

**Pwyllgor Diwylliant, Cyfathrebu, y Gymraeg,  
Chwaraeon, a Chysylltiadau Rhyngwladol**

**Culture, Communications, Welsh Language,  
Sport, and International Relations  
Committee**

**Senedd Cymru**

Bae Caerdydd, Caerdydd, CF99 1SN  
SeneddDiwylliant@senedd.cymru  
senedd.cymru/SeneddDiwylliant  
0300 200 6565

**Welsh Parliament**

Cardiff Bay, Cardiff, CF99 1SN  
SeneddCulture@senedd.wales  
senedd.wales/SeneddCulture  
0300 200 6565

José Carvalho  
Head of Wealth and Personal Banking  
HSBC UK

Oliemata O'Donoghue  
Managing Director, Wealth and Personal Banking  
HSBC UK

Copy to: Ian Stuart  
Chief Executive Officer  
HSBC UK

11 December 2023

**Re: HSBC UK's decision to close its Welsh speaking customer service phone line**

Dear José

I am writing to thank you for appearing in front of the Committee on Wednesday 29 November 2023. Members of the Committee were grateful for your time, and we appreciate that you were the representative put forward to respond to our concerns about HSBC UK's decision to close its Welsh speaking customer service phone line. Following your evidence session with us, we wish to pursue some further questions.

Firstly, we would like to reiterate our position as a Committee. We implore HSBC UK ("HSBC") to overturn its decision to close its Welsh speaking customer service phone line ("the Service"). HSBC's website outlines its existing Welsh language commitments, noting that the bank is:

*"...dedicated to the life, culture and people of Wales and we aim to embrace the Welsh language in all our branches in Wales, and in doing so provide the highest quality service to our customers."*

HSBC will be aware of the strength of feeling amongst Committee Members about the bank's recent decision, and that this feeling is shared by Members from all political parties in the Senedd. HSBC's failure to maintain an approach consistent with its values is considered disingenuous and disturbing, and there is a potential for this to have a significant impact on your Welsh speaking customers. We outline our rationale for coming to this view below.

### **Number of users of the Welsh Language Service**

During our evidence session, you informed us that there are three full-time members of staff working to provide the Service. Between these three agents, they receive around 22 calls a day. You also stated, however, that of the Welsh calls that HSBC receive:

*"...we end up with only six per cent of the calls that are coming in being answered in Welsh by these three agents."*

This means that 94 per cent of calls to the Service are not being answered in Welsh, despite speakers requesting to use the service.

HSBC have referred on a number of occasions to a steady decline in the number of users of the Service, compared with the almost 20,000 daily calls to the English language line. We would posit that HSBC's claim in its **letter** of 8 November 2023 that the service is, "...no longer being fully utilised" is not in fact the case: rather, the low number of calls to which HSBC refers reflects your bank's inability to provide a functioning and coherent service that meets the needs of its Welsh speaking customers.

We believe that this shows a level of contempt towards HSBC's customers, and that the bank's language and rationale surrounding the decision to close the Service has been disingenuous. The effect of HSBC's actions has been to push Welsh speakers out by stealth. To suggest that the decision to close the Service was taken because of a decline in usage is a misrepresentation of the facts and, as a result of this, we would reiterate our calls for HSBC to reconsider the decision to close the Service in the strongest terms.

### **Protecting and supporting vulnerable customers**

Our Committee also raised concerns about the need to protect and support vulnerable customers as a result of the decision to close the Service. We were informed that there is a consumer duty to look after vulnerable customers, and that HSBC has identified 85 existing customers who are considered "vulnerable". We were also told that these customers will be contacted in advance of the change in January 2024. We welcome the proactive steps taken by the bank in this regard, but we still have a number of outstanding concerns.

We would be grateful if HSBC could outline how it determines whether or not a customer is "vulnerable". The bank has approximately 600,000 customers in Wales, with only 85 of those having been identified as "vulnerable". This is 0.01 per cent of the bank's customer base in Wales. This seems

a particularly low figure, when compared with data made available by the Financial Conduct Authority.<sup>1</sup> Given the impact the decision to close the Service will inevitably have on vulnerable customers, we would welcome further assurance from HSBC that these customers are being identified correctly, and supported accordingly.

We are of the view that waiting three days for a call back is too long. In our view, this is inconsistent with HSBC acting with an appropriate level of care, especially for vulnerable customers who may not be able to access a banking service in other ways. For example, if such a customer were to have an urgent banking matter, such as paying an energy bill, or resolving a financial penalty on an account, waiting three days for a call-back would be considered unacceptable. In such a scenario, we would ask what assurances HSBC can provide that Welsh speaking customers would not be at a disadvantage, through no fault of their own, because of the three-day wait for a callback.

Furthermore, we are acutely worried about the increased risk of vulnerable customers being exposed to harm, like data theft or scamming. We would ask, for example, how customers (and in particular, vulnerable customers) will know to whom they are speaking when receiving a call back from the bank. That is, what steps are being taken to ensure that vulnerable customers will know that it's HSBC calling, and not a "scammer"? If the call is missed by the customer, how will they be followed up, and how many further attempts will be made to call them? We would suggest that scheduling a time for a call back would be more appropriate.

Given the concerns we have outlined, we have not received the reassurances necessary to provide confidence that the decision to close the Service is appropriate or safe, particularly for vulnerable customers. As a Committee, we were not convinced by your answers that sufficient consideration has been given to such potential scenarios by HSBC. This shows a significant lack of empathy on the bank's behalf.

We think that efforts must be made urgently to ensure that vulnerable customers are not at a disadvantage compared with those customers who are able to bank more easily via different methods. As such, we would implore HSBC, as we and others have stated, to overturn its decision to close the existing Service. Having said this, and given that the bank has provided no indication to date that it has listened to such calls, we would ask that the following changes be introduced for vulnerable customers to ensure their safety:

- A guarantee that they will receive a Welsh language callback within one business day;
- A guarantee that a pre-arranged time will be provided for a callback;

---

<sup>1</sup> **In October 2022, 52 per cent of UK adults had characteristics of vulnerability, up from 46 per cent in February 2020, FCA Financial Lives Survey 2020.**

- A guarantee that they will receive a minimum of three callbacks should the first callback not be answered;
- A guarantee that vulnerable customers who cannot fulfil the security requirements for a callback from the bank will be given additional specialist support from the bank.

These changes would, at least, go some way towards showing that HSBC is serious about its duty to protect these customers.

### **Bilingual digital services**

With regards to digital banking services, it was noted that:

*"...about 97 per cent of...transactions today are done digitally, either in the app or on internet banking."*

We also questioned why the HSBC banking app is not available in Welsh. In response to this line of questioning, we were told that it's not "*...as simple as translating the app*". We were told the reasons for this are that:

*"...most of the screens that you see and most of the services behind an app and internet banking come from different parts and different systems across the bank... at the moment, we have no plans to create the capability for multilanguage within the UK infrastructure. It would be quite a significant investment and change in the technology set-up for us."*

It was, however, confirmed to us that the HSBC banking app is available in different languages across the world.

We were not convinced by the reasons given as to why it wasn't possible to create a Welsh version of the HSBC banking app. As was outlined, it is indeed possible to do this, but it would seem that HSBC has chosen not to make this investment in Welsh. As was the case with the bank's inability to successfully answer calls from Welsh speakers, we are concerned that the bank is also handling technological change poorly and with complete disregard for its customer needs.

In spite of this, we believe that there is now an opportunity for HSBC to reassert its commitment to Wales and the Welsh language by transforming its digital banking offer. We would urge HSBC to commit to working with the Welsh Language Commissioner to improve its Welsh language offer, in order to better support the bank's 600,000 customers in Wales. This would include providing a Welsh version of the banking app. We would strongly encourage HSBC to consider this matter.

To conclude, we implore HSBC to reverse its decision to close the Welsh Language Service in January 2024. **HSBC's own values** state that:

*We were born speaking different languages....The greater our empathy and diversity, the better we reflect the worlds of our customers and communities...*

We were born speaking different languages in Wales, and we are still living and speaking different languages. It is vital, especially for those who are vulnerable in Wales, that they are not disadvantaged by having to wait three days to be able to speak to a Welsh language agent. As we have outlined repeatedly in this letter, we implore HSBC to reconsider its decision and reflect on its own words that the bank better reflects the worlds of its customers and communities.

Should the bank's existing position remain unchanged, we would urge HSBC to take action on the changes we have outlined in this letter. A failure to do so would in effect mean that HSBC's commitments to Wales and the Welsh language are redundant.

I look forward to receiving a response from you in due course.

Yours sincerely,



**Delyth Jewell MS**  
**Committee Chair**

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.