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Mynediad i Fancio Stryd Fawr yng Nghymru

Amdanom ni

[Cyngor Gweithredu Gwirfoddol Cymru \(CGGC\)](#) yw'r corff aelodaeth cenedlaethol ar gyfer mudiadau gwirfoddol yng Nghymru. Ein diben yw galluogi mudiadau gwirfoddol i wneud mwy o wahaniaeth gyda'i gilydd.

Trwy'r cyflwyniad hwn, hoffem dynnu sylw'r Pwyllgor at yr heriau unigryw y mae cau canghennau banciau a chymdeithasau adeiladu yn eu cyflwyno i fudiadau gwirfoddol yng Nghymru.

Cefndir

Mae dros 45,000 o fudiadau gwirfoddol yng Nghymru. Y sector sy'n gyfrifol am 10.7% o gyflogaeth y wlad ac mae'n galluogi oddeutu 938,000 o wirfoddolwyr i gyfrannu 145 miliwn awr o'u hamser at achosion elusennol bob blwyddyn. Amcangyfrifir fod gwerth amser gwirfoddolwyr yn oddeutu £1.7 biliwn y flwyddyn.¹ Yn aml, mudiadau gwirfoddol a gwirfoddolwyr sy'n cefnogi'r rhai mwyaf agored i niwed mewn cymdeithas. Mae lleihau capasiti a chau mudiadau gwirfoddol yn cael effaith gynyddol ar y cymunedau y maen nhw'n eu cefnogi.

Pan gollir canghennau banc y stryd fawr a mynediad at arian parod, pa ardaloedd neu gymunedau sy'n cael eu heffeithio fwyaf?

Mae cau canghennau banc wedi effeithio ar Gymru gyfan. Dengys data diweddaraf 'Which?' fod 371 o ganghennau wedi cau neu yn cael eu cau yng Nghymru rhwng 2015 a 2025 a dim ond 188 fydd yn aros ar agor.² I Gymru, golyga hyn y bydd yn colli bron 2/3 o'i changhennau banc stryd fawr erbyn 2025. I'r rheini sy'n dibynnu ar fancio wyneb yn wyneb, bydd

¹ Cyngor Gweithredu Gwirfoddol Cymru, Porth Data'r Sector Gwirfoddol (Cyrchwyd 2 Mai 2024)

<https://wcva.cymru/cy/y-sector-gwirfoddol-yng-nghymru/>

² Which?, Bank branch closures: is your local bank closing? (23 Ebrill 2024)

*<https://www.which.co.uk/money/banking/switching-your-bank/bank-branch-closures-is-your-local-bank-closing-ayYyu4i9RdHy#which-areas-have-been-hardest-hit-by-bank-branch-closures>

crynhoad y farchnad yn cyfyngu ar ddewis defnyddwyr.³ Yn y cyfamser, mae cwsmeriaid sy'n newid i fancio ar-lein yn agored i amrediad ehangach o beryglon twyll.⁴

Ond mae cymunedau sy'n wynebu heriau ychwanegol sy'n gysylltiedig â daearyddiaeth a seilwaith Cymru. Mae cysylltedd mewnruyd a derbyniad ffôn symudol gwael yn parhau i fod yn broblem ar draws cryn dipyn o gefn gwlad Cymru.⁵ Mae tlodi trafndiaeth yn effeithio ar lawer o gymunedau, gyda 12% o bobl yng Nghymru heb unrhyw gysylltiadau â thrafnidiaeth gyhoeddus yn eu hardal leol.⁶ Ni fu'r gwasanaethau bancio a ddarparwyd drwy gyfrwng y Gymraeg erioed yn effeithiol iawn, ond mae cau canghennau lleol yn gwaethgu'r broblem hon. Mae terfynu llinell ffôn cymorth cwsmeriaid Cymraeg HSBC yn ddiweddar⁷ yn codi cwestiynau ynghylch dyfodol cymorth bancio ar-lein a thros y ffôn i gwsmeriaid sy'n siarad Cymraeg.

Yn bennaf, credwn mai'r cymunedau daearyddol sydd yn y perygl fwyaf yw'r rheini sydd:

- Mewn ardal â chysylltedd band-eang a derbyniad ffôn symudol gwael
- Wedi'u hynysu'n ddaearyddol, heb opsiynau trafndiaeth dibynadwy a/neu fforddiadwy (gan gynnwys cymunedau gwledig, amdrefol a maestrefol)
- Yn siarad Cymraeg yn bennaf ac yn methu derbyn cymorth bancio mwyach yn eu mamiaith am fod canghennau lleol yn cau

Adlewyrchir yr heriau hyn yn yr adroddiadau rydym yn eu derbyn gan fudiadau gwirfoddol mewn lleoliadau sy'n cyd-fynd ag un neu ragor o'r categorïau uchod. Dengys y canlyniadau cychwynnol o'n harolwg o fwy na 80 o gynrychiolwyr o'r sector gwirfoddol yng Nghymru fod 58% o ymatebwyr gwledig wedi dweud bod gwasanaethau bancio wyneb yn wyneb naill ai 'ddim ar gael o gwbl' neu 'ddim ar gael rhyw lawer' i'w mudiad. Dywedodd 27% o'r holl ymatebwyr ei fod yn cymryd rhwng 30-60 munud iddynt deithio i'w cangen fanc agosaf, ac roedd 11% arall dros 1 awr i ffwrdd o fanc.⁸ Mae teithiau pell i gwblhau tasgau bancio yn mynd ag amser gwerthfawr staff, gwirfoddolwyr ac ymddiriedolwyr elusennau ac yn eu rhoi nhw mewn perygl pan fyddant yn cario symiau mawr o arian parod i'w bancio.

Pan fydd canghennau banc y stryd fawr yn cau, pa grwpiau cymdeithasol sy'n cael eu heffeithio mwyaf?

³ Sefydliad Marchnad Gymdeithasol, Consumers and the economy are getting a bad deal because companies don't face enough competition (2 Hydref 2017) *<https://www.smf.co.uk/consumers-economy-getting-bad-deal-companies-dont-face-enough-competition-event/>

⁴ Which?, How safe is online banking? (24 Ebrill 2024) *<https://www.which.co.uk/money/banking/banking-security-and-payment-methods/how-safe-is-online-banking-aPdmC5M5Emnj>

⁵ Cymunedau Digidol Cymru (Llywodraeth Cymru), Cynhwysiant Digidol yng Nghymru (Cyrchwyd 2 Mai 2024) <https://www.digitalcommunities.gov.wales/cy/cynhwysiant-digidol-yng-nghymru/>

⁶ Sustrans Cymru, Gwneud y Cysylltiad (11 Mai 2022) <https://www.sustrans.org.uk/our-blog/news/2022/may/people-in-wales-facing-transport-poverty-reality-says-sustrans-report/pobl-yng-nghymru-n-wynebu-gwirioneddau-tlodi-trafnidiaeth-medd-adroddiad-sustrans/>

⁷ BBC Wales, HSCB scraps Welsh language phone line (8 Tachwedd 2023) *<https://www.bbc.co.uk/news/uk-wales-politics-67357612>

⁸ [Civil Society Group](#), arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

Mae bancio yn wasanaeth hanfodol ac mae colli'r rhan helaeth o ganghennau banc mewn ardal (os nad nhw i gyd) yn effeithio ar bawb yn y gymuned leol. I rai unigolion, effeithiau cymharol fach fydd y rhain, ond bydd eraill mewn perygl llawer uwch o gael eu heffeithio'n anghymesur.

Mae bancio ar-lein yn parhau i fod yn llai hygyrch i bobl hŷn, oedolion ag anawsterau dysgu, amhariadau ar y golwg a'r clyw, dyslecsia, ac anabledau eraill. Caiff siaradwyr Cymraeg hefyd eu rhoi o dan anfantais fynych wrth geisio cael cymorth bancio ar-lein a thros y ffôn.⁹

Mae Age Cymru¹⁰, Mencap Cymru¹¹, Disability Rights UK¹² ac eraill o fewn y sector wedi arwain ymgyrchod i godi ymwybyddiaeth o'r effaith sylweddol y mae cau canghennau banc a symud i gymdeithas ddi-arian yn ei chael ar y bobl y maen nhw'n eu cynorthwyo.

Oedran cyfartalog 92% o ymddiriedolwyr yng Nghymru a Lloegr yw 55-64 oed, ac mae hyn yn codi i 65-74 oed mewn elusennau llai.¹³ Yng Nghymru, mae'r cyfraddau gwirfoddoli ar eu huchaf ymhlith y grŵp oedran 65-74 oed, a dilynir hyn yn agos gan y rheini sy'n 75 oed ac hŷn.¹⁴ Yn ymarferol, golyga hyn fod llawer o fudiadau gwirfoddol, yn enwedig grwpiau cymunedol bach a redir gan wirfoddolwyr, yn cael eu heffeithio'n anghymesur gan y penderfyniad i gau canghennau banc. Mae gan y sector gwirfoddol hefyd gyfran uwch o bobl anabl yn ei weithlu nag yn y sectorau cyhoeddus a phreifat.¹⁵

'Fe gymerodd hi fwy na chwe mis i symud ein cyfrif banc oherwydd y ffurflenni cymhleth oedd angen eu llenwi a'r problemau cyfathrebu i'n hymddiriedolwyr byddar' – Ymddiriedolwr a Phrif Swyddog Cyfathrebu, Sir Benfro¹⁶

Yn aml, mae staff, ymddiriedolwyr a gwirfoddolwyr mudiadau gwirfoddol yn gynrychiadol o'r cymunedau y maen nhw'n eu gwasanaethu. Felly, mae'r gor-gynrychiolaeth o grwpiau cymdeithasol sy'n debygol o gael eu heffeithio'n negyddol gan y penderfyniad i gau canghennau banc o fewn y sector gwirfoddol yn effeithio ar y grwpiau hynny ddwywaith: unwaith drwy wneud rolau proffesiynol neu wirfoddol unigolion yn anoddach, a'r eildro pan fydd adnoddau mudiad yn cael eu gwastraffu er mwyn datrys problemau bancio.

⁹ Comisiynydd y Gymraeg, Adolygiad statudol i wasanaethau Cymraeg banciau'r stryd fawr yng Nghymru (Ebrill 2015) *<https://www.welshlanguagecommissioner.wales/media/ynvbdtyv/statutory-review-of-banks.pdf>

¹⁰ Age Cymru, Mynediad i fancio (8 Tachwedd 2023) <https://www.ageuk.org.uk/cymraeg/age-cymru/cymryd-rhan/ymgyrchoedd/mynediad-i-fancio/>

¹¹ BBC Cymru, Gwrthod arian parod yn 'annheg' i bobl ag anabledau dysgu (12 Ebrill 2023) <https://www.bbc.co.uk/cymrufyw/65243456>

¹² Disability Rights UK, Four in ten banks fail Disabled customers, says Which? (27 Gorffennaf 2021) *<https://www.disabilityrightsuk.org/news/2021/july/four-ten-banks-fail-disabled-customers-says-which>

¹³ Comisiwn Elusennau Cymru a Lloegr, Taken on Trust (Tachwedd 2017)

*<https://www.gov.uk/government/publications/taken-on-trust-awareness-and-effectiveness-of-charity-trustees-in-england-and-wales>

¹⁴ Cyngor Gweithredu Gwirfoddol Cymru, Porth Data'r Sector Gwirfoddol (Cyrchwyd 3 Mai 2024) <https://wcvva.cymru/cy/y-sector-gwirfoddol-yng-nghymru/>

¹⁵ Cyngor Cenedlaethol Mudiadau Gwirfoddol, UK Civil Society Almanac 2022 (18 Hydref 2022)

*<https://www.ncvo.org.uk/news-and-insights/news-index/uk-civil-society-almanac-2022/workforce/who-works-in-the-voluntary-sector>

¹⁶ *[Civil Society Group](#), arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

Beth yw'r effaith ar gwsmeriaid a busnesau bach pan nad oes mynediad at fanciau stryd fawr?

Pan ddaw hi i wasanaethau bancio a mynediad at arian parod, mae mudiadau gwirfoddol a busnesau bach¹⁷ yn rhannu llawer o'r un heriau:

- costau trafndiaeth uwch a straen ar adnoddau amser
- diffyg cyfathrebu clir gan y banciau
- pryderon diogelwch o ran cludo symiau mawr o arian parod neu gadw arian ar y safle am gyfnodau hir o amser
- yr ystod gyfyngedig o wasanaethau a ddarperir gan unedau bancio symudol
- mynediad cyfyngedig at arian parod a natur annibynadwy peiriannau ATM

Fodd bynnag, mae heriau sy'n unigryw i'r sector gwirfoddol y mae'n rhaid i lunwyr polisi eu hystyried.

Nid yw'r gwasanaethau bancio a ddarperir wedi'u cynllunio gan ystyried elusennau. Mae hwn yn mynd y tu hwnt i'r ddarpariaeth ar-lein, ond mae'n golygu y bydd ymddiriedolwyr ac unigolion cyfrifol eraill yn debygol o fod angen cymorth ychwanegol i gwblhau tasgau arferol.

1. Ychwanegu llofnodwyr at fandad cyfrif banc a/neu eu tynnu ymaith

Dyweddodd 58% o ymatebwyr ein harolwg eu bod wedi wynebu heriau wrth geisio ychwanegu llofnodwyr at fandad eu cyfrif banc a/neu eu tynnu ymaith.¹⁸ Yn aml, mae llofnodwyr mudiadau gwirfoddol yn gymysgedd o ymddiriedolwyr a staff uwch. Oherwydd deiliadaethau cyfyngedig ymddiriedolwyr (arfer gorau yn y sector¹⁹), mae hwn yn wasanaeth y gofynnir amdano'n aml. Eto i gyd, mae'n parhau i fod yn broblem gyson. Weithiau, bydd cau cangen yn golygu bod yn rhaid i nifer o staff ac ymddiriedolwyr deithio milltiroedd maith i lenwi'r gwaith papur.

'Y prif broblemau rydw i wedi'u cael yw dim cangen leol i sortio pethau allan pan mae pethau'n mynd o'i le a'r amser sydd ei angen i newid cyfeiriadau llofnodwyr ac ati' – Ymddiriedolwr neuadd gymunedol, Ceredigion²⁰

2. Cael gwybod nad yw'r ddogfen rydych wedi'i darparu i'ch banc yn dderbyniol, er ei bod yn cydymffurfio â'r rheoliadau i elusennau

Mae 27% o ymatebion yr arolwg wedi cael gwaith papur (megis dogfen sefydlu) wedi'i wrthod i ddechrau. Gofynnwyd i 12% arall am ddogfen nad yw'n berthnasol i elusennau (er

¹⁷ Ffederasiwn y Busnesau Bach, Locked Out (17 Hydref 2016) *<https://www.fsb.org.uk/resources-page/locked-out.html>

¹⁸ *[Civil Society Group](#), arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

¹⁹ Y Cod Llywodraethu i Elusennau, Egwyddor 5. Effeithiolrwydd y Bwrdd (Cyrchwyd 3 Mai 2024)

https://www.charitygovernancecode.org/cy/5-effeithiolrwydd-y-bwrdd?set_language=cy

²⁰ *[Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

enghraifft, tystysgrif gofrestru).²¹ Mae cau canghennau lleol yn golygu nad oes cyfle i egluro dryswch ac ymdrin ag anghysondebau'n effeithlon.

'Er bod yn well gen i fancio ar-lein ar gyfer talu allan cyffredinol, mae'n amhosibl siarad yn uniongyrchol â rhywun sy'n gallu helpu nawr (mewn cangen) gan ei bod yn daith gron o 75 milltir nawr i'n Barclays agosaf.' – Ymddiriedolwr cwmni elusennol, Sir Benfro²²

3. Nid yw bancio ar-lein yn opsiwn i fudiadau gwirfoddol weithiau

Dywedodd 20% o ymatebwyr yr arolwg nad oes modd cael dau lofnodwr gyda bancio ar-lein. Mae llawer o fudiadau gwirfoddol yn parhau i ddibynnu ar roddion ar ffurf arian parod a sieciau. Mae 73% o'r mudiadau a arolygwyd wedi gorfod defnyddio bancio wyneb yn wyneb i dalu arian parod i mewn ac 74% wedi gorfod gwneud hyn i dalu sieciau i mewn yn ystod y ddwy flynedd ddiwethaf.²³

Yn gyffredinol, dywedodd 33% o fudiadau bod yn rhaid iddynt fel arfer defnyddio cyfleuster bancio wyneb yn wyneb unwaith y mis neu ragor; mae 23% angen bancio wyneb yn wyneb unwaith yr wythnos neu ragor.²⁴

Mae'n amlwg nad yw'r cyflenwad yn ateb y galw.

Mae'r gwasanaethau bancio gwael sydd ar gael, gan gynnwys cau canghennau lleol, yn cael effaith negyddol sylweddol ar fudiadau gwirfoddol yng Nghymru. Dywedodd 35% o ymatebwyr yr arolwg wrthym ei fod yn peri llawer o straen iddynt orfod ymdrin â'r gofynion o agor a/neu gynnal cyfrif banc eu mudiad.²⁵ Mae hyn yn arbennig o bryderus ar adeg pan mae'r sector gwirfoddol yn ymdrin â'r argyfwng difrifol o recriwtio a chadw gwirfoddolwyr.²⁶

Ni ellir llwyr ddeall ehangder yr effaith ar fudiadau gwirfoddol os edrychir ar gau canghennau banc yn unig. Mae dadfancio, rhewi cyfrifon, ffioedd gwasanaeth uchel, cynnyrch bancio anaddas, a'r anallu i ddod o hyd i fanc sy'n barod i dderbyn cwsmeriaid elusennol newydd yn broblemau ledled y DU.²⁷ Dengys data newydd gan Y Comisiwn Elusennau ar gyfer Cymru a Lloegr fod 42% o ymddiriedolwyr wedi derbyn gwasanaeth gwael gan eu banciau yn ystod y 12 mis diwethaf.²⁸

Dywedodd 32% o'r cynrychiolwyr o'r sector gwirfoddol y gwnaethom eu cwestiynu eu bod wedi cael anhawster dod o hyd i fanc a fyddai'n eu derbyn fel cwsmer. Dywedodd 45% eu bod yn wynebu costau amser afresymol er mwyn defnyddio gwasanaethau bancio.

²¹ * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

²² * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

²³ * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

²⁴ * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

²⁵ * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

²⁶ Cyngor Gweithredu Gwirfoddol Cymru, Mewn argyfwng, gwisgwch eich masg ocsigen eich hun yn gyntaf (2 Rhagfyr 2023) <https://wcva.cymru/cy/views/mewn-argyfwng-gwisgwch-eich-masg-ocsigen-eich-hun-yn-gyntaf/>

²⁷ Cyngor Mudiadau Gwirfoddol yr Alban (SCVO), The charity (de)banking landscape (23 Ebrill 2024)

* <https://scvo.scot/p/89511/2024/04/23/the-charity-debanking-landscape>

²⁸ Comisiwn Elusennau Cymru a Lloegr, New data suggests nearly half of charities experience issues when banking (7 Mawrth 2024) * <https://www.gov.uk/government/news/new-data-suggests-nearly-half-of-charities-experience-issues-when-banking>

Dyweddod pob un o'n hymatebwyr Cymraeg eu bod wedi wynebu rhwystrau wrth geisio cael gwasanaethau bancio yn Gymraeg.²⁹ Mae cau canghennau banc yn mynd â ffordd bwysig o ddatrys anawsterau i ffwrdd drwy fynd â chymorth i gwsmeriaid ymhellach i ffwrdd o gymunedau lleol. Nid yw'r gwasanaethau awtomeiddio ac ar-lein yn cael eu dylunio gan ystyried elusennau.

'Bancio ar-lein - rydym ni wedi cael ein rhewi allan o'n cyfrif banc wrth wneud trafodion arferol a rhaid i ni aros hyd at awr ar y ffôn i siarad â rhywun i'w ddadrewi, dim ond i glywed mai'r algorhythm sy'n gwneud hynny'n awtomatig ac nad oes llawer y gallant ei wneud i'w stopio. Rydym wedi cwyno am hyn a dywedodd y banc na fyddent yn mynd â'r gŵyn ymhellach. Mae ein swyddog cyllid yn gweithio 15 awr yr wythnos yn rhan-amser, ac nid yw'n rhesymol nac yn dderbyniol i ddisgwyl iddo dreulio un awr yr wythnos yn ceisio dadrewi'r cyfrif.' - Prif Swyddog Gweithredol cwmni elusennol, Sir Benfro

A yw'r pethau sydd wedi'u darparu yn lle banciau'r stryd fawr ar hyn o bryd (gan gynnwys hybiau banc, faniau bancio a banciau cymunedol) yn ddigonol ac a ydynt yn rhoi digon o fynediad i gymunedau at arian parod?

Nid ydym wedi derbyn adborth positif iawn ar y gwasanaethau amgen hyd yn hyn.

'Nid yw'r Hybiau Bancio'n gymwynasgar iawn ac nid ydynt i weld yn gwybod beth yw eu rolau a'u cyfrifoldebau. Rwyf wedi gwastraffu nifer o deithiau i Hwb i geisio cwblhau'r broses ddilysu angenrheidiol i gael fy ychwanegu at y cyfrif. Nid oedd y staff yn gymwynasgar o gwbl ac nid oeddent yn canolbwyntio ar y cwsmer. (...) Yn y pen draw, bu'n rhaid i mi deithio dros 20 milltir i brif gangen i gwblhau'r broses.' – Ymddiriedolwr a Phrif Swyddog Gwybodaeth, Sir Fynwy³⁰

'Fe gaeodd ein cangen leol ac mae gennym wasanaeth wythnosol yn ein tref nawr, ond d'yn nhw ddim yn derbyn arian parod na sieciau'. – Prif Swyddog Gweithredol cwmni elusennol, Sir Drefaldwyn³¹

Mae hyd yn oed gwasanaethau symlach a ddarperir, fel peiriannau ATM, yn annigonol mewn rhai lleoedd. Dywedodd 6% o ymatebwyr yr arolwg wrthym ei fod yn cymryd rhwng 30 munud ac awr (un ffordd) iddynt gyrraedd y peiriant ATM agosaf sydd am ddim i'w ddefnyddio. Dywedodd 16% nad oedd y peiriant ATM agosaf atynt sydd am ddim i'w ddefnyddio ar gael 24/7.³²

A yw'r amgylchedd rheoleiddiol presennol yn sicrhau bod seilwaith bancio ffisegol ar gael i gwsmeriaid yng Nghymru?

Ar sail y dystiolaeth rydym wedi'i chasglu, nid ydym yn credu bod yr amgylchedd rheoleiddiol presennol wedi sicrhau bod seilwaith bancio ffisegol ar gael i holl gwsmeriaid Cymru. Er ei

²⁹ * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

³⁰ * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

³¹ * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

³² * [Civil Society Group](#) Arolwg bancio Ebrill – Mai 2024 (canlyniadau cychwynnol)

fod wedi bod yn galonogol gweld mesurau fel y Ddyletswydd Defnyddwyr³³ yn cael ei gyflwyno, rydym yn gobeithio y bydd yr Awdurdod Ymddygiad Ariannol yn defnyddio ei bwerau newydd o dan Ddeddf Gwasanaethau a Marchnadoedd Ariannol 2023 i ddiogelu mynediad cymunedau mewn perygl at arian parod. Fodd bynnag, mae'r bil yn diogelu unigolion yn hytrach na mudiadau, sy'n ein gadael heb fesurau penodol wedi'u hanelu at ddiogelu'r sector gwirfoddol.

* Saesneg yn unig

³³ Awdurdod Ymddygiad Ariannol, Y Ddyletswydd Defnyddwyr (Cyrchwyd 3 Mai 2024)
*<https://www.fca.org.uk/firms/consumer-duty>

Access to High Street Banking in Wales

About us

[Wales Council for Voluntary Action \(WCVA\)](#) is the national membership body for voluntary organisations in Wales. Our purpose is to enable voluntary organisations to make a bigger difference together.

Through this submission, we would like to draw the Committee's attention to the unique challenges the closure of bank and building society branches pose to voluntary organisations in Wales.

Background

There are over 45,000 voluntary organisations in Wales. The sector accounts for 10.7% of employment in the country and enables approximately 938,000 volunteers to contribute 145 million hours of their time to charitable causes each year. Volunteers' time has an estimated annual value of £1.7 billion.³⁴ Voluntary organisations and volunteers often support the most vulnerable in society. The reduction of capacity and closure of voluntary organisations has a knock-on effect on the communities they support.

Which regions or communities are most affected by the loss of high street bank branches and access to cash?

Bank branch closures have affected the whole of Wales. Which?'s newest data shows 371 branches have closed or will close in Wales between 2015 and 2025 and only 188 are to remain open.³⁵ This means that by 2025 Wales will lose nearly 2/3 of its high street bank branches. For those relying on in-person banking, market concentration limits consumer choice.³⁶ Meanwhile, customers switching to online banking are vulnerable to a wider range of fraud risks.³⁷

But there are communities experiencing additional challenges linked to Wales' geography and infrastructure. Poor internet connectivity and mobile reception remains an issue across

³⁴ Wales Council for Voluntary Action, The Voluntary Sector Data Hub (Accessed 02 May 2024)

<https://wcva.cymru/the-voluntary-sector-in-wales/>

³⁵ Which?, Bank branch closures: is your local bank closing? (23 April 2024)

<https://www.which.co.uk/money/banking/switching-your-bank/bank-branch-closures-is-your-local-bank-closing-ayYyu4i9RdHy#which-areas-have-been-hardest-hit-by-bank-branch-closures>

³⁶ Social Market Foundation, Consumers and the economy are getting a bad deal because companies don't face enough competition (02 October 2017) <https://www.smf.co.uk/consumers-economy-getting-bad-deal-companies-dont-face-enough-competition-event/>

³⁷ Which?, How safe is online banking? (24 April 2024) <https://www.which.co.uk/money/banking/banking-security-and-payment-methods/how-safe-is-online-banking-aPdmC5M5Emnj>

much of rural Wales.³⁸ Transport poverty affects many communities, with 12% of people in Wales not having any public transport links in their local area.³⁹ The provision of banking services through the medium of Welsh has always left much to be desired, but the closure of local branches further exacerbates the issue. The recent termination of HSBC's Welsh language customer support phone line⁴⁰ poses questions about the future of online and phone banking support for Welsh-speaking customers.

Principally, we believe the geographical communities at highest risk are those who:

- Are located in an area with poor broadband connectivity and mobile reception
- Are geographically isolated, have no reliable and/or affordable transportation options (including rural, peri-urban, and suburban communities)
- Predominantly speak Welsh and can no longer receive banking support in their first language as a result of local branch closures

These challenges are mirrored in the reports we receive from voluntary organisations based in localities that fit within one or more of the above categories. Preliminary results from our survey of over 80 Welsh voluntary sector representatives show that 58% of rural respondents said in-person banking services are either 'not available at all' or 'not very available' to their organisation. 27% of all respondents said it takes them 30-60 minutes to travel to their closest bank branch, and a further 11% are located over 1 hour away from a bank.⁴¹ Long commute to complete banking tasks takes away from the valuable time of charity staff, volunteers and trustees and puts them at risk when carrying large amounts of cash to deposit.

Which social groups are most affected by high street bank branch closures?

Banking is an essential service and the loss of most (or all) bank branches in an area has an impact on everyone in the local community. For some individuals the impacts may be relatively small but others are at a much higher risk of being disproportionately impacted.

Online banking is still less accessible for older people, adults with learning difficulties, vision and hearing impairments, dyslexia, and other disabilities. Welsh language speakers are also frequently disadvantaged when trying to access online and telephone banking support.⁴²

³⁸ Digital Communities Wales (Welsh Government), Digital inclusion in Wales (Accessed 02 May 2024)

<https://www.digitalcommunities.gov.wales/digital-inclusion-in-wales-2/>

³⁹ Sustrans Cymru, Making the Connection (11 May 2022) <https://www.sustrans.org.uk/our-blog/news/2022/may/people-in-wales-facing-transport-poverty-reality-says-sustrans-report>

⁴⁰ BBC Wales, HSCB scraps Welsh language phone line (08 November 2023) <https://www.bbc.co.uk/news/uk-wales-politics-67357612>

⁴¹ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁴² Welsh Language Commissioner, Statutory review of the Welsh language services of high street banks in Wales (April 2015) <https://www.welshlanguagecommissioner.wales/media/ynvbdtyv/statutory-review-of-banks.pdf>

Age Cymru⁴³, Mencap Cymru⁴⁴, Disability Rights UK⁴⁵ and others within the sector have led campaigns to raise awareness of the significant impact bank branches closures and the shift to cashless society has on the people they support.

92% of trustees in England and Wales have an average age of 55-64, rising to 65-74 in smaller charities.⁴⁶ In Wales, volunteering rates are highest among the 65-74 age group, closely followed by those 75 and over.⁴⁷ In practice, this means that many voluntary organisations, especially small volunteer-ran community groups, are disproportionately impacted by the closure of bank branches. The voluntary sector also has a higher proportion of disabled people in its workforce than both the public and private sectors.⁴⁸

'It took over 6 months to move our bank account because of the complex form filling and communication problems for our Deaf trustees' – CIO trustee, Pembrokeshire⁴⁹

The staff, trustees and volunteers in voluntary organisations are often representative of the communities they serve. The overrepresentation of social groups likely to be negatively impacted by bank branch closures within the voluntary sector therefore affects those groups twice: once as it makes individuals' professional or voluntary role more difficult, and a second time when organisational resources are wasted to resolve banking issues.

What is the impact on customers and small businesses of losing access to high street banks?

Voluntary organisations and small businesses⁵⁰ share many of the same challenges when it comes to banking services and access to cash:

- increased transportation costs and a strain on time resource
- lack of clear communication from the banks
- security concerns over transporting large amounts of cash or keeping cash at premises for long periods of time
- the limited range of services mobile banking units provide

⁴³ Age Cymru, Access to banking (08 November 2023) <https://www.ageuk.org.uk/cymru/get-involved/campaigns/access-to-banking>

⁴⁴ BBC Wales, Cashless businesses 'penalise' people with disabilities, claim families (12 April 2023) <https://www.bbc.co.uk/news/uk-wales-65239611>

⁴⁵ Disability Rights UK, Four in ten banks fail Disabled customers, says Which? (27 July 2021) <https://www.disabilityrightsuk.org/news/2021/july/four-ten-banks-fail-disabled-customers-says-which>

⁴⁶ Charity Commission for England and Wales, Taken on Trust (November 2017) <https://www.gov.uk/government/publications/taken-on-trust-awareness-and-effectiveness-of-charity-trustees-in-england-and-wales>

⁴⁷ Wales Council for Voluntary Action, The Voluntary Sector Data Hub (Accessed 03 May 2024) <https://wcva.cymru/the-voluntary-sector-in-wales/>

⁴⁸ National Council for Voluntary Organisations, UK Civil Society Almanac 2022 (18 October 2022) <https://www.ncvo.org.uk/news-and-insights/news-index/uk-civil-society-almanac-2022/workforce/who-works-in-the-voluntary-sector>

⁴⁹ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁵⁰ Federation of Small Businesses, Locked Out (17 October 2016) <https://www.fsb.org.uk/resources-page/locked-out.html>

- limited access to cash and the unreliability of ATM networks

However, there are challenges unique to the voluntary sector that must be taken into account by policymakers.

Banking service provision is not designed with charities in mind. This extends beyond online provision, but it means trustees and other responsible persons are more likely to need additional support to complete routine tasks.

1. Adding and/or removing signatories on a bank account mandate

58% of our survey respondents said they have had challenges adding and/or removing signatories on their bank account mandate.⁵¹ Voluntary organisations often have a mix of senior staff and trustees as signatories. Limited trustee tenures (best practice in the sector⁵²) makes this a commonly sought after service. Yet, it poses a persistent problem. Branch closures sometimes lead to multiple staff and trustees frequently travelling many miles to fill in paperwork.

'My main issues have been lack of local branch to sort things out when things go wrong and the complexities and time needed to change signatories addresses, etc.' – Community hall trustee, Ceredigion⁵³

2. Being told that a document you have provided your bank with is not acceptable, even though it is compatible with charity regulations

27% of survey respondents have had paperwork (for example, a founding document) initially rejected. Another 12% have been asked for a document that is not applicable to charities (for example, a certificate of registration).⁵⁴ The closure of local branches removes the opportunity to clear up confusion and deal with discrepancies efficiently.

'Although I do prefer on line banking for general paying out, speaking direct to someone that can help (in branch) is now impossible as it is a 75 miles round trip to our nearest Barclays.' – Charitable company trustee, Pembrokeshire⁵⁵

3. Online banking is sometimes not an option for voluntary organisations

20% of survey respondents said their bank doesn't allow for dual signatories with online banking. Many voluntary organisations still rely on cash and cheque donations. 73% of surveyed organisations have had to access in-person banking to pay in cash and 74% to pay in cheques in the past two years.⁵⁶

⁵¹ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁵² Charity Governance Code, Principle 5. Board effectiveness (Accessed 03 May 2024) <https://www.charitygovernancecode.org/en/5-board-effectiveness>

⁵³ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁵⁴ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁵⁵ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁵⁶ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

Overall, 33% of organisations said they typically need to access in-person banking once or more per month; 23% require in-person banking once or more per week.⁵⁷

It is clear the supply does not meet the demand.

Poor banking services availability, including the closure of local branches, has a significant negative impact on voluntary organisations in Wales. 35% of survey respondents told us it is very stressful for them to deal with the requirements of setting up and/or maintaining their organisation's bank account.⁵⁸ This is particularly concerning at a time when the voluntary sector deals with an acute volunteer recruitment and retention crisis.⁵⁹

The breadth of impact on voluntary organisations cannot be truly understood if bank branch closures are examined in isolation. Debanking, account freezes, high service fees, unsuitable banking products, and the inability to find a bank willing to accept new charity customers are issues widespread across the UK.⁶⁰ New data from The Charity Commission for England and Wales shows 42% of trustees have experienced poor service from their banks in the last 12 months.⁶¹

32% of voluntary sector representatives we surveyed said they have had difficulties finding a bank that will accept them as a customer. 45% said they incur unreasonable time costs in order to access banking services. All of our Welsh language responders said they have faced barriers to accessing banking services in Welsh.⁶² Bank branch closures are taking away an important avenue for resolving difficulties by taking customer support further away from local communities. Automation and online service provision are not being designed with charities in mind.

'Online banking - we have been regularly frozen out of our bank account doing normal transactions and it takes up to an hour waiting on the phone to speak to someone to get it unfrozen who then has just said, it's the algorithm which is automatically doing that there's not much we can do to stop it. We have complained about this and the bank said they would not uphold the complaint. Our finance officer works part time 15 hours a week and it is unreasonable and unacceptable that they should have to spend 1 hour weekly trying to get our account unfrozen.' – Charitable company CEO, Pembrokeshire

⁵⁷ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁵⁸ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁵⁹ Wales Council for Voluntary Action, In an emergency, put on your own oxygen mask first (20 December 2023) <https://wcva.cymru/views/in-an-emergency-put-on-your-own-oxygen-mask-first/>

⁶⁰ The Scottish Council for Voluntary Organisations (SCVO), The charity (de)banking landscape (23 April 2024) <https://scvo.scot/p/89511/2024/04/23/the-charity-debanking-landscape>

⁶¹ The Charity Commission for England and Wales, New data suggests nearly half of charities experience issues when banking (07 March 2024) <https://www.gov.uk/government/news/new-data-suggests-nearly-half-of-charities-experience-issues-when-banking>

⁶² [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

Are the current replacements for high street banks (including banking hubs, banking vans and community banks) adequate and do they provide communities with sufficient access to cash?

We have not received particularly positive feedback on replacement services so far.

'The Banking Hubs are not very helpful and do not seem to know what their role and responsibilities are. I wasted several journeys to a Hub trying to complete the necessary authentication to become added to the account. The staff were very unhelpful and not at all customer focused. (...) I eventually had to travel over 20 plus miles to a main branch to complete the process.' – CIO trustee, Monmouthshire⁶³

'Our local branch closed and we now have a weekly service in our town, but they do not accept cash or cheque deposits.' – Charitable company CEO, Montgomeryshire⁶⁴

Even simpler service provision, such as ATMs, is not adequate in some localities. 6% of survey respondents told us it takes them between 30 minutes and an hour (one way) to get to their closest free to use ATM. 16% said their nearest free to use ATM is not available 24/7.⁶⁵

Does the existing regulatory environment ensure that physical banking infrastructure is accessible to customers in Wales?

Based on the evidence we have collected, we do not believe the existing regulatory environment has ensured that physical banking infrastructure is accessible to all customers in Wales. While we have been encouraged to see the introduction of measures such as Consumer Duty⁶⁶, we hope the Financial Conduct Authority will utilise its new powers under the Financial Services and Markets Act 2023 to protect access to cash for communities at risk. The bill, however, covers individuals and not organisations, which leaves us with no specific measures aimed at protecting the voluntary sector.

⁶³ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁶⁴ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁶⁵ [Civil Society Group](#) banking survey April – May 2024 (preliminary results)

⁶⁶ Financial Conduct Authority, Consumer Duty (Accessed 03 May 2024)

<https://www.fca.org.uk/firms/consumer-duty>