Access to Banking for Prisoners

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Contents

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Vision

There is a simple and secure process by which prisoners in the UK can open a bank account in preparation for their release, thereby improving resettlement outcomes and reducing re-offending.

Objectives

1. **A National NOMS Banking Agreement**

An agreement exists between NOMS and the UK banking industry which describes how the organisations will work together to improve resettlement outcomes for offenders and reduce re-offending.

2. **An Area Partnership Protocol**

An agreed process exists by which NOMS / Prison Service Area Offices are able to develop partnerships with regional bank offices, and facilitate local agreements.

3. **Local Service Agreements**

All prisons offer prisoners the chance to open a bank account and receive financial capability training as an integrated part of their resettlement service.

4. **Key Staff Training**

All prisons and banks have key staff adequately trained to deal sensitively and appropriately with prisoners who wish to open a bank account.
Need

1. Former offenders face significant financial exclusion, including access to insurance, mortgages, and other credit products. As a result, they either use non-mainstream providers commanding significant premiums or simply remain excluded.

2. 40% of prisoners surveyed by the Legal Service Research Centre reported having no current account or other financial products, compared to 5% of people interviewed in the community.

3. It is extremely difficult for prisoners to set up even basic bank accounts prior to release. This is creates a barrier to stable employment and housing, as well as to the further take up of mainstream financial products and services.

4. Although there is an increasing number of pilot projects, schemes remain isolated and are often ad-hoc and dependant on individual relationships.

5. A significant number of prisons have made efforts to establish relationships with local bank branches but have been unable to make progress. Lack of access to even basic banking remains the norm for most prisoners. (See Evidence of Need on page 8)

Access to Banking and the Reducing Re-offending Pathway Examples

**Employment:** Lack of an account is a barrier to employment

**Education:** Required for Educational Maintenance Allowance application

**Finance:** Finance gap on discharge exacerbated by lack of an account

**Benefits:** DWP uses Direct Payment to pay benefits directly into accounts

**Debt:** Reduces reliance on door-step lenders / loan sharks

**Attitudes:** Improved money management, self-respect, social inclusion

**Accommodation:** Paying via direct debit decreases the risk of arrears

**Children/Family:** Financial dependence traps people in negative relationships
Rationale for Banking Partners

1. Providing account opening services in partnerships with prisons can provide a structured way of meeting aims for basic banking.

2. Identification verification has a high confidence level, since individuals have been processed through police, courts and custody.

3. The UNLOCK/HBOS pilot demonstrated that with appropriate financial capability training, former prisoners can actually handle basic accounts ‘better than average customers’.

4. A basic banking relationship provides the foundation for the provision of additional products as the customer’s needs grow.

5. Reformed offenders have proven to be loyal customers when given access financial products through UNLOCK’s insurance service.

6. Financial exclusion contributes to re-offending, which costs the UK tax-payer £11 billion per annum and makes up 18% of recorded crime.

7. Setting up bank accounts for prisoners before release supports employment, thereby supporting local community crime reduction.
Current Situation

1. Government

- The issue is now recognised at ministerial level. Parliamentary Under Secretary of State for Justice Maria Eagle MP has stated her support for prisoners being able to open accounts prior to release in support of employment *(Hansard 23 Apr 2008: Column 445WH)*
- UNLOCK has also been advised that Minister of State for Justice David Hanson has a particular interest in the issue
- The need has been recognised by NOMS both in the regions and with central policy. Thus far there has been a reliance on independent local solutions

2. Banks

- Prior to 2005 there was little work specifically targeting this group
- Since 2005 an increasing number of leading banks have invested in this area
- Some banks are engaged at national level (HBOS, Barclays, Co-Op)
- There is also some regional engagement (Nat West)
- Some bank branches are engaged locally (LloydsTSB, HSBC, Northern Rock)
- Major programmes remain limited
- Many projects based on pilots and unofficial agreements
- There can be a disconnect between corporate policy and branch practice
- Positive attitudes at branch level appear quite random

3. Prisons

- 2005: HMP Cookham Wood, HMP Coldingley (HBOS/UNLOCK Pilot)
- 2006: HMP Forest Bank (Co-operative Bank, eventually expanded to 29 prisons)
- 2008: HMPs Blundeston, Norwich, Littlehey, +1 tbc (Barclays/UNLOCK/ FTC)
- 2008: HMP Wormwood Scrubs, HMP Coldingley, +2 tbc (HBOS/UNLOCK)
- South West Area prisons (NatWest, South West Reducing Re-offending Partnership)
- At the end of 2008 UNLOCK is aware of 50 prisons having had some level of relationship with at least one bank. The quality of these relationships and the volume of accounts being opened are not known.

Key Barriers to Large Scale Change

1. Banks: Identification, attitudes, training, fear of media, bottom line
2. Prisons: Awareness, confidence, training, resources and staff turnover
3. Individuals: Address history, financial record, skills, awareness, confidence
### Mapping of Prison/Bank Partnerships

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## Mapping of Prison/Bank Partnerships

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<td>Closed</td>
<td>C</td>
<td>Nat West</td>
<td>Regional</td>
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<tr>
<td>Springfield</td>
<td>Male</td>
<td>Open</td>
<td>D</td>
<td>Natwest</td>
<td>Local Branch</td>
</tr>
<tr>
<td>Standford Hill</td>
<td>Male</td>
<td>Open</td>
<td>D</td>
<td>Cooperative</td>
<td>National</td>
</tr>
<tr>
<td>Sudbury</td>
<td>Male</td>
<td>Open</td>
<td>D</td>
<td>Derbyshire BS</td>
<td>Local Branch</td>
</tr>
<tr>
<td>The Verne</td>
<td>Male</td>
<td>Closed Training</td>
<td>C</td>
<td>Cooperative</td>
<td>National</td>
</tr>
<tr>
<td>Wayland</td>
<td>Male</td>
<td>Closed Training</td>
<td>C</td>
<td>Cooperative</td>
<td>National</td>
</tr>
<tr>
<td>Whatton</td>
<td>Male</td>
<td>Closed</td>
<td>C</td>
<td>Cooperative</td>
<td>National</td>
</tr>
<tr>
<td>Winchester</td>
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<td>Local</td>
<td>B</td>
<td>Cooperative</td>
<td>National</td>
</tr>
<tr>
<td>Wormwood Scrubs</td>
<td>Male</td>
<td>Local</td>
<td>B</td>
<td>HBOS</td>
<td>National</td>
</tr>
<tr>
<td>Wymott</td>
<td>Male</td>
<td>Closed Training</td>
<td>C</td>
<td>Cooperative</td>
<td>National</td>
</tr>
</tbody>
</table>

December 2008
Discussion Questions

Access & Eligibility

Banks should:

a) Offer access to all eligible prisoners, irrespective of their geographical location
b) Divide up the prison estate and each adopt specific prisons

The eligibility criteria should be:

a) All prisoners (no eligibility requirements)
b) Prisoners with between 6 months and 6 weeks remaining before release
c) Prisoners with between 6 months and 6 weeks remaining before open conditions
d) Prisoners with less than 2 years before release or open conditions

Acceptable name/address identification should include:

a) Mainstream only (e.g. Passport, Driver’s License, Birth Certificate)
b) Prison Service ID Form signed by the Governor or authorised deputy
c) Letter signed by Governor
d) Face to face meeting at the bank branch

The account types made available should be:

a) Basic bank account with cash card
b) Basic bank account with choice of cash card or debit card
c) Current account subject to credit check
d) Savings account
Delivery & Support

The service should be delivered by:
   a) Bank staff visiting the prison
   b) Prison officers
   c) The education contractor
   d) A voluntary sector organisation

Support should be offered in opening an account at:
   a) Initial induction and assessment
   b) Final stages of resettlement work
   c) At any time requested

The acceptance letter, card and PIN should be:
   a) Collected from a branch after release
   b) Deposited at the prison gate desk on the day of release
   c) Sent to the prisoner but held securely with their valuable property until release

Post-release support around banking should:
   a) Be provided by the bank
   b) Be provided by the prison/probation
   c) Be provided by charities
   d) Not be provided as it is unnecessary/impractical

Financial capability training should be:
   a) Mandatory when using the account opening service
   b) Available and encouraged but voluntary
   c) Not provided
Account Funding

Funds would ideally be placed in the account via:

a) Automatic payment of part of / the full discharge grant

b) The option of payment of discharge grant by the individual

c) A pre-arranged link with Job Centre +

d) The customer at a time of their choosing

Before release customers should:

a) Be able to pay into their account and allows others to pay in

b) Be able to draw down money into their prison spends accounts according to prison limits

c) Be able to spend money from their accounts where it is helpful to their resettlement prospects and subject to checks and approval from the prison authorities

d) Not be able to use their accounts at all
Market Analysis

Size

- 7.3 million offenders currently on the Home Office Offender Index
- 1.48 million people found guilty of criminal offences in England & Wales in 2005
- 250,000 citizens enter the correctional services each year (Prison or Probation)
- 140,000 people leave prison each year (approx.)
- 83,164 offenders in prison (England & Wales, 12/12/08)
- 138 public and 11 private prisons
- All but a few prisoners will return to the community at some point
- 1 in 3 men have a criminal record by mid-life, the majority in adolescence

Financial Characteristics

- 1/3 prisoners lose homes, 2/3 lose jobs, 1/5 have increased financial problems
- 54% of offences by women are caused by 'lack of money'
- 26% of offenders identified as having finance, benefit or debt needs
- 81% of offenders with such a need receive no intervention, support, or help
- 72% of prisoners were in receipt of benefits before prison, 81% on release
- £46 discharge grant paid on release is supposed to last 12 days but ex-prisoners can wait several months before benefits are paid by Job Centre +
- Offenders with unspent convictions (and their families) are usually rejected by the mainstream insurance market
- Hundreds of thousands of UK households could hold invalid policies because they are unaware of the requirement to disclose unspent convictions as material facts
About UNLOCK

- Established in 1999 by reformed offenders including Stephen Fry and the current Chief Executive Bobby Cummines to achieve equality for reformed offenders
- 4000+ former offenders and their family members are currently members
- Helped set up the first specialist broker for ‘ex-offender insurance’ in 2000. Now work with 9 brokers who arrange insurance for former offenders and families
- Opened basic bank accounts for 133 prisoners in partnership with HBOS in 2005 pilot project [Noted in “Financial Inclusion – Access to advice, banking & credit”, BBA/APACS]
- 99% of women and 97% of men rated UNLOCK’s basic banking training for offenders as 'Excellent' or 'Good' during the pilot project
- Publish and distribute banking and insurance advice leaflets throughout the prison system and offer information and referral service to members.

Further Reading

Making Bank Accounts Accessible to Offenders (NOMS, 2007)

*The post project review of the HBOS / UNLOCK pilot*


Banking on a Fresh Start (LJMU, 2008)

*Research study into the impact of The Co-Operative Bank’s project*

APPENDIX 1

The Joint Money Laundering Steering Group

Prevention of money laundering/combating the financing of terrorism

GUIDANCE FOR THE UK FINANCIAL SECTOR
PART II: SECTORAL GUIDANCE

January 2006
ANNEX 1-I Special Cases

Many customers in the categories below will be able to provide standard documents, and this will normally be a firm’s preferred option. This annex is a non-exhaustive and non-mandatory list of documents (see Notes) which are capable of evidencing identity for special cases who either cannot meet the standard verification requirement, or have experienced difficulties in the past when seeking to open accounts, and which will generally be appropriate for opening a Basic Bank Account. These include:

<table>
<thead>
<tr>
<th>Customer</th>
<th>Document(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benefit claimants</td>
<td>Entitlement letter issued by DWP, HMRC or local authority, or Identity Confirmation Letter issued by DWP or local authority</td>
</tr>
<tr>
<td>Those in care homes/sheltered accommodation/refuge</td>
<td>Letter from care home manager/warden of sheltered accommodation or refuge Homeless persons who cannot provide standard identification documentation are likely to be in a particular socially excluded category. A letter from the warden of a homeless shelter, or from an employer if the customer is in work, will normally be sufficient evidence.</td>
</tr>
<tr>
<td>Those on probation</td>
<td>It may be possible to apply standard identification procedures. Otherwise, a letter from the customer’s probation officer, or a hostel manager, would normally be sufficient.</td>
</tr>
<tr>
<td>Prisoners</td>
<td>It may be possible to apply standard identification procedures. Otherwise, a letter from the governor of the prison, or, if the applicant has been released, from a police or probation officer or hostel manager would normally be sufficient.</td>
</tr>
<tr>
<td>Economic migrants [here meaning those working temporarily in the UK, whose lack of banking or credit history precludes their being offered other than a basic bank account]</td>
<td>National Passport, or National Identity Card (nationals of EEA and Switzerland)</td>
</tr>
</tbody>
</table>

Details of documents required by migrant workers are available at www.employingmigrants.org.uk and
APPENDIX 2 (Excerpt from Prison Service Instruction)

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<table>
<thead>
<tr>
<th>TITLE</th>
<th>Education Maintenance Allowance (EMA) and Identity (ID) for Bank Account Applications by young people (16-18 years of age)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PROCESS</td>
<td>PSO 4465 - PRISONERS FINANCIAL AFFAIRS</td>
</tr>
<tr>
<td>IMPLEMENTATION DATE</td>
<td>02 December 2007</td>
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</tbody>
</table>

**CONTAINS MANDATORY INSTRUCTIONS**

*For Action*

Governing Governors, Directors and Controllers of Contracted Prisons

*For Information*

All Prison Staff

*For Action monitored by*

Governing Governors, Directors and Controllers of Contracted Prisons

*For Information on authority of*

Prison Service Management Board

**Contact Point**

Learning and Skills Council  Tel: 02476 825617

**Other Processes Affected**

None

**NOTES**

Young people between the ages of 16-18 who are in custody have the same status as looked-after children when applying for the EMA. Young people will only receive the EMA upon release from custody.
Bank Accounts

4.13 To be eligible for an EMA a young person must have a bank account in their own name. Where young people who are applying for an EMA do not have appropriate ID to apply for a bank account the Governor will provide confirmation using the attached form (Annex 2). The form is for bank use only and must not be given to the young person directly on any occasion and the form must not be used for any other purpose than to support a young person in gaining a bank account for the EMA application process.

4.14 Access to bank accounts requires evidence of identity (ID). In general banks specify these identity documents should be a passport, driving license or birth certificate and three months’ utility bills, though on request they should provide an extended list of acceptable documents.

4.15 Many young people in custody do not have this evidence and are therefore restricted in gaining a bank account and thereby from accessing their entitlement to the EMA.

4.16 A NOMS pilot project, with the charity UNLOCK and Halifax Bank of Scotland (HBOS), worked with HMP Coldingley and HMP/YOI Cookham Wood to gain access to bank accounts for adults in custody. The pilot showed positive results. A full report is available at http://www.unlock.org.uk/upload_img/Banking_Pilot_Report.pdf

4.17 As part of the project a form (see Annex 2) was produced providing confirmation of the prisoner’s identity (ID). The form which was signed by a prison governor was accepted by HBOS as the identify document (ID) requirement for the opening of a bank account.

4.18 For the duration of the project HBOS centrally managed account applications. This agreement has not continued beyond the project and there is no agreement in place with any bank (including HBOS).

4.19 Completing the form does not mean that a bank will automatically accept it as ID for the purpose of opening an account for a young person.

(signed)

Michael Spurr
PERSONAL IDENTIFICATION DOCUMENT

I am willing for this form to be passed to [insert name of bank] to help me to open a bank account, and to notify the bank of the address I will be living at when I am released.

Name .............................................................................

Signature ........................................... Date .......................

Upon my release I will be living at the following address

..........................................................................................................
..........................................................................................................
..........................................................................................................

Witnessed by.......................................................................................+

Position of witness ...............................................................................+

Signature of witness...............................................................................+

The Governor or Deputy Governor only, should confirm the following sections

Applicant’s Full Name

..............................................................................................

Applicant’s Date of Birth

..............................................................................................

Applicant’s Current Address (HMP/YOI)

..............................................................................................
..............................................................................................
..............................................................................................19
Expected Release Date

Release Address
(If the address is not known at time of completing the application this section must be completed when known, and confirmed at the Discharge Board (any changes to be also communicated to the bank)

Verification of name and address by HMP

I certify that the name and address details supplied above match those on the court/prison records related to the applicant shown above.
I confirm that the photograph is a true likeness of the applicant.

Name .................................................................
Position ...........................................................

Signature..........................................................Date ...........................................
APPENDIX 3

Evidence of Need

Samples from emails from Her Majesty's Prison Service

I am a serving officer within HMP Edinburgh in Scotland and I run a pre-release course here which lasts for one week. Part of my remit is to assist my client group to open a bank account. I have been sent info regarding your work on addressing the financial needs of former offenders from the bank and would be grateful if you could provide me with any further information that I can use to assist my client.

Restart Officer, HMP Edinburgh

I am currently on secondment to the West Midlands Area Office and have been tasked with moving forward the possibility of prisoners having access to bank account as part of the finance, benefit and debt pathway. Currently I am seeking to access the banks and get them to agree a standard form of identification, a basic bank account, and means of getting the funds into the account.

Principal Officer, West Midlands Area Office

The prison Director has asked me to contact you re Bank accounts for inmates. He has heard that you may be running a pilot scheme and would like details and is interested in HMP Wolds taking part in such a pilot.

Resettlement Co-ordinator, HMP Wolds

At present I am running Money Management Courses for prisoners in Bullingdon prison, in order to help them to be financially aware when they are released. The course includes modules on Budgeting, Benefits, Credit, & Debt. As you are aware a Bank Account today plays an important role in these areas particularly if receiving or are due to receive benefits. I understand that "Unlock" is running a pilot scheme opening basic bank accounts for prisoners while still in prison, and I was wondering if there was any possibility that Bullingdon could be include in the pilot?

Community Development & Training Officer.
Trading Standards Service, Oxford
I work at HMP Wymott and during one of my housing assistance drop ins I received a query from a prisoner wishing to open a bank account. I have some information on your organisation and wondered whether you could be of any help to me regarding this. How would I go about assisting the prisoner and do you have any literature to help or contacts? As I usually deal with housing its not my area, but having been asked for help I need to do what I can for this man and find what information I can to assist in future.

*Nacro Housing, HMP Wymott*

I work on the prison service plus resettlement project at HMP Lincoln. I was given your email today by the Unlock office, as we are interested in becoming involved with the basic bank account scheme. I have discussed the scheme with our deputy resettlement governor as I think it would be beneficial to our project and all of the prisoners here, and he has asked me to request some more information on the scheme and what is involved. I would be grateful if you could send this to me, and I will pass it on to him.

*Case Manager, Prison Service Plus, HMP Lincoln*

HMP Manchester is currently in contact with Senior Management of the Cooperative Bank whose HQ is located close to the Prison and with whom we hope to develop closer working links. In the circumstances we are interested and eager to learn from your experience (gained via your pilot study) and related forms that you have used in order to establish a system and process that will assist reformed offenders to open a bank account from within prison. Is there a person or prison contact I could approach? I have read your website articles and would welcome the opportunity to access further practical information and guidance on the successes and pitfalls.

*Head of Offender Management*
*HMP Manchester*
From the Learning & Skills Council

Dear Chris

I understand from BITC (Business in the Community) in the East of England that you are working to secure bank accounts for serving offenders. I would be very interested in discussing this as we are working to ensure young people can prepare well for release.

Offenders’ Learning and Skills Advisor (young people)
Learning and Skills Council

______________________________________________________________

From UNLOCK members

Dear Sir/Madam

I am writing to you today with the hope I may be able to get assistance off yourselves if possible to open a bank account whilst in prison so I can start to plan to get my affairs in order. I would be very grateful if you could help and let me know if any schemes are in place. Thank you very much for taking the time to read this.

______________________________________________________________

Unfortunately, some months ago, while depressed I committed a driving offence. Prior to that, I had started work on a business venture, and it was only weeks after I had paid the fine that I applied for a business bank account.

In a rejection letter that was carefully worded, I was told that while my credit rating was good, there were other aspects of my application, which went beyond the company’s mandate, and that they could no longer help me. Up until then, I had genuinely put my past offences behind me, and was looking forward, starting anew. And it did take me a while to work out why I had been rejected. This led me to conclude that my record must have been checked and used to reject me.

Although I am applying for another business account, I would be grateful if you can advise me on the best course of action to take if the other banks reject me, as I have already set up the limited company, have a website in development, and cannot trade until I have the account. I am not even asking for a loan, just a place where my customers can send their payments to.
APPENDIX 4

SOUTH WEST REGION

PRISONER FINANCE / BENEFIT / DEBT PROVISION

DECEMBER 2008

Overview

Through the inception of the regional finance, benefit and debt pathway in 2005 the South West region has actively progressed a wide range of provision.

The pathway has been successful in a number of external funding bids that have led to the promotion of initiatives under 3 main areas of work:
- The setting up and running of a regional network for opening bank accounts for serving prisoner
- Increasing the capacity of face to face debt advice both in prisons and in the community
- Exploring the potential of increased engagement with Credit Unions especially in relation to work around Bridging the Finance Gap on release

Bank Accounts

Working with a RBS manager, who is a permanent member of the pathway, we have been able to establish a network of 16 Nat West banks in the region (all based close to prisons) where prisoners are able to open a basic bank account either prior to release via ROTL (Release on Temporary Licence) or on release.

A key element of this scheme has been the banks acceptance to allow a specially designed form (signed by the Governor of the respective prison) to serve as a legitimate form of identification. Thus overcoming the barrier faced by main prisoners who have no traditional formal ID.

Unlike some other banks Nat West insist on a face to face meeting before the account can be activated. This additional security measure has meant that numbers will be limited from some establishments where ROTL is harder to obtain for many prisoners. However the open estate, HMP Leyhill, has no problems and a steady number of prisoners open accounts every month in the local NW branch.

However a recent change has mean that the bank now only accept the Governor’s letter as proof of address not proof of identity. We are not aware of any problems with the use of the accounts opened by prisoners and so this change will only serve to decrease considerably the numbers accessing the service.
Some prisons in the region already use the Co-operative bank provision and with the change in status of the governor’s letter this is likely to increase and Nat West usage will reduce.

**Face to Face Debt Advice in Prisons**

A successful sub-regional bid led to face to face debt advice being carried out sub-regionally by A4e. This was massively successful and case studies from this and linked projects were used extensively in the FSA Signposting Offenders to Financial Capability Training, Debt Advice & Financial Services. A recent successful bid to LSC will see a £1.3 million project being launched to cover every prison in the south west from Spring 2009, this bid will also create the first ever totally integrated delivery model for prisons. It will also include work with families of offenders.

**Community**

Further work with LSC & A4e will see the launch in January 2009 of a fully integrated approach to Community Legal Advice for all offenders on community services. Hopefully if successful this model could be rolled out nationally.

**Bridging the Finance Gap**

In Bristol, we have run a pilot project over the past 18 months – the Entrust Pilot – addressing this issue. It involved prisoners setting up a credit union account prior to release, and receiving loans whilst waiting for benefits to be paid by JC+.

The pilot has seen some success, with some clients paying back their loans and then actively engaging with the Credit Union. In addition, prisoners engaging with the project have shown an increased desistance to offending. However, due to issues around lack of support and intervention (the pilot was operated through goodwill of agencies) many clients never made appointments at the credit union, or have not paid back their loans.

We recognize that a project of this importance needs proper funding and a trust application was submitted in October 2008. Despite some identified problems with the original pilot we are confident that this model can provide a real, workable solution to the finance gap that the majority of prisoners face on release.

**Mark Ellery**
SW Regional Partnership Development Manager
mark.ellery@justice.gov.uk