

Information about current account services

Consultation Paper CP17/24**

July 2017

How to respond

We are asking for comments on this Consultation Paper (CP) by 25 September 2017.

You can send them to us using the form on our website at: www.fca.org.uk/your-fca/ documents/consultation-papers/ cp17-24-response-form.

Or in writing to:

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How to navigate this document onscreen



returns you to the contents list

takes you to helpful abbreviations

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1 Summary

Why we are consulting

1.1 These proposals seek to promote effective competition by enabling customers to make effective comparisons between providers of personal current accounts (PCAs) and business current accounts (BCAs) based on service, and by incentivising providers to improve service and performance.

Who this applies to

- **1.2** This consultation paper (CP) affects the majority of current and potential participants in the PCA and BCA markets as well as those interested in this market.
- **1.3** The CP applies to firms that accept deposits (banks and building societies) and provide payment accounts as defined by the Payment Accounts Regulations¹ (typically PCAs) or BCAs that have the features of a payment account. These firms should read the whole consultation.
- **1.4** Organisations which offer comparison services are encouraged to read the whole consultation and to respond to questions 7 10.
- **1.5** This CP will be of interest to PCA and BCA customers. While we do not expect customers to read this paper in full, organisations representing consumers may want to read the summary of the consultation.

The wider context of this consultation

1.6 In its retail banking investigation final report² the Competition and Markets Authority (CMA) recommended that we require firms to publish objective measures of service performance for both PCAs and BCAs, in addition to the core service quality indicators it will require the largest current account providers to publish. We committed to consider doing so, where the evidence supported this and the measures advanced our objectives.³

¹ http://www.legislation.gov.uk/uksi/2015/2038/pdfs/uksi_20152038_en.pdf

² https://assets.publishing.service.gov.uk/media/57ac9667e5274a0f6c00007a/retail-banking-market-investigation-full-final-report.pdf

³ November 2016, FCA response to the CMA's recommendations following its investigation into retail banking. www.fca.org.uk/publications/corporate-documents/our-response-cma-investigation-competition-retail-banking-market



What we want to change

- 1.7 Information available to customers about the service provided by individual firms is rarely provided in a consistent manner that allows comparison between firms. We want to make it easier for customers to access and assess information about providers' service, enabling them to make informed comparisons and choose the provider that best suits their needs. We also want to incentivise BCA and PCA providers to improve their service and performance.
- **1.8** To achieve this we propose to require BCA and PCA providers to publish service information in the following categories:
 - Account opening clear information about the account opening process and information about how long it takes to open an account and gain access to specified services including overdraft funds (see paragraphs 4.40-4.55)
 - Time taken to replace a lost, stolen or stopped debit card and to organise third party access to a PCA under a power of attorney (see paragraphs 4.56-4.75)
 - Service availability identifying how and when various services can be accessed and whether 24-hour help is available for certain matters (see paragraphs 4.76-4.83)
 - Major incidents information about the number of major operational and security incidents that firms have reported to the FCA, by channel (see paragraphs 4.84-4.88)
- **1.9** The service information we propose to require firms to publish includes both:
 - standing data information firms will be required to publish and keep up to date, for example about the times of day when certain services are available
 - service metrics things that we will require firms to measure or count and publish every quarter

Other proposals

- 1.10 We propose to require firms with more than 70,000 relevant PCAs or 15,000 BCAs (held by "banking customers" as defined for the purposes of BCOBS) to publish this service information. These thresholds apply per brand. We do not consider it proportionate to require firms to publish service information for smaller brands. However, if they choose to publish service metrics they will need to comply with those rules to ensure meaningful and consistent comparisons (see paragraphs 4.13-4.18).
- **1.11** So that customers and digital comparison services can access service information we propose that firms should publish it on their website. We also want firms to make the information available via Application Programming Interface (API) and propose to require firms that are part of Open Banking and all firms in scope of the rules which use an API for the purposes of PSD2 to also to make the information published under our rules available through an API (see paragraph 4.23-4.28).



- **1.12** We propose that the service metrics should be measured quarterly (beginning in April 2018) and published within six weeks of the end of each quarter. Depending on the outcome of this consultation, we will aim for the first publication of the metrics to coincide with firms' first publication of the core indicators required by the CMA in August 2018 (see paragraphs 4.29-4.32).
- **1.13** We propose not to require service information in a number of areas, including subjective service quality measures, measures related to fraud, and information specific to BCAs for example regarding relationship managers. We are not pursuing these because our research and analysis suggested that they may duplicate the core CMA service indicators, not be motivating to customers, not be practical to measure, or result in unintended consequences. While we are not proposing service information requirements in these areas now, we will reconsider this in the future if evidence suggests we should. For further information about service information we are not pursuing see Chapter 5.

Unintended consequences of our intervention

- 1.14 In designing our proposals we have considered possible unintended consequences and these are outlined in this CP. We have sought to be proportionate in designing these remedies and we are neither proposing that they apply to all firms nor all aspects of service. The rules we are proposing relate to areas of service that our research tells us matter to customers. We are mindful that introducing service metrics for some services and not others may impact the attention that firms pay to ensuring the quality of other services that are not subject to metrics. We consider that the CMA core service quality indicators (for those firms which are subject to the CMA's requirements) will mitigate this since they focus on overall brand perceptions.
- **1.15** We are aware that not requiring the smallest firms to provide service information and not applying rules to certain providers, including credit unions could potentially distort competition. We propose that if these firms wish to compete by publishing the same or similar service metrics, they must comply with the relevant rules.
- **1.16** We will monitor whether publication of service information causes unintended consequences.

Outcome we are seeking

- **1.17** We want to improve competition in the current account market by:
 - making it easier for customers to make informed comparisons and choose the provider that best suits their needs based on service, and
 - incentivising BCA and PCA providers to improve their service and performance.
- **1.18** We consider that we will achieve this if the following conditions are met:



- firms comply with requirements to publish meaningful and comparable service metrics
- customers access and assess the information about providers' service when choosing an account
- digital comparison services and the media use the published metrics to draw attention to the service offered by providers
- there is competitive pressure from market commentary, and
- firms respond to the pressure of reputational damage caused by indications of providing worse service than their competitors by taking steps to improve service.

Measuring success

- **1.19** We will gather baseline information about customers' attitudes and behaviour related to service information and switching in 2018. We will also interview digital comparison services to understand their role in distributing service information to customers, and track media coverage.
- **1.20** We will repeat this exercise as part of a post-implementation review, expected to take place in 2019/20, to assess the impact of the changes we make.

Next steps

- **1.21** The consultation period for this CP is two months. We consider this shorter consultation period is appropriate as we have engaged with stakeholders, including firms, extensively as we developed our proposals, and it will allow firms more time for implementation. Subject to the outcome of the consultation, we would aim to have rules in place to require the first publication of additional service metrics in August 2018 to coincide with the first publication of the core CMA service quality indicators.
- **1.22** Please send your response to this CP by 25 September 2017. To submit a response, please use the online response form on our website or write to us at the address on page 2.
- **1.23** If, having considered the feedback to this CP, we propose to make rules we would plan to publish a Policy Statement later this year.
- **1.24** We may consider introducing additional service information requirements in the future should there be evidence that this would benefit customers and improve competition.

2 The wider context

The harm we are trying to address

2.1 The CMA's retail banking market investigation found that there are barriers to accessing and assessing information about service quality, which contributes to low customer engagement in the current account market. This may result in harm as customers may receive poor value by staying with products that are not best suited to their needs or do not provide good quality service.

The CMA's package of remedies

- **2.2** The CMA identified several remedies which are intended to work together to tackle the underlying problems identified in the PCA and BCA markets by:
 - enabling customers to make reliable comparisons between providers
 - ensuring customers can compare the service quality of existing and prospective providers by requiring firms to make available:
 - information about customers' willingness to recommend their service to others
 - operational performance metrics with respect to PCA and small and mediumsized enterprise (SME) banking services, and
 - promoting engagement by prompting customers to consider their banking arrangements and take appropriate action.
- 2.3 The CMA is implementing a number of these remedies itself, but has also made five broad recommendations to the Financial Conduct Authority (FCA). These include a recommendation that we consider requiring operational performance metrics (the subject of this consultation), work on Open Banking, designing prompts and alerts to encourage consumers to consider their banking arrangements, reviewing the Maximum Monthly Charge for unarranged overdrafts and delivering a more competitive market for SMEs. Our response to the CMA's final report outlines the recommendations the CMA made to the FCA and our response.⁴
- 2.4 The CMA has made an Order which requires the largest PCA and BCA providers to publish core service quality indicators.⁵ Firms will publish results in their branches, on their websites and in leaflets. These core measures of quality are based on customers' willingness to recommend their bank's services to friends, family or colleagues or other SMEs. They will be measured every six months by an independent survey required by the CMA with the first set of results due to be published by firms in August 2018. As

⁴ November 2016 www.fca.org.uk/publications/corporate-documents/our-response-cma-investigation-competition-retail-bankingmarket

⁵ https://www.gov.uk/government/publications/retail-banking-market-investigation-order-2017



discussed at paragraph 1.6, the CMA asked the FCA to consider whether we should require firms to publish additional objective measures of service performance. This CP outlines our proposals on this and how we consider them to further our objectives.

How it links to our objectives

2.5 The action we are taking to consider each of the CMA's recommendations is intended to advance our statutory objectives, which are broader than the CMA's remit.

Competition

Requiring the provision of additional service information will improve customer engagement in the current account market.

- **2.6** Improving the availability of meaningful and comparable information about service will make it easier for customers to make informed comparisons and choose the provider that best suits their needs based on the quality of their service.
- **2.7** More engaged customers and reputational pressure from publishing service information should drive providers to improve service and performance to retain existing and attract new customers.

Consumer Protection

Requiring the provision of additional service information will lead to provision of services that are better suited to meeting consumers' needs

- **2.8** While not directly focussed on our consumer protection objective, as a result of our intervention we expect to see provision of services that are better suited to consumers' needs, for example as providers adjust the service availability and contact routes they offer.
- **2.9** Where we require provision of service information to advance our competition objective, the FCA and other regulators may also be taking action in other ways to protect consumers, for example in relation to reducing harm arising from major incidents, fraud and aspects of access to financial services.



What we are doing

- **2.10** We are proposing rules that would oblige firms to publish information about service for PCAs and BCAs. The following chapters provide more information on our reasons for doing this and the detail of our proposals:
 - Chapter 3: Considering the case for additional service information
 - Chapter 4: Changes to the Banking Conduct of Business sourcebook
 - Chapter 5: Discussion of metrics we are not pursuing
 - Chapter 6: Next steps

Equality and diversity considerations

- **2.11** We have considered the equality and diversity issues that may arise from our proposals.
- **2.12** Overall, we do not consider that the proposals adversely impact any of the groups with protected characteristics under the Equality Act 2010 but we will continue to consider the equality and diversity implications of the proposals during the consultation period. We will also revisit them when publishing the final rules.



3 Considering the case for additional service information

- **3.1** As discussed in paragraph 2.4 the CMA will require firms to publish core service quality indicators. These will be based on a survey that asks customers how willing they are to recommend their bank's services to friends, family or colleagues or other SMEs.
- **3.2** The CMA recommended that we require firms to publish additional objective measures of service performance. Having undertaken research and analysis we have decided to pursue the publication of additional objective service information, as we consider that doing so will advance our operational objective to promote effective competition.
- **3.3** In this section we outline the consultation, research and analysis we have undertaken to come to this conclusion. We also explain why we consider requiring publication of additional objective service indicators will advance our objectives.

Process

- **3.4** In summary, our process to consider additional service information included five stages:
 - Review of existing evidence to analyse the likely effect on customers of consistent service information, and to develop a long-list of options.
 - Establishing a stakeholder expert group to prioritise and reduce the options to a shortlist and understand how metrics would be used by firms/intermediaries and communicated to customers.
 - Qualitative consumer research to get customer views on shortlisted options, and identify any alternatives.
 - Discussions with firms to understand the potential effects on firm behaviour of such publication, and their capability to deliver the metrics.
 - Analysis of evidence and deciding to pursue publication of additional metrics.
- **3.5** We provide more detail on each stage of this process below.



Review of existing evidence

- **3.6** We began by reviewing a considerable amount of existing research and evidence. This included the CMA's final report into competition in the retail banking market⁶ and additional information gathered by the CMA on the service information that firms already collect for internal monitoring purposes. Whilst not directly related, we also looked at experience of service-disclosure interventions by other regulators, and experience from FCA interventions requiring data publication, such as on complaints, the cash savings sunlight remedy, and general insurance claims. We also considered published research on consumer attitudes to service in relation to bank accounts.
- **3.7** This review of existing evidence helped us to understand the pros and cons of different approaches and to develop a list of potential metrics to discuss with stakeholders as we developed our proposals. It also helped to shape our qualitative research.

Stakeholder expert group

- **3.8** Acknowledging the complexity of developing industry-wide metrics for services, we established an external stakeholder expert group (SEG) of consumer and SME representatives, digital comparison services, service experts, other regulators and a trade body to inform our consideration of what service quality information could be made available and how it might be used.
- **3.9** The SEG considered a long-list of over 90 service information items suggested from our research and by stakeholders, including items already collected by firms for internal monitoring purposes, and additional items suggested by SEG members. The full list of metrics considered is available in Annex 5. Detailed feedback from members on likely customer and intermediary use, credibility, and interaction with the core CMA indicators was consistent with findings from our review of existing evidence. It highlighted what information would most likely be used by customers, digital comparison services and commentators. It showed that some metrics duplicated the CMA core indicators, while others could complement them and contribute to competition in the interests of customers.
- **3.10** A list of SEG member organisations is available in Annex 4 of this CP. The SEG's views are included in our discussion of our proposals in this CP.

Qualitative consumer research

- **3.11** After considering the views and evidence provided by the SEG, we commissioned qualitative research into a short-list of over 30 service metrics. The results of the research are published alongside this report.⁷ The research aimed to:
 - test customers' understanding of a short-list of service indicators and their power to motivate them to consider switching or trying a new current account with another provider, and

7 www.fca.org.uk/publications/search-results?live_c=1

⁶ https://assets.publishing.service.gov.uk/media/57ac9667e5274a0f6c00007a/retail-banking-market-investigation-full-final-report.pdf



- test, by different areas of service, customers' preferences for different types of information (eg number of events or duration of events; national average figures or data about local service).
- **3.12** The research included ten focus groups with PCA holders, and three workshops and 37 in-depth telephone interviews with SME BCA holders. The research also included eight face-to-face in-depth interviews with individuals deemed to have additional needs with regards to their current account. A total of 155 respondents were engaged.
- **3.13** Participants were asked what was important to them about their current account. They were also asked to reflect on the CMA core service quality indicators. The research then tested 34 possible metrics⁸ categorised into six groups:
 - Communicating with the bank
 - Technical service reliability
 - Ease of opening an account
 - Resolution of issues
 - Complaints
 - Local branch offering
- **3.14** The short-list of areas of service and indicators tested in the research was created by us based on views of the SEG and findings from our review of existing evidence.
- **3.15** Our qualitative research backs up the views of experts in our SEG that customers value good service and would be willing to switch account to get it. While some assume 'all banks are the same,' this perception is challenged when they learn about the service available from other providers. However, often this information is not provided and when it is available it is rarely provided in a consistent manner that allows comparison between firms.
- **3.16** BCA and PCA customers had similar views on what service information they wanted to see. They considered the CMA core metrics a "useful starting point to understand which banks were performing." However, they also wanted to see objective measures of the service they could expect to receive. They were more interested in measures of service that were important to them than in aspects of service that they did not expect to experience. Areas of particular interest were:
 - Efficiency of response
 - Service stability
 - Accessibility (particularly out-of-hours)
 - Speed and flexibility of opening an account.
 - 8 Eight of which were specific to SME audiences and only tested during telephone interviews with this group.



3.17 Customers expect to access service information through digital comparison services and the media. They expect to use information about service to choose an account. They also think this information could prompt them to consider switching or trying another account. Once engaged, they might seek out further information on a firm's website.

Discussions with banks and building societies

- **3.18** We have engaged with banks and building societies individually and by participating in a series of roundtable meetings with them to discuss potential effects on firms' behaviour of data publication, and their capability to deliver the additional measures of service we are proposing. We have also discussed our proposals with trade bodies of impacted firms.
- **3.19** These conversations showed that challengers are competing on service in the areas of interest to customers and there is sufficient differentiation in service to warrant publication of metrics. Service metrics in these areas would enable customers to choose their account provider based on its performance, and this along with broader reputational considerations would encourage account providers to improve their service.

Decision to propose publication of additional metrics

- **3.20** The CMA's retail banking investigation found that there are barriers to accessing information about service quality which contribute to low consumer engagement in the current account market. This adversely affects competition in the retail banking market. Throughout our evidence gathering and consultation process we have seen a broad and on-going consensus that requiring firms to publish additional service information alongside the CMA core indicators of service quality will help address this.
- **3.21** Publication of additional service information will advance our operational objective to promote effective competition by making it easier for customers to access and assess information about providers' service, enabling them to make informed comparisons and choose the provider that best suits their needs. More engaged customers and reputational pressure from publishing service information should incentivise BCA and PCA providers to improve their service and performance to retain and attract customers. Commonly defined service metrics may be particularly relevant and useful for smaller banks or building societies that cannot take part in the CMA core service quality indicator survey and could help them to compete.
- **3.22** Throughout the process outlined above we considered over 90 service indicators proposed by stakeholders against a range of criteria including:
 - Relevance to customers: to consider whether customers will be sufficiently interested in the service information
 - Relevance for challengers and smaller banks and building societies: to ensure that metrics would be adequately relevant and useful for challengers, particularly given their exclusion from the CMA core indicators



- Relevance to intermediaries: to assess whether intermediaries are likely to use the proposed service metric in their comparison tools or publications in a way that is useful for customers
- Differentiability: to assess whether variation between providers would be of significance to customers
- Duplication: to ensure that the proposed metrics do not duplicate information that is already available or will be available elsewhere
- Unintended consequences: to consider if there are risks that the proposed metric could lead to unintended consequences leading to detriment to competition, firms or the market
- Proportionality: to ensure that the metrics are feasible for firms to measure and the costs are reasonable relative to the benefit to customers.
- **3.23** As a result we propose that firms should publish service information related to the following aspects of service in this consultation. Unless otherwise stated we propose to require this information to be published for both PCAs and BCAs:
 - Account opening clear information about the account opening process and information about how long it takes to open an account and gain access to specified services including overdraft funds (see paragraphs 4.40-4.55)
 - Time taken to replace a lost, stolen or stopped debit card and to organise third party access to a PCA, under a power of attorney (see paragraphs 4.56-4.75)
 - Service availability identifying how and when various services can be accessed and whether 24-hour help is available for certain matters (see paragraphs 4.76-4.83)
 - Major incidents information about the number of major operational and security incidents that firms have reported to the FCA, by channel (see paragraphs 4.84-4.88).
 - Q1: Do you agree with our analysis that we should require publication of service information?
 - Q2: Do you agree that firms should publish service information related to the areas of service outlined? Are there any other areas we should consider (bearing in mind our discussion of metrics we are not pursuing in Chapter 5)?

4 Changes to the Banking Conduct of Business sourcebook

Introduction

- **4.1** In this section we consult on new rules in BCOBS to require the publication of additional service information about:
 - Account opening
 - Time taken to replace a debit card, and to give a third party access to a PCA under a power of attorney
 - Service availability
 - Major incidents
- **4.2** We discuss the application of the proposed rule changes, including the products and firms within scope of our rules.
- **4.3** We also discuss distribution (how we will require firms to make information about service available to customers) and the timing and frequency (when we expect new rules to commence and the frequency with which we expect firms to publish service information).
- **4.4** We seek feedback from interested stakeholders, particularly customer representatives, impacted firms and digital comparison services.

Application of proposed rule changes

Products within scope of our rules

- **4.5** Our main banking rules are in BCOBS. They apply to a range of accounts such as current accounts and savings accounts. They apply to a range of defined banking customers, including individual consumers, micro enterprises⁹ and charities which have an annual income of less than £1 million.
- **4.6** We are confident that BCOBS covers broadly the right banking customers for the purposes of these rules but, at this time, want to restrict their application to PCAs and BCAs.

⁹ An enterprise which: (a) employs fewer than 10 persons; and has a turnover or annual balance sheet that does not exceed 2 million Euros.



- **4.7** Despite PCA and BCA being common terms used by both firms and customers, they are currently not defined in BCOBS or in legislation. We are therefore adopting a definition of a PCA based on the definition of a 'payment account' in the Payment Accounts Regulations 2015 (PARs). This includes PCAs and basic bank accounts as well as instant access savings accounts and current account mortgages, where they are used in a way that is similar to a current account (that is, for day to day payment transactions).¹⁰ However, we propose to exclude current account mortgages as we consider that including these might distort the service information that firms report, making it less relevant to current account customers.
- **4.8** Our work will allow customers to compare similar current accounts held by the majority of each provider's customers. We are aware that a small minority of PCA customers get preferential service on their account, for example because they have a high balance or monthly income. We do not want to include these customers in our service information and metrics because they could skew them to show better performance than most PCA customers can get.
- **4.9** In order to ensure fair comparison we therefore propose to define and exclude 'premium service accounts'. We propose to define such accounts as PCAs which have eligibility criteria relating to minimum balances or minimum monthly deposits (or both) whose holders receive better service than non-premium service accounts, based on any of the service information we propose to require firms to publish. An account cannot be a premium service account if it is held by 10% or more PCA customers. For example, an account which has staff available to respond to relevant queries through telephone banking for more hours of the day than other accounts, or whose account holders can replace a lost debit card more quickly than other accounts, would be a premium service account if it is not held by 10% or more of the firm's PCA customers.
- **4.10** An account may only be a "payment account" for the purpose of the PARs if it is held by a "consumer". As a business user is not a consumer, we propose to define a BCA as an account which would be a PCA if the account holder were a consumer. Further, we propose to align our rules with BCOBs, so that only BCAs held by "banking customers" will be subject to our rules.
 - Q3: Do you agree with PCAs and BCAs being defined by reference to the definition of "payment account" in the Payment Accounts Regulations 2015?
 - Q4: Do you agree that 'premium service current accounts' should be excluded from PCA service information?
- **4.11** There are other accounts that sit outside BCOBS, for example accounts provided by e-money and payment institutions which are similar to current accounts. There may be benefits to competition of making information about service quality available to customers with those accounts. However, our rule making powers do not currently extend to the providers of such accounts.
- **4.12** We will monitor the impact of introducing service information for current accounts. If we consider there could be consumer and competition benefits to requiring service information to be published for other products such as mortgages, savings accounts

¹⁰ We have issued guidance to help firms decide if an account they offer is a Payment Account. www.fca.org.uk/publications/finalisedguidance/fg16-6-payment-accounts-regulations-2015-definition-payment-account



that are not payment accounts (as defined by PARs) or insurance, we may consider doing so.

Providers within scope of our rules

- **4.13** We propose that firms measure and publish information about each of their brands separately, as this is the basis on which customers will identify providers. By 'brand' we mean the trading name notified to the FCA.
- **4.14** We have analysed data related to firms' market share to consider which firms should be in scope of our rules. We are unable to publish details of this analysis as this is commercially sensitive information. The data available to us suggest that it is not appropriate to require firms with fewer than 70,000 PCAs in a brand to publish information about their PCA service under that brand, or fewer than 15,000 BCAs in a brand to publish information about BCA service under that brand. These thresholds differ from those set by the CMA. For PCAs our proposed PCA definition (as discussed in paragraph 4.7-4.9) is wider. For BCAs, we propose a narrower application of our rules, in line with the existing application of BCOBS limited to micro enterprises and to charities whose annual turnover is less than £1 million. The CMA's thresholds are measured separately for Northern Ireland and Great Britain and cover only active accounts, while ours relate to all accounts in scope and cover the whole of the UK.
- **4.15** We consider that the thresholds proposed above will encompass a wide range of account providers, including challengers, and that this will increase the availability of information for customers and lead to increased competition in the interest of customers. We understand that these thresholds will capture firms that are actively competing for PCA and BCA customers, including all of the firms in scope of the CMA core indicators plus others which have fewer active accounts than the CMA's threshold. We consider that it would not be proportionate to require firms with fewer accounts than our proposed thresholds to publish service information and metrics.
- **4.16** Firms with fewer accounts than our proposed threshold may wish to compete on service in the current account market by publishing information which is the same or similar to one or more of the service metrics we are requiring larger firms to publish. However, if they choose to publish information which is within scope of any of the service metrics (not standing data), we propose that they are required to comply with the rules as if they did have the requisite number of accounts and are required to publish all aspects of the metric concerned. For example, if choosing to publish information about time taken to replace a debit card (see paragraph 4.67-4.69) they would be required to publish same day, average and 99% response times for the same quarterly reporting period. This is to ensure a fair and consistent comparison between firms. We will monitor the impact of these proposals on competition.
- **4.17** Where firms have fewer than 70,000 PCAs or 15,000 BCAs but later meet this threshold, we propose that they will not be required to measure service information for two quarterly reporting periods. This will allow time (at least six months) for them to introduce the required measuring and reporting capability. For example, if in quarter one a firm reaches the threshold, it will be required to start measuring metrics and publishing service information in quarter four. Where a firm, having previously met the threshold, no longer meets the threshold, they will no longer be required to publish service information and metrics for any quarter after the one during which they fell below the threshold.



- **4.18** We propose that customers of overseas branches and customers whose correspondence address is overseas will be excluded from these rules. The service these customers receive may not be comparable with customers in the UK for example it may take longer for firms to send a debit card to them and we do not want to reduce the comparability of the service information that firms with a large overseas presence provide. We also propose to exclude credit unions from the rules, as providing service information is unlikely to be proportionate since membership requirements restrict customers' ability to choose their credit union.¹¹
 - Q5: Do you agree with the proposed application of the rules? In particular do you agree with the providers, customers and products in scope of the rules?
 - Q6: Do you agree with the proposed threshold? Do you agree that providers below the threshold which choose to publish the same or similar service metrics must comply with the relevant rules?

Distribution

4.19 We have considered how service information should be made available to customers. The options we considered have included: requiring firms to report performance against service indicators to the FCA for publication on the FCA's website; requiring firms to make information available directly to customers and digital comparison services on their own websites; and requiring firms to make information available for distribution by APIs.

Our research

- **4.20** Our consumer research found that customers are interested in service and would consider service information if it were presented to them by digital comparison services, financial commentators or the media. Currently, the larger, better known digital comparison services that provide comparisons for financial services (for example, insurance, credit and banking products) do not compare providers on the quality of their bank account service. We understand this is due to the lack of regular, comparable information and that digital comparison services would use new regulated service information to rank or recommend current accounts and draw attention to varying levels of service between brands in one place.
- **4.21** Research in behavioural economics tells us that consumers can find multiple indicators difficult to assess and compare.¹² We have been mindful of this and are proposing to require service information only in a handful of areas that are of most interest to customers. However this still necessitates multiple indicators. There is an important role for digital comparison services to bring the service information we propose to require together in a useful, engaging and meaningful way so that it is easy for customers to access and compare. Doing so would allow customers to compare accounts based on their own preferences and account usage, going beyond current comparisons based on price.

¹¹ www.fca.org.uk/publication/forms/mutuals-cu-common-bond-specimen-wording.doc

¹² See, for example, 'Price Lab: An investigation of consumers' capabilities with complex products', which can be accessed here: www.esri.ie/pubs/BKMNEXT306.pdf_



4.22 We are aware that people who are digitally excluded are unlikely to access service information online. However, we consider that these customers will still benefit from our proposals. We expect service indicators to be of interest to financial commentators and the media and that commentary about service quality will appear in off-line publications. Firms may also choose to use published service metrics in their marketing. Further, as discussed in paragraph 2.7, we consider that publishing service information will result in improvements in firms' service that will benefit all customers. We will monitor the distribution of the impacts of requiring publication of service information, including for digitally excluded customers.

Our proposal

- **4.23** Publishing service information will make it easier for customers to compare accounts. We expect intermediaries including digital comparison services and the media to incorporate service information into their offer and that this will be a key channel through which customers access the information. This method of distribution reflects customer preferences for accessing service information and it works for the detailed nature of the metrics and information proposed. We understand that digital comparison services see opportunities to make the information available to consumers. For BCAs this data will be available for digital comparison services that may emerge in 2018 from work of the National Endowment for Science Technology and the Arts (NESTA) on behalf of the CMA to develop new comparison websites.¹³
- **4.24** We propose to require firms to publish the service information and metrics we will require on their websites so that they are easily accessible to customers, digital comparison services and other intermediaries. It is our policy intention that over time firms will make the information available via API as this format is preferred by many digital comparison services. However, we are mindful that the costs to firms not already using API may be very significant, at least initially. We propose to require firms that are part of the Open Banking initiative to make the service information and metrics we require available via the same API as they are required to make the CMA core indicators available from August 2018. We expect firms to work with Open Banking to do this.
- **4.25** We think there are incentives for other firms to make this information available via API, for example because it will be easier for digital comparison services to use it. We expect many firms will use an API to meet obligations in PSD2 to enable customers to use the services of account information service providers and payment initiation service providers. If they do use an API for this purpose we propose to require them to also make service information available via API. In other cases, we expect digital comparison services to be able and willing to access data published on firms' websites.
- **4.26** Participants in our customer research wanted reassurance about the methodology and comparability of information. To provide certainty that an independent body has set the parameters of the service information, we propose to require firms to state that they are required by the FCA to publish it. Firms which also publish the CMA core indicators should make clear that the statement that it is required by the FCA does not refer to the CMA indicators. In addition, we propose to specify the language firms must use to describe the service information. This is to ensure consistency between firms and improve ease of comparability. It is important that service information we prescribe is clear to firms, customers, and intermediaries including comparison services, so we welcome views on the language chosen.

¹³ See http://www.nesta.org.uk/project/open-challenge



- **4.27** Beyond this, we are not currently proposing to prescribe a presentational style provided that the language we propose is used and the information is easily accessible. We consider that information will be more engaging to customers in the firm's own presentational style. It is our understanding that intermediaries, including digital comparison services, can access and compare information that may be presented in a different format if the content is common. The tables in the proposed BCOBS 7 Annex 1R contain the language we propose to require firms to use.
- **4.28** We propose that firms notify us of the webpages where they publish the service information and we may aggregate the data for our own use.
 - Q7: Do you agree that our proposals will make service information easily accessible to customers?
 - Q8: Do you agree that comparison services are an important route through which customers will access and assess the service information we propose to prescribe?
 - Q9: Do you agree with the proposals to require publication via an API, initially for those firms required to be part of Open Banking and subsequently for those firms that will use an API for the purposes of PSD2?
 - Q10: Do you agree that we should specify the language firms use to describe the service information, but not its presentational format?

Timing and frequency

Discussion

- **4.29** The first set of CMA core service indicators will be published in August 2018 and we see significant benefits to launching the additional service information we propose at the same time. The CMA metrics will be relevant to the banking arrangements of the vast majority of consumers and we expect them to attract attention from the media. Aligning with the launch of the CMA metrics will also ensure additional service information is available for digital comparison services to use in any new services they plan to launch using the CMA core indicators.
- **4.30** We have considered the frequency with which we will require publication. The CMA survey data will be collected over 12 months and published on a rolling six monthly basis. Quarterly reporting of additional "objective" service indicators would provide firms a regular opportunity and therefore incentive to improve any areas of poor performance highlighted. It would also provide more up-to-date insights into the service available to customers.

Our proposal

4.31 We propose to require firms to measure and publish the service metrics on a quarterly basis, starting with the first reporting period in the second quarter of 2018 (April-June), with publication due within six weeks of each end quarter. This allows firms six weeks to review and quality assure the data, and it also means that the publication dates will align with the twice yearly reporting of the CMA core service quality survey results.

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Table 1 shows the cycle for the first year of reporting. The date of first collection of data is determined by the objective of aligning first publication of our proposed metrics and information with that of the first CMA core service indicators. We propose that the

Reporting period	Start of reporting period	End of reporting period	Publication of service information
Q1 2018/19	1 April 2018	30 June 2018	By 15 August 2018
Q2 2018/19	1 July 2018	30 September 2018	By 15 November 2018
Q3 2018/19	1 October 2018	31 December 2018	By 15 February 2019
Q4 2018/19	1 January 2019	31 March 2019	By 15 May 2019

following years follow the same cycle in order to remain aligned with future CMA survey

Table 1: Proposed reporting timetable for the first year

results. Standing data should be published and kept up-to-date.

- **4.32** We have discussed timescales for implementation with firms. We recognise that our timetable gives firms a limited time period to implement systems changes required to report performance in a consistent manner. We will seek to make rules as quickly as practical following this consultation to give firms as much time as possible to implement.
 - Q11: Do you agree with our plans for the timing and frequency of publication? In particular, do you agree that the first publication of service information under the rules that we are proposing should be in August 2018, to coincide with the first of the CMA's service quality indicators?

The service information

- **4.33** As discussed in Chapter 3 we undertook significant pre-consultation to decide whether we should require additional information about service to be published. We found the following areas of service were of most interest to customers, challengers and intermediaries including digital comparison services:
 - Account opening
 - Time taken to resolve issues
 - Service availability
 - Major incidents
- **4.34** The remainder of this chapter discusses the case for requiring firms to publish service information for each of the service areas discussed above. It seeks feedback on the service information we propose to require firms to publish.
- **4.35** We found that most of the service information we propose to require was equally relevant for both BCA and PCA customers, except for third party access under power of attorney which is only relevant to PCA customers. However, firms often deliver



services differently to PCA and BCA customers, so we consider it is proportionate and necessary to separate reporting of BCA and PCA metrics in the majority of cases.

- **4.36** Where we specify service information by channel we refer to the following definitions:
 - Mobile banking accessing an account via a banking app via any device (including smart phone or computer)
 - Online banking accessing an account via the internet but not through mobile banking
 - Telephone banking use of a phone to access an account but not via mobile banking.

Service metrics

- **4.37** Our research suggests that the dimension of service which is most motivating for customers and easiest for them to compare across firms is, in many cases, the elapsed time from when they applied for or requested the service until they receive the service. To introduce such metrics we have defined a set of events which are sufficiently broad that they will be of relevance to customers but have start and end times that can be defined and measured comparably by firms.
- **4.38** We have considered how best to measure and communicate elapsed time to customers. Participants in our research were interested in the service they should expect to receive rather than average service. Following discussions at our SEG and having considered the management information that firms already collect, we consider that several metrics are required to provide a realistic indication of service:
 - The percentage of customers provided the service on the same day this shows how often firms are able to provide the service immediately (within the same day)
 - The average number of days within which the service was provided this provides a reasonable basis upon which customers can compare firms but may not provide an accurate indication of how long customers can expect to wait
 - The number of days within which the service was provided for 99% of customers this shows the longest a customer might normally expect to wait before the issue is resolved. We recognise that a small number of customer requests may be difficult to resolve for reasons outside of firms' control. We note that some firms already measure the time taken to provide the service to 99% of customers so consider it proportionate for firms to continue using this measure as we have no evidence that it is unsuitable.

Standing data

4.39 In other areas of service, the motivating aspect of the service provided by a firm is in what way customers can access services and when they can speak to somebody who is suitably trained to answer their query or resolve an issue. In addition, customers need to know what documents or other information they need to supply to their current account provider in order to obtain various services. Both these types of information will change infrequently and are not suited to traditional measurement.



Account opening

Discussion Speed of opening an account

- **4.40** Our research found that PCA and BCA customers were very interested in the time taken for a new account to become fully functional, with particular emphasis on access to money and avoiding interruptions to direct debits. While the seven working day Current Account Switching Service has standardised the switching process between participant banks, this process only starts once an account has been opened. There is differentiation, particularly from challengers, on the speed and ease of opening an account prior to the start of the seven day switch process but this information is not currently provided to customers comparing accounts. Digital comparison services have indicated that as this information is relevant to customers they would use this information in their services if it was available on a consistent basis. We consider that making objective information about account opening available at the point of account comparison would remove some of the remaining uncertainty around switching and enable consumers to make more informed decisions.
- 4.41 Conversations with firms about service metrics have highlighted concerns that logging every customer enquiry regarding account opening would be challenging and potentially invasive. Firms have also stressed that the time customers take to complete their application following initial enquiry is influenced by factors outside of the bank or building society's control. Firms have indicated it would be more comparable between firms to define a reporting standard that commenced from the point a customer submitted a completed application including required identification. We recognise the difficulties and delays customers can experience in the early stages of the account opening process. However, we consider firms have raised legitimate issues that hinder measurement prior to submission of a complete application. To incentivise firms to publish standing data covering aspects of this process.
- **4.42** We recognise that there is a tension between introducing metrics related to speed of account opening and the importance of firms conducting robust and thorough anti-money laundering and fraud checks, including customer due diligence (CDD) when opening an account. To avoid this conflict we considered requiring metrics that did not start until after CDD was complete, as is the case for the seven working day current account switching process. However, we do not consider this information would be as useful or as readily understood by customers as a measure covering the whole account opening process following application, and do not consider concerns regarding possible impacts on CDD to be insurmountable. Existing FCA rules require firms' on-boarding processes, including CDD, to be effective and risk-based; our service metrics will not alter this. We consider that technological advances mean it is possible to improve the efficiency of on-boarding processing times without sacrificing thoroughness.
- **4.43** Conversations with firms have also highlighted that there are variations in processes following account opening. From a customer perspective an account is not fully functional until they can access the services they require. Some providers are able to provide customers with a debit card and/or access to online and telephone banking on 'day one' in branches while others have to provide these by post. We consider that breaking down the account opening process into component parts will provide customers with sufficient insight into when they can expect the amount to be functional.



4.44 The CMA found that PCA customers who are heavy overdraft users could benefit the most financially from switching their current account.¹⁴ We are separately considering overdrafts as part of our review of High Cost Credit.¹⁵ We consider that if firms publish information about the time it takes to make overdraft funds available following account opening this would help improve certainty for overdraft users who are considering switching but will require access to overdraft funds very soon after their account is open. We are mindful of a possible unintended consequence if firms were to offer fewer overdrafts to personal customers in order to speed up the approval process, but we consider this a low risk.

Our proposed service information for account opening Standing data about the account opening process

- **4.45** We propose to require providers to either publish standing data for each of their PCA and BCA products (per brand) about the minimum information and documents needed to open an account, and about how accounts may be opened, or publish a statement that they do not publish this information. Firms will be free to publish a single set of standing data, and indicate any variation between accounts. We recognise that a customer's circumstances, for example lack of a credit record or a digital footprint, may impact the account opening process. Information published about the account opening process should advise customers of circumstances where they may need to follow a different procedure.
- **4.46** We also propose to require publication of a statement on the following questions:
 - Whether the firm publishes all the information required to open an account in one place. If it does then the firm must list it or provide a weblink to its location.
 - Whether an account can be opened without visiting a branch
 - Whether an account can be opened without an appointment in a branch
 - Whether an account can be opened with identification provided electronically
 - Whether an account can be opened by post
- **4.47** We also propose to require providers to publish standing data relating to the availability of a channel through which they can discuss the account opening process, including how and when customers can apply to open an account, the account opening process, and overdraft eligibility. See paragraphs 4.76-4.83 on service availability for further information.

Account opening

4.48 We propose to split measurement of the account opening process into stages to reflect firms' differing approaches to the account opening process. When considered as a set, the metrics will provide an overview of the account opening process from submission of a complete application to provision of a debit card online banking and arranged overdraft funds. We propose that for each of these stages firms measure and publish a same day, average and 99% response time metric (see paragraph 4.38).

¹⁴ https://assets.publishing.service.gov.uk/media/57ac9667e5274a0f6c00007a/retail-banking-market-investigation-full-final-report.

pdf

¹⁵ www.fca.org.uk/news/press-releases/fca-launches-call-input-high-cost-credit-and-overdrafts



- **4.49** The first proposed metrics will require providers to show the time taken from submission of a complete application to the account being open, ie, the point at which the customer has been given an account number and can make deposits. This is intended to reflect the speed of service customers can expect if they submit a complete application, including required proof of identification.
- **4.50** Firms that publish a list of the information and documents needed to open an account will only need to measure the time taken to open the account (as above, have a working account number) from the point at which they receive all the listed information and documents. They will not need to include in their metrics those cases where additional information or documents are required on a case-by-case basis.
- **4.51** Firms who do not publish a list will have to measure and include in their metrics all account openings, from the point at which the application is first submitted, irrespective of whether it is a complete application and irrespective of whether the firm needs to request further information or documents. The intention here is to incentivise firms to publish a list, and to ensure that there is no perverse incentive to avoid requesting further information or documents in appropriate cases (for example, for client due diligence or anti-fraud purposes).
- **4.52** We also propose to require providers to publish separate metrics related to the time taken, following account opening, for a debit card, online banking and arranged overdraft funds to be available to the customer.
- **4.53** These metrics are intended to show customers how long they can expect to wait for services related to their new account to be provided. We recognise that many customers rely on other services such as access to telephone banking and mobile banking but consider that limiting metrics to cover the time taken to receive a debit card, and online banking and arranged overdraft funds to be available to be proportionate and indicative of the overall speed of service customers can expect at account opening.
- **4.54** We propose that each of these metrics should be measured and published separately rather than as a single metric covering the whole account opening process. Each metric should be measured and published separately for PCAs and BCAs but not for each account type. We propose that metrics cover PCAs and BCAs opened via all channels; we are not proposing that firms publish separate metrics for each channel as we do not expect that channel will significantly affect the time taken to open the account.
- **4.55** The relevant service or action should be included in published service information for the quarter in which it takes place, irrespective of the quarter in which the other services or actions take place or the quarter in which the application was made. We propose that the time taken to, for example, issue a debit card should be measured up to the point when the customer receives the replacement card (and PIN), but not activation; we therefore propose that, unless the customer receives the relevant items on the same day, they be treated as received on the day on which the firm sent them. Similarly, internet banking should only be treated as enabled once the customer is expected to have received everything necessary from the firm to access it.



- Q12: Do you agree with the proposed standing data and metrics for the account opening process?
- Q13: Do you agree that firms should publish separate metrics related to the opening of an account, provision of a debit card, online banking, and an overdraft?
- Q14: Do you agree with our proposal not to require firms to publish separate metrics for each channel through which a customer can open an account?

Time taken to replace a debit card, and to give an attorney access to a PCA

Discussion

- **4.56** Our research found that both PCA and BCA customers would value information about responsiveness.
- **4.57** Firms already report information about complaints resolution to us and this is published on our website. If firms submit a report to the FCA reporting 500 or more complaints they are required to publish a summary of the complaints data on their own website.¹⁶ Our experience of complaints reporting has shown that publishing this information has encouraged firms to improve their performance. Since firms already publish information about complaints we do not consider it proportionate to require firms to publish additional information about complaints as part of our current account service information work.
- **4.58** Firms do not report or publish information about resolution of requests and issues that are not complaints. As explained in Chapter 3, participants in our research considered how quickly they could expect to get a response to a typical question or request to be a good indicator of overall bank service. They said they would consider switching provider to receive quicker service. They recognised that they would not expect firms to publish metrics on everything, but considered some metrics would give an indication of the levels of service they could expect to receive overall, particularly when considered alongside the CMA core indicators.
- **4.59** Digital comparison services in our SEG considered information about the length of time taken to resolve typical customer queries/issues by channel a good indicator of service quality that would be easy for them to display and for customers to understand. However, feedback from the majority of firms has indicated that reporting response times would require significant changes to their systems and in some circumstances, particularly for queries made in-branch, response time would be difficult to measure.
- **4.60** We have considered firms' concerns and propose to introduce only a limited number of response time metrics, at least initially. Metrics we propose to introduce relate to:
 - Replacing a lost or stolen or stopped debit card, and
 - Organising third party access to a PCA under power of attorney.

¹⁶ DISP 1.10A1



- **4.61** Replacing a stopped card is an inconvenience. We consider that a metric that reflects the speed with which customers can expect to receive a replacement card is a service event that is easy to measure and one that will resonate with customers.
- **4.62** Participants in our research highlighted difficulties arranging third party access to accounts under power of attorney. We have been working with stakeholders as part of our Ageing Population project¹⁷ to understand how the financial sector can better support people who require third party access to accounts. There is significant scope to improve access to third party access arrangements, and this will require improvements to services. The BBA recently agreed and published principles (a voluntary code of practice) to improve access.¹⁸ Given the known issues with third party access and the growing number of people who require this service, we consider that requiring publication of service information in this area will provide customers with a good indication of the quality of service they can expect to receive from firms if they encounter difficulties with their banking.
- **4.63** There are many types of third party access ranging from third party mandates agreed between the customer, third party and the firm, to various legal instruments granting access including, for example, Lasting Power of Attorney, Appointeeship and Court of Protection Deputyship. Legislation varies between England and Wales, Scotland and Northern Ireland. Firms' processes may not be comparable between types of third party access arrangements. We propose that our metrics in this area cover powers of attorney, since we understand these are the most common forms of arrangement.
- **4.64** We recognise that the early stages of the third party access process, including getting clear information about how to apply and what documentation is required, can cause delays and be frustrating for customers. However, it is difficult to measure quality of these services objectively. We consider that requiring firms to state whether they have published complete information about how to apply for third party access under a power of attorney and requiring them to state the hours and channels through which customers can access staff trained to deal with third party access requests will assist customers. We discuss our proposals for this in paragraphs 4.76 4.83.
- **4.65** As with our proposed account opening metrics, we considered whether metrics related to third party access should measure time taken to perform customer due diligence for example checking identification and the authenticity of the original or certified power of attorney certificates provided. As discussed in paragraph 4.42, we recognise the potential concern that firms might reduce the thoroughness or compromise anti-money laundering or fraud checks, but consider that there are adequate incentives for firms to ensure their processes are robust, and also that there is room for firms to improve the efficiency of their processes.
- **4.66** Third party access agreements via power of attorney vary. Some attorneys will be able to access all account features, including use of internet banking and a debit card, while others may be restricted to viewing account information or making payments by cheque or in person. For this reason, we do not consider it is possible to define a single point at which third party access has been granted. Instead we propose is to require multiple metrics that, as for account opening, capture separate stages of the process to give an attorney access to a PCA.

¹⁷ www.fca.org.uk/publications/discussion-papers/ageing-population-financial-services

¹⁸ https://www.bba.org.uk/news/bba-voice/a-little-help-from-friends-and-family



Our proposed metrics for time taken to replace a debit card, and to give an attorney access to a PCA

Time taken to replace a lost, stolen or stopped debit card

- **4.67** We propose to require firms to publish the same day, average and 99% response time metrics (see 4.38) for the time taken to replace lost or stolen cards or cards otherwise stopped, eg following a security incident. We propose to require these metrics to be published separately for PCAs and BCAs.
- **4.68** Measurement of metrics should include cards reported lost or stolen or otherwise stopped by the firm, and requests made by telephone, in a branch or via online banking or mobile banking or by any other channel. Time taken to provide the replacement card should be measured in the same way as for provision of a debit card with a new account (see paragraphs 4.48-4.55).
- **4.69** The draft guidance in the instrument which appears at Appendix 1 to this CP refers to the Payment Services Regulations 2017, which will require a payment service provider to allow the use of the payment instrument or replace it with a new payment instrument as soon as practicable after the reasons for stopping its use cease to exist.¹⁹

Time taken to provide third party access to a PCA under power of attorney

- **4.70** We propose to require providers to either publish standing data for each of their PCA products (per brand) about the information and documents necessary to apply for third party access to a PCA under a power of attorney or a statement that they do not publish this information. Firms will be free to publish a single set of data, and indicate any variation between accounts. Information published about access via power of attorney should advise customers of circumstances where they may need to follow a different procedure. We propose to require firms that do publish this information to publish a link to it alongside the statement.
- **4.71** We propose to split measurement of the process to grant third party access to an attorney into four stages for the reasons described in paragraph 4.66. For each metric we will expect firms to publish the same day, average and 99% response time (see paragraph 4.38).
- **4.72** The first proposed metric requires providers to show the time taken to provide an attorney access to the account. By this we mean access that enables the attorney to ascertain the account balance and obtain information about transactions on the account. We propose that this metric be measured from the point that the attorney has requested access and has provided all required ID and documentation to the firm. Access is granted when the firm acknowledges the attorney's right to access. Access may be requested by any channel the firm allows.
- **4.73** We propose that the following three metrics are measured once access to the account has been provided:
 - **1.** The time taken to allow the attorney to withdraw money and initiate payment transactions, if this is requested

¹⁹ http://www.legislation.gov.uk/uksi/2017/752/introduction/made



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- 2. The time taken to issue a debit card to the attorney if this is requested, measured as per provision of a debit card (see paragraphs 4.48-4.55).
- **3.** The time taken to enable internet banking for the attorney if this is requested, measured as per provision of internet banking (see paragraphs 4.48-4.55).
- **4.74** As for the proposed account opening metrics, we propose that instances should be included in the service metric for the quarter in which the service or action is carried out.
- **4.75** Firms may exclude from their measurement of these metrics cases where they required additional information and documents to those specified in their list of information and documents necessary to apply for third party access. If the firm does not publish such a list it may not exclude any cases from its measurement.
 - Q15: Do you agree with our proposed metrics related to time taken to replace a debit card?
 - Q16: Do you agree with our proposed metrics related to providing access under power of attorney? In particular, do you agree that firms should publish separate metrics related to each stage of the process for giving a third party access to a PCA under power of attorney?

Service availability

Discussion

- **4.76** Our qualitative research found that convenient access to banking services is important to consumers. Both PCA and BCA customers were interested in branch opening times and the availability of service provision outside of normal working hours. Discussions with stakeholders also suggest that service availability is extremely relevant to customers' choice of bank or building society. Participants in our research remarked that they had chosen their bank or building society because its branch location/ opening hours were convenient for them. Some voiced frustration that it was not possible to speak to customer service staff over the phone in the evening or in branch 'out–of-hours' at the weekend. Perceptions that all banks and building societies were the same were challenged when other participants explained that they did have access to these services out-of-hours. This prompted participants to think about their own banking arrangements.
- 4.77 Information about individual branch locations and opening hours has recently been made available by the largest banks and building societies in a common format via the Open Banking API. We understand that all firms publish information about branch locations and opening hours on their website. Other information about services available via telephone banking, online banking and mobile banking is available on providers' websites but it is not always clear which services can be provided out-of-hours. For example, telephone banking may be available 24 hours a day but availability of some services, including the option to speak to an adviser, may be limited in the evening and overnight.



4.78 We consider that requiring firms to publish a common set of standing data covering services of interest to customers will enable customers to differentiate between brands and make better comparisons to choose the best account for their needs. Digital comparison services will be able to consider customers' preferences for service availability when recommending accounts. This will encourage banks and building societies to better identify the specific needs of customers and improve the accessibility of their service to meet these demands.

Proposed standing data related to service availability

- **4.79** We propose to require providers to publish standing data about their service provision for each of their products. Firms may choose to publish a single set of data and indicate any differences that relate to particular products.
- **4.80** We propose that firms be required to publish standing data showing the availability (hours and days of the week) of the following services via telephone, telephone banking, online banking, and mobile banking:
 - **1.** Check balance and transactions
 - 2. Send money within the UK including setting up a standing order
 - 3. Make a payment in a foreign currency
 - 4. Pay in a cheque
 - 5. Cancel a cheque
- **4.81** For each of these services 1-5 above and for the services 6-12 below we propose to require firms to state whether 24 hour help from a suitably trained person is available, for example so that a customer can ask and receive an answer to a question about the service. Where help is available, we propose that firms should state how it can be accessed. If 24 hour help is not available we propose to require firms to state the days and times that help can be accessed and how it can be accessed.
 - 6. Discuss withdrawing money abroad
 - 7. Discuss a lack of funds, including unarranged overdrafts, payments taken despite lack of funds and cancelled payments due to lack of funds
 - 8. Discuss a direct debit or continuous payment authority
 - 9. Discuss third party access, including under power of attorney, to an account
 - **10.** Discuss problems using online banking or mobile banking
 - **11.** Discuss progress following an account suspension or card cancellation eg following a fraud incident
 - **12.** Discuss account opening, including overdraft eligibility, what is required to open an account and an indication of what overdraft may be available



- **4.82** These services represent those that customers are most likely to access and therefore make enquiries about and services important to participants in our research.²⁰ The language we use to describe these services needs to be clear to firms, digital comparison services and customers. We have based our description of these services on consumer research conducted to inform the development of terminology required by the Payment Accounts Directive.²¹ There is a balance to be struck between having too long a list of services and enabling firms to describe their service availability in a way that is clear. We seek feedback on the descriptions used and may modify this list following consultation to aid users' understanding.
- **4.83** Since branch opening hours are likely to vary by location we are not proposing to require firms to include branch hours in their service availability table(s). We do not propose to require firms to publish information and metrics for ATMs, as customers are not restricted to using their own bank or building society's branded ATM.
 - Q17: Do you agree with our proposed requirements for service availability information?
 - Q18: Do you agree that the service descriptions we have chosen will be clear to users? Could some of these categories be combined to reduce the amount of information published and make it easier to use? Should any be omitted? Should any others be added?

Major incidents

Discussion

- **4.84** Our research found that both PCA and BCA customers would value information about service reliability. They were particularly interested in the frequency of major unplanned service outages. They considered that frequent unplanned interruptions may be a sign of poor investment in the resilience of systems and security. Not being able to access services for a period of one hour or more would cause them significant inconvenience.
- **4.85** Digital comparison services considered this information might be useful but warned against providing anything that was too granular. They suggested that they may present customers with a red/amber/green rating or a percentage showing service availability. A few banks publish dashboards showing current availability of their banking services, but their performance cannot be compared because they do not measure service availability in a consistent way. Impacts of major incidents on customers are widely reported in the media.
- **4.86** We see benefits to requiring firms to publish consistent information on major incidents which is comparable between providers. We recognise that firms already put significant resource into improving the resilience of their systems, but this information will enable them to compare their performance with other providers and potentially to compete on the resilience of their systems. It will also allow commentators and

²⁰ Work to implement the Payment Accounts Directive (PAD) has involved the FCA creating a list of the UK's most representative payment account services. www.fca.org.uk/publication/feedback/fs15-04.pdf Additional services were prioritised by participants in our research.

²¹ www.fca.org.uk/publication/research/payment-accounts-directive-optimisa-research.pdf



customers to review performance and factor this into their choice of account and account recommendations.

4.87 When the Payment Services Regulations 2017 come into force, firms will be required to report major incidents to the FCA.²² The regulations implement PSD2, which requires major operational and security incidents to be reported to regulators. Regulators will be required to notify the European Banking Authority (EBA) and the European Central Bank, and they may then notify regulators in other Member States so that they can take all necessary measures to protect the immediate safety of the financial system. The EBA has consulted on draft guidelines for incident reporting.²³ We recently published a CP that includes proposals on how we will implement these guidelines.²⁴

Our proposed metrics

4.88 We propose to require firms to publish the total number of major incidents for which they submit an initial report to the FCA under the regulations, in the reporting quarter and in the last year, and also the number of these incidents for each of online banking, telephone banking and mobile banking. For ease of access by customers, we consider that this information is best published by firms along with the other service information we prescribe, rather than the FCA publishing the data separately elsewhere.

Q19: Do you agree with our proposed major incident metrics?

²² http://www.legislation.gov.uk/uksi/2017/752/introduction/made

²³ https://www.eba.europa.eu/news-press/calendar?p_p_id=8&_8_struts_action=%2Fcalendar%2Fview_event&_8_eventId=1688807

²⁴ www.fca.org.uk/publications/consultation-papers/cp17-22-revised-payment-services-directive-psd2-implementation

5 Discussion of metrics we are not pursuing

- **5.1** As discussed in paragraph 4.21, there is evidence suggesting customers may find too many service metrics difficult to assess and compare. We are therefore proposing to require firms to publish a small number of meaningful service metrics that customers tell us matter to them.
- **5.2** In this section we discuss areas of service that we do not plan to pursue as service metrics at this stage. A full list of metrics considered, including those we do not propose to take forward now, can be found in Annex 5.
- **5.3** Some of these, for example those specific to vulnerable customers, were partly supported by the evidence we have collected, and while we are not proposing requirements relating to them now, we may reconsider this in the future. Firms can, of course, publish this and any other information about their service if they choose to do so.

Subjective measures of service quality

- 5.4 We considered whether to introduce additional subjective measures of service such as customer satisfaction measures alongside the CMA core service quality indicators. Our SEG suggested that an ideal mix of indicators would include both objective factual measures and subjective measures of customer experience. However, they also noted that surveys of satisfaction measure a different thing from surveys based on willingness to recommend so they cannot be directly compared.
- **5.5** From a customer perspective, most participants in our research felt additional subjective measures of service were not necessary alongside the CMA's core service quality indicators. They were sceptical that customer satisfaction data would reflect the service they would receive. They considered objective measures more reliable.
- **5.6** Subjective measures of service quality would require regular customer surveys in addition to that already required by the CMA. Given the findings from our research we do not consider the costs of this proportionate and we do not intend to pursue any additional subjective measures of service quality.

Firms' response to fraud

5.7 Our SEG questioned whether customers would engage directly with fraud metrics but believed that intermediaries could use the information to create an overall score. Participants in our research were concerned about fraud but often had limited understanding of what it meant in practice. They wanted firms' response to fraud to be proactive and they expected firms' investigations and reinstatement of accounts to be quick.



- **5.8** We have identified a likelihood of unintended consequences of requiring publication of metrics which highlight the speed or frequency with which banks and building societies identify fraud and alert the customer. One unintended consequence could be to encourage firms to prioritise speed over the diligence with which they investigate potential fraud. Another consequence is that such metrics could help criminals to choose firms to target, resulting perversely in higher levels of fraud.
- **5.9** While we are not proposing metrics related to the speed with which firms investigate or alert customers to suspicious activity, we expect all authorised firms to have systems and controls to counter the risk that they are misused for the purposes of financial crime of all types, and this includes systems and controls to counter the risk of fraud.
- **5.10** We are consulting on metrics related to replacement of a lost/stolen or stopped cards (see paragraphs 4.67-4.69). We also propose to require firms to state whether 24 hour help is available to discuss issues using online banking or mobile banking (outside of a major incident) or to discuss progress following an account suspension or card cancellation, or a suspected fraud incident (see paragraphs 4.79-4.83).

In-branch service

- **5.11** Participants in our research valued branch services and wanted information about branch opening hours and locations. This information is already published by the largest banks via Open Banking and we do not propose to duplicate this. We understand that firms that are not part of the Open Banking API already publish information about individual branch opening hours and locations on their websites and it is possible for digital comparison services to access this information.
- **5.12** Participants were also interested in how quickly they could expect to get an issue resolved in branch. We propose to require firms to monitor the speed of resolution of specific issues, some of which may be raised in branch, such as account opening and requests for third party access under a power of attorney (see paragraphs 4.70-4.75). However, we are not taking forward metrics related to general speed of service in branch, for example average queue times. The CMA remedies include a subjective measure of branch service quality and banks have argued that objective measures of branch service, for example average wait times at various times of day, are prohibitively difficult to measure. Our evidence at this stage is that proxies for this information for example the number of branch staff or customer service terminals, are not of sufficient interest to consumers and digital comparison services to warrant requiring their publication.

Complaints

5.13 As discussed in paragraph 4.57, information about complaints is already published by firms and we do not consider it proportionate to introduce new requirements to publish complaints information. However, we will work with intermediaries before implementation to discuss how they could highlight available complaints data alongside service information.



Telephony

5.14 We considered whether to introduce metrics related to telephony, for example, the speed with which calls are answered, call abandonment rates and average tenure of call centre workers. Participants in our research were concerned, however, that metrics related to call answering times may encourage firms to use automated services or triage services to answer the call quickly but without resulting in improvements to the service they received. We consider that measures related to service availability and time taken to resolve a representative selection of issues will instead capture the importance of meaningful customer contact.

Relationship management

5.15 We tested with BCA customers the same general metrics we tested with PCA customers and found BCA customers were equally motivated by these metrics. We therefore consider the general metrics we are progressing sufficient to help BCA customers choose an account and to improve service offered to BCA customers by firms. We also considered metrics specific to the experience of BCA customers, including relationship management, but few SME participants in our research were motivated by these indicators.

Overdrafts (outside of the account opening process)

5.16 SME consumers were interested in the time taken to get an overdraft granted. We propose to include overdraft provision (for both PCAs and BCAs) in our account opening metrics (see paragraphs 4.48-4.55) but have not seen evidence to require separate metrics related to other overdraft requests. Research has found 97% of SME overdrafts are made available 'in good time²⁵' and overdrafts are already separately identified within the core CMA satisfaction metrics. We are committed to looking at PCA customer overdrafts as part of our prompts remedy and our review of high cost credit.²⁶

Vulnerable customers

- **5.17** We recognise that customers with more complex needs may find it harder to access services and resolve issues.²⁷
- **5.18** Our qualitative customer research tested specific measures of service for vulnerable customers. Participants wanted to know that banks were looking after people who might struggle with their banking. However, there was confusion and some concern about who would be classified as vulnerable, and customers who could be considered

²⁵ SME Finance Monitor Q4 2016, BDRC, March 2017. <u>http://bdrc-continental.com/BDRCContinental_SME_Finance_Monitor_Q4_2016_Final.pdf</u>

²⁶ www.fca.org.uk/publication/call-for-input/call-input-high-cost-short-term-credit.pdf

²⁷ FCA occasional papers on access and vulnerability www.fca.org.uk/publications/occasional-papers/occasional-paper-no-17-access-financial-services-uk www.fca.org.uk/publications/occasional-papers/occasional-paper-no-8-consumer-vulnerability



to be vulnerable did not place themselves in this group. Participants did not consider metrics specific to more vulnerable customers particularly motivating when considering switching – especially if not seen to be relevant to them specifically.

- **5.19** Our researchers also conducted ten in-depth interviews with customers with more vulnerable circumstances. They found that these customers particularly valued access to the branch network and being able to contact the bank or building society at a time that suited them to discuss their needs. We consider that the metrics we are proposing to introduce on service availability meet these needs.
- **5.20** Due to the complexities identified, and the lack of evidence that metrics related to the treatment of vulnerable customers will improve competition, we are not planning to introduce specific metrics in this area at this time. However, we plan to reconsider this in the future if we identify this as an appropriate response to a specific harm.
 - Q20: Do you agree that we should not pursue publication of service information for these aspects discussed in Chapter 5 at this time?



6 Next steps

6.1 In this chapter, we set out the next steps on this consultation and other work that is relevant to our proposal to require publication of service information.

Developing rules

6.2 The rules and guidance on which we are consulting are in the draft instrument in Appendix 1. The consultation closes on 25 September 2017. During the consultation period we plan to engage with customer stakeholders, industry and digital comparison services. We will then review the responses and, subject to the outcome of the consultation, publish our feedback, policy decisions, final rules and guidance.

Post implementation review

6.3 We intend to review the effectiveness of the final rules after they have been fully implemented by firms and in operation for long enough to assess competition outcomes.

Future work

- 6.4 This CP seeks feedback on service metrics that are representative of the service provided by firms that we consider can be published by August 2018. Our research and stakeholder consultation also suggested there would be merit in the introduction of other current account service metrics. We may consider introducing further metrics related to current account service in the future.
- **6.5** There may be consumer and competition benefits to requiring publication of similar service information for other products such as mortgages, savings accounts and insurance. We will continue to gather and consider evidence on service metrics in future policy projects concerning these products and, potentially, different types of firm that operate in these markets.
- **6.6** This is one of a set of recommendations made by the CMA to the FCA. Details of our future work on the other remedies, which are designed to work together as a package to improve competition were set out in our response to the CMA's recommendations.²⁸

²⁸ November 2016, FCA response to the CMA's recommendations following its investigation into retail banking. www.fca.org.uk/publications/corporate-documents/our-response-cma-investigation-competition-retail-banking-market



Annex 1 Questions in this paper

- Q1: Do you agree with our analysis that we should require publication of service information?
- Q2: Do you agree that firms should publish service information related to the areas of service outlined? Are there any other areas we should consider (bearing in mind our discussion of metrics we are not pursuing in Chapter 5)?
- Q3: Do you agree with PCAs and BCAs being defined by reference to the definition of "payment account" in the Payment Accounts Regulations 2015?
- Q4: Do you agree that 'premium service accounts' should be excluded from PCA service information?
- Q5: Do you agree with the proposed application of the rules? In particular do you agree with the providers, customers and products in scope of the rules?
- Q6: Do you agree with the proposed threshold? Do you agree that providers below the threshold which choose to publish the same or similar service metrics must comply with the relevant rules?
- Q7: Do you agree that our proposals will make service information easily accessible to customers?
- Q8: Do you agree that comparison services are an important route through which customers will access and assess the service information we propose to prescribe?
- Q9: Do you agree with the proposals to require publication via an API, initially for those firms required to be part of Open Banking and subsequently for those firms that will use an API to for the purposes of PSD2?
- Q10: Do you agree that we should specify the language firms use to describe the service information, but not its presentational format?
- Q11: Do you agree with our plans for the timing and frequency of publication? In particular, do you agree that the first publication of service information under the rules that we are proposing should be in August 2018, to coincide with the first of the CMA's service quality indicators?





- Q12: Do you agree with the proposed standing data and metrics for the account opening process?
- Q13: Do you agree that firms should publish separate metrics related to the opening of an account, provision of a debit card, online banking, and an overdraft?
- Q14: Do you agree with our proposal not to require firms to publish separate metrics for each channel through which a customer can open an account?
- Q15: Do you agree with our proposed metrics related to time taken to replace a debit card?
- Q16: Do you agree with our proposed metrics related to providing access under power of attorney? In particular, do you agree that firms should publish separate metrics related to each stage of the process for giving a third party access to a PCA under power of attorney?
- Q17: Do you agree with our proposed requirements for service availability information?
- Q18: Do you agree that the service descriptions we have chosen will be clear to users? Could some of these categories be combined to reduce the amount of information published and make it easier to use? Should any be omitted? Should any others be added?
- Q19: Do you agree with our proposed major incident metrics?
- Q20: Do you agree that we should not pursue publication of service information for these aspects discussed in Chapter 5 at this time?
- Q21: Do you have any comments on our CBA?



Annex 2 Cost benefit analysis

Introduction

- 1. The Financial Services and Markets Act 2000 (FSMA), as amended by the Financial Services Act 2012, requires us to publish a cost benefit analysis (CBA) of our proposed rules. Specifically, 138l requires us to publish a CBA of proposed rules, defined as 'an analysis of the costs, together with an analysis of the benefits that will arise if the proposed rules are made' and an estimate of those costs and those benefits (unless it is not reasonably practicable to produce those estimates).
- 2. This cost benefit analysis presents an analysis of the significant impacts of our proposal. We provide monetary estimates for the impacts where we believe it is reasonably practicable to do so and where we have been able to obtain robust data. For others, we provide an analysis of outcomes in other dimensions, based on what we consider are reasonable assumptions or using what data is relevant and available to us. Our proposals are based on carefully weighing these multiple dimensions and reaching a judgement about benefits to competition as well as the appropriate level of consumer protection, taking into account all the other impacts we foresee.
- **3.** Chapter 4 proposes policy measures to require firms to publish service metrics and service information which are intended to help personal and SME customers find and access information about current accounts with better service levels. This analysis first summarises adverse effects on competition found in this market by the CMA, and the core service quality indicators it will require firms to publish as a partial remedy, along with other remedies. With this context set, it outlines a rationale for the FCA to intervene to require the additional policy measures and presents our assessment of the benefits and costs that we expect as a result.

Adverse effects on competition and context for the CBA

- In its retail banking investigation, the CMA found that, due to the complexity and lack of information in the retail banking market there are adverse effects on competition:
 - Many customers have little information about the service offer and quality of other banks and building societies and it can be difficult to consider whether there are better deals elsewhere
 - Service information which is available is often not consistently defined, making it difficult or costly for comparison services and commentators to compare service offers and quality between providers and rank or recommend them.
- 5. As part of a package of remedies to address this, the CMA has made an Order requiring providers of most PCAs/BCAs²⁹ to publish service quality indicators for each brand

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²⁹ For PCAs, providers with more than 150,000 active PCAs in Great Britain and 20,000 active PCAs in Northern Ireland, and for BCAs more than 20,000 active BCAs in Great Britain and 15,000 in Northern Ireland.



prominently and in a specified form in branches, on websites and mobile banking and in leaflets.

- 6. The indicators will give the percentage of customers willing to recommend to friends and family / other SMEs the service, according to the:
 - brand
 - brand's online and mobile banking services
 - brand's branch service/business centre service
 - brand's overdraft and loan services, and
 - for BCAs only, the brand's relationship/account manager.
- 7. The CMA's Order also requires providers to publish their rank in relation to all the brands surveyed for each indicator, and to display charts showing scores of the top five named providers (with their logos) for each, along with the provider's own scores.
- 8. Another remedy in the CMA package which we consider relevant to this CBA is the Open Banking standard, which will from early 2018 enable customers to give third parties and firms controlled access to their banking data to offer previously unavailable individually tailored services, including innovative comparison services.
- **9.** In addition to the core service indicators, the CMA recommended that the FCA consider and then require providers of PCAs and BCAs to publish and make available additional objective measures of customer service performance.
- **10.** The evidence obtained from our research and engagement highlights that there is a need to improve the availability of meaningful and comparable information about service quality. Our proposals aim to make these improvements to make it easier for customers to make informed comparisons and choose the provider that best suits their needs based on the quality of their service.

Our analytical approach

- **11.** This CBA sets out our analysis and estimates of the benefits and costs of our proposals. Our analytical approach was designed to assess the impact of our proposed intervention in the future regulatory environment that will pertain when our proposed rules would come into force, and when various other changes in the market have occurred, notably when CMA survey results will be published regularly and Open Banking and PSD2 are implemented.³⁰
- 12. This CBA assesses the impact that requiring providers to publish additional service information is likely to have. This CBA assesses the costs and benefits of our proposed rules alone, and not the impact of the publication of core service quality indicators required by the CMA's Order (which applies only to the current account providers above the de minimis threshold in the CMA's Order), but it assumes that those

³⁰ Under PSD2, customers will be able to give third parties and firms controlled access to their banking data in order to offer them individually tailored services, including innovative comparison services.



indicators will be published, and that Open Banking and PSD2 will be implemented, in setting the baseline for assessing the impacts of our proposed intervention.

- **13.** Our approach is therefore to set out a clear causal analysis of how our policy intervention is intended to work and, using relevant evidence, set out as best as we can about what the future benefits and costs may be.
- 14. The approach we have taken and evidence gathered of potential benefits of requiring these provisions are set out in Chapter 3. The causal analysis in this CBA reflects insights from the qualitative customer research and SEG meetings of the likely customer interest and transmission routes of service information and metrics to customers through intermediaries.
- **15.** To gain evidence of the likely costs of implementation, we have spoken to the BBA, the Building Societies Association (BSA) and the Association of Foreign Bankers. We have also identified the relative costs of collecting various types of service information and metrics. The costs vary depending on whether the parameters set out in our proposed rules are the same or close to existing regulatory requirements for measurement or to data already collected by firms.

Analysis of benefits to consumers and competition

- 16. Effective competition means firms striving to win business on the basis of service, quality, price and innovation. Consumers have the information they need to choose the product that offers the best outcome for them. If consumers are not satisfied, they can take their business to another firm. However, when consumers don't have the right information it can result in low levels of consumer engagement. Indeed, the FCA has observed that consumer engagement in some financial markets is low and this was identified by the CMA's market investigation as a problem in the PCA and BCA markets. As a result, consumers may not get the best deal from their current account. Our proposals are directly aimed at addressing low consumer engagement in the PCA and BCA markets.
- 17. We therefore judge that our proposals will create the following positive benefits:
 - Objective data on matters that are of interest to consumers will be available and presented in a consistent manner for consumers to compare between providers on the basis of service
 - Consumers will be able to investigate service metrics which are of particular interest to them as users on providers' own websites, on comparison sites which enable users to compare a number of different providers in one place, or in other services or publications that seek to reduce the complexity of financial products
 - As a result of this, customers will become more aware of the speed and availability of the services offered by different providers, enabling them to make more informed and better decisions about whether their bank account offers them good service in comparison with others





- Better informed customers would be more likely to identify whether they would benefit from switching to an account or to a provider that offers them better service, better value for money, or financial benefits
- As a result, firms are likely to compete actively both to retain and to attract customers by improving their products, service and performance
- In turn, this should lead to more customers who are more satisfied with the service they receive from their current account provider.
- **18.** As supported by evidence from our consumer research, the metrics we are proposing relate to areas that are meaningful to consumers, for example, because they help consumers understand how quickly they can resolve the inconvenience of replacing a card or arranging essential third party access to an account, or understanding what services are available from a provider and when they are available, so that they can determine whether that provider is likely to be able to meet their needs.
- **19.** Almost all adults in the UK (97% in 2014³¹) have a current account. Improvements in service across the market as a result of these provisions have the potential to benefit over 50 million people.³²
- 20. The CMA's retail banking investigation found that 56% of PCAs have no overdraft usage.³³ Since these consumers likely to number almost 30 million people do not pay overdraft interest or fees, commentary and account recommendations based on comparable service metrics and information will offer a new basis for differentiating between providers. This could significantly increase their engagement with the choice of a current account. Our qualitative research provides evidence that consumers would find objective information about certain elements of providers' service useful because they value good service and would be willing to switch account to get it.
- **21.** Our proposals are aimed at both PCAs and BCAs, which generated revenues of over £11 billion in 2014.

Estimate of benefits to consumers and competition

22. We consider that our proposals could have a significant positive impact on a large number of consumers through increased engagement, better decision making and improvements in service in the PCA and BCA markets. We expect our proposals to produce the benefits outlined in paragraph 17. The nature of some of these improvements means that we cannot quantify their economic benefits robustly in financial terms. Further, there are developments in these markets, notably publication of the CMA's core service indicators and Open Banking and PSD2, that have not occurred yet but whose impact cannot be reliably foreseen or predicted but which could significantly affect the impact of our own proposals. It is therefore not reasonably practicable for us to quantify, in monetary terms, the benefits we expect

³¹ CMA Retail Banking final report, pg9, https://assets.publishing.service.gov.uk/media/57ac9667e5274a0f6c00007a/retail-bankingmarket-investigation-full-final-report.pdf

³² Number of adults with at least one current account using data from Financial Inclusion Annual Report and Office of National Statistics

³³ CMA Retail Banking final report, pg224, https://assets.publishing.service.gov.uk/media/57ac9667e5274a0f6c00007a/retail-bankingmarket-investigation-full-final-report.pdf



our proposals to achieve.

Analysis of costs

- **23.** Firms have told us in roundtable meetings that the cost of collecting service data varies between metrics and also between firms. The costs are very low if the data has to be collected to meet another regulatory requirement, and remain low if it is necessary only to make small system changes to amend similar data already collected. In cases where a firm must create new mechanisms to collect data, the costs of doing so may be significant.
- 24. We were able to acquire cost estimates for the collection of most metrics from a small number of large and medium-sized banks and building societies. The estimated costs provided by the firms were high level estimates only. As expected, the cost estimates varied widely even between similar-sized firms. This is likely to reflect both differences in firm-specific costs and differences in the approach used to provide these estimates.
- 25. Our telephone conversations with the sample of firms allowed us to obtain a better understanding of the relative costs of providing different service metrics. Our discussions revealed that the costs for third party access and the time taken to get an overdraft are likely to be more significant than the other metrics. Given the widespread variation in the estimates provided by the sample for these metrics and the idiosyncratic nature of these costs, we do not see a reasonable basis for scaling up the costs for the industry. Firms have told us that costs may vary significantly depending on the detail of the required metrics, so we do not believe it is proportionate to seek additional cost estimates from more firms ahead of this consultation.
- 26. Our engagement with the sample of firms highlighted that the costs of publishing the metrics (once measured) and service information statements (eg service availability times and helplines) on websites and API has the potential to involve significant costs, depending on the provider's existing systems and the costs involved with building a new system.
- **27.** Table 1 sets out the reasons for varied costs of implementation across the different provisions and firms.



Type of service metric/information	Same as regulatory requirement	Similar data already collected - minor changes	No similar data collected now - significant build
Major service outages	PSD2 service interruption definitions will apply to all payment account providers by 2019		
Account Opening		Elements of account opening under firm control and with digital footprint	Elements of account opening requiring customer action and/or not digitally recorded
Service availability information by channel in and out of normal hours	Addition of standing data to Open Banking data required by CMA Order for firms subject to CMA's Order	Adoption of Open Banking data format and an API by firms outside CMA's Order but within these provisions	
Third party access to accounts under a power of attorney		Elements of allowing access which are under the firm's control and with digital footprint	Elements of allowing access which require customer action and/ or are not digitally recorded
Replacing cards		Small changes to existing processes	
Major incident	PSD2 service interruption definitions will apply to all payment account providers by 2019		

Source: BBA roundtables

28. There will also be costs to the FCA of supervising firms' compliance with our proposals. However, these are already accounted for in the FCA's existing budget for supervisory activities. The costs for supervising these specific rules are of minimum significance.

Estimate of costs

29. We have obtained estimates from a sample of large and medium-sized banks and building societies of the costs of collecting service metrics where they do not collect data already and expect costs of doing so to be significant. The estimated one-off cost of collecting data for those service metrics which require significant changes is between £30,000 and £1 million per firm.³⁴

³⁴ The large variation in the cost range is due to the nature of responses from the firms in the data requests. Due to the limitation in our sample and the costs provided by the firms, we were unable to provide a better cost estimate



- **30.** We also asked the sample firms to provide one-off cost estimates for making service metrics and standing data available on their websites and via API. The estimated one-off costs for making metrics and standing data available is between £50,000 and £2 million per firm.³⁵
- **31.** Finally, we asked the sample of firms to estimate running costs of collecting the metrics and standing data and making it available on websites and via API. The estimated cost is between £17,000 and £200,000 per annum per firm.³⁶
- **32.** Overall, our sample of firms expected one-off costs per firm of between £70,000 and £1.5 million for collecting data for all our proposed metrics, and £50,000 to £2 million for making these and standing data available on their websites and via API. The sample of firms expected running costs of between £17,000 and £200,000 per annum per firm. As noted above, given the widespread variation in the best estimates provided by the sample for these metrics and the idiosyncratic nature of these costs, we do not consider that we can scale up the costs for the industry with any degree of precision. We therefore consider that it is not reasonably practicable for us to produce an estimate of these costs

Q21: Do you have any comments on our CBA?

The £2 million cost estimate provided by one firm was much higher than other estimates.

The large variation in the cost range is due to the nature of responses from the firms in the data requests. Due to the limitation in our sample and the costs provided by the firms, we were unable to provide a better cost estimate.

Annex 3 Compatibility statement

Compliance with legal requirements

- 1. This Annex records the FCA's compliance with a number of legal requirements applicable to the proposals in this consultation, including an explanation of the FCA's reasons for concluding that our proposals in this CP are compatible with certain requirements under the Financial Services and Markets Act 2000 (FSMA).
- 2. When consulting on new rules, the FCA is required by 138I(2)(d) of FSMA to include an explanation of why it believes making the proposed rules is: (a) compatible with its general duty, under s. 1B(1) of FSMA, so far as reasonably possible, to act in a way which is compatible with its strategic objective and advances one or more of its operational objectives; and (b) its general duty under s. 1B(5)(a) of FSMA to have regard to the regulatory principles in s. 3B of FSMA. The FCA is also required by s. 138K(2) FSMA to state its opinion on whether the proposed rules will have a significantly different impact on mutual societies as opposed to other authorised persons.
- **3.** In addition, this Annex explains how we have considered the recommendations made by the Treasury under s. 1JA of FSMA about aspects of the economic policy of Her Majesty's Government to which we should have regard in connection with our general duties.
- **4.** This Annex includes our assessment of the equality and diversity implications of these proposals.
- 5. Under the Legislative and Regulatory Reform Act 2006 (LRRA), the FCA is subject to requirements to have regard to a number of high-level 'Principles' in the exercise of some of our regulatory functions and to have regard to a 'Regulators' Code' when determining general policies and principles and giving general guidance (but not when exercising other legislative functions like making rules). This Annex sets out how we have complied with requirements under the LRRA.

The FCA's objectives and regulatory principles: Compatibility statement

- **6.** The proposals set out in this consultation are primarily intended to advance the FCA's operational objective to promote effective competition by:
 - Making it easier for consumers to access and assess information about providers' service, enabling them to make informed comparisons and choose the provider that best suits their needs
 - Incentivising BCA and PCA providers to improve their products, service and performance.



- 7. Although not the direct objective of the proposed rules, we will also enhance consumer protection to the extent that the rules are a catalyst for current account providers to improve their services offering to consumers' needs, for example, at more times of the day, or to avoid consumers being left without access to services, for example when their debit card has stopped or when a person is left waiting to get access to a current account under a power of attorney.
- 8. We consider these proposals are compatible with the FCA's strategic objective of ensuring that the relevant markets function well. They seek to address our findings that there are barriers to accessing information about service quality, which contribute to low consumer engagement. For the purposes of the FCA's strategic objective, relevant markets are defined by s. 1F of FSMA.
- **9.** In preparing the proposals set out in this consultation, the FCA has had regard to the regulatory principles set out in s. 3B of FSMA.

The need to use our resources in the most efficient and economic way

10. We limit the burden on FCA resources by exploiting synergies with other measures being implemented in this market by the FCA and other regulators over the same time period. We are not requiring firms to report or submit data directly to the FCA. Implementing these proposals will introduce new rules and guidance. These rules will need to be supervised and may be enforced, but we do not think that this will impact on our resourcing.

The principle that a burden or restriction should be proportionate to the benefits

11. We believe that our proposals are proportionate to the benefits that we are seeking. Competition in this market is not working effectively for many consumers, and barriers to accessing service information are one of the causes. In considering our proposals, we have sought to come up with a package of service metrics focused on the areas of service that are most important and useful for consumers. We have discounted measures where we thought the desired outcome was likely to be achieved through other means. We have reduced the burden on firms by basing data required where possible on data already collected by firms or using existing regulatory definitions which are flagged in their IT systems.

The desirability of sustainable growth in the economy of the United Kingdom in the medium or long term

12. We believe that our proposed remedies will increase competition in the current account market with consumers benefitting from better service quality over time. They should enable consumers to make informed and effective comparisons and choices, and drive providers, both incumbents and challengers, to compete by providing better products, service and performance. We see this as encouraging sustainable growth in the sector. Disproportionate costs on firms whose brands have fewer than 70,000 PCAs or 15,000 BCAs are avoided by exempting them from the requirement to publish service information.

The general principle that consumers should take responsibility for their decisions

13. Our proposals are intended to encourage active and informed comparisons and choice by consumers. Our qualitative research found that some consumers were unaware they could receive a better service from another provider. It is difficult for consumers to know whether they are getting good service for their current account and consumers have little reason to shop around. This can result in poor outcomes as customers continue to use products that are not the best for their needs or providing



CP17/24 Annex 3

the best level of service. We, therefore, believe we are justified in implementing new rules and guidance to encourage more active and informed decision-making by consumers. Our proposals will empower more consumers to take responsibility for those decisions.

The responsibilities of senior management

14. Senior managers will need to ensure compliance with our rules to measure and publish service metrics.

The desirability of recognising differences in the nature of, and objectives of, businesses carried on by different persons including mutual societies and other kinds of business organisation

15. We recognise that firms may have different business models. We believe all our proposals should be applied consistently, and have taken account of the need to ensure this takes place in our draft rules and guidance. We will not require firms whose brands have fewer than 70,000 PCAs or 15,000 BCAs to comply with these rules as we do not consider this proportionate. These firms will be able to opt-in to provide service metrics.

The desirability of publishing information relating to persons subject to requirements imposed under FSMA, or requiring them to publish information

16. Our proposals are compatible with this principle.

The principle that we should exercise our functions as transparently as possible

- 17. We announced our intention to undertake work to consider whether publication of service metrics on a consistent basis could further our competition objective in our response to the CMA's retail banking review in November 2016. At this time we also announced our intention to set up a stakeholder expert group (SEG) to inform this work.
- 18. Throughout development of the metrics we have sought comment from stakeholders through the SEG and sought feedback. We have supplemented this with bilateral meetings and roundtable discussions. We have considered feedback provided by firms, trade associations and consumer groups, and others when designing our proposals. This CP provides another opportunity for stakeholder input and we welcome stakeholder views.
- **19.** In formulating these proposals, we have had regard to the importance of taking action intended to minimise the extent to which it is possible for a business carried on by: (i) an authorised person or a recognised investment exchange; or (ii) in contravention of the general prohibition, to be used for a purpose connected with financial crime (as required by s. 1B(5)(b) of FSMA). We recognise that our proposals could impact on the thoroughness of firms' anti-money laundering and fraud checks, including customer due diligence (CDD) when opening an account. We will mitigate this by providing guidance, and monitoring firms in this regard to ensure that the risk does not materialise.



Expected effect on mutual societies

- 20. The FCA does not expect the proposals to have a significantly different impact on mutual societies unless they choose to opt-in to publishing these metrics. Discussions with the Building Societies Association which represents the interests of building societies did not indicate that there were significantly different implications for them in comparison to other firms.
- 21. We propose to exclude credit unions from the rules, as providing service information is unlikely to be proportionate since membership requirements restrict customers' ability to choose their credit union and therefore credit unions ability to compete. However, our rules do not prevent credit unions from publishing service information should they wish to do so.

Equality and diversity

- 22. We are required under the Equality Act 2010 to 'have due regard' to the need to eliminate discrimination, to foster good relations between people who share a protected characteristic and those who do not and to promote equality of opportunity in carrying out our policies, services and functions. As part of this, we conducted an equality impact assessment to ensure that the equality and diversity implications of any new policy proposals were considered.
- 23. We consider that availability of service metrics will have a positive impact for all customers. Protected groups that may see a particular benefit include older people and carers, because we are proposing a service metric on third party access via a power of attorney. Allowing very small brands not to provide service information may disproportionately impact customers of small foreign banks not actively competing for UK customers. These customers will still have access to comparable information about other banks. We do not expect them to receive a worse service than they currently receive as a result of our proposals.
- 24. Overall, we do not consider that the proposals adversely impact any of the groups with protected characteristics under the Equality Act 2010 but we will continue to consider the equality and diversity implications of the proposals during the consultation period. We will also revisit them when publishing the final rules.

Legislative and Regulatory Reform Act 2006 (LRRA)

- **25.** We have had regard to the principles in the LRRA for the parts of the proposals that consist of general policies, principles or guidance and consider that our proposal is:
 - Transparent: We are following a consultation process in making these rules.
 - Accountable: We are seeking feedback from this consultation paper on whether stakeholders agree with our proposed approach.



- Proportionate: We have carefully deliberated on our approach and believe our proposals are proportionate. We have sought wherever possible to minimise costs and we expect significant benefits.
- Consistent: Our proposed approach applies in a consistent manner.
- Targeted at situations in which action is needed, as explained in Chapter 2 of this CP, we consider there to be a strong case for the introduction of these measures.
- 26. We have had regard to the Regulators' Code for the parts of the proposals that consist of general policies, principles or guidance. We consider that the proposals will be effective in helping firms understand and meet regulatory requirements more easily, in a manner that leads to improved outcomes for consumers and addresses the issues identified in this market.

Treasury recommendations about economic policy

27. In developing our proposals, we have had regard to the Treasury's recommendations to us about aspects of the economic policy of the Government to which the FCA should have regard when discharging its functions. In particular, our proposals should increase competition and innovation in the retail banking market, leading to better outcomes for consumers.



Annex 4 Stakeholder expert group

- 1. The stakeholder expert group was established by the FCA to highlight the perspectives of customers and of intermediaries (eg price comparison services and commentators on retail banking) on service information.
- 2. Members were invited on the basis of their expertise in customer service in banking or other relevant products and as representatives of stakeholder interests of consumers, SME banking customers, or intermediaries/commentators on current account providers. The following organisations were members of the group:

Association of Independent Professionals and the Self-Employed British Bankers' Association British Chambers of Commerce Citizens Advice Comparethemarket.com Competition and Markets Authority Consumer Council Northern Ireland Confederation of British Industry Defaqto Enterprise Research Centre, Warwick Business School Federation of Small Businesses Fairer Finance Financial Services Consumer Panel Forum of Private Business GoCompare Institute of Customer Service Institute of Directors Money Advice Service MoneySuperMarket and Money Saving Expert National Association of Commercial Finance Brokers Ofcom The UK Regulators Network Which?

Annex 5 Metrics considered

- 1. This annex lists all of the metrics considered. Details of the process we followed to arrive at the long and short-lists of metrics and the final metrics we are consulting on in this CP are detailed in Chapters 3 and 4.
- 2. Details of the metrics vary between the long and short-list and the proposals in this consultation. This is because we refined the metrics as we engaged stakeholders including consumers, third parties, and firms. Metrics are shown in bold where a similar metric is included in the rules in this consultation.

3. Long-list of metrics considered

- **4.** The tables below list all 95 of the metrics considered by our SEG. These fall into six categories:
 - Availability of core services, resilience and cyber
 - Issue resolution, payment issues and fraud
 - Account opening, account use and product offering
 - Channels and customer interaction
 - BCA specific indicators (relationship management and lending)
 - Others to consider alongside other FCA/Ombudsman Service/CMA information.

	Availability of core services, resilience and cyber		
	Sub-category	Indicator	Measure type
1	Service availability	Number of unplanned severe outages across the firm affecting transactions per week/month/ year	Objective
2	Service availability	Average length of severe outage across the firm affecting transactions	Objective
3	Service availability	Number of unplanned severe outages of mobile app per week/month/year	Objective
4	Service availability	Average length of severe outage of mobile app	Objective
5	Service availability	Number of unplanned severe outages of internet banking per week/month/year	Objective
6	Service availability	Average length of severe outage of internet banking	Objective
7	Service availability	Number of instances when customers could not log in to mobile app or internet banking	Objective
8	Service availability	Time of downtime on the bank's core services during the course of a year	Objective



9	Service availability	Number of planned interruptions during working hours	Objective
10	Service availability	Number of unplanned severe outages of telephone banking per week/month/year	Objective
11	Service availability	Average length of severe outage of telephone banking	Objective
	Availability of con	re services, resilience and cyber	1
	Availability	Banking	
12	Service availability	Number of unplanned severe outages of ATMs per week/month/year	Objective
13	Service availability	Average length of severe outage of ATMs	Objective
14	Resilience	Track record on security/fraud	Objective
15	Resilience	Investment in technology and security	Objective and subjective
16	Cyber	Statistics on breaches of cyber security	Objective
17	Cyber	Where data are held	Objective
	Issues resolution	, payment issues and fraud	
	Sub-category	Indicator	Measure type
18	Issue resolution	Call centre opening hours	Objective
19	Issue resolution	Availability of a UK contact centre	Objective
20	Issue resolution	% of calls answered within a particular time period	Objective
21	leave recolution	Average length of time taken to resolve a	Objective
21	Issue resolution	customer query/issue, by channel	
22	Issue resolution		Objective
		customer query/issue, by channel Average length of time until a call is answered, by	
22	Issue resolution	customer query/issue, by channel Average length of time until a call is answered, by time period (peak/ off peak)	Objective
22	Issue resolution	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rate	Objective Objective
22 23 24	Issue resolution Issue resolution Issue resolution	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rateAverage tenure of call centre workers	Objective Objective Objective
22 23 24 25	Issue resolution Issue resolution Issue resolution Issue resolution	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rateAverage tenure of call centre workersRatio of incoming calls to operativesAverage number of staff customers have to speak	Objective Objective Objective Objective
22 23 24 25 26	Issue resolution Issue resolution Issue resolution Issue resolution	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rateAverage tenure of call centre workersRatio of incoming calls to operativesAverage number of staff customers have to speak to resolve the query/issueWhether the bank can be contacted online via	Objective Objective Objective Objective Objective
22 23 24 25 26 27	Issue resolution Issue resolution Issue resolution Issue resolution Issue resolution	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rateAverage tenure of call centre workersRatio of incoming calls to operativesAverage number of staff customers have to speak to resolve the query/issueWhether the bank can be contacted online via secure messageAverage length of time it takes to receive a	Objective Objective Objective Objective Objective Objective
22 23 24 25 26 27 28	Issue resolution	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rateAverage tenure of call centre workersRatio of incoming calls to operativesAverage number of staff customers have to speak to resolve the query/issueWhether the bank can be contacted online via secure messageAverage length of time it takes to receive a response to an online secure messageAverage length of time it takes to receive a	Objective Objective Objective Objective Objective Objective Objective
22 23 24 25 26 27 28 29	Issue resolution	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rateAverage tenure of call centre workersRatio of incoming calls to operativesAverage number of staff customers have to speak to resolve the query/issueWhether the bank can be contacted online via secure messageAverage length of time it takes to receive a response to an online secure messageAverage length of time it takes to receive a response to an online secure messageRecord keeping policies on information related to	Objective Objective Objective Objective Objective Objective Objective Objective Objective
22 23 24 25 26 27 28 29 30	Issue resolution	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rateAverage tenure of call centre workersRatio of incoming calls to operativesAverage number of staff customers have to speak to resolve the query/issueWhether the bank can be contacted online via secure messageAverage length of time it takes to receive a response to an online secure messageAverage length of time it takes to receive a response to an online secure messageRecord keeping policies on information related to problems reported by customers	Objective
22 23 24 25 26 27 28 29 30 31	Issue resolution Payment issue	customer query/issue, by channelAverage length of time until a call is answered, by time period (peak/ off peak)Average call abandonment rateAverage tenure of call centre workersRatio of incoming calls to operativesAverage number of staff customers have to speak to resolve the query/issueWhether the bank can be contacted online via secure messageAverage length of time it takes to receive a response to an online secure messageAverage length of time it takes to receive a response to an online secure messageRecord keeping policies on information related to problems reported by customersNumber of payment errors per 1000 accountsProportion of error transactions that were judged	Objective Objective

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	Issue resolution,	payment issues and fraud	
35	Fraud	Statistics on fraud	Objective
36	Fraud	Average cost of fraud per customer (or another measure on fraud levels)	Objective
37	Fraud	Average length of time taken to receive a refund for anunauthorised transaction/% of unauthorised transaction refunded.	Objective
	Account opening	, account use and product offering	
	Sub-category	Indicator	Measure type
38	Account Opening	Documents needed to open an account for BCA and PCA	Objective
39	Account Opening	Average number of days between account application to account being fully functional (card/PIN received, direct debits transferred etc.), split by product (current account, savings, loans etc.)	Objective
40	Account Opening	% of customers switching bank account per year	Objective
41	Account Opening	Quality of communications when opening the account (clarity, completeness, accuracy)	Subjective
42	Account Opening	Average number of employees/directors needed to verify account opening (BCA only)	Objective
43	Accountuse	Ease of use of banking services	Subjective
44	Accountuse	Flexibility of bank's systems to deal with unusual circumstances	Subjective
45	Accountuse	The extent to which firms assist or inhibit money	Subjective
		management	
46	Account use	Channels available to manage accounts	Objective
47	Product Offering	Information about product features available	Objective
48	Product offering	Loyalty rewards offered by firm	Objective
	Channels and cus	stomer interaction	1
	Sub-category	Indicator	Measure type
49	Branches	Number of branches in the UK, by region	Objective
50	Branches	Number of branches outside the UK	Objective
51	Branches	Countries where the provider has a branch	Objective
52	Branches	% of branches open outside normal business hours	Objective
53	Branches	Access to self-serve options in branch (i.e. how many cash points, pay in machines are available)	Objective
54	Branches	Access to staff in branch	Objective
55	Branches	Number of customer-facing staff in each branch, by position (e.g. teller, personal bankers etc.).	Objective
56	Branches	Number of staff employed in branch who can complete	Objective
_		Ratio of staff to customer footfall in branch	Objective



58	Branches	Branch opening times	Objective
	Channels and customer interaction		
59	Branches	Average queuing time for cashier per branch	Objective
60	Branches	Average length of time it takes to make an appointment to speak to an adviser	Objective
61	Branches	Quality of branch staff (professionalism, knowledge, politeness)	Objective
62	Customer Interaction	How easy it is for customers to contact their bank	Objective and subjective
63	Customer Interaction	The extent to which firms keep to promises	Subjective
64	Customer Interaction	Quality of communications (clarity, completeness, accuracy, volume, bank lets the customer know when they can get better products)	Subjective
65	Customer Interaction	Quality of contact with staff (i.e. bank staff listen and respond to the customer's needs; staff are sensitive in dealing with unusual situations; friendly staff)	Subjective
66	Customer interaction	Readily available information on the website	Objective and subjective
67	Internet Banking	Number of transactions which can be completed via internet banking or mobile app	Objective
68	Internet Banking	Number of administrative tasks which can be completed via internet banking or mobile app	Objective
69	Internet Banking	Availability of telephone banking without menus	Objective
	BCA specific indi	cators (relationship management and lending)	
	Sub-category	Indicator	Measure type
70	Lending	Time taken to receive overdraft (from application to overdraft being available)	Objective
71	Lending	Documents are needed to apply for overdraft	Objective
72	Lending	Average size of approved overdraft	Objective
73	Lending	Approved overdraft as a proportion of applied overdraft	Objective
74	Lending	Time taken to receive SME lending (from application to lending being available)	Objective
75	Lending	Proportion of BCA customers who have one or more SME lending products	Objective
76	Lending	Whether provider subscribes to regimes in place to allow businesses to access specialist financial services with confidence, for example, the Lending Code	Objective
77	Relationship management	Proportion of SMEs with a relationship manager	Objective
78	Relationship management	Average frequency of contact with relationship manager	Objective



79	Relationship management	By branch, average number of SMEs per relationship manager	Objective
	BCA specific indicators (relationship management and lending)		
80	Relationship management	By branch, average number of sectors covered by relationship manager	Objective
81	Relationship management	Proportion of customers using automated account managers	Objective
82	Relationship management	Criteria which SMEs need to meet in order to have a dedicated account/ relationship manager	Objective
83	Relationship management	Data relating to the number of employees with relevant qualifications, memberships at professional bodies, have achieved a professional standard	Objective
	Others to consid Information	er alongside other FCA/Ombudsman Service /	СМА
	Sub-category	Indicator	Measure type
84	Complaint handling	Satisfaction with speed and accuracy of complaints handling	Subjective
85	Complaint handling	Number of complaints per 1000 accounts	Objective
86	Complaint handling	Number of complaints regarding switching per 1000 accounts	Objective
87	Complaint handling	% of complaints resolved within three business days	Objective
88	Complaint handling	Average number of days to resolve a complaint (need clear guidelines on what constitutes a complaint)	Objective
89	Regulatory history	Regulatory history, including fines for breaches of regulatory rules and redress packages	Objective
90	Satisfaction	Would recommend provider/ satisfaction with provider	Subjective
91	Satisfaction	Satisfaction with digital offering	Subjective
92	Satisfaction	Satisfaction with internet banking	Subjective
93	Satisfaction	Satisfaction with mobile app	Subjective
94	Satisfaction	Satisfaction with branch service	Subjective



Shortlist of metrics

- 5. The following short-list of metrics was developed from the long-list following consultation with our SEG. Indicators in this short-list were tested with consumer and SME respondents in our qualitative research. They fall into five main categories:
 - Communicating with the bank
 - Resolution of issues and complaints
 - Technical service reliability
 - Ease of opening an account local branch offering.
- 6.

Respondents' views on each of the indicators is detailed in the research report 'Understanding customer views on current account service indicators' published along with this consultation.³⁷

	Communicating with the bank	
	Indicator	Measure type
1	Response times through different channels	Objective
2	Access outside normal business hours	Objective
3	Customer satisfaction after communicating with the bank	Subjective
4	Service satisfaction of customers in vulnerable circumstances	Subjective
	Resolution of issues and complaints	
	Indicator	Measure type
5	Time taken for bank to contact you in regards to suspicious activity	Objective
6	Response times / average time taken to resolve issues	Objective
7	Customer satisfaction with complaints	Subjective
8	Customer satisfaction with treatment when there is fraud/ suspicious activity on their account	Subjective
9	Number of customer complaints that the bank rejects but the Ombudsman service supports	Objective
	Ease of opening an account	
	Indicator	Measure type
10	Indicator Time taken for the account to become fully functional	Measure type Objective
10 11		
	Time taken for the account to become fully functional Clear information on where to open an account (eg online or in	Objective
11	Time taken for the account to become fully functional Clear information on where to open an account (eg online or in branch)	Objective Objective
11	Time taken for the account to become fully functional Clear information on where to open an account (eg online or in branch) Type and number of documents required to open an account	Objective Objective Objective
11 12 13	Time taken for the account to become fully functional Clear information on where to open an account (eg online or in branch) Type and number of documents required to open an account % of applicants rejected for a current account	Objective Objective Objective Objective
11 12 13	Time taken for the account to become fully functionalClear information on where to open an account (eg online or in branch)Type and number of documents required to open an account% of applicants rejected for a current accountTime taken to get an appointment in branch to open an account	Objective Objective Objective Objective



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16	Number of instances when customers could not log-in to mobile or internet banking services	Objective
17	Length of time the bank's core services are down	Objective
18	Reason for service outages	Objective
19	Customer satisfaction with log-in process	Subjective
20	Number/time of planned interruptions during working hours	Objective
21	Time of day most major incidents have occurred	Objective
	Local branch offering	
	Indicator	Measure type
22	Average number of self-service terminals in branch	Objective
23	Number of customer facing staff in each branch, by position	Objective
24	Average waiting time for an appointment with an advisor	Objective
25	Range of services available at most branches	Objective
	SME specific metrics	
	Indicator	Measure type
26	Criteria to have a dedicated Relationship Manager (RM)	Objective
27	Proportion of SME customers with RM	Objective
28	Number of sectors covered by RM by branch	Objective
29	Number of SMEs per RM	Objective
30	Time taken to get an overdraft granted	Objective
31	Time taken to get a loan granted	Objective
32	Number of staff required to open the account	Objective
33	Documents needed to apply for an overdraft/loan	Objective



Annex 6 Abbreviations used in this paper

ΑΡΙ	Application programming interface
BBA	British Bankers Association
BCA	business current account
BCOBS	Banking: Conduct of Business sourcebook
BSA	The Building Societies Association
СВА	Cost-benefit analysis
CDD	Customer due diligence
СР	Consultation Paper
СМА	Competition and Markets Authority
DISP	Dispute Resolution: Complaints sourcebook
EBA	European Banking Authority
FCA	Financial Conduct Authority
FSMA	The Financial Services and Markets Act 2000
LRRA	Legislative and Regulatory Reform Act 2006
PAD	Payment Accounts Directive
PARs	Payment Accounts Regulations 2015
РСА	personal current account
PSD2	Second Payment Services Directive
SEG	stakeholder expert group
SME	small and medium sized enterprise

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We have developed the policy in this Consultation Paper in the context of the existing UK and EU regulatory framework. The Government has made clear that it will continue to implement and apply EU law until the UK has left the EU. We will keep the proposals under review to assess whether any amendments may be required in the event of changes in the UK regulatory framework in the future.

We make all responses to formal consultation available for public inspection unless the respondent requests otherwise. We will not regard a standard confidentiality statement in an email message as a request for non-disclosure.

Despite this, we may be asked to disclose a confidential response under the Freedom of Information Act 2000. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by the Information Commissioner and the Information Rights Tribunal.

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Appendix 1 Draft rules and guidance

[*Editor's note*: the text in this instrument takes into account the changes proposed by CP17/11 'Implementation of the Payment Services Directive (PSD2): draft Approach Document and draft Handbook changes' (April 2017) as if they were made.]

BANKING (INFORMATION ABOUT CURRENT ACCOUNT SERVICES) INSTRUMENT 2017

Powers exercised

- A. The Financial Conduct Authority makes this instrument in the exercise of the following powers and related provisions in the Financial Services and Markets Act 2000 (the "Act"):
 - (1) section 137A (General rule-making power);
 - (2) section 137T (General supplementary powers); and
 - (3) section 139A (Guidance).
- B. The rule-making powers listed above are specified for the purpose of section 138G(2) (Rule-making instruments) of the Act.

Commencement

C. This instrument comes into force on [1 April 2018].

Amendments to the Handbook

D. The Banking: Conduct of Business sourcebook (BCOBS) is amended in accordance with the Annex to this instrument.

Citation

E. This instrument may be cited as the Banking (Information about Current Account Services) Instrument 2017.

By order of the Board [*date*] 2017

Annex

Amendments to the Banking: Conduct of Business sourcebook (BCOBS)

Part 1: amendments to BCOBS 1

In this Part, underlining indicates new text and striking through indicates deleted text.

1 Application

1.1 General application

•••

Limitations on the general application rule

. . .

1.1.5 R BCOBS 2.2A, BCOBS 4.1.2G(2A) to (2E), (3A), (6A) and (6B), BCOBS 4.1.4AG(2)(a), BCOBS 5.1.3AG, BCOBS 5.1.3BG, BCOBS 5.1.5AR, BCOBS 5.1.5BG, and BCOBS 5.1.13R and BCOBS 7 (apart from BCOBS 7.1.4R and 7.1.5G) do not apply to a credit union.

Part 2: insertion of BCOBS 7

In this Part, all the text is new text.

7 Information about current account services

7.1 Application

What?

- 7.1.1 R (1) This chapter requires a *firm* to publish information about its provision of personal current accounts and business current accounts.
 - (2) In this chapter:
 - (a) a "personal current account" means an account, other than a current account mortgage or a premium service account, which is a payment account within the meaning of the *Payment Accounts Regulations* (see *BCOBS* 7.1.3G(2));
 - (b) a "business current account" means an account which would be a personal current account if the *banking customer* were a

consumer (with the definition of "personal current account" in (2)(a) applying for the purposes of this sub-paragraph as if the words "or a premium service account" were omitted) (see *BCOBS* 7.1.3G(3)); and

- (c) a "premium service account" means an account of a type:
 - (i) in respect of which *banking customers* receive better or faster service, assessed by reference to any of the information which the *firm* must publish under this chapter, than that provided in respect of one or more other types of personal current account held with the *firm* under the relevant trading name;
 - (ii) which requires the *banking customer* to do either or both of the following:
 - (A) maintain a credit balance in the account, exceeding an amount specified by the *firm*, and
 - (B) make deposits into the account each month, exceeding an amount specified by the *firm*; and
 - (iii) which is held by fewer than 10% of the holders of personal current accounts held with the *firm* under the relevant trading name (with the definition of "personal current account" in (2)(a) applying for the purposes of this sub-paragraph as if the words "or a premium service account" were omitted).

Who?

- 7.1.2 R (1) This chapter applies to a *firm* in relation to a current account measurement period (see *BCOBS* 7.7.1R):
 - (a) in respect of personal current accounts held with the *firm* under a trading name of the *firm*, if:
 - (i) at the start of the current account measurement period, 70,000 or more personal current accounts are held with the *firm* under that trading name; and
 - (ii) 70,000 or more personal current accounts were held with the *firm* under that trading name throughout the previous two current account measurement periods; and
 - (b) in respect of business current accounts held with the *firm* under a trading name of the *firm*, if:

- (i) at the start of the current account measurement period, 15,000 or more business current accounts are held with the *firm* under that trading name; and
- (ii) 15,000 or more business current accounts were held with the *firm* under that trading name throughout the previous two current account measurement periods.
- (2) This chapter does not apply in relation to an account held by a *banking customer* in respect of whom the main correspondence address held by the *firm* is outside the *United Kingdom*.
- (3) This chapter does not apply to a *credit union*.
- (4) But this *rule* is subject to *BCOBS* 7.1.4.R.
- 7.1.3 G (1) This chapter applies to a *firm* separately in relation to personal current accounts and business current accounts, for each of its trading names as notified to the FCA in accordance with SUP 16 Annex 16AR. For example, a *firm* which only has 50,000 personal current accounts and no business current accounts will not be subject to the requirements of this chapter (except where BCOBS 7.1.4R applies). If a *firm* has two trading names, with 150,000 personal current accounts held with the *firm* under the first name and 50,000 personal current accounts under the second name, and only 10,000 business current accounts, the requirements of this chapter will apply to the firm only in respect of the first trading name and only in respect of personal current accounts (except where BCOBS 7.1.4R applies). The numbers in BCOBS 7.1.1R and 7.1.2R apply to the number of accounts, rather than the number of account holders.
 - (2) The definitions of "personal current account" and "business current account" both refer to the definition of a "payment account" under the *Payment Account Regulations*, that is: "an account held in the name of one or more consumers through which consumers are able to place funds, withdraw cash and execute and receive payment transactions to and from third parties, including the execution of credit transfers, but does not include any of the following types of account provided that the account is not used for day-today payment transactions: savings accounts; credit card accounts where funds are usually paid in for the sole purpose of repaying a credit card debt; current account mortgages or e-money accounts".
 - (3) The FCA has issued guidance on that definition: see FG16/6 Payment Account Regulations 2015. A payment account under the Regulations is one which is held by a consumer, namely a natural person acting for purposes which are outside that person's trade, business, craft or profession. A business current account (defined in BCOBS 7.1.1R(2)(b)) is not a payment account because it is not held by a consumer, but is one which would be a payment account if the account holder were a consumer. The exclusion of "premium service

accounts" (see (7)) does not apply to business current accounts.

- (4) Accounts held by *banking customers* whose main correspondence address is outside the United Kingdom are excluded both from the number of accounts and from the requirements of BCOBS 7.3 to 7.6.
- (5) BCOBS applies only to the activity of accepting deposits from banking customers carried on from an establishment maintained by it in the United Kingdom (see BCOBS 1.1.1R). Therefore, this chapter only applies to accounts operated and activities carried out from United Kingdom branches and not, where a firm also has branches outside the United Kingdom, from non-United Kingdom branches.
- (6)BCOBS 7.1.2R also makes provision for firms whose current account businesses are growing or contracting. For example, a *firm* which passes the 70,000 threshold for the first time on 29 March and then stays above it, will have to measure the time it takes do to those things which BCOBS 7.3 to 7.6 require to be measured starting from 1 October, and publish its first statistics (relating to the period from 1 October to 31 December) on or before 15 February of the following year. It will also have to publish the other information required by BCOBS 7.3 to 7.6 from 1 October. (See BCOBS 7.7.1R.)
- (7)Premium service accounts are excluded from BCOBS 7.3 to 7.6. Premium service accounts are those personal current accounts which have eligibility criteria relating to minimum balances or minimum monthly deposits (or both), and whose holders receive better service than non-premium service accounts, based on any of the information or data which this chapter requires a *firm* to publish. For example, an account which has staff available to respond to relevant queries through telephone banking for more hours of the day than other accounts, or whose account holders can replace a lost debit card more quickly than other accounts, would be a premium service account. But an account is not a premium service account for this purpose if accounts of that type of account are held by 10% or more of the firm's personal current account banking customers (treating all accounts as non-premium for the purposes of the 10% calculation).
- R (1)This *rule* applies to a *firm* to which this chapter does not otherwise apply in respect of either or both of personal current accounts and business current accounts held under a particular trading name.
 - (2)This *rule* applies to information which covers the same subject matter as any of the following *rules* ("regulated information"):
 - (a) BCOBS 7.3.5R(1) (information about the speed of the account opening process);
 - (b) BCOBS 7.4.1.R(1) (information about the time taken to replace a lost, stolen or stopped debit card);

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- (c) *BCOBS* 7.4.5.R(1) (information about the speed with which a *firm* can give an attorney access to a personal current account and enable the attorney to take various actions in relation to the account); and
- (d) *BCOBS* 7.6.1.R(1) (information about operational and security resilience).
- (3) The *firm* must not publish any regulated information or include any regulated information in a communication or *financial promotion* addressed to a *banking customer* or a potential *banking customer*, unless the information that the *firm* publishes or includes
 - (a) would meet the requirements of *BCOBS* 7.3.5R(2), *BCOBS* 7.4.1R(2), *BCOBS* 7.4.5R(2) or *BCOBS* 7.6.1R(2), as the case may be, and
 - (b) had been calculated in accordance with the requirements of this chapter,

as if the *firm* were a *firm* to which this chapter (apart from this *rule*) applied in respect of that information in relation to that trading name.

7.1.5 G If a *firm* does not have 70,000 personal current accounts, or 15,000 business current account, under a particular brand (i.e. trading name), this chapter does not require the *firm* to publish information about its personal current account service and/or its business account service (as relevant) for that brand. However, if a *firm* chooses to publish information about that brand that is within the scope of any of the *rules* in his chapter that relate to speed of service or operational and security resilience ('regulated information'), the *firm* must comply with the relevant *rule* in full as if this chapter did apply to that brand. This means that they must measure and calculate the information to be published, and publish it, as required by this chapter. The same applies to a *credit union* that publishes any regulated information.

7.2 What information is to be published and how is it to be measured?

Publication of information about personal current accounts and business current accounts

- 7.2.1 R (1) A *firm* to which this chapter applies must publish the information and statements specified in *BCOBS* 7.3 to 7.6:
 - (a) separately, in relation to each trading name in respect of which the *firm* has 70,000 or more personal current accounts;
 - (b) separately, in relation to each trading name in respect of which the *firm* has 15,000 or more business current accounts; and

- (c) subject to (2), separately for personal current accounts and business current accounts in relation to each of those trading names.
- (2) Where any of the information or statements which a *rule* in (3) requires a *firm* to publish is the same for both personal current accounts and business current accounts, the *firm* may publish a single set of information or a single statement for both personal current accounts and business current accounts.
- (3) The *rules* are:
 - (a) *BCOBS* 7.3.1R (information needed to open a current account);
 - (b) *BCOBS* 7.3.3R (information about how an account may be opened); and
 - (c) *BCOBS* 7.5.1R and 7.5.2R (information about the availability of certain services and helplines).
- 7.2.2 G (1) Where a *firm* is subject to this chapter in respect of more than one trading name, *BCOBS* 7.2.1R requires the *firm* to publish separate information for each of its trading names. And where a *firm* is subject to this chapter in respect of both personal current accounts and business current accounts, *BCOBS* 7.2.1R requires the *firm* to publish separate information for personal current accounts and business current accounts, for each trading name. (*BCOBS* 7.2.1R(3) provides for an exception, where standing information about personal current accounts and business current accounts is the same: in that case, the *firm* may publish a single set of information required by the *rules* listed in *BCOBS* 7.2.1R(3) but should indicate that it applies to personal current accounts and business current accounts.)
 - (2) But the following *rules* apply to personal current accounts and business current accounts separately: *firms* should not publish a single set of information covering both categories. These *rules* apply to the category as a whole and not to different types of product or account within those two categories. If a *firm* offers more than one type of current account within either or both of those two categories under the same trading name, the information in relation to all those types of account is to be aggregated within the relevant category. The *rules* are:
 - (a) *BCOBS* 7.3.5R(1) (information about the speed of the account opening process);
 - (b) *BCOBS* 7.4.1.R(1) (information about the time taken to replace a lost, stolen or stopped debit card);
 - (c) BCOBS 7.4.5.R(1) (information about the speed with which a

firm can give an attorney access to a personal current account and enable the attorney to take various actions in relation to the account); and

- (d) *BCOBS* 7.6.1.R(1) (information about operational or security resilience).
- (3) *BCOBS* 7.4.3R and 7.4.5R only apply in respect of personal current accounts. *Firms* do not need to publish information under those rules in respect of business current accounts.
- 7.2.3 R For the purposes of *BCOBS* 7.3 to 7.6:
 - (1) a working account number is to be treated as generated for a *banking customer* only when the account number has been issued to the *banking customer* and the *banking customer* is able to make deposits into the account;
 - (2) a thing is be treated as issued to a *person*:
 - (a) on the same *day*, if the *person* receives it that *day*; else
 - (b) on the *day* on which the *person* would ordinarily be expected to receive it, in accordance with the delivery method by which the *firm* sent it;
 - (3) a reference to an average number of *days* is a reference to the mean, expressed as a whole number of *days*;
 - (4) "telephone banking" means a facility provided by the *firm*, other than mobile banking, which enables a *banking customer* to use voice telephony to ascertain the balance on an account and initiate a payment transaction on the account;
 - (5) "mobile banking" means a software application provided by the *firm* which enables a *banking customer*, by use of an electronic device (including a smartphone, a tablet computer and a desktop computer) on which that application is installed, to ascertain the balance on an account and initiate a payment transaction on the account;
 - (6) "internet banking" means a facility provided by the *firm*, other than mobile banking, which enables a *banking customer* to use the internet to ascertain the balance on an account and initiate a payment transaction on the account; and
 - (7) internet banking is to be treated as enabled only when the *firm* has issued all information, and any devices specific to the *firm* (for example, a card reader), necessary for the *banking customer* or attorney to use internet banking.
- 7.2.4 G (1) *BCOBS* 7.2.3R(2) specifies that a thing is to be treated for the purposes of *BCOBS* 7.3 to 7.6 as having been issued to a *banking*

customer only when the *banking customer* would ordinarily be expected to have received it. For example, if a debit card is sent to a *customer* by first class post, it will be treated under *BCOBS* 7.2.3R(2) as issued on the *day* after the *day* on which is was posted (or, if posted on a Saturday, as issued on the Monday).

- (2) When counting the number of *days* taken:
 - (a) *firms* should count each part of a *day* as a whole *day* (but the *day* from which the thing is to be counted may be disregarded); and
 - (b) a thing done on the following *day* should be counted as done within one *day*.
- (3) Where *BCOBS* 7.3 to 7.5 require a percentage or an average to be published, the percentage is to be expressed as an integer and an average is to be expressed as a whole number of *days*, with a fractional part of a figure which is 0.5 or over being rounded up and a fractional part of less than 0.5 being rounded down.

7.3 Account opening information

Information needed to open a current account

- 7.3.1 R (1) In relation to each type of personal current account and each type of business current account that it offers, a *firm* must publish either:
 - (a) a statement that the *firm* has published a list of the information and documents which, as a minimum, the *firm* requires to open an account for a *banking customer* who is not currently a *customer* of the *firm*; or
 - (b) a statement that the *firm* does not publish such a list.
 - (2) A *firm* must not publish a statement as in (1)(a) unless the statement either includes the list or indicates where the list is available.
 - (3) For the purposes of (2), a list is not to be treated as available unless it has been published in the same manner as the statement in (1).
- 7.3.2 G (1) BCOBS 7.3.1R requires a *firm* to publish a statement indicating whether or not a list is available of the minimum information and documents necessary to open each type of account that it offers. That list must itself be published on the *firm*'s website: this is the effect of BCOBS 7.3.1R(3) and BCOBS 7.7.2R. The statement must either include the list or provide a link to it.
 - (2) The list should set out the minimum information and documents that the *firm* needs to open each type of account that it offers, for a new

customer. For example, the list might specify what types of proof of identity or proof of address the *firm* requires, whether they must be original copies or certified copies, etc.

- (3) *Firms* have discretion about how to present the list. If the list is the same for all, or most, of their accounts, they may choose to publish a single list and indicate any exceptions or differences that relate to particular accounts.
- (4) In individual cases, the *firm*'s obligations under the *Money Laundering Regulations*, or its other anti-fraud procedures, might mean that the *firm* requires additional or more particular information or documents to open an account: *BCOBS* 7.3.1R does not affect a *firm*'s responsibility for discharging those obligations or carrying out those procedures fully and properly.
- (5) *Firms* may wish to include a comment in their statement that additional information or documents may be required on a case-by-case basis. But *BCOBS* 7.3.1R does not prevent a *firm* from publishing a more comprehensive list if it wishes to do so.

Information about how an account may be opened

- 7.3.3 R (1) In relation to each type of personal current account and each type of business current account that it offers, a *firm* must publish information about whether it is possible to open the account:
 - (a) without visiting a branch;
 - (b) where a visit to a branch is required, without an appointment;
 - (c) on the basis of documents and information supplied in electronic form; and
 - (d) by post.
 - (2) Unless the information is true in all cases, the information must include a statement to the effect that, although the information may be true for some cases, it may not be true in all cases.
- 7.3.4 G *BCOBS* 7.3.3R requires a *firm* to publish information about the manner in which an account may be opened. The *firm* has discretion over how the information is presented; for example, it may choose to make a series of statements, or present the information in a table.

Information about the speed of the account opening process

- 7.3.5 R (1) This *rule* applies to information about the speed with which a *firm* can open an account.
 - (2) A *firm* must publish the information in (3) about each of the following things done in a current account measurement period (see

BCOBS 7.7.1R):

- (a) generating a working account number for a *banking customer* who is not already a *customer* of the *firm*;
- (b) issuing a debit card to a *banking customer* who requests one as part their application to open the account or for whom issue of a debit card is a term or condition of the account contract;
- (c) enabling internet banking for a *banking customer* who requests it as part their application to open the account or for whom provision of internet banking is a term or condition of the account contract; and
- (d) providing *credit* under an *authorised non-business overdraft agreement* or an *authorised business overdraft agreement* where the *banking customer* has requested such *credit* as part of their application to open the account.
- (3) The information is:
 - (a) the percentage of *banking customers* for whom the *firm* did that thing on the same *day*;
 - (b) the average number of *days* the *firm* took to do that thing; and
 - (c) the number of *days* within which the *firm* did that thing for 99% of *banking customers* for whom that thing was done.
- (4) The *firm* must use the words specified in Table 1 of *BCOBS* 7 Annex 1R when publishing that information about those things.
- (5) For the purposes of (2)(a) and (3):
 - (a) where the *firm* has published a list under *BCOBS* 7.3.1R in relation to that type of account:
 - (i) the *firm* need only publish information about those cases where the *firm* does not require any information or documents additional to those specified on that list; and
 - (ii) the number of *days* taken to generate a working account number is to be counted from receipt of a complete application which includes all the information and documents specified on the list;
 - (b) where the *firm* has not published a list under *BCOBS* 7.3.1R in relation to that type of account, the number of *days* taken to generate a working account number is to be counted from receipt of an application (irrespective of whether the

application is complete, or the *firm* requires information or documents not included in or submitted with the application).

- For the purposes of (2)(b), (2)(c), (2)(d) and (3), the number of *days* (6)taken is to be counted from the day on which the firm generates a working account number for the banking customer.
- G (1) Firms must publish information under BCOBS 7.3.6R(3) separately for each of their trading names, and separately for personal current accounts and business current accounts for each of their trading names. (See BCOBS 7.2.1R(1).)
 - (2)Firms can choose how and where they publish information under BCOBS 7.3.5R, provided that they use the language in Table 1 of BCOBS 7 Annex 1R and comply with BCOBS 7.7.2R. These rules do not prevent a *firm* from using its own font or presentational style, provided that the language in Table 1 is used and the information is easily accessible.
 - (3) Each of the things mentioned in BCOBS 7.3.5R(2) should be measured and published in relation to the current account measurement period in which that thing is done, irrespective of the current account measurement period in which each of those other things is done and irrespective of the current account measurement period in which the *banking customer* submitted the application for the account.
 - (4) If the *firm* has published a list of the minimum information and documents it needs to open the account under BCOBS 7.3.1R, it need only measure the time taken to generate a working account number for those straightforward cases where it does not need to request additional information or documents from the banking customer. If the firm has not published such a list, it should measure the time taken to generate a working account number from receipt of an application, irrespective of whether the application is complete or the firm requires additional information or documents not included in the application.
 - (5) The *firm* should only treat *credit* as having been provided, for the purposes of BCOBS 7.3.5R(2)(c), when the funds under an arranged overdraft granted at the time of account opening are available for the banking customer to withdraw. An arranged overdraft with a limit other than that requested should be counted; if no overdraft is granted, the account should not be counted for the purposes of BCOBS 7.3.5R(2)(c).
 - (6)Firms are reminded of their obligations under CONC 5.2 (Responsible lending) to carry out a creditworthiness assessment before entering into an agreement for an arranged overdraft. Firms are also reminded of their obligations under the *Money Laundering* Regulations. Firms should discharge those obligations, and carry out

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any other appropriate affordability and anti-fraud checks, fully and properly without curtailing or omitting them for the purposes of the information to be published under *BCOBS* 7.

7.4 Information about certain services requested at a time later than the opening of an account

Time taken to replace a stolen, lost or stopped debit card

- 7.4.1 R (1) This *rule* applies to information about the time it takes a *firm* to replace a debit card which has been lost, stolen or stopped.
 - (2) The *firm* must publish the following information about debit cards replaced in the relevant current account measurement period (see *BCOBS* 7.7.1R):
 - (a) the percentage of debit cards which the *firm* replaced on the same *day*;
 - (b) the average number of *days* the *firm* took to replace a debit card; and
 - (c) the number of *days* within which the *firm* replaced 99% of the debit cards it replaced.
 - (3) The *firm* must use the words specified in Table 2 of *BCOBS* 7 Annex 1R when publishing that information.
 - (4) For the purposes of this *rule*:
 - (a) the time taken is to be counted from the earlier of the *day* on which:
 - (i) the debit card is reported to the *firm* as lost or stolen; and
 - (ii) the *firm* stopped the debit card for any other reason; and
 - (b) a debit card is to be treated as replaced only when both the card and (where relevant) personal identification number have been issued to the *banking customer*.
- 7.4.2 G (1) The time taken to issue a replacement debit card need not include activation of the card.
 - (2) *Firms* are reminded that regulation 71(6) of the *Payment Services Regulations* requires a payment service provider to allow the use of the payment instrument or replace it with a new payment instrument "as soon as practicable" after the reasons for stopping its use cease to

exist.

Information needed to give an attorney access to a personal current account

7.4.3 R (1) In relation to each type of personal current account that it offers, a *firm* must publish either:

- (a) a statement that the *firm* has published a list of the information and documents which, as a minimum, the *firm* requires to give an attorney access to an account; or
- (b) a statement that the *firm* does not publish such a list.
- (2) A *firm* must not publish a statement as in (1)(a) unless the statement either includes the list or indicates where the list is available.
- (3) For the purposes of (2), a list is not to be treated as available unless it has been published in the same manner as the statement in (1).
- (4) In this *rule* and in *BCOBS* 7.4.5R:
 - (a) an "attorney" means an attorney under:
 - (i) in England and Wales, a power of attorney, a lasting power of attorney or an enduring power of attorney; or
 - (ii) in Scotland, a general power of attorney or a continuing power of attorney; or
 - (iii) in Northern Ireland, a power of attorney or an enduring power of attorney; and
 - (b) an attorney is given access to an account when the *firm* has informed the attorney that the *firm* recognises the attorney's entitlement to ascertain the balance on the account and obtain information about payment transactions on the account.
- 7.4.4 G (1) BCOBS 7.4.3R requires a *firm* to publish a statement indicating whether or not a list is available of the minimum information and documents necessary for the *firm* to give an attorney access to each type of personal account that it offers. That list must itself be published on the *firm*'s website; the statement must either include the list or provide a link to it. The list should set out the minimum information and documents that the *firm* needs. For example, the list might specify what documents and what types of proof of identity or proof of address the *firm* requires, whether they must be original copies or certified copies, and how and by whom those copies should be certified.
 - (2) *Firms* have discretion about how to present the list. If the list is the same for all, or most, of their personal current accounts, they may

choose to publish a single list and indicate any exceptions or differences that relate to particular accounts.

- (3) In individual cases, the *firm*'s obligations under the *Money Laundering Regulations*, or its other anti-fraud procedures, might mean that the *firm* requires additional or more particular information or documents: *BCOBS* 7.4.3R does not affect a *firm*'s responsibility for discharging those obligations or carrying out those procedures fully and properly.
- (4) *Firms* may wish to include a comment in their statement that additional information or documents may be required on a case-by-case basis. But *BCOBS* 7.4.3R does not prevent a *firm* from publishing a more comprehensive list if it wishes to do so.
- (5) For the purposes of *BCOBS* 7.4.3R and 7.4.5R, "access" to an account for an attorney means the attorney being able to check the balance on the account and obtain information about transactions on the account. Access is granted when the *firm* acknowledges the attorney's right to access: for the purposes of the *rules*, this may be done orally or in writing.

Giving an attorney access to an account and enabling an attorney to operate an account

7.4.5 R (1) This *rule* applies to information about the speed with which a *firm* can give an attorney access to a personal current account and enable the attorney to take various actions in relation to the account.

- (2) A *firm* must publish the information in (3) about each of the following things done in a current account measurement period (see *BCOBS* 7.7.1R):
 - (a) giving an attorney access to a personal current account;
 - (b) issuing a debit card to an attorney, where the attorney has requested one;
 - (c) enabling internet banking for an attorney, where the attorney has requested it; and
 - (d) enabling an attorney to withdraw money and initiate payment transactions, where the attorney has requested that ability.
- (3) The information is:
 - (a) the percentage of attorneys for whom the *firm* did that thing on the same *day*;
 - (b) the average number of *days* the *firm* took to do that thing; and

- (c) the number of *days* within which the *firm* did that thing for of 99% of attorneys for whom that thing was done.
- (4) The *firm* must use the words specified in Table 3 of *BCOBS* 7 Annex 1R when publishing that information about those things.
- (5) For the purposes of (2)(a) and (3):
 - (a) where the *firm* has published a list under *BCOBS* 7.4.3R in relation to that type of account:
 - (i) the *firm* need only publish information about those case where the *firm* does not require any information or documents additional to those specified on that list; and
 - (ii) the number of *days* taken to give the attorney access is to be counted from receipt of all the information and documents specified on the list;
 - (b) where the *firm* has not published a list under *BCOBS* 7.4.3R in relation to that type of account, the number of *days* taken to generate a working account number is to be counted from receipt of an application or request for access.
- (6) For the purposes of (2)(b), (2)(c), (2)(d) and (3), the number of *days* taken is to be counted from:
 - (a) the *day* on which the *firm* gives the attorney access to the account, where the attorney requested the relevant thing before the *day* on which the *firm* gives the attorney access to the account; else
 - (b) the *day* on which the attorney requested the relevant thing.
- 7.4.6 G The *guidance* in *BCOBS* 7.3.6G applies to *BCOBS* 7.4.5R, with necessary modifications (for example, replacing references to account opening with references to the attorney gaining access to the account).

7.5 Availability of certain services and helplines

- 7.5.1 R A *firm* must publish information about the *days* on which and the times at which a *banking customer* may, by each of the methods specified in *BCOBS* 7.5.3R, carry out each of the actions specified in *BCOBS* 7.5.4R.
- 7.5.2 R (1) A *firm* must publish a statement as to whether or not it is possible, twenty four hours a *day* and every *day* of the year, for a *banking customer* and, in relation to *BCOBS* 7.5.5R(i) and (j), a potential *banking customer* to discuss with the *firm*:

- (a) each of the actions specified in *BCOBS* 7.5.4R; and
- (b) each of the matters specified in *BCOBS* 7.5.5R.
- (2) A *firm* may publish a statement that it is so possible only if it is possible to discuss those actions and those matters, by one or more of the methods specified in *BCOBS* 7.5.3R, with a member of staff of the *firm* who has been trained to discuss the relevant action or matter.
- (3) If it is so possible, the *firm* must specify in the statement:
 - (a) by which of those methods it is possible; and
 - (b) if it is possible by telephone, the telephone number.
- (4) If it is not so possible by all of the methods specified in *BCOBS*7.5.3R, the *firm* must publish information about the *days* on which and the times at which a *banking customer* and, in relation to *BCOBS*7.5.5R(i) and (j), a potential *banking customer* may, by each of the methods specified in *BCOBS* 7.5.3R, discuss with the *firm*:
 - (a) each of the actions specified in *BCOBS* 7.5.4R; and
 - (b) each of the matters specified in *BCOBS* 7.5.5R.
- (5) In the information published under (4), the *firm* may only indicate *days* on which and times at which the *banking customer* or potential *banking customer* may discuss the action or matter with a member of staff of the *firm* who has been trained to discuss the relevant action or matter.
- (6) In the statement published under (1) and in the information published under (4), the *firm* must use the descriptions in the right hand column in each of *BCOBS* 7.5.4R and *BCOBS* 7.5.5R to refer to the actions and the matters.

7.5.3 R The methods are:

- (1) telephone (other than telephone banking);
- (2) telephone banking;
- (3) internet banking; and
- (4) mobile banking.
- 7.5.4 R The actions are:

	Action	Description
(a)	ascertain the balance on the account	check balance and

(b)	access a transaction history covering at least the previous 90 <i>days</i>	transactions
(c)	initiate a payment transaction to a payee in the <i>United Kingdom</i>	send money within the UK, including setting up a standing order
(d)	set up a standing order to a payee in the <i>United Kingdom</i>	standing order
(e)	initiate a payment in a currency other than a currency of the <i>United</i> <i>Kingdom</i> to a payee, whether in the <i>United Kingdom</i> or outside the <i>United Kingdom</i>	make a payment in a foreign currency
(f)	make a deposit by cheque	pay in a cheque
(g)	cancel a cheque	cancel a cheque

7.5.5 R The matters are:

	Matter	Description		
(a)	use of a debit card to withdraw money in a currency other than a currency of the <i>United Kingdom</i> from a machine or at an establishment outside the <i>United</i> <i>Kingdom</i>	discuss withdrawing money abroad		
(b)	overdrawing without a pre-arranged overdraft or exceeding a pre- arranged overdraft limit	discuss lack of funds, including unarranged overdrafts, payments taken despite lack of funds,		
(c)	a payment made from the account although the result of the payment is that the <i>banking customer</i> overdraws without a pre-arranged overdraft or exceeds a pre-arranged overdraft	cancelled payments due to lack of funds		
(d)	a payment not made from the account where the result of the payment would be that the <i>banking</i> <i>customer</i> overdraws without a pre- arranged overdraft or exceeds a pre- arranged overdraft			
(e)	a direct debit within the meaning of the <i>Payment Services Regulations</i>	discuss direct debit or continuous payment authority		

(f)	an attorney obtaining access to the account	discuss third party access to an account, for example under a power of attorney	
(g)	 inability of a <i>banking customer</i> to access or use: (i) internet banking; or 	discuss problems using on- line banking or mobile app	
(h)	(ii) mobile bankingthe stopping of a debit card, the suspension of transactions on the account, or a transaction which is suspected to be fraudulent	discuss progress following an account suspension or card cancellation, e.g. following a fraud incident	
(i)	opening an account	discuss account opening	
(j)	eligibility for an overdraft	including overdraft eligibility, what is required to open an account and an indication of what overdraft may be available	

7.5.6

G

(1) This section requires *firms* to publish various types of information:

- (a) information about how and when *banking customers* can carry out certain actions on their account;
- (b) a statement about whether or not 24-hour help is available for *banking customers* to raise queries about carrying the actions on their account specified in *BCOBS* 7.5.4R or about the matters specified in *BCOBS* 7.5.5R, and for prospective *banking customers* to raise queries about account opening and overdraft availability; and
- (c) where 24-hour help is not available under one or more of the methods specified in *BCOBS* 7.5.3R, information about how and when *banking customers* can raise queries about carrying out certain actions on their account and about various other matters, and prospective *banking customers* can raise queries about account opening and overdraft availability.
- (2) A *firm* should only indicate that help is available (i.e. an action or matter may be discussed) where the *banking customer* or prospective *banking customer* is able to discuss the action or matter with a member of staff who has been appropriately trained to respond to such queries. This might mean, for example, a customer call centre responding to telephone queries or live webchat for internet banking, operated by appropriately trained staff. Automated responses, an FAQ list which filters out queries, or a messaging or mailbox system would not be sufficient; the discussion must involve real time

interaction.

- (3) A *firm* should only indicate that 24-hour help is available by one of the methods specified in *BCOBS* 7.5.3R if all of the specified actions and all of the specified matters can be discussed by that method.
- (4) Firms may present the information and the statement in a format of their choosing, but must describe the actions and the matters using the terms specified in the right hand column of the tables in BCOBS 7.5.4R and BCOBS 7.5.5R

7.6 Publication of information about major operational or security incidents

Major operational or security incidents

- 7.6.1 R (1) This *rule* applies to information about the *firm*'s operational or security resilience.
 - (2) The *firm* must publish the information in (3) about the major operational or security incidents in respect of which the *firm* has submitted an initial report to the FCA under regulation 99 of the *Payment Services Regulations* in a current account measurement period (see *BCOBS* 7.7.1R).
 - (3) The information is:
 - (a) the total number of major operational or security incidents reported in the relevant current account measurement period (see *BCOBS* 7.7.1R);
 - (b) the number of major operational or security incidents reported in that period, for each of:
 - (i) telephone banking;
 - (ii) mobile banking; and
 - (iii) internet banking;
 - (c) the total number of major operational or security incidents reported in that period aggregated with those reported in the preceding three current account measurement periods; and
 - (d) the number of major operational or security incidents reported in that period aggregated with those reported in the preceding three current account measurement periods, for each of:
 - (i) telephone banking;
 - (ii) mobile banking; and

- (iii) internet banking.
- (4) The *firm* must use the words specified in Table 4 of *BCOBS* 7 Annex 1R when publishing that information unless (5) applies.
- (5) Where the *firm* did not report any incidents to which a category of information specified in (3) applies, the *firm* may indicate that it did not report any incidents in that category.
- 7.6.2 G *BCOBS* 7.6.1R requires *firms* to publish information about the number of initial reports about major operational or security incidents that it makes to the *FCA* under regulation 99 of the *Payment Services Regulations*. The published numbers relate to: the total number of initial reports in the last current account measurement period, and in the last four current account measurement periods; and the numbers relating to telephone banking, mobile banking and internet banking, again in the last current account measurement period, and in the last current account measurement period, and in the last four current account measurement period, and in the last four current account measurement period, and in the last four current account measurement period, and in the last four current account measurement period, and in the last four current account measurement period, and in the last four current account measurement periods. *Firms* are not required to publish separate numbers for commercial channels affected by a major operational or security incident other than telephone banking, mobile banking and internet banking.

7.7 Publication of information about current accounts

How frequently must information be published?

7.7.1 R (1) The information published under the *rules* specified in (2) must be published in respect of each current account measurement period on or before the publication date immediately following the end of that current account measurement period as set out in the table below.

Current account measurement period	Publication date
the period beginning on 1 January and ending on 31 March	15 May
the period beginning on 1 April and ending on 30 June	15 August
the period beginning on 1 July and ending on 30 September	15 November
the period beginning on 1 October and ending on 31 December	15 February

- (2) The *rules* are:
 - (a) BCOBS 7.3.5R(1) (information about the speed of the account

opening process);

- (b) *BCOBS* 7.4.1.R(1) (information about the time taken to replace a lost, stolen or stopped debit card);
- (c) *BCOBS* 7.4.5.R(1) (information about the speed with which a *firm* can give an attorney access to a personal current account and enable the attorney to take various actions in relation to the account); and
- (d) *BCOBS* 7.6.1.R(1) (information about operational and security resilience).
- (3) The information and statements published under the *rules* specified in (4) must be published and kept up-to-date.
- (4) The *rules* are:
 - (a) *BCOBS* 7.3.1R (information needed to open a current account);
 - (b) *BCOBS* 7.3.3R (information about how an account may be opened);
 - (c) *BCOBS* 7.4.3R (information needed to give an attorney access to an account); and
 - (d) *BCOBS* 7.5.1R and 7.5.2R (information about the availability of certain services and helplines).

How must information be published?

- 7.7.2 R (1) A *firm* to which this chapter applies must:
 - (a) publish on its website the information and statements which this chapter requires it to publish;
 - (b) ensure that the information and statements are easily accessible by a *banking customer* or a potential *banking customer*; and
 - (c) notify the *FCA* of the website location where the information and statements are published, no later than the *day* of their publication.
 - (2) A *firm* to which this chapter applies must include alongside the information and statements it publishes under the rules specified in *BCOBS* 7.7.1R(2) a statement to the effect that the *FCA* requires the *firm* to publish the information.
 - (3) A *firm* must make the information and statements published in accordance with this chapter publicly available free of charge by

means of an application programming interface, if it is a *firm*:

- (a) to which this chapter applies;
- (b) which is subject to the provisions of either or both of:
 - (i) clause 13 (release of service quality indicators) of the Retail Banking Market Investigation Order 2017; and
 - (ii) regulations 69(2)(a) and 70(2)(a) of the *Payment Services Regulations*; and
- (c) which uses an application programming interface for the purposes of a provision specified in (b).
- (4) A *firm* to which (3) applies must:
 - (a) use the same application programming interface to make information and statements available for the purposes of (3) as it uses for the purposes of:
 - (i) clause 13 (release of service quality indicators) of the Retail Banking Market Investigation Order 2017, expanding that interface as necessary for the purposes of this *rule*; or
 - (ii) if clause 13 of that Order does not apply to the *firm*, regulations 69(2)(a) and 70(2)(a) of the *Payment Services Regulations*; and
 - (b) ensure that the application programming interface is itself also publicly available free of charge.
- 7.7.3 G (1) *Firms* should publish information and statements under this chapter on their websites. The *FCA* would view the information and statements as "easily accessible" if the information and statements, or a link to the webpage(s) on which the information and statements are published, is prominently displayed on the *firm*'s or the brand's homepage for personal current accounts or, as the case may be, business current accounts.
 - (2) *Firms* may notify the FCA of the webpages on which they publish information under this chapter by sending a link to the webpages to retailbanking@FCA.org.uk.
 - (3) The *FCA* will treat the following statement as satisfying the requirements of *BCOBS* 7.7.2R(2): "The Financial Conduct Authority requires us to publish the following information".
 - (4) A *firm* which is required to publish information under clause 13 of the Retail Banking Market Investigation Order 2017 (that is, the service quality indicators required by the Competition and Markets

Authority) may wish to publish information under this chapter alongside information published under that Order. If so, the *firm* should ensure that a reader of the relevant webpage would not infer from the wording or position of the statement required by *BCOBS* 7.7.2R(2) that the *FCA* has required the *firm* to publish the information which that Order requires the *firm* to publish.

- (5) Clause 13 of the Retail Banking Market Investigation Order 2017 requires certain *firms* to use an API to publish the service quality indicators specified by the Competition and Markets Authority. Regulations 69 and 70 of the *Payment Services Regulations* require payment service providers to "communicate securely" with payment initiation service providers and account information service providers in accordance with the regulatory technical standards adopted under Article 98 of the *Payment Services Directive*; *firms* might use an API for that purpose.
- (6) Where a *firm* uses an API for the purposes of clause 13 of that Order or, if clause 13 of that Order does not apply to it, for the purposes of regulations 69 and 70 of the *Payment Services Regulations*, *BCOBS* 7.7.2R requires the *firm* to make information and statements published under this chapter also available through that API; both the API and the information and statements made available through it should be publicly available and free of charge. *Firms* that are not subject to the Order or those provisions of the *Payment Services Regulations* are, however, free to choose to make the information or statements published under this chapter available by API.

7 Annex Publication of information: specified language 1R

Table 1: account opening information, published under *BCOBS* 7.3.5R

The speed of our [personal/business] account opening process

How quickly do we open [personal/business] current accounts?

[(for firms that publish a list under BCOBS 7.3.1R) When all we need is the information and documents we ask for on our account opening list, **OR** (for firms that do not publish a list under BCOBS 7.3.1R) When we receive an application,] we give customers an account number and enable them to start paying into the account:

- the same day, for [x]% of customers;
- on average, in [x] days; and
- within [x] days for 99% of customers.

How quickly do we give customers a debit card?

Once an account is open, we give customers a debit card:

- the same day, for [x]% of customers;
- on average, in [x] days; and
- within [x] days for 99% of customers.

How quickly do customers get internet banking?

Once an account is open, customers have internet banking:

- the same day, for [x]% of customers;
- on average, in [x] days; and
- within [x] days for 99% of customers.

How quickly is an overdraft available?

Once an account is open, the overdraft is available:

- the same day, for [x]% of customers;
- on average, in [x] days; and
- within [x] days for 99% of customers.

Table 2: time taken to replace a lost, stolen or stopped debit card published under *BCOBS* 7.4.1R

The speed with which we can replace a debit card

How quickly do we replace debit cards which have been lost, stolen or stopped?

We replace debit cards:

- the same day, for [x]% of customers;
- on average, in [x] days; and
- within [x] days for 99% of customers.

Table 3: information about giving an attorney access to a personal current account, published under *BCOBS* 7.4.5R

The speed with which we can give another person access to a personal current account under a power of attorney

How quickly can we give another person access to a personal current account under a power of attorney? [(for firms that publish a list under BCOBS 7.4.3R) When all we need is the list of information and documents we have published, **OR** (for firms that do not publish a list under BCOBS 7.4.3R) When we receive a request for access,] we enable another person acting under a power of attorney to check the balance on the account and get information about transactions on the account:

- the same day, for [x]% of attorneys;
- on average, in [x] days; and
- within [x] days for 99% of attorneys.

How quickly can we give an attorney a debit card?

Once the attorney has access to the account, we give them a debit card:

- the same day, for [x]% of attorneys;
- on average, in [x] days; and
- within [x] days for 99% of attorneys.

How quickly can an attorney get internet banking?

Once the attorney has access to the account, they have internet banking:

- the same day, for [x]% of attorneys;
- on average, in [x] days; and
- within [x] days for 99% of attorneys.

How quickly will an attorney be able to withdraw money and make payments out of the account?

Once the attorney has access to the account, they are able to withdraw money and make payments out of the account:

- the same day, for [x]% of attorneys;
- on average, in [x] days; and
- within [x] days for 99% of attorneys.

Table 4: information about major operational or security incidents, published under *BCOBS* 7.6.1R

Information about the operational and security resilience of our services

We are obliged to report major operational or security incidents to the Financial Conduct Authority.

Overall:

• we reported [x] incidents between [e.g. 1 January 2019 and 30 March 2019], and [x] between [e.g. 1 April 2018 and 30 March 2019].

For telephone banking:

• we reported [x] incidents between [e.g. 1 January 2019 and 30 March 2019], and [x] between [e.g. 1 April 2018 and 30 March 2019].

For mobile banking:

• we reported [x] incidents between [e.g. 1 January 2019 and 30 March 2019], and [x] between [e.g. 1 April 2018 and 30 March 2019].

For internet banking:

• we reported [x] incidents between [e.g. 1 January 2019 and 30 March 2019], and [x] between [e.g. 1 April 2018 and 30 March 2019].

TP 1 Transitional provisions for information about current account services

(1)	(2)	(3)	(4)	(5)	(6)
	Material to which the transitional provision applies		Transitional provision	Transitional provision: dates in force	Handbook provision coming into force
1.1	BCOBS 7.1.2R	R	For the purposes of BCOBS 7.1.2R(1)(a)(ii) and BCOBS 7.1.2R(1)(b)(ii), references to preceding current account measurement periods should be read as including periods which predate 1 April 2018.	From 1 April 2018 to 30 September 2018	1 April 2018
1.2	BCOBS 7.1.2R	G	<i>Firms</i> will not be subject to <i>BCOBS</i> 7 in respect of the current account measurement period 1 April 2018 to 30 June 2018 if they have not continuously had 70,000 or more personal current accounts, or 15,000 or more business current accounts, since 1 October 2017. And <i>firms</i> will not be subject to <i>BCOBS</i> 7 in respect of the current account measurement period 1 July 2018 to 30	From 1 April 2018 to 1 October 2018	1 April 2018

			September 2018 if they have not continuously had 70,000 or more personal current accounts, or 15,000 or more business current accounts, since 1 January 2018.		
1.3	<i>BCOBS</i> 7.3.1R, 7.3.3R, 7.4.3R, 7.5.1R and 7.5.2R.	R	<i>Firms</i> are not obliged to publish a statement or information.	From 1 April 2018 to 14 August 2018	1 April 2018
1.4	<i>BCOBS</i> 7.3.1R, 7.3.3R, 7.4.3R, 7.5.1R and 7.5.2R.	G	The <i>rules</i> to which TP 1.3 applies require <i>firms</i> to publish various statements and information. TP 1.3 permits <i>firms</i> not to publish those statements or that information until 15 August 2018.	From 1 April 2018 to 14 August 2018	1 April 2018
1.5	<i>BCOBS</i> 7.3.5R, 7.4.1R, 7.4.5R and 7.6.1R	R	<i>Firms</i> are not obliged to publish information that relates to a current account measurement period ending before 1 April 2018.	From 1 April 2018 to 14 August 2018	1 April 2018
1.6	<i>BCOBS</i> 7.3.5R, 7.4.1R, 7.4.5R and 7.6.1R	G	The <i>rules</i> to which TP 1.5 applies require <i>firms</i> to publish various information. TP 1.5 permits <i>firms</i> not to publish information that relates to a current account measurement period ending before 1 April 2018. <i>Firms</i> must, however, collect information relating to the current account measurement period beginning on 1 April 2018 and publish it no later than 15 August 2018.		
1.7	BCOBS	R	Firms may disregard	From 1 April	1 April 2018

	7.6.1		current account measurement periods ending before 1 April 2018	2018 to 30 June 2019	
1.8	<i>BCOBS</i> 7.6.1	G	<i>BCOBS</i> 7.6.1R(3)(c) and (d) require firms to publish information about the total number of incident reports in a current account measurement period aggregated with those reported in the previous three periods (i.e. a twelve month total). TP 1.7 means that <i>firms</i> do not have to aggregate for periods which end before 1 April 2018.	From 1 April 2018 to 30 June 2019	1 April 2018

Sch 1 Notifications and reporting requirements (if any)

1.1G

Handbook reference	Matter to be notified	Contents of notification	Trigger event	Time allowed
<i>BCOBS</i> 7.7.2R(1)(c)	The website location(s) where information and statements published under <i>BCOBS</i> 7 are available	The website location(s) where information and statements published under <i>BCOBS</i> 7 are available	The publication of information and statements under <i>BCOBS</i> 7	No later than the date of publication

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