing desire for branches and branch networks, which we summarise in this chapter.

The most widely available data on this is people's' declared perception of branches, which comes out uniformly in favour of their retention. Surveys tend to find that people agree that branch locations and branch networks are important to them, both in terms of their existing bank and when choosing where to switch to.

For example, in June 2014 research by YouGov for the British Bankers Association found that 58% of people said that a branch is important, with 57% "citing its necessity for discussing issues face-to-face." Those figures rose to 68% and 66% respectively for SME customers.<sup>[11]</sup>

Similarly, research from April 2015 by GfK NOP for the Competition and Markets Authority found that 63% of current account customers felt that having a convenient local branch was either "essential" or "very important". That number rose significantly for those who do not use internet banking (74%), and for those with no access to the internet (76%). Having a national network of branches was also deemed either "essential" or "very important" by 58% of respondents.<sup>[12]</sup> These findings mirror earlier research from ComRes, conducted for TSB Bank in June 2014, which found that 69% of people "believe that it is important to have a bank branch close to where they live."<sup>[13]</sup>

The picture is similar for when people consider whether to switch their bank. In the 12 months to December 2013, GfK research found that convenient branch location was the most popular reason for why people had changed banks. With 34% of respondents giving branch location as their key reason for switching, it was cited more than twice as often as the next nearest reason.<sup>[14]</sup> In their later research for the CMA, GfK NOP found that 31% of people chose their main bank based upon the convenience of the locations and opening times of that bank's branches (rising to 39% for people in Northern Ireland), which was the second most cited reason (after personal recommendation on 34%).

Conversely, the Social Market Foundation found recently that only 32% of people would be happy to use a bank that had no branches as their main financial services provider, whilst 47% actively disagreed that they would use such a provider as their main bank. In the same research, the SMF found that of those who had used a branch in the last 12 months, 37% said that nothing would stop them using their branch – the most selected response for that question.<sup>[15]</sup>

In other words, all recently published research on the topic demonstrates that on the whole, people say that they like branches, that they want branches to remain, and that branches are influential when deciding who to bank with and whether to switch. It's a surprise, therefore, that despite the consistency of responses to this question, most research on the topic chooses not to emphasise – and sometimes not even to recognise – this clear declared preference of the public for the continuation of bank branches.

## 4. Branch usage – Reality

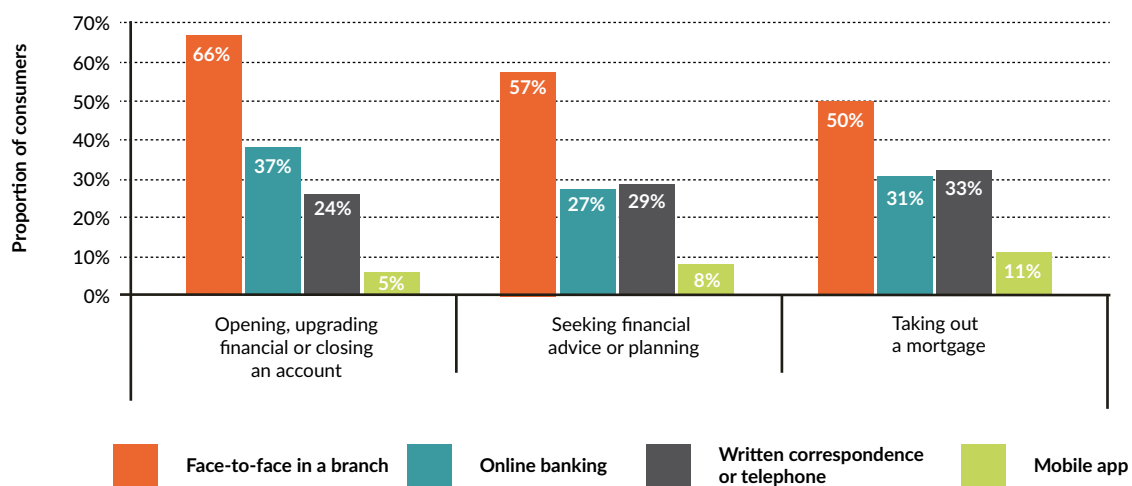
The reluctance of researchers to emphasise the declared preference of most people to retain branches may come from the distance between what a person’s expressed preference is, and their actual behaviour. After all, the maxim “actions speak louder than words” is as true in banking as it is anywhere else.

The Social Market Foundation’s recently published report Bricks and Clicks is a particularly valuable contribution to the literature in this regard, because it explores people’s actual behaviour in addition to their declared preferences.

In that research, the SMF found that people are increasingly using online banking to manage simple transactions, basic money management tasks, and to apply for familiar and non-complex products, whilst branch usage for these tasks is declining. Furthermore, the SMF found that there was a discrepancy between people’s preferred channel for these activities and the actual channels that they were using, with fewer people saying they preferred to use branches for these tasks than actually were. This led the SMF to predict that branch usage for these simple, basic tasks will further decline over time. <sup>[16]</sup>

By contrast, the researchers found an overwhelming preference to use branches for more complex transactions or big financial decisions – a preference that was matched by people’s behaviour. <sup>[17]</sup> Although it does not look at the reasons for branch visits beyond current accounts, the GfK NOP

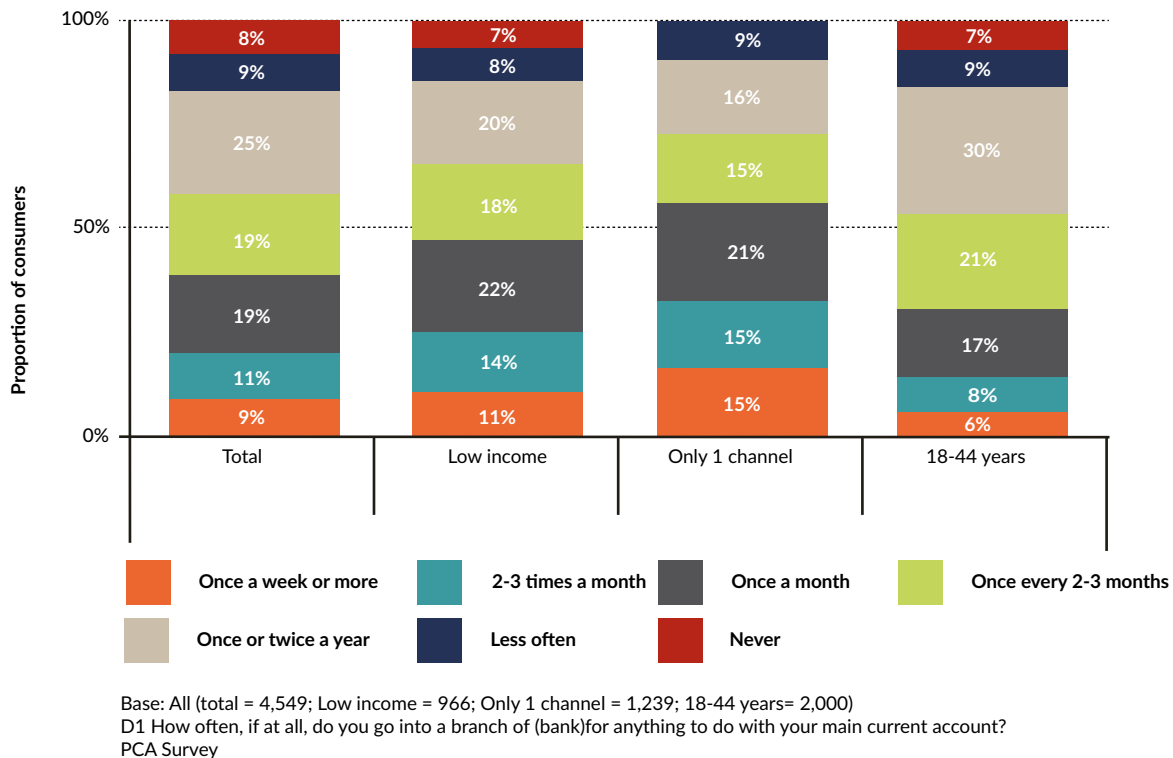
Figure 3: Channels used by consumers to take long-term or more complex financial decisions



research for the CMA largely bears out the same conclusions in terms of frequency of branch visits. It shows that 17% of people visited their local branch once a year or never, whilst two fifths of people were found to visit their branch at least monthly (39%), with only one in ten people (9%) visiting weekly.

Significantly, however, this figure increases dramatically for certain types of people, with 47% of those on a low income and 51% of those who only use one channel visiting their bank branch in the last month. Conversely, those aged 18-44 are less likely to regularly use branches.<sup>[18]</sup>

**Figure 4: Frequency of visits to main current account bank branch**



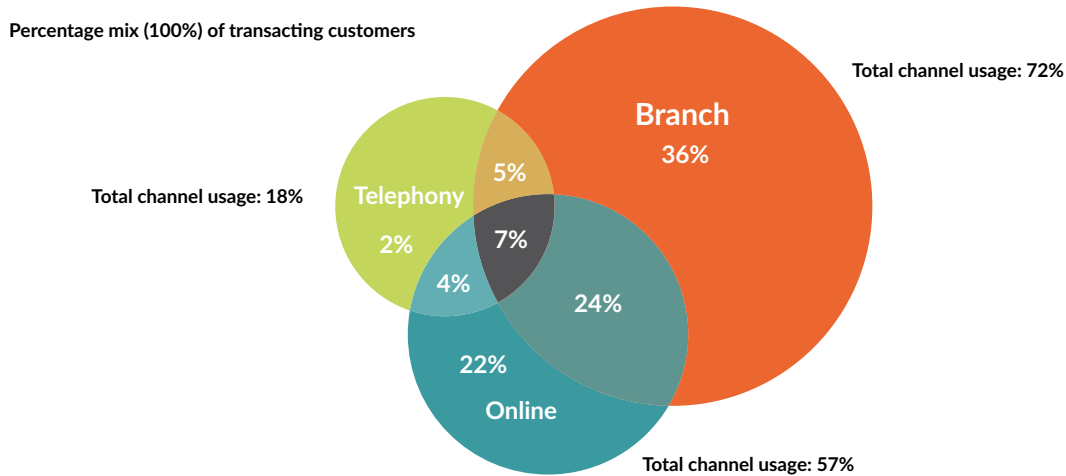
Given this, it becomes clear that not everybody is using branches, and that those who do are not all using them in the same way. Indeed, the SMF’s research further shows that while a sizeable minority now use online channels only, more than 3 in 5 people (62%) still use branches in some way. And although discernable patterns could only be found for 66% of the total population, those who only use branches and those who use branches for all but the most simple of tasks tended to be older and to have lower incomes, who collectively amount to 11% of the population – some 7 million people.<sup>[19]</sup>

This becomes incredibly relevant when looking at where branch closures are being targeted and the demographics of those areas, because it is largely areas that have higher levels of elderly people or those on a low income that are suffering the most branch closures – as discussed in more detail in chapter 5 below. In addition, there are 8.6 million adults in the UK who do not use the internet,<sup>[20]</sup> whilst 1 in 5 of the population have no access to broadband either at home or through their mobile<sup>[21]</sup> although there is likely to be significant overlap between these groups, there is also a strong probability that even more people are affected by branch closures because of these low levels of access and/or use of the internet.

For the remaining 34% of the population for whom no discernable pattern could be found, it becomes even more difficult to assess their level of reliance on their local branch, or their demographics. That makes it almost impossible to assess the impact of branch closures on more than a third of the population, until further research on their usage is done.

Another area of data on people’s actual usage comes from the banks themselves.<sup>[22]</sup> One example of such data comes from TSB from 2014, where the bank revealed that a huge majority of 72% of its current account customers use its branch network within a three month period, with more than one in three (36%) using this channel only.<sup>[23]</sup>

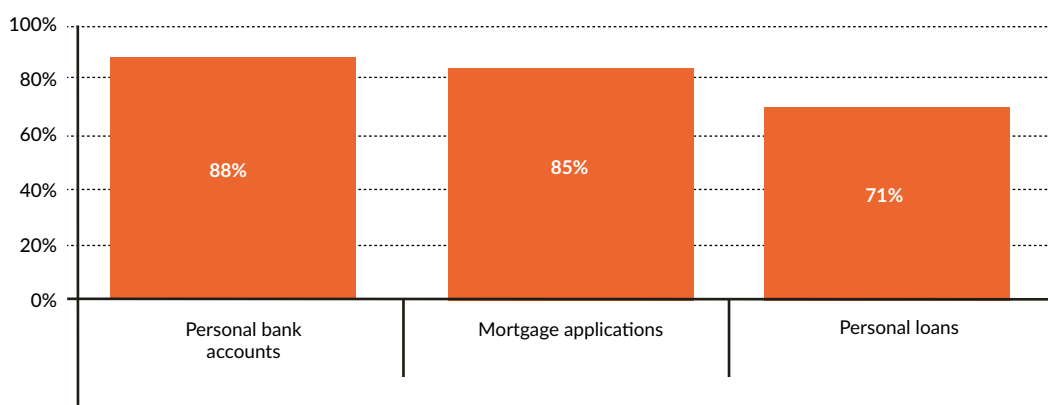
**Figure 5: The branch remains TSB’s most used channel**



Source: TSB internal data. PCA transacting base Q2 2014

Even more starkly, TSB revealed that several products are overwhelmingly purchased in branch – not only complex products such as mortgages, but also “bread-and-butter” current accounts, which form the bedrock of a customer’s personal relationship with their main financial services provider.

**Figure 6: Personal bank accounts are predominantly purchased through the branch**



Source: TSB internal data. Products purchased in branch (Jan/Feb 2014)

How are we to make sense of this? Whilst it is clear that bank branches play a reduced role in managing people’s day-to-day finances on aggregate, it is just as clear that a majority of people still use branches in some way. A significant minority still rely heavily or entirely on branches for their financial management, interactions and engagement.

This has led major lenders, and the financial sector more broadly, to look closely at what the future role and functions should be of bank branch networks. Disappointingly, though unsurprisingly, this has more often been from the perspective of profit maximisation and selling the most products, rather than on providing the services and functions that people and society need and upon which they rely.

## 5. “Rationalisation” and the changing role of branches: The industry view

Despite the evidence of continued usage, the most commonly given reason for the closure of branches both on the local level and in aggregate nationally is that branch usage has declined dramatically. Branches are seen as inefficient and costly, and branch networks must be “rationalised” – that is to say, shrunk – in order to fit this view.

As a result, the banking industry has spent a lot of time and effort analysing which bank branches should remain and which branches should close in order to “rationalise” branch networks. And the results are instructive, not just in terms of which communities are most likely to be hit, but also more broadly for the impact this will have on financial inclusion and the macroeconomy.

As we have seen, people are more likely to use branches for more complicated transactions, such as loans, mortgages, and opening new accounts. Clearly these interactions are more profitable than basic interactions, given the opportunity to profit from interest rates in the case of lending products, and for upselling in the case of current accounts.

This is not a fact that has escaped the banking industry. Several industry-focused studies have examined how banks can redesign their retail spaces and enhance in-branch digitalisation, in order to sell more complex products and cater more to this highly profitable side of branch provision. Some even go so far as to recommend that banks should break-up their networks so that they are “made up of differentiated branches targeting specific customer segments.” In some areas of the world, this is already happening.<sup>[24]</sup>

Proliferating branch provision and targeting them to specific customer segments is hardly the talk of an industry that cannot afford to maintain branch networks. And indeed, branch networks are not as much of a drain on resources as most banks like to make out. In 2015 the “Big Four” UK banking groups alone made operating profits before tax of £11.24 billion from their retail banks, which own and operate their branch networks.<sup>[25]</sup> On average, the retail banks made contributions of around 40% of income to these UK-based banking groups. To say that branches are not profitable is patently and demonstrably untrue.

Indeed, according to the McKinsey’s Global Banking Annual Review of 2015 – one of the most thorough and well-respected reviews of the global banking market – banks make a 22% return on equity from customer origination and sales, compared with just 6% for providing credit. In other words, banks earn a far higher amount from pure customer interaction than they do from merely making loans, and consequently 59% of global banking profits come from this form of interaction.<sup>[26]</sup>

This has also been recognised in the UK context. In a far-ranging review of branches from 2014, Deloitte noted that “the primary objective” of branches in affluent urban areas in and around London (or what they term “super conurbations”) should be customer acquisition. Likewise, branches in commuter zones “should focus on both customer acquisition and retention”.<sup>[27]</sup> Of seven “micro-markets” identified by Deloitte in its report, only in these two areas are branches unambiguously recommended to remain.



Going further, Deloitte suggests that “although they may not be the most valuable now, these young customers [in affluent urban areas] have significant lifetime value. Thus, banks and building societies should focus on fast-tracking them through the purchase of anchor products”.<sup>[28]</sup> In other words, banks and building societies should try as hard as possible to saddle young people with debt products through their branch networks, and should do so as quickly as possible in order to tie them to the bank brand for life.

Many would argue that this is simply good business sense, the dynamics of the market at play. Commercial, profit-making companies clearly have an imperative to pursue profitable activities, and are not charitable providers. But the real question here isn’t whether banks should be intentionally targeting young people with complex debt products, valid though that question remains in the context of huge and ongoing mis-selling scandals across the industry. The question that matters is about what happens to those people and locations that are not deemed to have ‘significant lifetime value’.

On this, the Deloitte report seems quite clear. In what it terms “retirement areas”, “booming towns and villages”, “declining rural communities” and “struggling blue-collar districts”, banks are recommended to “streamline” their branch networks, to “shrink square footage” and to “co-locate services”. “Continuing to offer primacy to costly face-to-face services in [these] locations... will only ratchet up pressure on cost-to-income ratios”, they warn.<sup>[29]</sup> In short, banks are recommended to close branches in these areas, in order to “rationalise” their branch networks.

Looking at these four micro-markets in which closures and “rationalisation” and closures are recommended, common themes quickly emerge. In general, populations in these areas are older and ageing, and have lower levels of disposable income. Unemployment is higher, average house prices are lower, and the number of businesses is declining.<sup>[30]</sup> As we have seen in Chapter 4, these are also the demographics of people that are most likely to be reliant on branches for their financial management, engagement, and access to the financial system.

In other words, those most likely to be adversely affected by branch closures are the very people living in those areas most at risk of branch closures, according to Deloitte’s analysis and recommendations.

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***Those most likely to be adversely affected by branch closures are the very people living in those areas most at risk of branch closures***  
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Figure 7: Average age in 7 “micro-markets”

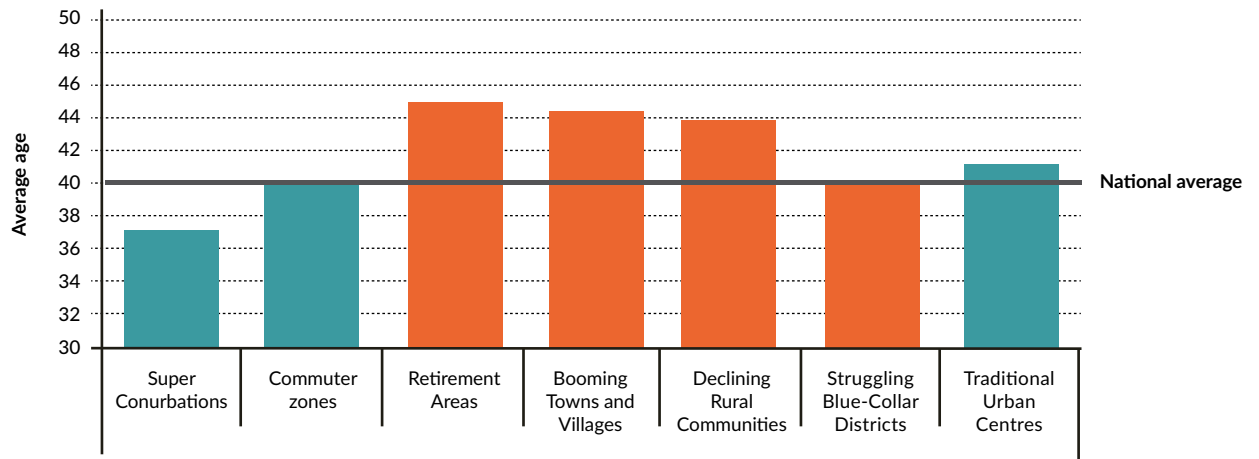


Figure 8: Average disposable income in 7 “micro-markets”

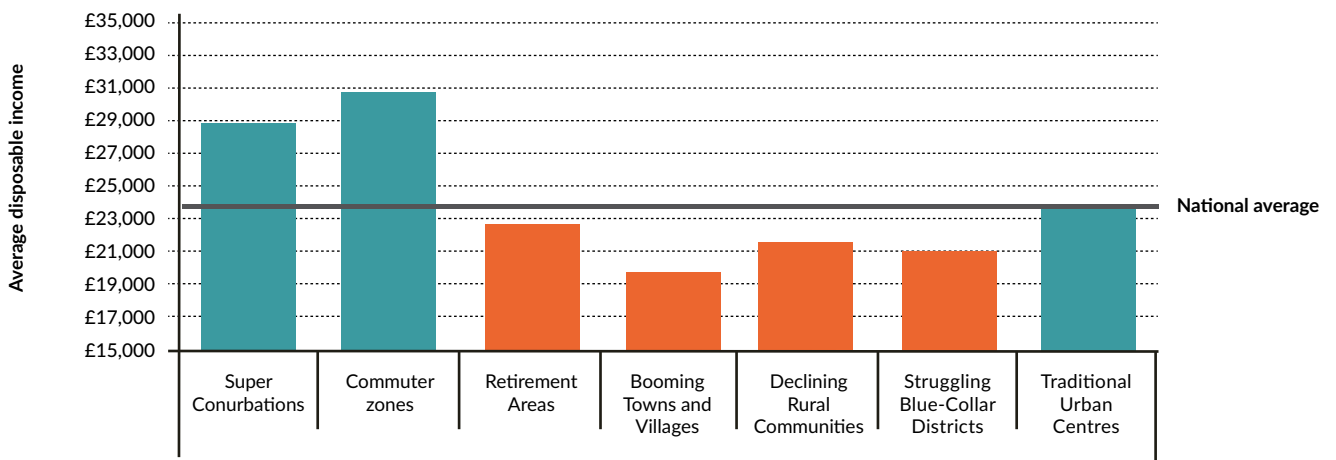
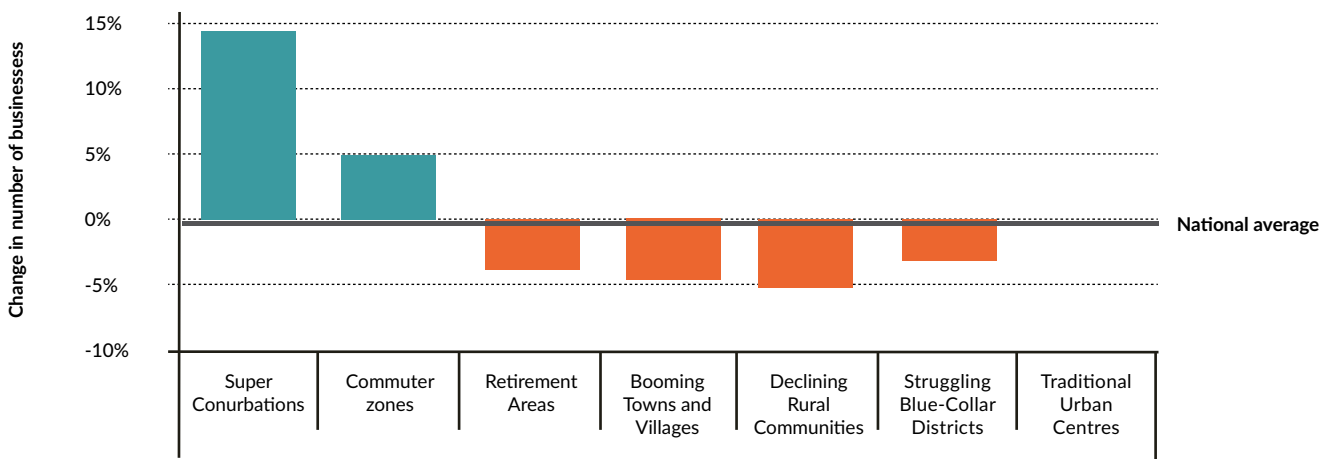


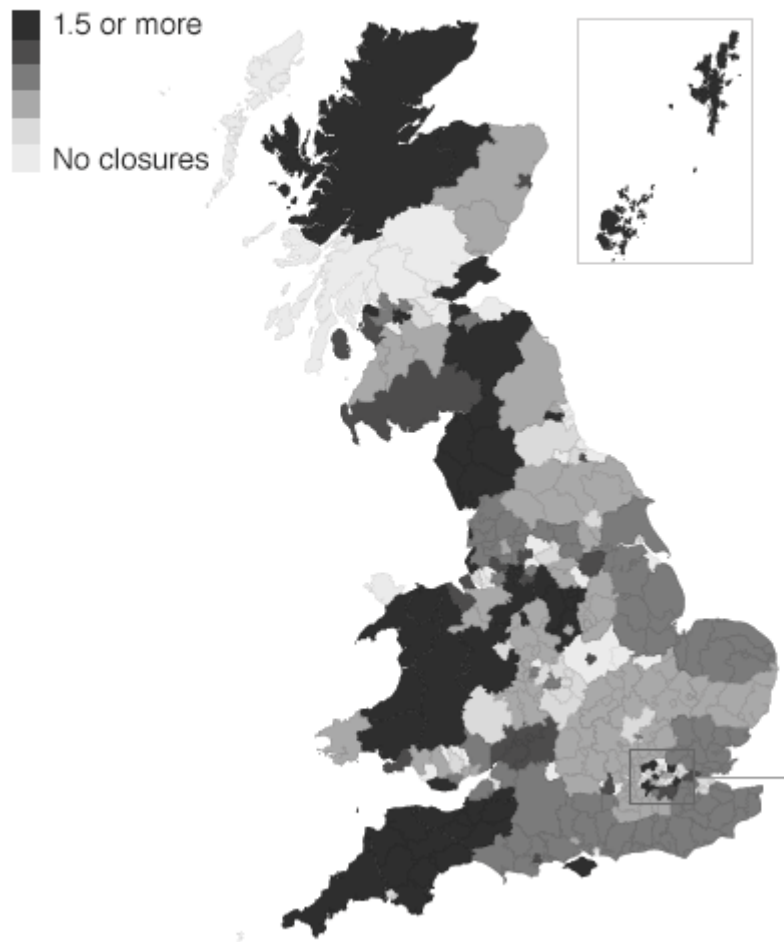
Figure 9: Change in the number of businesses in 7 “micro-markets”



And that risk is being realised. Recent research by Reuters has shown that more than 90% of bank branch closures in the last year have occurred in areas where the median household income is below the national average.<sup>[31]</sup> Other research from the BBC has mapped where branch closures have been most heavily enacted. By overlaying Deloitte’s micro-markets onto the BBC’s map of closures, it becomes quite clear that banks have predominantly followed Deloitte’s advised strategy to close branches in older, poorer areas – the areas with the highest concentration of people that need those branches the most.

This map from the BBC demonstrates which areas of the country have been most badly affected by branch closures:

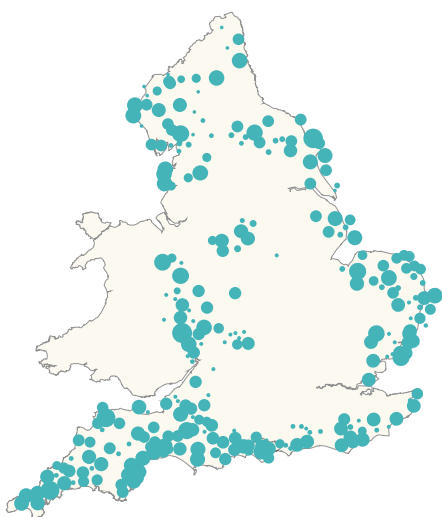
**Figure 10: Which areas are hardest hit?**



Data covers April 2015 to April 2016  
Source: BBC, Big Six Banks, ONS

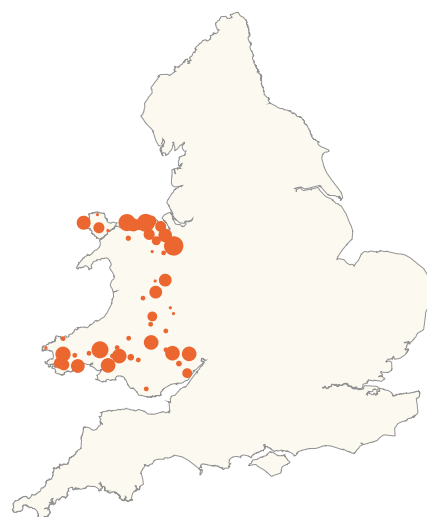
And these maps demonstrate the areas that Deloitte recommends that branch closures take place:

**Figure 11: Catchments in Retirement Areas**



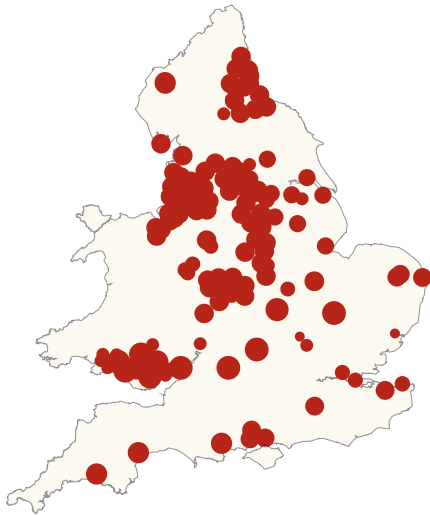
Source: Deloitte analysis  
For all Deloitte figures, Circle size is proportional to the total number of branches and retail outlets in the catchment.

**Figure 12: Catchments in Declining Rural Communities**



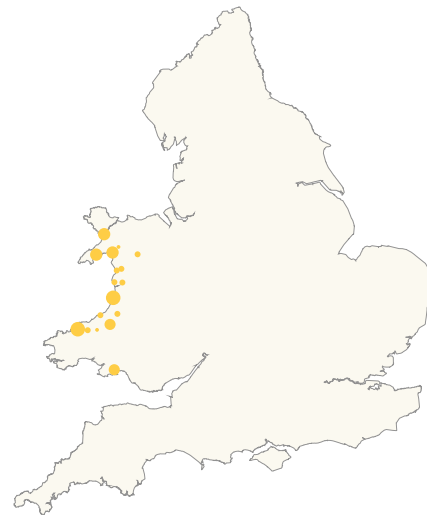
Source: Deloitte analysis

Figure 13: Catchments in struggling Blue-Co Districts



Source: Deloitte analysis

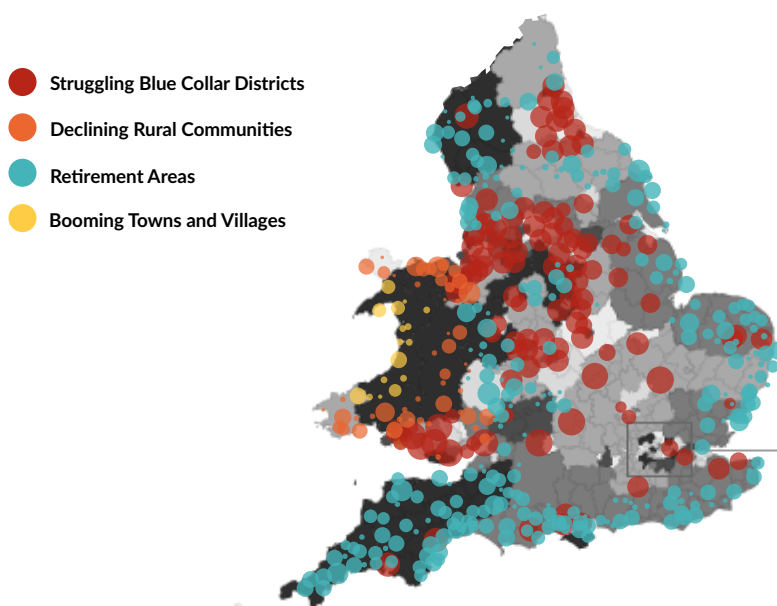
Figure 14: Catchments in Booming towns and villages



Source: Deloitte analysis

Plotting Deloitte's recommended areas for branch closures over the BBC's map of actual closures shows a clear and strong correlation between the two:

Figure 15: Amalgamated map of recommended closures over actual closures



These recent closures in areas of depressed economic activity, ageing populations and low disposable income are not new, but instead are continuing earlier patterns. In their longitudinal study, University of Nottingham researchers noted that between 1995-2012 the areas that suffered the largest decline in branch numbers 'are characterised by unemployment rates and levels of renting from the public sector that are far above the national average... the least affluent third of the population has borne the brunt of two thirds of net closures'.<sup>[31]</sup>

Many feel entirely comfortable about this changing landscape of banking provision. "As cash transactions fall... and the older generations age, branches will become spaces for conversations,

rather than straightforward transactions”<sup>[32]</sup> argues the Social Market Foundation. Deloitte argues that there are “bigger questions, such as how the bank should work with and support the local population... to help these towns and villages get back on track.”<sup>[33]</sup> The problem is that no one is answering these questions. And in the mean-time, bank branch closures are demonstrably and adversely impacting those people and their communities.

## 6. Voices from the frontline:

# The impact of closures on people and communities

Very little has been written about the impact of these closures on local people and their communities. By focusing predominantly on the pressures on banks and the behaviours of customers, researchers have neglected to study the consequences these widespread closures are having on those they leave behind.

Some researchers have predicted that the effects will be significant. In their longitudinal study, University of Nottingham researchers noted that “the faster than average withdrawal of branches from poorer socio-economic areas raises concerns about the extent to which different types of financial institutions are present in areas of economic distress, and the implications of this. As mainstream financial institutions continue to pull out of economically distressed areas... so they are replaced by more predatory forms of financial institution.”<sup>[34]</sup>

On a related note, the Social Market Foundation references Britain’s low rates of financial capability, and argues that “access to financial services is likely to become the main barrier to financial inclusion, as the less affluent, those with basic qualifications and the unemployed are particularly likely to rely on branches to manage their money.”<sup>[35]</sup> These are major potential issues for the health and prosperity of Britain and its population, yet they seem to have been lost in the debate about bank branch closures.

Having campaigned with local communities on this issue for the last year, Move Your Money has found consistent anecdotal evidence that these fears are being realised. Local campaigners and people who have lost their local branches repeatedly mention that after their bank closes, footfall and tourism decline, local businesses suffer, and general economic conditions worsen. Access to the financial system also declines, particularly for the elderly, the disabled, and for those in areas that have poor access to the internet or low IT skills.

One aspect of this that was perhaps most surprising was the impact and influence this can have on physical cash. Whilst the London policy bubble excitedly talks about a future cashless society and triumphantly points to statistics proving the increased use of digital and card payments, cash continues to be the predominant payment method in the UK, with twice as many payments still made in cash than the next most used method.<sup>[36]</sup> This is particularly the case outside of big cities, where card transactions are not as widely available, and where branch closures are felt most acutely.

Despite this, many bank branch closures are taking their cash points with them, which is extending the damage these closures are causing. For example, of the 51 RBS closures announced so far in 2016, only 10 are leaving behind a cash point.<sup>[37]</sup> One local campaigner in Nottinghamshire told us that their local supermarket had to put a cap on cashback payments, because so many people were forced to use this method to access cash after the closure of their last bank branch and its attendant ATM. The resident in question had also experienced physical fights in the supermarket between customers trying to ensure that they could withdraw the last of the notes from the supermarket’s tills. ‘It was like living in Greece,’ the campaigner told us, only half-jokingly referring to that country’s recently imposed capital controls during its extended banking crisis. This was in a village of 9,500 people, with a catchment area of around 14,500.

In the UK we live in the fifth largest economy in the world, and yet the fact that there are significant areas where businesses and villages are declining because they cannot access physical cash is simply astonishing.



## **‘It was like living in Greece’**



Charities, third-sector organisations and micro-businesses reliant on cash have also struggled with branch closures, with increased travel expenses, heightened security issues and cashflow problems all resulting from the lack of convenient facilities to quickly, reliably, and consistently withdraw and deposit cash. Post Office banking provision, the Government’s main intervention in this area (which is discussed in more detail in Chapter 8) is struggling to cope, and is an inadequate replacement for branches in the first place.



### **Case study: Andrea <sup>[38]</sup>**

*“The story I found most moving when I was campaigning to save my local branch was that of an 85-year old lady who arrived on a mobility scooter. She told me that she has to do her shopping locally because she’s her husband’s only carer. He is house-bound after back surgery and she herself, a cystic fibrosis sufferer, has only one lung and has undergone a triple by-pass operation. She asked if I understood why she couldn’t travel to the next nearest town, six miles away, to do her banking. As if! Actually, I was particularly concerned about the number of elderly and infirm people who use the bank, people who wouldn’t know where to start on internet banking.”*



Anecdotally it appears very clear that bank branch closures are having a serious and significant impact, but good policy should be based on accurate, empirical and compelling evidence.

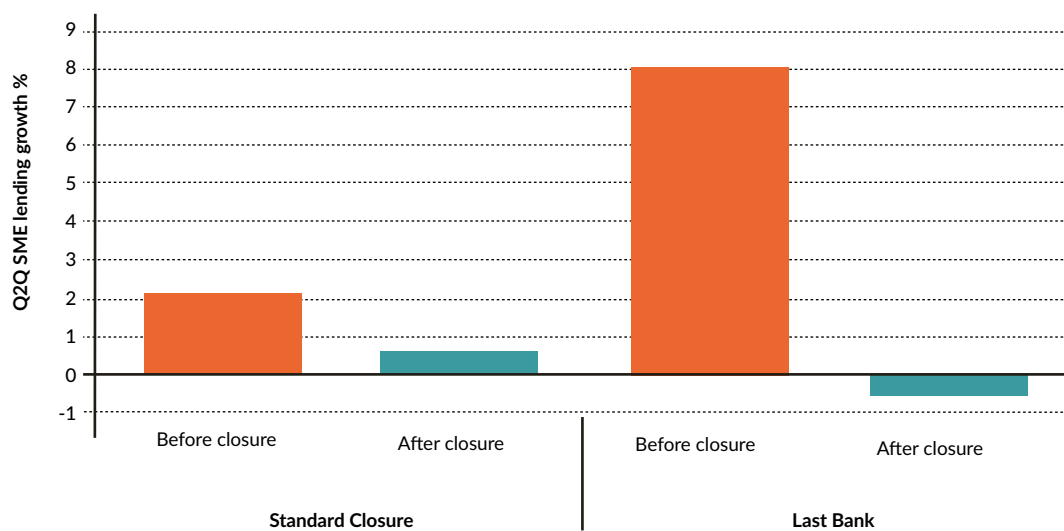
Unfortunately, such evidence is extremely hard to gather. The biggest banks have been reticent to publicise where and when historical bank branch closures have happened, and only display recent closures on their websites for a very limited period of time. This obfuscation of branch closure times and locations is a major obstacle in investigating the impact of these closures on both the local and the macroeconomic level, as it leaves researchers with little empirical evidence to work with. Improved access to and proliferation of information about bank branch closures is a central recommendation of this report, and should be a key reform of the review of the Access to Banking Protocol, conducted by Professor Russel Griggs (see Chapter 8).

## SME lending

Despite these setbacks, some relevant data is available. By taking data on the level of postcode lending to both individuals and to SMEs and mapping this geographically and temporally against branch closures, we can see one proxy measure for the economic impact of branch closures across the UK.<sup>[39]</sup>

And the results are astounding. Before a branch closure, lending for SME's within a given postcode grows from one quarter to the next by 2.13% on average. But after a branch closure in that postcode, average Q-2-Q growth in SME lending drops to only 0.79% – a staggering 63% reduction. This reduction in the growth of SME lending both reflects and drives lower demand, meaning businesses have less opportunity to sell, grow, and provide employment. This weakens local business confidence, and ultimately results in higher rates of business failure. Given that branch closures are predominantly happening in areas that have higher than average rates of business failure already, the removal of a bank branch and the subsequent drop in Q-2-Q SME lending growth can only exacerbate the problem.

Figure 16: Quarter-to-quarter SME lending growth before and after bank closures



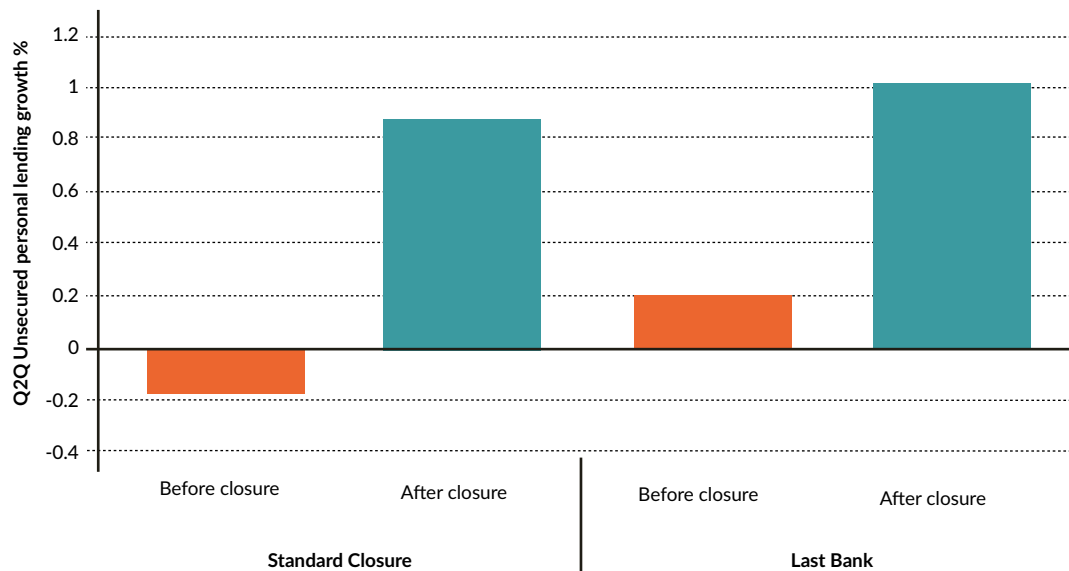
The effect is even more pronounced in postcodes that suffer a last-bank-in-town closure. On average, Q-2-Q growth in SME lending drops from 8.06%, to -0.34% – a 104% plummet that sees the major UK banks actually withdrawing money from that postcode. Comparing lending figures from the most recently available data (Q3 2015), these postcodes are on average receiving -6.84% less SME lending than they were during the quarter of the last-bank-in-town closure. This equates to an average of £1,594,580 less lending per postcode, over the course of around just one year. This is a significant and damaging drop for these areas that are, on average, poorer, older, and with higher levels of unemployment in the first place.

## Personal lending

For personal lending the picture is more complex. In contrast with SME lending, personal lending is falling by -0.16% on average in postcodes before they suffer a branch closure. After a closure this rises to 0.89%. In postcodes that lose their last-bank-in-town, the effect is even more pronounced, leaping from 0.21% Q2Q growth before the closure, to 1.03% after – a fivefold increase.



Figure 17: Quarter-to-quarter unsecured personal lending growth before and after closure



It's not immediately clear why personal unsecured lending would increase as a result of branch closures. There is a possibility that after the last bank closes, local residents suffer from worsening local economic conditions - such as business failure, job losses and lower footfall from out of town - and borrow more to make up the difference.

But if branch closures trigger that process, then it also follows that there are fewer outlets or "acquisition channels" from which those residents could take out unsecured personal debt from a major bank. In those circumstances, growth of personal unsecured debt from major banks should dampen, not increase. In addition, if the problem for a local resident is that all the major banks have left town, how would it help their situation by taking out more debt from one of those same banks?

All of this has taken place in a wider macroeconomic context, where unsecured personal debt has been rising in the UK since 2013 for a number of reasons.<sup>[40]</sup> As a result, it would be unwise to attribute causality for this phenomenon to branch closures without further research, despite the consistency of the results.

Whilst these results are illuminating, it is also worth reiterating that such lending figures should only be taken as a proxy measure for the economic impact of branch closures on the local level. This is because bank lending is only one measure of local economic prosperity, amongst many potential others. For example, consumer footfall, local multiplier effects, and per capita disposable income are all valid inputs to test for a relationship with bank branch closures, as well as their related impact on the local economy.

Indeed, local economies are multi-faceted systems that are interwoven with bank lending but are not wholly reliant on or represented by it. Work from the think tank Demos has also persuasively argued that depressed house prices outside London and the Southeast have a dampening effect on local bank lending, which in turn creates depressionary cycles that sees higher rates of business failure and lower employment rates<sup>[41]</sup> - two key indicators that local bank branches will close, as we have seen in chapter 5.

As such, local economies are complex and inter-related systems, and warrant further study than can be afforded here. In particular, close attention needs to be paid to chronology, and to which direction causality flows in these systems of local economic depression, bank lending, and bank branch closures. Suffice to say, the evidence presented here suggests that there is a strong relationship that warrants further study. As a result, only improved access to information about bank branch closures will allow for adequate scrutiny of the problem, and well-informed policy responses to it.

## 7. Bank obfuscation and manipulation of figures

Instead, what we have often found is obfuscation from Britain's biggest banks, as well as widespread accusations of manipulation of the figures to suit pre-determined bank policies and interests.

Take branch usage figures, for example. Across the country, bank branch closures are accompanied by standard template press releases citing declining branch visits from "regular weekly customers".<sup>[42]</sup> What exactly defines a "regular weekly customer" is never explained, and Move Your Money has been unsuccessful at getting a response from the major banks on this question.

Instead, we have found that local campaigners often dispute these figures. By monitoring branch visitors and users, one local campaign group estimated that their bank branch due for closure received 699 people transacting in the branch over the period of one week, with a further 947 users of the ATM. By contrast, the bank in question, RBS, had claimed that the branch received only 61 customers that were "using the branch on a regular weekly basis". For another community the respective estimated usage figures were 413 in-branch users and 1575 ATM users throughout the week, compared to a claim of only 50 "regular weekly customers" from RBS.<sup>[43]</sup> In such a situation, it is difficult to come to a definitive conclusion on what the accurate usage figure is without access to the bank's definition of a regular weekly customer, or without access to any anonymised transactions data – both of which the bank keeps private, claiming commercial confidentiality.

Other accusations have also been levelled at banks. One campaigner in Wales whose spouse worked in a branch due for closure recounted the story that the branch staff had been instructed not to process cheques that had been handed in, but instead to post them to the next nearest branch for processing there. The next nearest branch, several miles away and in a more prosperous and wealthy area, was cited by the bank as being more busy than the branch due for closure, despite being in a smaller catchment area and featuring fewer facilities than the branch due for closure. In other words, the bank was intentionally and wilfully manipulating the figures in order to justify its predetermined decision to close the branch.

Such stories are commonplace.<sup>[44]</sup> Other techniques are also used to massage and manipulate the statistics. For example, transactions carried out on automated and smart ATMs in branch with the full assistance of a staff member are registered as digital transactions rather than face-to-face or counter transactions, even though the staff member is present throughout the transaction, and the customer would not have been able to complete it unassisted. Subsequently, the rise of digital transactions and the fall of face-to-face transactions are later cited as reasons for the branch closure.

Time and again, local campaigners have accused their bank of producing misleading figures to justify pre-made decisions on branch closures, rather than conducting honest and open assessments of community need or impact of branch closures. The asymmetry of information and power in such situations makes it impossible to assess what criteria banks are actually using to decide on closure locations. Meanwhile, the mechanisms set up to protect people and their communities from exclusion from the financial system are proving woefully inadequate for that purpose.

## 8. The Access to Banking Protocol: What is it, what's wrong with it, and how to improve it

The main protection mechanism in this regard is the Access to Banking Protocol, which is an industry-wide agreement, established between the British Bankers Association, the major banks, and a few select civil society groups including Age UK and the Federation of Small Businesses. The aim of the protocol is to “support access to banking and financial inclusion in the community,” by ensuring customers and small businesses are “treated fairly’ and offered ‘an alternative way to bank... locally” in the event of a permanent branch closure.<sup>[45]</sup>

The problem is that in its current form, the Access to Banking Protocol is nowhere near good enough. It does little in practice to support access to banking, and next to nothing to protect communities most at risk of financial exclusion. Nor does it afford any genuine or meaningful consultation for individuals or communities affected by the banks’ decisions to close, meaning that it does not ensure that customers and businesses are treated fairly either.

The main provisions of the protocol are that banks ensure that they conduct an “internal analysis” on the impact a branch closure will have on its community, as well as undertaking an “engagement” with the local community to enhance their impact assessment of the closure. Secondly, banks are also mandated to ensure that “suitable alternative ways to bank will be put in place before the branch is closed”. There are a number of serious issues with this framework.

Firstly, the requirement for an “internal analysis” to assess the impact of the branch closure is wholly inadequate, and does nothing to protect or represent the interests of the community when it comes to branch closures or access to banking provision.

Such internal analyses are never made public, and there is no clarity or definition on what constitutes “impact on branch users”. Given that the protocol specifically privileges the right of the bank to make closures based “ultimately” on commercial considerations, banks are essentially mandated from the outset to close branches specifically on cost-to-income ratio grounds, without due regard, consideration or response to the impact the closure has on the community it leaves behind.

Not only this, but activities to engage the community on the impact of a branch closure is only mandated to occur after the decision to close the branch has already been made. So where community engagement happens at all, it has no power or recourse to influence branch closure decisions whatsoever. In that sense, community engagement exercises are practically pointless, because no matter what local campaigners say or do the bank will not change its decision. The engagements are therefore simply tick-box exercises that give a veneer of consultation to a predetermined *fait accompli*.

When MYM challenged one member of the policy team at the Federation of Small Businesses about this, they said that “it may only be a tick-box exercise, but at least it’s something.”<sup>[46]</sup> We disagree. If a consultation does not adequately consult its stakeholders and does nothing to put stakeholder views into practice, then it is worse than nothing – it is a waste of everybody’s time.

Such practices leave local communities disenfranchised and disillusioned, as well as often leaving them underbanked and underserved by the financial system, as we have seen above. Such practices also undermine the “rebuilding of trust and confidence in the sector”, another key aim of the Access to Banking Protocol.

Another problem with the ABP is its loose definition of “adequate replacement services,” which again are not only left up to the banks discretion to assess, but also to define in the first place. Predominantly this has meant stating the proximity of the next nearest branch to the closure, the availability of cash points in the local area, and whether or not there is a Post Office nearby.

The availability of cash points in the area is a useful metric, and one that has been used successfully by campaigners to pressure banks into keeping or reinstating ATMs in their areas on a number of occasions. The other two measures, however, fall short of providing adequate provision of financial services.

How far is it reasonable to expect people to travel to their next nearest branch, for example? And is this expectation universal, or should it depend on the demographics and topography of the local area? Or perhaps the specific demographics of the customer base of that branch? With the Protocol handing all power to the banks to not only assess but also to define the banking provision needs of the local community, such questions are rarely even asked, let alone answered – yet they are questions of critical importance to local people and communities.

Not only this, but the means of assessment seem to be completely standardised too, with assessments made by algorithm rather than reason or intellect. Such methods may be more efficient and less costly for the bank, but they can create anachronistic results that again emphasise the lack of genuine consultation or consideration for communities when such decisions are taken.

Take Berkeley, for example, a last-bank-in-town closure in Gloucestershire that closed its doors in August 2015. In the “consultation” document produced by NatWest, the bank claimed that affected customers could conduct their banking at the closest Post Office, 0.1 miles away, or at any of the 5 other Post Offices within 5 miles of the branch.

The problem with this statement was that the closest Post Office could not handle cash or cheques, let alone other banking activities. As for the other 5 Post Offices, each of them remains on the other side of the River Severn, with the nearest crossing a 13 mile drive each way by road. Meanwhile, the next nearest financial institution – Stroud Credit Union – was a 28 mile round trip. In other words, the bank’s algorithmic assessment found that Berkeley was well-served with banking provision, even though the reality could not have been further from the truth. The branch closed anyway, with no significant concessions from the bank.



***In other words, the bank’s algorithmic assessment found that Berkeley was well-served with banking provision, even though the reality could not have been further from the truth. The branch closed anyway***



Although Berkeley is an acute example, such anachronistic impact assessments are “not untypical, as the computer software the banks use seems to ignore sea and rivers in between, and even motorways” according to the Campaign for Community Banking Services.<sup>[47]</sup> There are no examples of community engagements having had any impact on decisions to close branches over at least the last four years.

As well as ignoring local residents and topography, the Access to Banking Protocol plays a broader role in shutting down debate on access to banking provision. Since the imposition of the ABP, banks have been able to conduct the activities mandated by the protocol – however arbitrary, inaccurate or inappropriate their results may be – and then claim that they have done all that they are required to do. Recourse to governmental and representative authorities also seems to have no impact, because these authorities merely point to the imposition of the protocol, and its mandate that banks assess impact and provide alternative access.<sup>[48]</sup>

In other words, the Access to Banking Protocol is being used as a firewall for criticism on both sides; the banks can claim that they have followed the protocol and so need not do more, whilst the Government can say that they have implemented the protocol and closures are commercial decisions. It matters not that the aims of the protocol and the outcomes that it seeks are not being delivered, because both parties are satisfied that they have been “seen to be doing something”. Meanwhile, communities and their constituents suffer.

## 9. The failure of “competition” in producing adequate access and provision

A key reason for these failures is the dominant ideological position that where there is a need, the market will provide. What this paper has attempted to show is that there is a significant market failure in banking, where those that are most reliant on branches for access to the financial system are the ones that are becoming most consistently and adversely affected by branch closures. This is not a small demographic – 11% of the population, or 7million people according to the Social Market Foundation,<sup>[49]</sup> and potentially even more due to poor internet access or poor Post Office provision.

The primary intervention to ensure ongoing access to the financial system has been to strike a deal with the Post Office, whereby Post Office branches can handle deposits and withdrawals for customers of the major banking groups. The Campaign for Community Banking Services has expressed “deep concerns about the capacity of Post Office outlets to cope,”<sup>[50]</sup> whilst on the ground customers are frequently concerned about issues of privacy, security, and long queues.

This is not to mention the fact that Post Office staff and systems have neither the capacity nor the ability to provide a full range of banking services or complex interactions. Even simple transactions like depositing funds take significantly longer to clear through the Post Office than they do through bona fide branches, putting unnecessary and potentially damaging cashflow pressures on SMEs and individuals.

In addition, the Post Office network itself is also under pressure to drastically reduce its branch network,<sup>[51]</sup> yet there are no protections or procedures in place to protect those areas that are suffering from branch closures from also being affected by Post Office closures. Only 5% of respondents to the Social Market Foundation survey said that increased Post Office provision would stop them from using their local branch,<sup>[52]</sup> and yet Post Office provision continues to be the Government’s current and preferred strategy for dealing with the collapse of bank branch numbers.

As such, Post Office provision is a wholly inadequate replacement for branches in the first place. Alternative approaches, such as RBS’ mobile banking bus, are little more than a marketing gimmick. Visits from buses that have limited service functionality for only one or two hours a week are no replacement for permanent and full-service branches.

Worse though, the idea that the market will provide for all is a dangerous fallacy. The current paradigm in banking reform and financial services provision is that increased competition will solve all the problems of the sector. What is rarely discussed is what is meant by “competition”. All too often, the type of competition that is implied and encouraged is a proliferation of providers that are competing for the same types of business and the same types of customers, rather than a diversity of provision aimed at different market segments, customers and needs.

Take the challenger banking sector, for example – often touted as the silver bullet to issues in financial provision. Of all banks in the UK, only Metrobank and Handelsbanken have embarked on large-scale programmes of branch opening, yet the locations of these branches are consistently in urban and suburban affluent areas – i.e. those areas best served by current provision, and constituted of demographics that are least affected by the issues of branch closures and

digitalisation in banking. Many other new challenger banks such as Atom, Mondo and B are digital-only or digital-first offerings that are targeting the young, affluent and digitally literate, who are those with the highest access to banking provision, and are those least affected by the downsides of branch network “rationalisation”.

Concurrently, incumbent banks are closing branches in communities that need them most, whilst opening new branches in affluent urban areas. This year, RBS has closed over 100 branches in predominantly rural and non-affluent areas, whilst opening new branches in the prime real estate locations of Canary Wharf and Bishopsgate, London. Similarly, between April 2015 – April 2016 Lloyds bank closed 64 branches across the UK, but opened three new branches in affluent London locations: Marylebone, Clapham Junction and St Paul’s.

In a report on challenger banks released in May 2015, KPMG stated that ‘the absence of a branch network is not a hindrance to customers,’ and that to compensate for the loss of the branch as a channel for customer acquisition “it is possible that challengers could share physical infrastructure” with the Post Office being “a natural contender for this role.”<sup>[53]</sup> This “physical aggregation” is also a solution proposed by the Social Market Foundation.<sup>[54]</sup>

Not only does KPMG’s view ignore the very real problems faced by customers who have no access to branches, but the policy proposal of shared branches also makes the assumption that necessary solutions to the problems of provision will somehow materialise of their own accord. This is against all evidence and historical experience. Despite the fact that shared branches will radically reduce operating costs – ostensibly the reason for big bank branch closures – and despite consistent campaigning for this very solution by the Campaign for Community Banking Services, this policy proposal is as far away from implementation as it has ever been.

The Competition and Markets Authority’s investigation into the retail banking market replicates and reinforces this narrow view of competition. Where it talks about branches at all, the Authority states that “it is not clear that... the need for a branch network will act as a constraint on entry or expansion in retail banking” and that “supply-side developments... [are] likely to reduce the need for branches in modern retail banking.”<sup>[55]</sup> The Authority’s position essentially validates the banking sector’s current approach to bank branch closures, claiming that a proliferation of digital services and the increase in digital usage renders branches practically irrelevant, other than in terms of operating costs and customer acquisition. This completely ignores those underserved by current and future provision, as well as the impact that underserving these communities and regions is having across the UK.

What becomes clear is that when it comes to the digitally excluded, the elderly, the disabled, those with lower wages and disposable incomes, those living in rural communities, and those in unbanked or single-bank communities, current market provision is not serving these people, nor is it likely to in the future. Indeed, with bank profit margins still tight for the largest banks under the weight of record fines and compensation for their illegal activity,<sup>[56]</sup> and with cost-to-income ratios pledged to come down, this problem is only likely to get worse over the coming years.

Yet despite warnings about the future implications this has for financial exclusion, community decline, local economic stagnation, and the prevalence of predatory debt, there is a collective refusal from the Government and the private banking sector to recognise this as a problem, let alone to address it.

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***There is a collective refusal  
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# 10. Conclusion - The need for public provision of key banking services

As such, bank branch provision and access to the financial system for underserved communities is a public good that should be provided in the public interest, and can only be met through a conscious and deliberate policy response from the Government to fill this gap.

With the Griggs review currently assessing the Access to Banking Protocol and how to improve it, we lay out a set of clear and effective policy proposals that can adequately achieve this aim.

## Policy recommendations

### 1: Reform and strengthen the Access to Banking Protocol

The ABP has proven woefully inadequate in protecting access to the financial system and in securing diverse and adequate provision in retail financial services. As such, the Government should take the Access to Banking Protocol “in house”, strengthening the protocol and enforcing it rigorously on the private sector. Ways that the protocol should be strengthened include:

#### **Force banks into data transparency around branch closure locations and dates**

This will allow the Government, civil society and the banking sector to adequately assess and research the impact of branch closures on the national level, and to formulate appropriate policy responses moving forward.

A public national register of all branch closures should be maintained, paid for using fines levied on the sector for illegal activities. As a minimum the register should include the bank brand, branch location including full postcode, and closure date.

#### **Implement a requirement for a rigorous public interest assessment before any decision to close a branch is taken**

This will help to avoid the phenomenon of abandoned communities, particularly in areas where branches are most heavily relied on both in terms of the local population usage and in terms of the micro economy centred around that branch.

Closure decisions should be taken with specific reference to and assessment of the public interest case for provision, which should include an assessment of local demographics, population trends, and branch usage patterns.

Unlike the current arrangements, these assessments must qualitatively influence the decision making process, and banks must have an imperative to prove that their decision was made in light of and with due regard to the public interest – particularly where the bank is wholly, majority, or partly-owned by the public.

**Ensure that banks adequately consult communities in advance of making a decision around branch closures, and that decisions around closures are qualitatively affected by community considerations**

As with the public interest assessment, banks must be able to prove that their decisions took adequate account of community considerations, and that these considerations qualitatively affected their decision making process.

## **2. Recognise and investigate the case for banking in the public interest**

There are areas of banking and finance in which the needs of people, society and the economy are not being met by private banking provision. This paper has attempted to show that this is the case with regards to bank branches and access to the financial system.

Other research demonstrates that this is also the case in areas such as small business lending;<sup>[57]</sup> the ownership, structure and administration of the payments system;<sup>[58]</sup> and macroeconomic stability.<sup>[59]</sup> Consequently, these and other areas of significant national importance and public interest should be examined, with a view to the Government taking a more active role in the public provision of banking and financial functions, services and provision

**The government should undertake a full, independent and public review into the case for provision of public interest banking.**

Such a review should have a wide remit, and its terms of reference must be free from the narrow paradigm of private competition that currently dominates the debate on financial reform.

The review should include investigation of the desirability and feasibility of public provision of bank branch services, including shared branches, as well as the case for stakeholder banking provision, public ownership and administration of the payments system, macroeconomic stability, and other areas of public interest in banking.

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- [28] Deloitte, Bricks and Clicks p.9
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- [31] Reuters, “Britain’s poorer communities, hit hardest by closures, may face shutdown” June 2016 <http://uk.reuters.com/article/uk-britain-banks-branches-idUKKCN0Z60BP> accessed 21/06/16
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[34] Nottingham University, Changing Geography

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[39] For this analysis the British Bankers Association postcode lending data was used to test the impact of branch closures on the advancement of loans to SMEs and individuals by Britain's major banks. The dataset contains lending figures down to the sector postcode level from the 'Big Five' banks (HSBC, Lloyds, Barclays, RBS, Santander) as well as from Clydesdale & Yorkshire banks, and from Nationwide Building Society for personal lending only. The postcode lending data runs from Q2 2013 - Q3 2015. To get an accurate picture of the impact of closures on lending we wanted to see the lending patterns in postcodes both before and after the closure, so we sought out branch closures that had happened in the middle of the dataset, in 2014. Unite, the union for bank workers, have a published list of all 2014 NatWest/RBS branch closure announcements, but not their actual closure dates. Using local media reports we were able to identify the closure dates of around half of these bank branches, that we then mapped the postcode lending figures against.

We removed two outliers from the dataset. Edinburgh North Bridge was removed because although we could find the closure date for the branch, there was no lending data for that postcode. Humberstone Park was also removed, because this branch had a huge swing on a quarter-to-quarter basis on the quarter of closure from £11.9million to only £2.8million, a 76% drop. In the quarter following, lending increased to over £15million – much closer to their original lending figure, but an increase of 434% when looking at a quarter-to-quarter basis. This pronounced swing in lending is likely to be explained by the closure and subsequent re-opening of a big credit facility with a large SME, or group of SMEs. In any case, the example and its huge swing is highly untypical within the dataset of 55 branches, and affects the average figures significantly. Stripping away this outlier gives a more accurate picture of the impact of branch closures. In total, this leaves 54 bank branches under analysis, with 8 of these branches being recorded as last bank in town closures.

Subsequent research should certainly take a wider source base of bank branch closures, particularly in regards to last-bank-in-town closures. However in the current research environment, even getting branch closure locations is made highly difficult by the major banking groups, let alone their closure dates. This is particularly the case for older or historic closures, hence data transparency is a key recommendation of this report.

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[49] See footnote 19

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Figure 1: New Economics Foundation

Figures 2 & 10: BBC

Figure 3: Social Market Foundation

Figure 4: GfK NOP

Figures 5 & 6: TSB Bank

Figures 7, 8, 9, 11, 12, 13 & 14: Deloitte

Figures 15, 16 & 17: Move Your Money

All figures referenced above. With thanks to the original authors.