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Committee Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

By email: rrat.sen@aph.gov.au

Dear Committee Secretary

RE: SENATE INQUIRY INTO BANK CLOSURES IN REGIONAL AUSTRALIA

Thank you for the opportunity to provide a submission to the Inquiry into Bank Closures in Regional Australia.

ABOUT THE INDIGENOUS CONSUMER ASSISTANCE NETWORK (ICAN)

ICAN provides consumer education, advocacy, and financial counselling services to Aboriginal and Torres Strait Islander peoples across North and Far North Queensland, with a vision of "Empowering Indigenous Consumers". We also provide our services to non-Indigenous peoples across the region. ICAN is a registered Supply Nation entity.

ABOUT WEIPA COMMUNITY CARE

Weipa Community Care provides essential social services and support to Western Cape communities, families, and individuals, empowering them to achieve their desired outcomes. Our services include community and social resource development, crisis accommodation and food assistance for women and children experiencing domestic and family violence, crisis counselling and youth alcohol and other drugs programs. We believe that if we help our people when they need it and work collaboratively with our stakeholders, our communities will be well-supported to increase their social connectedness and live a better life.

BACKGROUND

The people our services work with are strong, resilient, and knowledgeable about their lives and communities. However, structural barriers and an uncompetitive marketplace in remote and regional communities create conditions in which exploitation occurs. The cost of living is unacceptably high, with basic food and necessities costing significantly more than in cities and large regional centres. Employment is limited, and regional centres are susceptible to significant events such as pandemics, industry downturns and extreme weather. Housing is limited and costly, and the consequent rate of homelessness and overcrowding is unacceptably high. Cars are essential items in the family home as they are the only form of transport and pose a significant upfront and ongoing expense. Against this backdrop, the closure of many bank branches in recent years has created significant barriers to accessing essential banking services for people in remote and regional locations.

SUMMARY OF SUBMISSION

The significant impact of bank closures in regional communities across North Queensland and the consequential barriers to accessing basic (and essential) banking services that people face has been a long-standing issue that our services have raised over many years. ICAN has informed the banking industry on Indigenous banking issues since the introduction of Reconciliation Australia's Indigenous Banking Reference group in 2006.[1] In our experience, the problems for people accessing banking services have significantly worsened rather than improved with the increasing rate of bank closures across regional Australia.

More recently these issues have been highlighted in the following submissions:

1) Formal feedback to the ABA for research it commissioned into access and usage of financial services in remote and very remote Indigenous communities (letter dated 22 January 2021)
2) Joint Consumer Submission to the 2021 Review of the Australian Banking Association Code of Practice, August 2021
3) Joint Consumer Submission to the Regional Banking Taskforce, December 2021
4) ICAN Submission to the House of Representatives Inquiry into *How the corporate sector establishes models of best practice to foster better engagement with Aboriginal and Torres Strait Islander Consumers*

The Joint Consumer Submission to the Regional Banking Taskforce, of which ICAN is a signatory, details the current experiences of regional and remote banking customers and provides clear recommendations for policy solutions. We urge the Committee to consider and adopt these recommendations. We also support the recommendations of the Regional Banking Taskforce and urge the banking industry and government to implement the recommendations as soon as possible. Similarly, the Joint Consumer Submission to the Review into the Code of Banking Practice also detailed the current issues faced by customers of banks who experience vulnerable circumstances. Again, we urge the committee to review this submission.

The above list does not include the countless hours that we have engaged directly with banks about these issues through their various customer stakeholder forums and consultation initiatives. Given the significant work our services and others have done in highlighting the issues over many years, we are in no doubt that banks are aware of these problems and the solutions that consumer advocates are calling for. We therefore don't intend detailing them here. However, we highlight some of the key concerns below in response to the Committee's Terms of Reference.

Our submission includes reference to both remote and regional communities because the closure of banks in regional centres significantly impacts remote communities that rely on services in their nearest regional centre.

BRANCH CLOSURE PROCESS, INCLUDING THE REASONS GIVEN FOR CLOSURES

Banks claim that consumer choice and customer demand for digital over face-face banking services are the reason for bank closures. Whether the uptake of digital banking has, in the main, been customer led or whether it has been demanded by banking institutions seeking to reduce costs through digital solutions, is not clear. However, for the people we provide services to, there is no

[1] In 2014 ICAN created a Remote Community Banking video to highlight some of the banking issues in remote communities in Cape York: https://youtu.be/CmaVwNhEx_w . The issues referred to in this video remain relevant today.

question that demand for digital banking is entirely driven by the banks with branch closures being an undesired outcome of the push to digital banking. Customers are given no choice but to engage via digital platforms in circumstances where they experience digital exclusion.

We are not aware of any examples in this region where the process for closing a branch has been undertaken through meaningful engagement with the community about the impact of the closure or consultation around necessary community supports in the absence of face-to-face banking services. The ABA's Branch Closure Protocol requires banks to offer customers education, training, and assistance to help them adjust to changes in the way they access their alternative banking products and services. In our experience, the customers most impacted by the closures are the least likely to receive training and nor is a whole of community approach taken to training and education. Instead, it falls on small community organisations on the ground to facilitate the customers ongoing engagement with their bank. We further refer the Committee to the comments in the Joint Submission to the ABA's 2021 Review of the Code of Banking Practice.

> **Recommendation**: The Committee should adopt recommendations 1, 2 and 5 made by the Regional Banking Taskforce in its Final Report (September 2022). In addition to these recommendations, 'Closure Impact Assessments' must consider the community's access to reliable and fast internet and mobile phone networks. Specific consideration of how the bank will support customers in vulnerable circumstances should also be provided. Furthermore, banks should be required to consult broadly and meaningfully with communities when branches are being permanently closed about what support (including training) needs to be implemented across the community to support ongoing engagement with their bank.

THE ECONOMIC & WELFARE IMPACTS OF BANK CLOSURES ON CUSTOMERS AND REGIONAL COMMUNITIES

> *The ability of people to manage and budget their incomes, arrange to pay third parties, purchase food, goods, and services, and maintain a level of financial and economic independence and planning, all rely on maintaining informed access to appropriate banking and financial services.*
>
> *The rhetoric of economic independence is commonly employed as a laudable objective for Indigenous peoples. However, there is little evidence of systematic attention being applied to ensuring Indigenous Australians can even enjoy equitable levels of access to those essential banking and financial services that are taken for granted by other Australians.*[2]

Banks, and the products and services they provide, are critical conduits for facilitating access to peoples' essential needs and managing day to day life. Banks provide essential services. This was recognised in the pandemic and should continue to be recognised in all aspects of their regulation. The economic and welfare impacts of bank closures on customers and regional communities are well documented[3], including most recently through the Joint Consumer Submission to the Regional Banking Taskforce.

For the regional and remote communities, we work in, the impact is significant. Internet and mobile coverage continues to be very limited and unreliable and therefore communities must continue to rely heavily on cash-based transactions for purchasing essential goods and services. Digital banking services are not an alternative for these customers, yet increasingly it is the only option they are

[2] Reconciliation Australia Strategic Plan 2001 - 2003

[3] See for instance, S McDonnell & N Westbury, *Banking on Indigenous Communities: Issues, Options, and Australian and International Best Practice*, CAEPR Working Paper No. 18/2002

given to engage with their bank. While this is often referred to as a 'digital' divide, or gap, the economic and welfare impacts of this gap on individuals and communities is so much more than just a digital one.

ICAN coordinates a group of consumer advocates operating in Far North Queensland. In 2021, this group highlighted the banking issues they see in communities and the impact of these in feedback to the ABA for its research into *Access & Usage of Financial Services in Remote and Very Remote Indigenous Communities*.

Through that consultation, one advocate made the point that:

> *The majority of clients in remote communities have had to access via phone banking. Rarely some would try online banking, as internet coverage has always been a challenge. When matters can't be resolved over the phone, it does make it difficult when the client is required to visit a branch.*

In addition to the issues outlined in the Joint Submission to the Regional Banking Taskforce, we have been told by people in communities that there are notable increases in the incidences of domestic and elder financial abuse once a branch closes and access to other banking facilities is limited. For instance, we have had many people in communities report the increased risk for elder abuse where older people who are unable to engage with online platforms rely on younger family members to assist with these banking services.

As one Taskforce member highlighted:

> *Often the suggested 'solution' from financial institutions is directing customers to sign up for online banking. This can absolutely be a very convenient option, however, if an older person with limited knowledge of technology is signed up for online banking, they may then become dependent upon a family member who understands the online banking process / has access to internet or Wi-Fi connectivity. Providing login details to a trusted family member may seem like a good idea, but can and does greatly increase the likelihood of exploitation and financial abuse. We've been seeing some Elders signed up despite their limited technological awareness/understanding. In [one community] I've seen a few instances where these Elders provided their online banking details to more tech-savvy family members as they don't have the confidence or capability to access the service themselves.*

As the Regional Banking Taskforce noted, another economic and welfare impact of bank closures is the loss of knowledge that the bank has about the diverse communities that their customers live and work in. Local branches have historically played an important role in connecting people with other services in the community as well as understanding the unique economic and social aspects of their community. The increased centralisation and digitalisation of services result in people delivering essential services who have no knowledge of the people and communities they are delivering services to.

In our experience, working with local branches to assist someone achieves better outcomes than when we are forced to engage with national contact points within banks. Unfortunately though, there are limitations on how much a local branch is empowered to do before departments based in other states have to get involved. Once again, this leads to a lack of understanding of the customer's lived experience.

This lack of knowledge was highlighted when ICAN was assisting someone in a remote community in the Northern Peninsula Area (NPA). For communities in the NPA, it is necessary to travel significant

distances over water or unsealed roads to either Thursday Island for a NAB branch, or Weipa for Qld Country Bank. Such travel is prohibitively costly and time consuming, particularly for people on low incomes. Transportation is not always accessible to these places either.

When we sought documents from the bank in relation to their customer, we received the following response:

> *We are still unable to process your request regarding personal data in regards to our mutual client, XXX.*
> *Unfortunately we do not hold any form of Identification on their profile.*
>
> *Can you please refer the client to their nearest CommBank branch at their earliest convenience and we will resume processing once Identification has been updated.*

The nearest CBA branch for our client to attend and identify himself was Cairns – a 12-hour drive over a distance of more than 900 kms.

This lack of knowledge also bears out in consumer lending disputes where unaffordable loans are provided to people in regional communities based on expenditure benchmarks that do not accurately reflect the true cost of living in regional and remote communities.

EFFECT OF BANK CLOSURES OR REMOVAL OF FACE-TO-FACE CASH SERVICES ON ACCESS TO CASH

The impact of removing face to face cash services on peoples' access to cash is also well documented. Most significantly, people who can least afford it are paying the most in ATM fees to access cash which they need to engage in their local economy because internet access does not allow for digital transacting. These fees are generally charged by non-bank, private ATM operators. The removal of bank owned ATM's means communities have no option but to access cash via fee charging machines. These fees continue to have a significant impact on regional and remote customers in general use fees, balance enquiry fees and ATM capped withdrawal amounts. While this has been a long-standing experience for remote communities, it will become the experience of regional communities as more and more branches and bank owned ATM's are closed down or withdrawn.

The Regional Banking Taskforce makes note of fee-free ATM's being available in remote communities. These have the potential to reduce the total amount of money going from the community to fee charging ATM operators and reduce the significant costs that people are incurring simply to access their own money. The reality, however, is that these machines don't operate in all communities and where they do, the operators are precluded from advertising them as fee free machines. Anecdotally we receive reports that they are placed in less accessible areas compared to fee charging machines. Overall, they are not adequately reducing the cost to individuals and the community of accessing their cash.

On Palm Island for example, there are a number of fee charging ATM's. These fees can vary between $2.50 and $2.70 and can be charged for both withdrawal of money or balance enquiries. The analysis by the Commonwealth Bank – "Supporting Palm Island Customers report[4], provides evidence of the significant fees going to private ATM operators.

[4] CBA, 2018, Supporting Palm Island Customers Report: https://financialservices.royalcommission.gov.au/public-hearings/Documents/exhibits-2018/4-july/EXHIBIT-4.159.pdf, accessed on 9 December 2021

In seeking feedback from the group of advocates in 2021, one of the NILS workers advised us:

> *ATM fees can be a killer. Whether it is Yarrabah or Palm, we've seen some pretty extreme cases. On the days that Centrelink is due to be deposited, there can be a few balance checks before the money arrives, then several withdrawals of $20/50/100 over the course of the day – each incurring a fee. Then an "insufficient funds" message on the next attempted withdrawal will lead to a further balance check to see how much is remaining, then a final withdrawal to take the remaining balance. It can be $30+ in ATM fees for a single day.*

One ICAN financial counsellor reflected that in a trip to the NPA in January 2020, the ATM at the Bamaga Service station charged a $2.50 access fee. This becomes expensive when someone who doesn't have internet banking has to do a balance check and then a withdrawal. That is $5 that they will never see again. In some cases, the maximum limit for a withdrawal is $200. If a person required more than this, they would have to make a couple of withdrawals, paying a fee each time.

Another worker went on to highlight that:

> *Phone/internet outages in communities like Yarrabah have compounded this issue. If residents don't have access to online or phone banking for an extended period, they are back having to use the ATMs to check balances (and incur the associated fees).*

We note that barriers to accessing peoples' money can open people up to exploitative businesses as highlighted in the example below.

Weipa Community Care has seen a particularly concerning practice occurring in at least one remote community in the Cape. The organisation is only aware of one ATM in the community which is located in the community store and charges $2.50 per transaction. As it is inside the store it is not accessible when the store is closed. This creates a need, when the store is shut, to travel to Weipa for people to access their money at the 24-hour ATM Machine there. It costs about $30 for people to catch a cab to Weipa.

In three separate cases, Weipa CC identified large sums of money being withdrawn from people's bank accounts by the local taxi service (up to $500). According to one of the people whose bank statements indicated this practice, the cab driver charged them $30 to provide the funds. That is, the taxi withdrew $500 from their account via EFTPOS and gave them $470 in cash. There were no actual taxi services provided in any of the three cases in which this 'service fee' was charged. While the cab driver's rationale might be that they would have to pay $30 to get to Weipa to access their cash, this in no way justifies the conduct.

The cost to this community in accessing their own cash is a direct consequence of inaccessible banking services in communities which are still reliant on cash-based economies.

> **Recommendation** – More fee free ATM's need to be placed in communities that don't have branches with greater visibility and accessibility to communities.

Identification Issues

In addition to accessing cash, another significant impact of bank closures for people in regional communities relates to opening bank accounts and other services which rely on 'in person' identification. Online systems of identification can work for people who hold the usual forms of

identification (driver's licence, birth certificate etc); have access to reliable internet and mobile coverage; and know how to use online banking. However, the moment you are without the usual forms of ID; reliable internet; and/or knowledge of online services, identifying yourself online so that you can open bank accounts and otherwise manage your money, becomes impossible.

There are many people, for a variety of reasons, who cannot access usual forms of identification. For this reason, AUSTRAC has issued the Guidance to Assisting Customers who don't have Standard Forms of Identification. However, in our experience, many banks are not applying this guide with the flexibility it intends and/or their online systems do not allow for these alternative forms of identification to be uploaded. Representatives within banks have advised us that some online platforms for uploading identification documents as part of online services have not been designed to accept alternative forms of identification. So even if the bank will accept an alternative form of identification, a person cannot take advantage of online application processes to identify themselves and obtain the service.

In the absence of an online option, banks and financial institutions insist that people present in branch to identify themselves in circumstances where the nearest branch can be 100kms away.

> **Recommendation -** We strongly urge banks and financial institutions to review their online platforms and ensure that they will allow a broad range of alternative forms of identification to be uploaded.

EFFECTIVENESS OF GOVERNMENT BANKING STATISTICS CAPTURING AND REPORTING REGIONAL SERVICE LEVELS, INCLUDING THE APRA'S AUTHORISED DEPOSIT-TAKING INSTITUTIONS POINTS OF PRESENCE DATA

Banks and governments hold vast amounts of data about consumers and communities. This data is very rarely shared, yet at an aggregate level, it can provide communities with critical insights and evidence that can be used to support their work in addressing the issues they are concerned about.

APRA's Point of Presence data is important data for understanding the presence of banks as essential service providers within communities. APRA should be supported to continue publishing this data and making improvements to it.

Ensuring that town/suburb-level data is captured is particularly important for support services like ours in understanding the presence of banks in particular communities we work in. Having a reliable data source about the presence of banks that allows for comparisons across towns and communities is important in our advocacy with the banks and other large institutions which provide essential services such as telecommunications providers. Ideally the data could also be drilled down via postcode.

There is an opportunity to report which banks are in which towns/suburbs across the country to understand where banks are located. At the moment, however, the SA2 coding within Table 1 of the data makes a search based on known towns and suburbs difficult. Again, this data is important for community support services and indeed bank staff on national call lines in understanding the banking options available to people.

We note that some towns/suburbs are not captured in Table 2. For instance, Cooktown, which is a relatively large regional town in north Queensland is not captured within the data. Nor are smaller communities such as Wujal Wujal or Bamaga.

In addition to the data captured, we agree with the Regional Banking Taskforce, the Points of Presence data could better capture indicators of how banking services are accessed (including at the town/suburb level) through digital channels. For instance, we note that the MAFFRA Branch Closure Factsheet documented at the Public Hearings refers to 87% of Maffra customers being registered for online and telephone banking but only 14% of these are active users. This alone raises important questions and suggests that engagement with the community is needed by NAB to understand why so few people are actively using online and phone-based services.

Delineating between Bank@Post and other face to face options is also important to understand the Bank@Post presence across communities and how this changes over time. For instance, we work in a community which had Bank@Post but now doesn't and therefore has no face-to-face banking options. Understanding the gaps in service provision are critical to services like ours who are providing much needed on the ground support to people in relation to their finances.

The amount of ATM fees coming out of communities and suburbs is also important data that should be captured to assist communities in understanding the impact of the removal of banks from their community and to advocate for alternatives to fee charging ATM's. This is data that fee charging ATM companies have and could provide to APRA. It is also data that banks themselves hold as the fees come out of their customers' accounts. See for instance the data that CBA was able to provide regarding their customers on Palm Island.

Finally, it should be made easier to compare the APRA data against data held by governments regarding income levels in the same towns/suburbs. Similarly, it should be possible to easily compare the data against levels of internet and mobile connectivity and reliability across those towns/suburbs. This is critical data that banks need to be able to do a thorough 'Closure Impact Assessment'. It is also data that would help governments understand gaps in essential service delivery. Quickly identifying those regions that are without face to face banking *and* experience limited or unreliable internet and mobile services alongside low incomes, is crucial to understanding financial inclusion levels across Australia.

We also believe more could be done to make this data accessible to people and to promote it, particularly to agencies supporting people with banking issues and to bank representatives in centralised departments.

CONSIDERATION OF SOLUTIONS AND ANY OTHER RELATED MATTERS

With the increased closure of banks, several solutions have been trialed, and in some cases embedded within the banking system. Some work more effectively than others. We will not detail all of them here as they are captured throughout many of the submissions and reports listed earlier.

Bank@Post

The Regional Banking Taskforce has highlighted the important role of Bank@Post and we support the recommendations made regarding promotion and support for these services. However, Bank@Post does not provide services in relation to opening and closing accounts; locking cards/reporting stolen cards; card activation; or setting or changing PINs. Considering the challenges that people in regional communities can face in uploading identification documents for online

banking services, the inability of Bank@Post to provide these basic banking services means it is not a full solution to bank closures in regional settings.

> **Recommendation** – in addition to Recommendation 3 in the Regional Banking Taskforce, Bank@Post should be able to assist people to open and close bank accounts, lock cards and report them stolen; activate cards and set or change PINs.

Dedicated Service lines such as First Nations Telephone Lines

> *A telephone service, no matter its efficacy, is not capable of solving all of the issues impeding access to banking services, whether by Aboriginal and Torres Strait Islander people or by others living in remote areas. It could only ever form part of a range of initiatives directed towards improving access*[5]

An important initiative by the major banks is the implementation of dedicated phone lines for First Nations communities. These have been created in recognition that First Nations customers need access to culturally safe and appropriate support which recognises and overcomes barriers. Dedicated First Nations service lines can be effective if they are staffed by First Nations peoples and people who have had appropriate and comprehensive cultural training and can engage with clear and Plain English. To work effectively these teams must be adequately resourced and supported to meet the needs of the customers relying on them. The needs of First Nations communities are diverse and dedicated phone services also need to operate in recognition of this.

Unfortunately, consumer advocates have identified instances where some of these services fall short of this objective. First Nations customers have experienced long wait times, inconsistent information, language barriers and limitations on what services can be provided through these lines before a referral has to be made to another department. People are having to constantly identify themselves and restate their story in order to get the service they require, knowing that they can't go into a local branch and get the matter sorted if there is no local branch to provide the service. If these dedicated services are not adequately resourced and valued by the corporate entities providing them they have the effect of further disadvantaging the very people they seek to support.

Mobile Banking

In the absence of branches, consumer advocates have been calling on banks to expand mobile banking services with banks visiting regional and remote communities on a regular basis to provide banking services. In our view, regular visits need to be monthly as anything less would fail to achieve the goals of the service. It is unreasonable to expect a banking customer to wait for more than a month for the following, non-cash banking transactions:

1) Replacement of key cards
2) Transfer of funds from one account to another – when waiting for a new key card
3) Activation of a key card
4) Setting up telephone banking passwords
5) Creating an internet banking profile and ongoing support with regards to accessing new digital products
6) Assistance with accessing the mobile phone CBA banking app.
7) Creating savings accounts
8) Applications for lines of credit, such as credit cards, car or personal loan, mortgages.

[5] The Commissioner, Honourable Hayne K, 2019, Royal commission into Misconduct in the Banking, Superannuation and Financial Services Industry – Final Report, p. 93

In our experience, there is ongoing follow up support needed for customers once the bank leaves the community. This inevitably falls to small agencies on the ground or local community councils. This needs to be considered and discussed with agencies on the ground with appropriate resourcing provided. Banking services and customer support to access these services are the core role of banks. Their customer support roles should not be outsourced to community agencies who are already struggling with demand for their own services. Where community organisations can undertake this role, they should be adequately and appropriately funded to do so.

Finally, for mobile banking to work effectively, there should be collaboration between the major banks in providing a core team so they can aid all banking customers regardless of who they bank with.

Below is a final case study which captures the many challenges faced by regional and remote banking customers:

CASE STUDY – LEO'S STORY

A financial counselling client sought assistance with his online bank account. He had ordered his key card in February and still hadn't received it months later. He came to the financial counselling service to set up his bank account online so that he could make a transfer enabling him to have money until his card arrived. He ended up having to stay at the financial counselling service for about 6 hours due to the long waiting queue on the bank's Indigenous phone service and having to go backwards and forwards with forms and two visits to the Justice of Peace because the signature was not matching on the bank's file.

In addition to these challenges, the bank advised that it would only transfer the money by phone if it was transferred into the account of another customer of the same bank.

The client's sister had offered for the money to be transferred to her bank account, but this was rejected by the client bank because it was a different bank's account. This meant that while they were on the phone, both the support worker and the client had to drive around the island trying to get someone who was a customer of the same bank and who the client trusted to transfer the money into their account.

In the end, the only solution the bank could come up with was to advise the support worker to provide the bank account of someone in the financial counselling agency to transfer the money to. Not only was this an inappropriate request, it did not accord with the agency's procedures and the agency could not authorize it.

The client didn't have a mobile number which understandably made it difficult for him to make his bank transfer. The support worker therefore offered for the bank to use the agency's office number to make a one-off transfer and then remove the number from the client's profile, but this was rejected by the bank. If someone doesn't have a mobile, the bank doesn't offer an alternative for their customer to access their money.

Due to the significant delays, the client was offered lunch at the Centre and a bag with food to bring home to help him with this emergency. The staff member remained all day assisting only this one client, sending home three other people who required assistance. She had her phone engaged for long hours on the queue and finalised the day without any solution for the client. The situation was stressful and overwhelming for all involved, except for the bank that showed no compassion

whatsoever with their customer's situation, clearly not understanding his needs, and excused themselves behind policies and procedures that they allegedly need to refer to without flexibility to get the solution. The long queue over the phone with the bank has been so far a typical day at the Centre, causing a lot of problems, frustration, and disappointment to the community.

Case study provided by Pearl Turner at 54Reasons

CONCLUSION

The issues that the Committee has been tasked to investigate are well known and documented over many years. As essential service providers, the closure of banks across regional Australia are having a significant impact on communities, particularly those already vulnerable to financial exclusion. When people face barriers to accessing their own money and engaging in their local economy, this impacts the whole community both economically and socially.

Banks claim that customer choice and preference are driving the move to digital banking. However, we see the many people who have never been given a choice and are directly impacted by banks' commercial decisions to close their banking service and push customers online. This is despite many of the communities impacted not having the digital capability to move online. This has been done without any support to communities and an over-reliance on small community agencies on the ground to fill the gap that has been left.

We hope that the above information is helpful.

Please don't hesitate to contact Jillian Williams of our office on 1800 369 878 if you require further information.

Yours sincerely,

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