Ahead of the Economy, Jobs and Fair Work Committee’s Focus Group Event due to take place in Dalmellington on Monday 30th April 2018, I thought it may be useful to provide you with a timeline of the RBS branch closures within my constituency along with a timeline of associated actions and correspondences.

Within Carrick, Cumnock and Doon Valley the chronological order of RBS branch closures over this Parliament term has been as follows:

- Maybole: 15th June 2016
- Dalmellington: 16th August 2016
- Girvan: 3rd October 2017
- Mauchline: 10th October 2017
- Cumnock: 11th October 2017

These RBS branch closures now mean that there is no RBS branch presence within my constituency, effecting a journey to either Ayr or Kilmarnock for constituents who wish to have a face to face banking experience, should the mobile branch solution not work based on accessibility or timing.

On Monday 4th July 2016 I was represented by my Head of Office, Tracy Hamilton at a meeting with the RBS held in Dalmellington regarding the pending closure of the town’s branch. Corri Wilson MP was in attendance and the RBS were represented by [Redacted], Regional Director, West Scotland and [Redacted], Head of Public Affairs – Commercial & Private Banking. This meeting was convened to discuss issues which had been raised by constituents with regards to the RBS advised “leave behind solutions”.
At this meeting it was emphasised how deep an impact the RBS Dalmellington branch closure would have on this rural community it serves. This branch was the last bank in the town and a clear and concise outline of the issues, as seen by people who live and work in the town, was presented from a mix of local business people and a representative from the community campaign group.

One of the concerns raised was the impact to local businesses and community groups, as it was perceived that people will do whatever they need to do at the shops in Ayr when banking there.

There were deep concerns raised regarding the practicalities of the proposed mobile branch solution, both from an access perspective and from a business perspective.

The then manager of the Post Office in Dalmellington had offered to have her premises used as a mobile banking solution and was awaiting a response as to why the proposal had been dismissed as “not viable”. advised that RBS banking facilities were already available via the Post Office counter, and whilst it was advised that we knew this to be the case the current arrangement did not allow real time banking - which was currently enjoyed by customers of other banks i.e. Nationwide or Santander. Specifically, that for RBS customers it takes 3 working days for money being deposited or transferred to show in the receiving account but for Nationwide and Santander this was instant. It was recognised that if the Post Office counter agreement could be revised it would solve most of the problems associated with the bank branch closure.

All of this was punctuated though a tangible overview of concerns surrounding the human aspects facing the community, as delivered by the then Post Office Manager. We were asked to imagine transactions being made where someone needed to transfer £2.52 to cover a direct debit that is due and that for some people in this community so struck by poverty, sometimes the £2 they withdraw could be for them to live on for a day or so, and that to ask these same people to make a trip to Ayr on a bus that costs £6.50 a return is just not realistic.

advised that the Post Office counter agreement was a national agreement but that he would ask to see what could be done. It was pointed out by my representative that if the RBS look at their national agreement in the context of the ask for Dalmellington, not only do they have a viable leave behind option for Dalmellington, but they have a future leave behind solution for any other community they serve with a branch closure notice.

Other concerns raised at the meeting included the mobile branch bank solution; money collection from local business; cash points that accept cash deposits; and having the ATM withdrawal value reduced from a minimum of £10 to £5.

Constituency Office, 46-48 Glaisnock Street, Cumnock, KA18 1BY
Tel: 01290 425 876 email: jeane.freeman.msp@parliament.scot
www.jeanefreeman.scot

Living Wage Scotland
We requested that the mobile branch which will service Dalmellington after the branch closure visits the town, to allow customers to see the facilities and speak to the staff prior to the branch closing.

After this meeting, aside from one further face to face meeting in Dalmellington with RBS representatives, all matters were dealt with via correspondence covering the following topics:

**ATM Note Denominations:**

On **13th July 2016**, I received correspondence from [redacted] confirming that the ATM would be configured to dispense £5 notes, and although this was something we had to revisit after the branch closed through correspondence sent to Sandy Watson, RBS Regional Director, West of Scotland on **6th September 2016**, the ATM was eventually configured mid-September 2016.

[Sandy Watson now left on maternity leave.]

**Online Clinics:**

On **13th July 2016** [redacted] confirmed that they had talked about the request for some online clinics particularly aimed at older and vulnerable customers, at the same time it it was advised that these clinics would be available to any customer who would be interested in developing their mobile banking tech skills. It was further advised that the RBS would work in partnership with The Zone in Dalmellington to run these clinics during the month of August.

On **15th July 2016** I wrote to [redacted] asking how the online clinics through The Zone will be advertised to customers so that there can be as wide an uptake as possible.

[redacted] advised on **4th August 2016** that they had ordered promotional flyers for the online clinics which would be placed in the Dalmellington branch, and that they would ask the Post Office and The Zone about displaying posters. [redacted] also advised that they were "taking every opportunity when speaking to customers" to raise awareness with regards to the mobile branch visit. The RBS advised they were also working with their marketing team to develop some online promotions as well advertising in the local branch.

I wrote to [redacted] on **6th September 2016** to advise that I had received a mixed response to the successes of the online clinic advertising, with one individual saying that they had picked up a leaflet to others saying that they had
not seen any advertising at all. It was also the case that the online clinics took place in Dalmellington Community Centre opposed to The Zone with feedback being that it was too far out for people to attend and that they didn’t know the clinics were on.

**Business Customer Engagement:**

advised on 13th July 2016 that they discussed the engagement they had carried out with their business customers following the announcement of the closure, and that they have so far engaged 28 business customers throughout the process.

I wrote to on 15th July 2016 to advise that upon speaking to some of the business customers in the community, that whilst they had received an email detailing matters it was felt to be “a bit vague”. Another business customer advised that they have had no further contact from the RBS since the end of June.

On 4th August 2016 advised that they had again spoken to both business customers I raised concerns on behalf of, and that they had gone through their individual banking requirements.

I wrote to on 6th September 2016 advising that both business customers advised that they had been contacted, but that both advise that the solutions offered do not suit their business model, specifically depositing needs at the mobile branch in terms of access (having to queue and wait) and availability, Tuesday 10.40am to 11.40am and Friday 11am to 1pm. It is my further understanding that both business customers changed banks.

On 16th September 2016 replied to me advising with regards to queuing at the mobile branch, that I should be reassured that all RBS customers have been served before the van leaves and to reduce the risk of queuing on Tuesdays they have extended their time there by a further 30 minutes.

**Mobile Branch:**

On 13th July 2016 advised that as per our request the mobile branch will visit Dalmellington before it is formally routed to the town once the branch is closed, allowing customers to see the facilities and speak to the staff.

On 15th July 2016 I asked how they were going to communicate the mobile branch visit so that as many customers as is practicable can have the opportunity to visit the mobile branch and see the facility in action.
On 4th August 2016 [redacted] advised that they were "taking every opportunity when speaking to customers" to raise awareness with regards to the mobile branch visit, and that the RBS were working with their marketing team to develop some online promotions as well advertising in the local branch.

On 6th September 2016 I raised the very urgent matter of the distressing experience my constituent Ms Sandra Borthwick had when she arrived at the mobile branch on Friday 2nd September. Ms Borthwick is a wheelchair user and was left to sit outside the mobile branch in the rain with an umbrella being held over her by another person. Ms Borthwick could not gain access to the mobile branch and was left deeply upset that the bank teller had taken all her banking details outside in the open area where anyone could have heard their conversation. This was the first occasion that I raised the very real accessibility issues with the RBS mobile branches asking what provisions could be made to ensure customers with mobility issues, including older members of the community who may not be able to manage up the steps of the mobile branch, can be treated with equal levels of privacy, dignity and respect as that enjoyed by customers who can access the mobile branch freely.

In this correspondence I included two photographs to demonstrate the issue advised by Ms Borthwick, and I include these now for your reference.

On 16th September 2016 [redacted] replied to me apologising for Ms Borthwick's distress at her visit to the mobile branch on 2nd September 2016. Mr Watson then
 went on to state that their "vans were previously fitted with disability tailgates however feedback suggested that many of our customers neither liked them or used them." And that "after much deliberation we decided not to build a tailgate onto our new vehicles, however this decision will be kept under review when considering additional/replacement vehicle purchases" and that he has noted my feedback.

continued that all mobile branch vehicles provide high visibility markings, a handrail, non-slip flooring and a bell to get the attention of staff on-board. As well as this, branches with bandit screens have induction-loop systems for those with hearing impairments.

The biggest issue I had with Mr Watson's correspondence was his comment that "Our staff can work flexibly to support customers and are we are keen to ensure [redacted] has a comfortable banking experience." And that he would be grateful for me to ask [redacted] "to get in touch with me so we can discuss her requirements and make any reasonable adjustments to support her."

then thanked me for being in touch and that he "appreciated my on-going feedback and assessment" and that "it would be great if we could schedule a call for three months time to check-in how things are going".

On 20th October 2016 I responded to [redacted] copying to RBS CEO Ross McEwan advising that I felt his response had fallen way short of the standard I had anticipated from him in his position as Regional Director for West of Scotland.

I specifically asked what feedback was gathered to advise that when previous vans were fitted with disability tailgates "many of" your "customers neither liked nor used them."

I also asked who decided not to build tailgates into the new vehicles, specifically on the advice that there had been "much deliberation".

At the same time, I took the opportunity to point out that failure to comply with this duty is unlawful discrimination, and that if a disabled person believes a service has failed in its duty to make reasonable adjustment, they can make a claim under the Act.
I then returned to my previous question of what feedback was gathered to change the provision of tailgates on the new vehicles and specifically asked what he plans to do to address the issues of equality of access for those with restricted mobility for whom handrails and non-slip flooring are not appropriate solutions.

Put simply, my constituent Ms Borthwick does not want a “comfortable banking experience” she is wanting an equal, fair and secure banking experience and I asked for a more respectful and timely response than that of his last correspondence.

On 16th December 2016 I met with [Redacted] and his team once more in Dalmellington, where I specifically asked that the RBS take their equalities responsibilities seriously. This meeting was jaw dropingly awful with nothing more than the same regurgitated PR lines with not so much of a sniff of movement. I advised at this meeting that not only was I the MSP for the constituency but I was the Scottish Government Minister responsible for disabilities and older people and offered once more that they review their current position. When there was no further movement I brought the meeting to an end. In all the meeting lasted 15 minutes.

On 5th February 2017 we took Ms Borthwick’s experience to the press - Daily Record 05/02/2017.

On 27th June 2017 I wrote to [Redacted] outlining Ms Borthwick’s experience and that after raising the matter with [Redacted] and his team, disappointingly I still did not have a resolution to this urgent matter.

This was punctuated that we were now some 9 months on from when I first raised this matter, and in light of the RBS announcement regarding the closures of branches in Cumnock, Girvan and Mauchline, we are now in the parlous situation where there will be no RBS branches left in the Carrick, Cumnock and Doon Valley Scottish Parliament constituency. Specifically, as the removal of these vital banking services together with the Bank’s failure to offer accessible mobile banking facilities shows scant regard for customers, local business and a rural economy which has provided RBS with custom and profit over the years.

I asked for [Redacted] to provide comment to these matters.

On 5th July 2017 I issued a news release challenging the RBS to make their mobile branches more accessible after East Ayrshire’s Leisure Trust had unveiled two new fully wheelchair accessible van based mobile libraries.

http://www.jeanefreeman.scot/pressrelease/jeane-freeman-msp-challenges152
On 14th July 2017 I received a response from [redacted], CEO, Personal and Business Banking due to [redacted] being on annual leave", [redacted] advises that [redacted] has spoken to Ms Borthwick "on a number of occasions" and that Ms Borthwick had informed [redacted] that she had chosen to close her banking account with the local Post Office and redirected her benefit income to her RBS account" stating that "these actions would suggest Ms Borthwick is satisfied by the service she receives from us - and she has already confirmed this directly with us too." It was then offered "if you have new or different concerns about the service we provide to Ms Borthwick then please do let me know but I am otherwise satisfied that we are providing a fair, accessible service to our customer, which allows her to meet her banking needs."

I contacted Ms Borthwick on 19th July 2017 whereby she confirmed that she had closed her Post Office account. Ms Borthwick advises that this is due to her shopping in Ayr and being in Ayr more often and that the branch is accessible, whereas the mobile branch is not. Ms Borthwick stated that she still uses the mobile branch when she "has" to and that she still has the same experience of her banking being conducted on the street. Importantly, Ms Borthwick also raised the example of the new East Ayrshire Leisure Trust libraries and how easy it can be done but stated that Mr Watson still advises that "it can't be done".

With regards to the telephone banking situation Ms Borthwick advises that Mr Watson "keeps pushing the telephone banking but it is not an option".

On 22nd August 2017 I wrote to [redacted] once more to convey my disappointment at a further reduction in the level of services provided by RBS in my constituency. Specifically, the quietly announced decision to reduce the level of service provided by the mobile branch whereby four villages would lose access altogether and four villages were to have a reduction to the length of time the mobile branch stops in these places. I also noted my surprise that there
would be no mobile branch provision in Mauchline, the village where the latest branch closure is taking place, and specifically as it is the last bank in the village.

I again took the opportunity to pursue the matter of the RBS making their mobile branches fully accessible, asking them again to meet their statutory obligations.

I advised of my recent press release regarding the accessible mobile vans that East Ayrshire Leisure Trust have launched, highlighting that there are vehicles available on the market to cater for customers with limited mobility. I specifically asked Mr McEwan to provide comment on these matters and whether any consideration has been given to customers who can’t access their current inadequate mobile bank fleet.

I received a letter from [redacted], Managing Director, Personal Banking Scotland on 6th September 2016. Apologies for the repetition, but the stock PR response of “we take our requirements under the Equality Act seriously and we are confident that we meet our statutory obligation in full” was yet again delivered.

It was then advised that mobile branch routes are reviewed for customer usage and that the mobile branch fleet is intended to support rural locations where customers use and benefit from timetabled services, and as such the RBS perform regular reviews “to ensure the mobile branch is being used by customers and this it is travelling to places with the highest demand.” It was also advised that “where a service is consistently used by fewer than ten customers, we will review the sustainability of the branch stop and consider whether a different location might better suit more customers.”

So in short, the mobile branches are currently not accessible to people with mobility issues, the timetables do not suit people who are at work, more rural branches are closing resulting in even more rural areas needing serviced with the vans, suggesting areas with the lowest usage will lose out.

There was also advice that the RBS are “appointing two Community Bankers in the local area” and that they “can help customers realise their financial goals, needs and priorities and will focus on community engagement and support.”

However, it was finally recognised that customers may prefer not to bank digitally or use the other methods outlined but that as the RBS have a contract with the Post Office counter they can “carry out simple transactions” via that route. This only reinforces my previous request for them to revisit their national agreement to allow for real time transactions.
On **19th September 2017** I wrote to Keith Brown MSP, Cabinet Secretary for the Economy, Jobs and Fair Work to raise the issue of disability access to RBS mobile branches within my constituency, outlining my endeavours so far to get the RBS to fulfil their statutory duty under parts 3 and 4 of the Equality Act 2010 and seeking his assistance in this regard.

On **26th September 2017** Keith Brown replied to my letter advising that he shares my concerns and that he would write to the RBS expressing our shared concern and ask what action the bank will take to ensure that they fulfil their statutory duty, and its obligation to customers to provide services that are accessible to all.

On **Friday 13th October 2017** STV ran with two articles about the accessibility issues I had raised –

**STV Bank Closures Live**

**STV Live at Six – Bank Closures**

It is the case that I will continue to raise the important matter of mobile branch accessibility at every opportunity, specifically as the RBS have continued to show scant regard to this very real consequence of their bank branch closures.

Recently I have been working with Scottish Rural Action in this regard, who have teamed up with Disability Equality Scotland who have just surveyed their membership regarding the RBS mobile banking vehicles. It is my understanding that they are now about to write a joint letter to **[redacted]** of the Equality and Human Rights Commission Scotland with their shared concerns, to ask the Commission to undertake an investigation into whether the proposal by the RBS to replace branches with mobile branches is a breach of the Equality Action 2010.

**Post Office Counter:**

On **13th July 2016** **[redacted]** advised that the request regarding the transaction times via the Post Office network was currently being looked at and that they had begun a conversation to see whether they could deliver a quicker processing time.

I returned to **[redacted]** on **15th July 2016** advising that I had been contacted by the Post Office Manager who stated that the RBS Manager responsible for Mauchline and Cumnock visited the Dalmellington Post Office premises on the morning of 5th July 2016 to ask about the use of the Post Office facilities as offered at the meeting, however rather disappointingly no consideration was
given to the internal capacity of the Post Office only a request to use the rear of the building to park the mobile branch.

In the same correspondence I stated that my understanding of the request regarding the Post Office counter service transaction times was not for a reduction in processing time but for real time transactions, as per those currently enjoyed by customers of other banks. I reiterated the importance of getting their national agreement changed so there is a comprehensive leave behind solution, not only for the community of Dalmellington but for any other communities impacted by RBS branch closures.

On 4th August 2016 [redacted] said she was sorry to hear of the Post Office Manager’s disappointment and that they have to tried to make contact in this regard on “several occasions”.

Rather disappointingly, [redacted] also advised that RBS would not be able to amend their current Post Office Counter arrangements as “the service is a national one so, it isn’t possible to alter it at a local level”; [redacted] acknowledged that this news would be disappointing but that she remains confident “that our customers will continue to be able to access a robust range of leave behind options that meet the regular banking needs of our customers.”

I wrote to [redacted] on 6th September 2016 to advise that I was disappointed with the response received regarding the Post Office counter transaction times, specifically as the RBS had not taken the opportunity to look at a national solution which could have been utilised as a future leave behind option for any community impacted by future RBS branch closures. I deliberately stated that I had not been looking for a local solution, and that it was my opinion that this was the one option which could have radically changed the leave behind options for the community of Dalmellington had it been implemented.

Suggested Questions:

There are still questions that the RBS have to answer, and I would like to offer the following suggestions:

- Why have the RBS not looked to change their Post Office counter national agreement, specifically in terms of real time banking transactions enjoyed by customers of other banks, for example Nationwide or Santander?
- Can the RBS accept that if they changed their Post Office counter national agreement that they would be providing their customers with much better leave behind solutions?
• What plans do the RBS have to increase their mobile branch fleet in light of the news that they are to close 62 branches across Scotland?
• Will any new vehicles the RBS purchase be fully accessible to wheelchair users and people with mobility issues?
• What criteria will be applied to the sustainability of mobile branch visits to rural communities once branches close, specifically in light of the experience of Dalmellington and many of the other communities across CCDV where there is now not one single RBS branch open?
• Can the RBS acknowledge that when bank branches close it is not always the case that technology or telebanking can replace the vital services that a local branch provides?

I hope this overview of the experiences from across Carrick, Cumnock and Doon Valley in relation to the RBS bank branch closures has been useful to you, not least in highlighting some of the needless obstacles that could easily have been removed if the RBS only showed a modicum of compassion and demonstrated some true corporate responsibility - rather than posturing and repeatedly churning out the same tired PR spin.

If you need anything further from me, please do not hesitate to ask.

Best wishes,

Jeane Freeman MSP
Carrick, Cumnock and Doon Valley Constituency