# <u>Armed Forces Personnel Access to Financial Services Meeting – Record Of Decisions (extracts)</u>

- 1. A meeting was held on 21 March 2013 at MOD Main Building to discuss the progress made following the commitments made and actions taken by organisations and representative bodies of the financial industry. The following industry/MOD representatives attended:
  - MOD Welfare and Families Policy (Chair)
  - DES BFPO Policy
  - British Bankers Association
  - Council of Mortgage Lenders
  - Finance and Leasing Association
  - Callcredit
  - Equifax
  - Equifax
  - The Building Societies Association
  - The UK Cards Association
  - Royal Mail
  - Experian
  - Experian
  - MOD
  - MOD Welfare Policy
- 2. **Introduction.** explained that the Government and MOD has undertaken a great deal of work under the Armed Forces Covenant to remove the disadvantages caused by Service life, primarily those associated with mobility, deployment and overseas service. He expressed the MOD's gratitude at the commitments made by the financial sector to overcome disadvantage to the Armed Forces community and cited the introduction of shadow BFPO postcodes last spring and the guidance notes for Service personnel applying for unsecured credit as examples of where this work had proven to be particularly successful. Since it has been a year or more since these changes had been introduced, the meeting had been called to review their progress and identify what more needed to be done.

. . .

- **5. BFPO Postcodes.** Whilst the issue of BFPO postcodes can benefit the Service person, they are presenting a number of administrative challenges for the stakeholders, particularly when processing credit applications. As the number of Service personnel assigned to a post code increases, so do the number of those sharing the same, or similar, surnames. This is particularly problematic when trying to gather information about an individual's circumstances to assess their application for credit or loan, as profiles can blur. The issues caused by this would grow over time as more people were tagged to a particular BFPO post code; two possible solutions were presented: The inclusion of a unique identifier, personal to the Service person their Service number, or the subdivision of the BFPO post codes into smaller areas or the use of an additional address line tagged to the BFPO post code Block A for example, or sub-dividing a postcode.
- 6. Building accurate individual profiles is further compounded by Service personnel, particularly those serving overseas, not regularly maintaining their personal records at their banks or building societies. Where allocated, BFPO post codes should be referenced and personnel should provide all of their financial providers with these updated address information. Additionally, those younger personnel who experience problems building a credit identity, can improve their credit applications by including their family details on applications.

7. Financial 'Top Tips'. The representatives were encouraged that the Guidance notes have been well received amongst the Service community and that they are proving to be a useful aid. They remain committed to ensuring that they remain current and of value and a review and re-release was recommended. Where Service personnel believe they have been disadvantaged, the top tips ought to serve as a useful reference tool to better inform discussions with their bank or building society or financial provider about the commitment to avoid disadvantage to the Armed Forces community; it was also recommended that personnel escalate matters to the Financial Ombudsman where they believe that they are being treated unfairly.

...

- explained several MOD initiatives: the Army will withdraw from Germany over the next few years leading to a significant number of retuning personnel; the MOD plans to reduce the overall mobility of Service personnel and; the MOD is seeking to encourage and incentivise home ownership amongst its personnel. It was recognised that there could, potentially, be problems securing mortgage offers by those returning from Germany because of the difficulties discussed in regard to building accurate individual credit profiles and we may see a surge of people experiencing credit reference difficulties as a result of their time in Germany.
- **10. Actions.** The meeting agreed to take forwards the following 3 strands of work:
  - a. BFPO Postcodes investigate the possibility of using Service numbers and of subdividing BFPO Postcodes to make for improved, more accurate, credit profile searches.
  - b. Review the existing 'Top Tips' Guidance Notes with a view to re-releasing them in the middle of the year.
  - c. Prepare Credit related Guidance notes specifically for those returning from Germany.
- 11. It was agreed that the group should meet on a 6-monthly basis and the next meeting is proposed for 10:00hrs on Wed 4 September in MOD Main Building (unless another venue is offered).

# <u>Letter sent by Minister of State for Defence Personnel, Welfare and Veterans to CEO Experian PLC; dated 18/09/2013</u>



#### THE CORPORATE COVENANT

I am writing to make you aware of a new Government initiative which is part of the wider Armed Forces Covenant and is called the Corporate Covenant. A Corporate Covenant is a voluntary statement of support by a particular company or charitable organisation for the Armed Forces Community (defined as serving personnel, reservists, veterans and their families) some of whom might work for or be customers of your organisation. This initiative is fully supported by the British Chambers of Commerce, the Business Services Association, the Confederation of British Industry, the Federation of Small Businesses and the Institute of Directors.

This new initiative complements the Armed Forces Covenant, which sets out the moral obligation between the Nation, the Government and the Armed Forces based on the two key principles: that members of the Armed Forces community should face no disadvantage compared to other citizens in the provision of public and commercial services; and that special consideration is appropriate in some cases, especially for those who have given most such as the injured and the bereaved.

There are a number of ways in which companies can help: such as offering to provide job interviews to veterans and also to partners and spouses of service personnel (especially if a unit moves from one garrison to another). Companies can also pledge to support cadet units and agree to release reservists if they are mobilised on operations. In addition, companies can show their support by holding events to help celebrate Armed Forces Day.

The Government are asking businesses and organisations of any size and from any industry, including all of the FTSE 100, who wish to make a real commitment to support the Armed Forces Community to sign a pledge (a template is attached, along with a best practice document giving greater detail) setting out their specific commitments to support the Armed Forces. These can be selected from the options in the pledge template and new ones added depending upon the particular circumstances of your specific organisation. When signed they will make clear just how you can demonstrate your support.

Organisations can benefit significantly from membership of the Corporate Covenant scheme as it offers an opportunity to build a reputation as a forces friendly business at a time when public support for the armed forces is at an all time high. Furthermore, the armed forces community can contribute real value to an organisation, both as employees, who bring a wealth of skills and experience, and as customers.

We urge you to consider just how much the Armed Forces, reserve personnel, veterans and their families have sacrificed in the service of their country. Signing a Corporate Covenant pledge is one way of recognising those sacrifices, helping to make their lives easier and showing gratitude for their contribution. In short, it represents an opportunity for businesses, both large and small to "do their bit" in support of our heroes.

The MOD is planning a high profile event towards the <u>end of October</u> to publically acknowledge those organisations that have signed up, and they plan to invite a cross section of those who are amongst the earliest to pledge their support. If you are interested in being one of the first to show your support, please contact the Covenant Team at the Ministry of Defence (mod.uk) and they can begin the process of registering your Corporate Covenant.

Yours ever,

# <u>Letter sent by Company Secretary Experian plc to Minister of State for Defence</u> <u>Personnel, Welfare and Veterans; dated 31/10/2013</u>

Dear	
Dear	

## THE CORPORATE COVENANT

Thank you for your letter to CEO Experian plc, dated 18 September 2013.

I am please to enclose a signed Armed Forces Corporate Covenant, signed on behalf of Experian plc.

Yours sincerely



**Company Secretary** 

Copy of the Corporate Covenant signed by Experian plc on 30 October 2013 here: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/332407/experian\_corp\_covenant.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/332407/experian\_corp\_covenant.pdf</a>

From: @mod.uk)
Sent: 07 October 2013 09:46

Subject: Release-authorised: AF Personnel Access to Financial Services Meeting

Good morning all,

Just to confirm arrangements for tomorrows meeting.

The meeting will start at 1400hrs here in Main Building. As before, would you please report to the North Door (Horse Guards Avenue) entrance in the first instance and we'll escort you to the meeting room.

The main points of discussion will be the financial Top Tips guidance notes, BFPO Postcodes and, of course, any other business. I've included the current working copies of the guidance notes which I would very much like to finalise at the meeting - although I will of course incorporate any final amendments you might bring along with you on the day, so that I might arrange for their issue.

Any problems, please don't hesitate to give me a call. Otherwise, I look forward to meeting you again tomorrow.

Kind regards,

From: @callcreditgroup.com]

**Sent:** 11 March 2015 09:23

Subject: RE: Armed Forces Personnel Access to Financial Services Meeting

Morning ,

From my notes, there was a subsequent meeting on the 8<sup>th</sup> October 2013 which involved a review of the tip tips guidance with some additional actions.

At the time, the CRA did still express concerns about the proposal as a key aspect in the solution involved the inception and use of the new 'BF' postcodes.

Analysis we did at the time, indicated minimal take up.

To this end, was planning to canvass some more views on this.

Admittedly, I am not sure whether any minutes from this meeting were produced.

Kind Regards

Callcredit Information Group

Subject: RE: Armed Forces Personnel Access to Financial Services Meeting

Dear all,

Please find attached an agenda for our meeting on Friday.

I also attach minutes from the last meeting which took place in March 2013; a summary of the key issues currently facing the Armed Forces community in obtaining financial products and services; and a copy of the two financial 'Top Tips' which came out of previous meetings via this forum.

For all those who require it I have registered you all into the building, please could I ask you all to come to the North Door, where either myself or a colleague will be able meet you and take you to the room.

I look forward to meeting you all and if you have any questions please do get in touch.

Kind regards,

**Armed Forces Covenant Team** 

From: @mod.uk)
Sent: 04 March 2015 08:19

Subject: RE: Armed Forces Personnel Access to Financial Services Meeting

#### Dear all,

Thank you very much for all those who have come back to me. The morning of 13<sup>th</sup> March has proven the most popular date, as such I have arranged for the meeting to take place on this date at the time of 1030-1200 at the Ministry of Defence, Main Building, Whitehall. For those of you who do not have passes to the building I will book you into the building and meet you at reception.

If you are either now unable to attend having previously told me you could or can now attend having previously not been able to, can you please let me know as soon as possible. I am sorry that we were not able to get everyone around the table for the first meeting, however, we are hoping to make this meeting a quarterly event, so hopefully you will be able to attend the next meeting.

I will endeavour to send out further details and papers to be discussed at the meeting early next week.

In the meantime, any questions please do not hesitate to call.

Kind regards,

Kind regar

**Armed Forces Covenant Team** 

From: (<u>@mod.uk</u>)
Sent: 16 February 2015 11:39

Subject: Armed Forces Personnel Access to Financial Services Meeting

Dear all,

I am writing to you because you previously attended the 'Armed Forces Personnel Access to Financial Services' group, the last meeting of which took place in March 2013 (for your information I attach the minutes of this meeting). As you will be aware, cooperation between the MOD and the financial sector led to a number of significant achievements helping to remove some of the disadvantages caused by Service life, for example the introduction of the shadow BFPO postcodes in Spring 2012.

Despite this progress, a number of issues continue to affect the Armed Forces Community, for example there is continued evidence that the impact of Service life negatively affects a Service persons credit rating, and this is particularly the case for those who have served overseas. As you will be aware, the removal of disadvantage for Service personnel in the provision of commercial services is a central principle in the Armed Forces Covenant. With this in mind we would like to re-start the meetings between the MOD and the Financial Services sector both to follow up on previous achievements and to work together in taking forward currently identified issues. We would envisage holding these meetings on a quarterly basis.

As someone who has previously attended the 'Armed Forces Personnel Access to Financial Services' group we would very much welcome either yourself or a representative of your organisation to attend this meeting. With regard to dates we were hoping to organise something in the 2<sup>nd</sup> week of March, on either the morning of the 10<sup>th</sup> March or on the 13<sup>th</sup> March, in the Ministry of Defence, Main Building, Whitehall. Please could you advise me if either of these dates are convenient for you.

Please give me a call if you have any questions.

Kind regards,



Armed Forces Covenant Team

#### **Armed Forces Personnel Access to Financial Services Meeting**

- 1. A meeting was held on 16 March 2015 at MOD Main Building to discuss the progress made since the last meeting in March 2013 and the challenges that continue to impact upon the Armed Forces community in relation to financial services. The following industry/MOD representatives attended:
  - MOD Armed Forces Covenant (Chair)
  - MOD Armed Forces Covenant
  - MOD Armed Forces Covenant
  - Equifax
  - Equifax
  - Finance and Leasing Association
  - British Bankers Association
  - MOD BFPO Policy
  - MOD BFPO Policy
  - The UK Cards Association
  - Defence Relationship Management (DRM)
  - Experian
- 2. **Introduction.** The chair thanked industry representatives for the work which had been achieved to date, including the production of financial top tips guidance documents and the creation of shadow BFPO postcodes. He explained the continued high importance and profile of the Armed Forces Covenant within the MOD and wider Government policy. He explained that following a recent piece of work to review issues affecting the Armed Forces Community, supported by evidence gathered from the three Service Family Federations and through the chain of command, there was consistent anecdotal evidence that Service personnel continued to face disadvantage in the provision of certain commercial services within the financial sector, in particular credit ratings. Given this evidence, and since it had been nearly two years since the last meeting of the group, this meeting had been called to review progress and examine the action both the MOD and the financial services industry could take to remedy the situation.
- 3. **BFPO Postcodes.** Despite previous good work on the creation of BFPO postcodes, Equifax explained that due to the large number of personnel that fell within a postcode, it continued to prove a problem for the credit rating agencies in identifying individuals. BFPO policy explained that despite previous calls for greater granularity within BFPO addresses this was currently not possible. It was explained that if we were able to include a unique identifier, personal to the Service person for example their Service number it may help remedy the problem. It was highlighted that MOD had previously investigated this but found it was not possible. **Action:** MOD will re-examine its policy on this and see if it is possible to use Service numbers for this purpose. The credit rating agencies agreed to meet with the industry organisations to examine the technicalities of implementing this if the MOD were able to change their policy, they will also look into whether using Service numbers could benefit Service personnel's credit rating historically.

There was also an issue with the recognition of BFPO postcodes in company software systems, where some companies did not include the annex of BFPO postcodes provided by the Royal Mail. **Action:** DRM will approach Royal Mail to see if the annex could be included in their main address list. Representatives of associations agreed to write to their members

highlighting the importance of including this annex in their mailing list system, the MOD will provide a draft text for this purpose.

- 4. **Communications.** The representatives highlighted the importance of Communicating with the Armed Forces Community to improve awareness of the steps they could take to improve their credit rating. Whilst the top tips guidance provides a good indepth advice it was agreed that a simpler and snappier tick-list to sit on top the top-tips guidance would be useful. **Action:** MOD will develop a tick-list in consultation with industry representatives. It was also agreed that it would be useful to refresh the top-tips guidance, this would be particularly helpful for those returning from Germany under the re-basing plan.
- 5. **Improving credit rating.** A wider discussion took place on what other actions members of the Armed Forces community could take to improve their credit rating history. The importance of registering to vote and having an active current account in balance were both highlighted as important steps to take. The work done through Big Issue Invest and Housing Associations was highlighted as an example which could be replicated for the Armed Forces community, whereby the possibility of linking personnel paying their monthly rent to their credit rating score. **Action:** Experian highlighted that this could fit into a piece of work they were currently undertaking on housing data and agreed to work with MOD in developing this.
- 6. **Notice of Correction.** The question was asked whether it would be possible for there to be a box to tick saying you are a member of the Armed Forces in a credit rating application, which would then trigger a 'notice of correction' so that it could be looked at manually. Industry representatives highlighted this as something that could be looked into, however, it would not benefit those who do not already have a credit history. **Action:** Industry representative to look into the possibility of a tick-box for members of the Armed Forces.
- 7. It was agreed that it would be useful to meet within the next three months, a date for the next meeting would be agreed following the meeting.

#### Summary meeting with Experian and Big Issue Invest – 30/04/2015

In attendance:
(MOD)
(Experian)
(Big Issue Invest)

#### Rental data and credit ratings

Big Issue Invest and Experian have been working together to use rent data from social housing landlords for credit ratings. The rationale being that rent, like mortgage payments, is a monthly charge which can indicate the payment status of an individual (whether they are able to pay). Credit ratings have historically been based on mortgage payments, but this has excluded large sectors of the population.

The research has borne good results, and is now being incorporated into Experian's data collection. Social housing landlords are now asking to get involved in the project if they are not already. At the moment 0.5m records have been successfully incorporated into Experian's systems. By the end of the financial year the aim is to have 3.3m records in the system. This will open up more affordable credit to 3.3m people. Before being signed up to data sharing, the housing associations involved have notified their tenants and given them an option to opt out. Some housing associations have discovered major gaps in their data through this project; it has been valuable for them to scrutinise and improve their data.

Credit ratings are now calculated algorithmically. The information that is available to the credit ratings agency is therefore critical in providing an accurate and fair rating. Ratings are affected on two counts:

- 1. Authentication information pinpointing the individual's identity
- 2. Payment status information about the financial trustworthiness of the candidate for credit

For those who pay their own rent (rather than having it paid directly to landlords, e.g. housing benefit or SLA charges), sharing information about rent payment can improve credit ratings. This information is shared by the landlord.

For those who may not be able to provide evidence of payment status, simply having a firmly authenticated identity can improve access to credit. The more points which can be used to authenticate the individual's identity the better. This could include: full name, date of birth, address, registration on the electoral roll, having a UK bank account. National Insurance numbers are not part of the data shard with and available to credit ratings agencies.

#### Questions

If credit ratings agencies recognise BFPO postcodes as UK addresses, what actually is the problem with identifying individuals if full name and date of birth are known? The MOD could do a small piece of work to see what the probability of this happening actually is.

The best way to test which bits of data would be most helpful in authenticating individuals is to run credit checks on data for research, under a Data Processing Agreement.

#### **Actions**

**MOD** to check if BFPO covers any UK addresses **Experian** to send MOD information about identifiers

**Experian** to check whether BFPO postcodes are recognised as UK addresses in Experian's systems

**MOD** to investigate the numbers affected by identity confusion at large BFPO addresses **MOD** to investigate running a piece of research on some MOD accommodation data

From: @uk.experian.com]

**Sent:** 19 May 2015 16:59

To: Cc:

Subject: RE: credit ratings and rent



Apologies for the delay in coming back to you. I've spent a bit of time with has outlined the issue as follows:

The Experian database currently holds the BFPO postcodes as supplied as part of the Royal mail PAF file and also, over 1500 records using the new BFPO postcodes with data supplied by lenders.

Under most circumstance, using name, premise detail and postcode we should be able to match to an individual – this is the Authentication point.

The issue we have is the ability to match the data supplied by lenders to the information supplied by PAF.

Much of the data on our database is not formatted in such a way that our system is able to confirm a match.

For example, if we receive a request for X Name, JFC Naples, Ruislip, BF1 2AB and a lender has supplied the data at that same address – our system will return this data. But if we have data supplied for the above example missing the post town or building name, our system has little to work on as the official address for BF1 2AB is BFPO 8 according to the Royal mail data.

The main issue we are having is that we are not seeing a clear premise identifier coming in. Without this, our system does not have sufficient information to provide an accurate match.

So in summary, we do hold the addresses that are supplied by Royal Mail but due to the data received from lenders (usually based on application form info) we can only match and return the records if they have been provided in the same level of detail/format. Thinking through utilising Rental/Tenancy records specifically. Capturing that data would increase the level of data on the individual at that premise, however without the input data and systems being able to match to it, it unfortunately won't really change anything.

From what I understand, this has been one of the main topics discussed at the working group, so can I please suggest you continue to work with and that group to see if a resolution can be found.

Apologies Rental wasn't the silver bullet we hoped for – or at least not until core data matching can be resolved,

Kind regards



### **Experian UK**

From: @mod.uk]
Sent: 19 May 2015 13:38

To:

**Subject:** RE: credit ratings and rent

Hi ,

I don't think I heard back from you last week on authentication fields...

Kind regards,



#### **Armed Forces Covenant Team**

From: @uk.experian.com]

**Sent:** 07 May 2015 12:11

To:

Subject: RE: credit ratings and rent

Hi,

Thanks for this extra info — it is really useful in comparing to what goes on with matching here. I will come back to you early next week with some more detail on the main fields used for authentication (address validation is required, which will be where this may be falling down) and feedback on the tests is running.



Experian UK

From: [ @mod.uk] **Sent:** 07 May 2015 10:00

To: Cc:

Subject: RE: credit ratings and rent



I've had a look at how many people have the same name and date of birth at BFPO addresses using our most recent data.

There were no people at all with the same first name, surname and date of birth, so clearly there were also none at the same BFPO address.

There were 8 people who had the same surname, date of birth, and first initial as someone else at the same BFPO address as them (this included a couple of sets of twins).

There were 22 people at the same BFPO address as another person with the same surname and date of birth (but different first names).

There were 102 people who had the same surname and date of birth (but different first names) as other people based in BFPO addresses (but not the same BFPO addresses).

All of this was out of a sample of around 27,000 people based in BFPO addresses.

Essentially I feel like this shows that this issue is a red herring. It should be possible, using first name, surname, date of birth, and address to authenticate every individual's identity,

despite the large numbers of people covered by BFPO addresses. If credit ratings agencies are having difficulty authenticating personnel's identity it must be for some other reason – perhaps the BFPO postcodes are not recognised in the CRAs' systems?

- I'd be grateful to find out how you've got on with testing a BFPO postcode in your systems; and also for some more information on the fields used to authenticate identity, as this might give us some ideas of where the problems are coming from.

Kind regards,



#### **Armed Forces Covenant Team**

From: @mod.uk]
Sent: 01 May 2015 09:41

Subject: credit ratings and rent

Hi and ,

Thanks very much for meeting with me yesterday.

I said I'd get back to you on whether there are any UK addresses which are covered by BFPO postcodes: the answer is that there are, for Northern Ireland. The latest list of BFPO addresses, including the NI ones, is here.

I will investigate internally what the numbers are like for personnel with the same names and DOBs living at the same address, and will also begin enquiries into the feasibility of taking a sample of data to use for research.

 when you get a moment could you please send me the information you mentioned about the fields used to identify individuals, and also check to see whether BFPO postcodes are recognised on Experian's systems as UK addresses.

Hope you have a good long weekend.

**Armed Forces Covenant Team** 

#### 17 June 2015: Financial Services Meeting Minutes (extracts)

#### In attendance:

UK Cards Association Experian MOD Welfare Team ABI

DRM

SIIAP, Forces Insurance, BIBA

MOD BFPO Policy

FLA BSA CallCredit

MOD Covenant Team

MOD Covenant Team

MOD Covenant Team (acting Chair)

# **Apologies:**



Introduction: The acting Chair welcomed the group and offered the Chair's apologies and thanked the industry representatives for their attendance. She explained that a recent piece of work had been done to collect and collate evidence of disadvantage under the Armed Forces Covenant from each of the single Services, which has given a much better idea of where commercial disadvantage is being experienced and has strengthened the evidence base for action on these issues. She outlined some wider contextual factors which will affect access to commercial and financial services in the medium term, including the drawdown from Germany, which is seeing high numbers of personnel and their families returning to the UK, and the drive to recruit more reservists, which will potentially increase the incidence of citizens used to accessing civilian services facing difficulty in accessing those services due to their military service. The acting Chair reiterated the political importance of the Covenant and the purpose of the group in seeking to address areas of commercial disadvantage.

#### Action:

• MOD will send a summary of relevant issues from the single Services to the group.

**Review of actions from the last meeting**: Actions from the last meeting were reviewed. The outstanding actions to be taken forward are:

- DRM to continue to work with Royal Mail on including the BFPO annex in the main PAF (postal address file) database.
- MOD to develop a tick-list in consultation with industry representatives and refresh top-tips guidance.

**BFPO:** The group discussed BFPO and the interlinked credit rating issues at length. This still remains a major issue for all. The group discussed the issues pertaining to BFPO postcodes, such as the difficulty in identifying individuals at large postcodes and technical compatibility issues with the format of BFPO addresses and the Royal Mail database. The group discussed the possibility of altering the format of BFPO addresses in the Royal Mail database, for example to include unit and sub-unit or service numbers. The credit reference agencies explained that there was a lack of evidence connected to BFPO postcodes in their

systems, and that more data could help the situation. Use of BFPO postcodes for commercial services remains low, as individuals have a tendency to use a relative's address when serving overseas, which is exacerbating the problem. It was suggested that residents of BFPO addresses can possibly be perceived to be of low commercial interest to UK firms across some sectors because they are based overseas and therefore not accessing products and services in the UK. One credit reference agency commented that, of a total number of some 40-50 million credit records, only around 25,000 currently had BFPO addresses. It is not therefore always commercially viable to adjust processes and policies for such a small cohort.

It was noted that while BFPO has been the focus of the group's previous discussions, there also remains a problem with other service addresses in the UK, such as barracks, where many people are registered at the same address, which can make it difficult to identify individuals.

Specifically in relation to the potential use of service numbers, the group agreed not to continue to pursue this avenue, due to a combination of the MOD's ongoing concerns around security and a wide range of technical complexities, as were set out by the credit reference agencies.

#### **Actions:**

- MOD to write a summary note of the issues which have been investigated and settled pertaining to BFPO postcodes, including service numbers and the separate BFPO annex.
- MOD to draft a Q&A or mythbuster for personnel and families trying to access commercial services.

Workstreams: The acting Chair introduced a proposal to replace this group with smaller groups focusing on specific areas – BFPO addresses, credit ratings, insurance and mobile phones. The group interrogated this proposal, noting that this would remove the high-level oversight that the group at present provides, and suggesting it might exclude certain sectors. The group did agree that there would be value in pursuing issues in smaller, more focused groups. It was agreed that there would be two workstreams: Data (credit ratings, BFPO) and Policies (insurance, mobile phones, mortgages, etc). Meanwhile the larger (core) group will continue to meet quarterly. The Data workstream will be headed up by Simon Dewhirst, and the Policies workstream by MOD will endeavour to attend any meetings of each workstream.

#### **Actions:**

- All members to inform the acting Chair which workstream(s) they would like to be involved in.
- Each workstream to develop proposals to take forward work in their area by the time
  of the next core group meeting, which will be longer and include breakout sessions
  for each group.

. . .

Other business: Communications was a recurring theme of the discussion. There needs to be better communications with industry and with the Armed Forces. This must be an incremental activity, but members of this group should endeavour to communicate the Armed Forces Covenant and commercial disadvantage frequently to members of their respective organisations. Manual processes for Armed Forces personnel was also discussed, but it was agreed that this would not be commercially viable across firms and must therefore be left to individual organisations to implement where they see a business case for doing so. However, it was acknowledged that manually processing applications and queries from the Armed Forces Community could be a significant factor in removing disadvantage. Defence Discounts were discussed in the context of providing a list of organisations and sectors amenable to assisting the Armed Forces. Defence Discounts is an independent charity, and

discount cards are available to a wider group than just the Armed Forces and their families (e.g. veterans, civil servants, cadets) and it cannot therefore be used as a proxy for service numbers to identify members of the Armed Forces.

#### Actions:

- DRM to investigate updating guidance to Corporate Covenant signatories with concrete actions organisations can take to remove disadvantage experienced by the Armed Forces Community, including a specific list for organisations from the financial services sector.
- All members of the core group to share specific questions to organisations with DRM for this purpose, where they want certain points included.
- DRM to provide a list of the top twenty organisations in the Defence Discounts scheme to the core group, for use in targeting communications.
- MOD to investigate exceptions policy with the Financial Conduct Authority.
- MOD to work with credit reference agencies to develop a mythbuster for the Armed Forces on credit ratings.

**Date of the next meeting:** MOD will arrange the next meeting of the core group for September 2015. It will be a longer meeting, and include breakout sessions for the workstreams.

# Notes from meeting with CRAs and Royal Mail 12 August 2015

#### In attendance:

Equifax

- CallCredit

- Experian (on the phone)

- Royal Mail

- Covenant team

- Covenant team

- Covenant team

#### Summary

The meeting was convened as a prelude to a session that will run at the Financial Services Steering Group meeting on 11 September. The aim was to discuss the data constraints and holes in addressing the BFPO address issues on CRA systems (see separate note on BFPO) and to task attendees of the meeting to go away to collect a robust evidence base to help diagnose the causes of the problems experienced with BFPO data.

had searched CallCredit's records for BF postcodes. A very low number of records came about – around 1,000. Usually they would expect such a search to yield hundreds of thousands of records. A 'record' means any piece of information submitted to the CRA's system. So the 1,000 records might only apply to a handful of individuals. said this implied either than personnel were not using BFPO postcodes, and were using family addresses in the UK instead; or, more disturbingly, that the companies/lenders that supply monthly files to the CRAs giving information on all their UK-based account holders (intentionally or unintentionally) were filtering out BF postcodes when they sent this information through.

CRAs are able to build credit profiles for individuals through information which is shared with them monthly from around 600 organisations. This includes banks, mobile phone companies, mortgage lenders, local authorities and the electoral roll. The more records for a person, at an address, that can be provided, the stronger and more accurate the individual's credit profile.

summarised the results of a recent investigation by Royal Mail. They had looked at a large number of commercial users of postal address file (PAF) data, and over half had systems enabled for BFPO transactions. However, they then looked at 30 financial users of the PAF such as banks and credit card companies, and none of them were enabled for BFPO transactions.

It was suggested that this was due to the historic incompatibility of BFPO addresses (before the shadow postcodes were introduced) with the PAF, which may have led the financial sector to filter out BF addresses before sending data to CRAs. Alternatively, the sector may not have updated their systems to accept BFPO postcodes.

also showed how BFPO address formats were different to conventional postal addresses. When BF postcodes were launched, Royal Mail sent out guidance to companies to encourage them to update their address templates to accept BFPO addresses in their full format as included in the PAF. However, it seems very few have done so due to the cost. Instead 'work-around' solutions are used, such as combining several address fields into one. The reformatting may be different on different companies' systems, and this may be partly why it is so difficult to make a match on CRAs' systems.

The PAF can be obtained either directly from Royal Mail or through one of around 250 service providers (of whom only 18 don't take BFPO data).

It was agreed that the cause should be diagnosed and education of the financial sector pursued. Firms which are already working closely with MOD and are likely to have a high number of personnel on their books were pinpointed to contact in the first instance: Vodafone, Lloyds, and Nationwide (although to note that Vodafone may not have a high number of BFPO accounts as it provides a service within the UK, not overseas). also mentioned that the AA uses BFPO data. It was agreed that when we have evaluated what has worked well for companies that take the BFPO data, we could celebrate and share this information to encourage others to follow – particularly in keys sectors such as banking, where a snowballing effect may be generated.

#### Actions:

The CRAs, Royal Mail and MOD agreed to work together to educate industry around the BFPO issues. MOD will draft a letter subsequent to the meeting in September and circulate t the group for comment before distribution. (Royal Mail's media office was happy to do a joint communication; CRAs too).

The CRAs agreed to re-examine their BFPO data and establish:

- How many BFPO records each CRA has
- How many people are connected to these records
- Which firms are supporting BF postcodes

The CRAs further committed to contacting key organisations and establishing:

- The number of armed forces accounts they hold
- Whether they enable full BFPO data on their systems
- Whether they include BFPO records in their monthly submissions to CRAs

agreed to ask Experian's subsidiary EDQ what they find happens with BFPO data.

Royal Mail agreed to resend its guidance on BFPO templates to providers.

#### MOD agreed to:

- Circulate a list of preferential providers to the CRAs and Royal Mail (e.g. Corporate Covenant signatories, Defence Discounts participants, and DRM accounts).
- Develop educational materials for personnel and families for distribution, e.g. a letter
  to all personnel at BF postcodes saying 'only x number of you out of a total of y have
  an up to date address on your credit record' and explaining why and how they should
  update information on their various accounts.
- Investigate setting up a pilot scheme to get a better understanding of the credit profile
  of members of the armed forces, in consultation with the CRAs. E.g. offering free
  credit reporting at the three CRAs monthly to estblsih whether new records were
  being created monthly. Participants could be picked strategically, to include spouses
  and children, personnel with accounts still registered at a parent's address, and
  personnel using BFPO addresses.
- To scope feasibility of the action above, speak to to discuss the issues.

#### 11 September 2015: Financial Services Meeting Minutes (extracts)

#### In attendance:

```
(BSA)
(FLA)
(Royal Mail)
(CallCredit) - 'Data' workstream lead
(BIBA) - 'Policies' workstream lead
(MOD)
(MOD)
(MOD)
(MOD)
(ABI)
(MOD)
(Nationwide)
(UK Cards Association)
(MOD) - chair
(DRM)
(DRM)
(MOD)
```

#### On the phone:

(Equifax)

# Apologies:

(Experian)

**Introduction:** The chair welcomed the group and thanked industry representatives for their attendance and continued support of the Armed Forces Covenant. In particular the support offered by individuals to the new 'Policies' and 'Data' workstreams was noted.

**Review of actions since last meeting:** Actions from the last meeting were reviewed, with significant progress made against most of them. In particular the following were discussed:

- DRM thanked Royal Mail for signing the Corporate Covenant and for inserting a commitment therein to work to overcome BFPO issues. Royal Mail described the scale of the problem briefly: initial research had shown that of the 250 solution providers only around 18 had not downloaded the necessary PAF file update to work with BFPOs. However, the big unresolved problem lay with large financial institutions: many banks had not yet downloaded the updated database. It was suggested that guidance developed in consultation with industry representatives might provide a useful starting point for rectifying this situation.
- DRM noted that they are continuing to work with companies on the content of new Corporate Covenant pledges, and with those who have already signed the Corporate Covenant to deliver on their commitments. Again there was a strong case for sharing industry best-practice in how and where to invest – for example, in dedicated helpline numbers.
- MOD confirmed that they had produced a myth-buster for discussion with the group in the separate workstream sessions. A summary note of relevant issues from the single Services had also been circulated to the group.
- The two workstreams confirmed that they had both met and discussed key issues since the last all Financial Services group meeting in June. The 'Policies' workstream had been looking into insurance and financial services provision, whilst

'Data' had focused on ongoing problems with BFPOs and credit ratings. It was agreed that there was a symbiotic relationship between the two workstreams, with 'Data' providing a strong evidence base to understand where existing policies were not being delivered or where new policies were required.

**Covenant Team update:** The Covenant team provided a quick update on progress. The chair emphasised in particular the continuing political importance of the Covenant and the pressure from the PM-led Cabinet Committee to continue to make progress on the most pressing issues (in particular mobile phones).

Communications was acknowledged as a serious and ongoing problem, both in terms of CRAs and membership organisations communicating best practice to members, and the support and guidance that was being provided by MOD for the Armed Forces Community. DRM asked what the most effective channels were here, noting that almost all issues were reported by spouses of Service personnel. Targeted channels should be explored for single personnel, as well as for families served through the Families Federations. DRM also asked whether there was currently an issues SPOC for case work. The Covenant team confirmed that no, at the moment all case work goes through the Parliamentary Secretariat, but that the development of a SPOC was a good idea.

#### Actions:

- MOD to ensure that the comms plan currently currently under development would include a specific commercial disadvantage section, and that this would be aligned with industry activity. This issue would also be discussed at a planned comms workshop to be held in September – by September 2015.
- MOD (Covenant team) to scope a SPOC for all Covenant issues case work by December 2015.
- MOD (Covenant team) to consider most effective channels for communicating with spouses, and how these channels might be different from those for single personnel – by October 2015.

**Workstreams:** The group then split up into separate discussions led by the respective workstream leads, to discuss issues specific to their areas.

. . .

**Data workstream:** CRAs' discussions with three banks have shown that their systems don't cater for BF postcodes and still use the old system, which redirects to a separate manual input address system using BFPO numbers and/or the Ruislip postcode. This appears to be a widespread problem in the financial sector. As a secondary problem, BFPO data isn't being shared with CRAs – potentially because it falls into separate manual processes rather than financial institutions' main processes.

There are two stages therefore where data is at fault:

- 1. Inputting data into systems that accept the correct PAF format
- 2. Sharing the data with CRAs

#### Actions:

 MOD to work with HMT to explore implementing changes recommended by Data Workstream to Government-owned banks' processes and technical set-up to make them compatible with BFPO postcodes. Going forwards Policy Workstream may also have recommendations to be implemented by Government-owned banks – Engage with HMT by October 2015

- DRM to encourage existing financial sector CC signatories to review their systems as well as their policies, and to develop a pledge for new financial sector signatories to use for this purpose – by October 2015
- CRAs to communicate BF postcodes issue to trade association industry day and report back at earliest opportunity (17/09/2015) – September 2015
- MOD to communicate the need to use the correct address format to personnel and families via payslip message and HIVES – by December 2015
- Data workstream to develop some pointers and examples for best practice in the financial industry for working with BF postcodes and sharing armed forces data with CRAs – by December 2015

**Post meeting note:** BIS will now also play a role in developing and disseminating communications materials through their established channels.

**Proposals and commitments:** The group came back together at the end of the meeting. The respective workstreams presented their discussion and agreed actions. It was clear that comms difficulties had been at the centre of both discussions and so further actions to address these difficulties were agreed upon, focusing on raising awareness of Covenant issues at different levels in corporations (especially amongst those who have signed the Corporate Covenant).

#### Actions:

- All industry representatives to comment upon revised myth-buster (attached). These
  comments should include any questions that the myth-buster is not currently
  addressing which it ought to by end of September 2015.
- MOD to draft Ministerial letter to send to chief executives urging them to continue to take action in support of the Armed Forces – by October 2015
- Trade associations to survey members to find out exactly what concrete steps are being taken to deliver on Corporate Covenant commitments – by October 2015
- MOD to draft best practice communication for financial services providers in conjunction with Nationwide and other industry representatives – by October 2015.

**Next meeting:** will shortly send round a poll to schedule the next meeting of the Financial Services Group in early December. The available dates are as follows:

- Wednesday 9 December, 1-4pm
- Thursday 10 December, 1.30-4.30pm
- Friday 11 December, 1.30-4.30pm

From: @callcreditgroup.com]

**Sent:** 24 September 2015 10:08

Subject: RE: Financial Services Meeting 11092015 - minutes and actions

Morning ,

Regarding the first bullet in the commercial advantage section, I would like to refine this slightly as the CRA need to agree and finalise what address format to send. Whilst there is no doubt that the key parts of the address will clearly be based on PAF, as mentioned previously the contentious areas surround the earlier parts of the address. i.e. the equivalent of house name/number and street.

So we do intend to produce specific guidance that we will send out to our data providers advising the most effective way to send addresses. This may be subtly different to the documentation produced by Royal Mail as we need to consider the wider complexities of name and address matching in our world. So can I change this bullet to read:

 "As a financial service provider or lender, we pledge to share data records for the armed forces with our accustomed credit referencing agency each month, using the correct British Forces Post Office (BFPO) postcodes and address template advised by the credit reference agencies."

Hope this is ok.

Regards



Call Credit Information Group

From: \_\_\_\_\_ [\_\_\_\_\_@mod.uk]
Sent: 23 September 2015 12:05

Subject: RE: Financial Services Meeting 11092015 - minutes and actions

Dear all

Thank you to those of you who have already let me know preferred dates and times for the next meeting. If any of you have strong preferences that you have not let me know about as yet then please do.

Following on from the meeting on 11/09 some work has been taken forward by DRM and the Covenant team to add standard clauses into future Corporate Covenants pledging support on BFPOs and Commercial Disadvantage. These are attached below, along with a refreshed standard set of clauses on Wounded, Injured and Sick (WIS).

Could I ask group members to review these clauses (if possible by the end of the week) and let me have any proposed comments or revisions. These will be inserted into all future relevant Corporate Covenants.

#### On BFPOs:

• "As a product, service or credit provider, we pledge to access and integrate current postal address file data from Royal Mail or its suppliers for British Forces Post Office (BFPO) addresses."

## On commercial disadvantage:

- "As a financial service provider or lender, we pledge to share data records for the armed forces with our accustomed credit referencing agency each month, using the correct British Forces Post Office (BFPO) postcodes and address template according to Royal Mail's postal address file."
- "As an online or mail-order retailer, we pledge to make our products available for delivery to British Forces Post Office (BFPO) addresses where appropriate at the lowest commercial rate."
- "We will strive to remove disadvantage faced by armed forces community in accessing our products and services"

Thanks for your support

**Armed Forces Covenant Team** 

#### 12 December 2015: Financial Services Steering Group Minutes (extracts)

# In attendance: (BBA) (BIBA) (ABI) (Equifax) (DRM) (MOD) (MOD) (MOD) On the phone: (UK Cards) **Apologies** (N.B. There were difficulties with the conference phone on the day): (Royal Mail) (BFPO) (Nationwide) (Call Credit) (BSA) (FLA) (CML) (MOD) (MOD)

**Introduction:** The chair welcomed the group and thanked industry representatives for their attendance and continued support for the work of the Financial Services Steering Group.

**Review of actions since last meeting:** Strong progress had been made against the majority of actions since the last meeting in September. The following were highlighted:

(2) The Covenant team have scoped a Single Point Of Contact for all Covenant issues
case work – this has been developed as digital form to sit on gov.uk, allowing Service
Personnel and their families to record instances of commercial disadvantage; an
escalation process has been agreed with DRM.

Action 1: MOD to work with DRM to get digital SPOC on gov.uk 'live' – by January 2016

. . .

Credit history gaps were again highlighted, with emphasis on the issues that might arise
from rebasing from Germany. In particular raised the issue of matching national
insurance and individual data online, which can often lead to local authorities removing
records.

**Action 3**: Covenant team and Experian to explore the feasibility of SP records in Glasgow updating CRAs on a monthly basis – by March 2016

• (8) Having checked with HM Treasury Government cannot exercise influence over processes in Government owned banks, therefore this action cannot be taken further.

<ul> <li>(9) New Corporate Covenant pledges on commercial disadvantage and BFPO have been developed; these will be introduced at the same time as the new Covenant branding in January.</li> </ul>
(11) and and provided an update on work to deliver an agreed BFPO data address format to be used by the financial services industry; a draft is currently with the Data Quality Working Party for comment.
<b>Action 4:</b> to share draft BFPO data format once comments from DQWP have been taken into account – by January 2016
<b>Action 5:</b> All FSSG members to communicate agreed format and encourage members to adopt the new format; MOD to issue guidance on the new format to SP – by March 2016
<ul> <li>(12) Sharing Armed Forces data with CRAs is still very sporadic; data is in different formats currently; without the ability to tie data together and enable matching it is not possible to share it. Covenant team's discussion with the Financial Conduct Authority suggests that there is no reason in regulations stopping CRAs from conducting wildcard searches for matching SP data; it is simply a question of logistics.</li> <li>(14) MOD did not draft a ministerial letter to chief executives as it was felt on reflection that this would have repeated much of the content of the letter sent to all FTSE350 CEOs in the summer. Ministers are very engaged with the work and will be in attendance on the Financial Services Round Table at Number 10 on 14 January.</li> <li>(15) The survey of CC signatories amongst trade associations has not yet been commissioned due to a lack of clarity over aims.</li> </ul>
Action 6: and Covenant team to speak in January to discuss next steps.
<ul> <li>(16) Nationwide have made changes to their policies for Service personnel living overseas at BFPO addresses, as well to their systems.</li> </ul>
<b>Action 7</b> : MOD to discuss issuing 'best practice' communications with Nationwide – January 2016
<b>Covenant update:</b> provided a short overview of Covenant, focussing on areas related to commercial disadvantage. Points emphasised included the new branding of the Covenant, the Number 10 drinks reception on 14 Jan, a Covenant microsite to be launched in the new year, and the continuing need to improve communication of the Covenant.
<b>Drinks reception:</b> outlined the plan for the number 10 event. BBA identified this as a good opportunity to publicise the Covenant and encourage each business to sign up.
Action 8: to liaise with FSSG leads to discuss best invitees – by 11 December (done)
<b>Action 9:</b> to share Financial Services Round Table brief with group for briefing of senior representatives; if necessary meet by 10 January for extra briefing – by 18 December (done)
<b>Explanatory note for DRM:</b> drafted a one page brief for DRM account managers to assist preliminary discussions with company contacts on implementing the recommendations of the FSSG (to be used in conjunction with the agreed Corporate Covenant pledges on commercial disadvantage and BFPO).

Action 10: MOD to circulate draft explanatory note for comment - in January 2016

**Presentation:** presented a draft workplan for 2016 for the FSSG. The workplan is intended to be reflective of the Group's agreed actions, and should not be seen as prescriptive or restrictive. However, given the increased political expectation of progress on financial services and commitments made in this year's Covenant Annual Report, it was felt that it would be sensible to capture these and our shared priorities in a single document. Four key areas were discussed: BFPO data, Overseas policies, Insurance and Educating the AF Community.

**Action 11:** MOD to circulate summary workplan – by 18 December (done)

**Action 12:** Any comments on workplan to be provided to \_\_\_\_\_ – by end of January 2016

#### **AOB**

None

Next meeting: March TBC – will be in contact in the new year to arrange the next meeting. Thank you all for your continuing support.

# <u>Financial Services Steering Group: Work Plan (extracts from draft, shared with FSSG on 18 December)</u>

<u>Purpose:</u> To set out an agreed set of objectives and high level activities for the Financial Services Steering Group in 2016, which delivers on the financial services commitments made in the 2015 Covenant Annual Report.

#### **2015 Covenant Annual Report commitments:**

- Rectify problems faced by service people in obtaining motor, home and travel insurance cover at a reasonable price
- Encourage all financial services providers to update their computer systems to work with BFPO addresses
- Improve financial services Identification & Verification processes for service personnel and their families
- Strengthen and extend our relationships with Corporate Covenant financial services signatories to ensure that they are delivering their promises on the ground
- Continue to educate service people in the most effective ways for them to build a strong credit history and access financial services

### **Background:**

- 1. The Armed Forces Covenant states that the Armed Forces community 'should face no disadvantage compared to other citizens in the provision of public and commercial services.'
- 2. Re-constituted in Q1 2015, the FSSG has been working to eliminate disadvantage for families in access for Service personnel and their families. So far its work has focused on understanding the issues facing the Armed Forces community more thoroughly, with a particular focus on credit ratings and BFPO issues, and on producing more effective guidance for Service personnel and their families.
- 3. The single Services and Families Federations continue to report examples of disadvantage in accessing financial services experienced by Service personnel and their families. Rebasing from Germany, combined with the increasingly fragmented dispersal of Service personnel on deployment around the world, are only likely to make these difficulties more pronounced unless real and concerted action is taken across the industry.
- 4. There is also substantial political interest, with both the Prime Minister and the Defence Secretary highlighting commercial disadvantage as a priority for the Covenant.
- 5. This year's Covenant Annual Report includes commitments on financial services which we believe to be ambitious but realistic. They will not be straightforward to achieve, but doing so will take us closer to our goal of fair access to commercial services for the Armed Forces.
- 6. To achieve this we need to agree a credible work plan for the next 12 months.

#### **Workstream: BFPO data (credit ratings)**

Objective: Financial services providers update their systems to be fully compatible with new BFPO addresses and postcodes (downloading BFPO PAF annex); sending this information to the CRAs to allow SP to build up a stronger credit history

#### **Activities:**

> PM to introduce asks to major banks and financial services industry representatives at financial services roundtable at Number 10 drinks event on 14 Jan: PM will ask them to

- update their computer systems and processes to be fully compatible with BFPO addresses and postcodes;
- ➤ Follow up letter on BFPO data/overseas policies from Secretary of State (preferably joint with e.g. Chairman of the BBA, CML, RM etc) to major banks, building societies and lenders (particularly the 6 major UK banks) reiterating asks;
- ➤ DRM to support ask of major 6 UK banks; insert standard BFPO clause into all major financial services' providers CCs; agree explanatory note;
- > CRAs and trade associations to work together to deliver agreed BFPO address format for use by finanancial services providers;
- Royal Mail and BFPO to work with solutions providers to influence their customers to adopt PAF BFPO annex data; work together on joint messaging campaign; Use Nationwide's system changes as a best practice case study;
- > RM to invite BFPO representation at PAF Advisory Board to explain issue;
- ➤ CRAs to conduct 'wildcard' searches for SP BFPO data in their system to understand whether the information is being inputted but in the wrong fields; FCA have confirmed (informally) that this is permissible.

. . .

# **Cross-cutting theme: Educating the Armed Forces Community**

Objectives: The Armed Forces Community understands how best to access financial services; in particular they understand how to develop a strong credit file and how to make use of BFPO addresses and postcodes

#### **Activities:**

Push new BFPO address and postcode format / commercial disadvantage guidance in a DIN/payslip message/HIVES/Fam Feds; promote commercial disadvantage work; encourage use of digital form to report specific examples of commercial disadvantage. From: @bba.org.uk]
Sent: 21 December 2015 16:54

Subject: RE: 20151212 - FSSG minutes, Prefered BFPO address format from CRA



As discussed at the meeting, I have now received a preferred address format provided by the CRA's (below). Would you be able to let us know if there are any concerns with this format of title and address before TA's consult with members?

The following shows how the new BFPO postcode and post town should be provided as part of your data submissions:

Rank - Title

Name
Sub Unit
Unit
Unit
BFPO Number
BFPO Town
BFPO Postcode

- Name
Address line 1
Address line 2
Address line 3
Address line 4
Postcode

### A simple example:

Title - Corporal Name - John Brown Address line 1 - 1stBn

Address line 2 - The Kings Fusiliers

Address line 3 - BFPO 13 Address line 4 - BFPO Postcode - BF1 0AA

Or

Title - Corporal Name - John Brown

Address line 1 - 1stBn, The Kings Fusiliers

Address line 2 -

Address line 3 - BFPO 13 Address line 4 - BFPO Postcode - BF1 0AA

Many Thanks



**BBA** 

From:	(	@m	od.uk)
Sent: 0	8 January	2016	16:41
To:			

To: Cc:

**Subject:** FW: Annual Covenant Celebration and Financial Services Round Table - Number 10 Downing Street, 14/01/2016, 1700-1930

Hi

Thank you for your help finding a suitable attendee from Experian. I'm delighted that will be able to attend.

Before next week I just wanted to make sure that you had access to the brief that we are providing to attendees for when you are asked to provide briefing for as the Subject Matter Expert.

It would be great if you could think about how Experian might be able to further support these asks, so that Chris can arrive at the meeting fully prepared to provide a substantive statement on Experian's behalf. Depending on what support you think Experian might be able to give there are definite opportunities for us to work together on comms on the day, and we will be in contact with you and next week to discuss the possibilities.

Thanks for all of your help and enjoy your weekend

XXXX

**Armed Forces Covenant Team** 

From: @experian.com]
Sent: 12 January 2016 12:35

Subject: RE: Financial Services Round Table - No10 14/01/2016, 1700-1930

Hi 💮

As time was so tight we've only been able to create a quote...

An Experian spokesperson said: "Experian was proud to sign up to the Corporate Covenant in 2013, underlining our commitment to support armed forces personnel and their families. Over the past few years we have worked with the MOD, Royal Mail and other parties to help tackle the credit-rating challenges faced by people serving overseas. We very much look forward to continuing this important work, particularly around address formatting. We have also worked on initiatives to raise awareness of these issues, helping produce an MOD fact sheet and a dedicated support page on the Experian website. There is still more work to do and we remain committed to helping armed forces personnel."

Happy to discuss,



From: [ @mod.uk]
Sent: 11 January 2016 18:09

To: Cc:

Subject: Financial Services Round Table - No10 14/01/2016, 1700-1930

Hi

Just following up on your phone conversation with this afternoon.

Attached is the briefing paper including the asks that the Minister will be making of the attendees on Thursday.

"Experian, Equifax and Call Credit jointly announced the creation of a new BFPO data format for Armed Forces personnel to use when accessing financial services whilst posted overseas. The three credit reference agencies also pledged to support the new format's rollout across the industry during 2016. This important step will help the Armed Forces community to build up and maintain a strong credit history, in turn making it easier for them to access financial products such as mortgages and unsecured credit, both overseas and once they have returned home."

As Experian are the only CRA to have signed the Covenant, and have a history going back to 2013 of working with MOD on the BFPO issue, it looks like an obvious opportunity for you guys to take the lead now. For Experian to be a star case study in our comms push it would be great if you could set out all the work that you have done in this area since 2013, and what new contributions you are going to be able to announce/make in the future. It would also be good if you had a nice case study to use focusing on how you have directly helped Service personnel and/or their families. I think you agreed to come back to by noon tomorrow with something for us.

Thanks – and if I can help you with any context then just let me know

**Armed Forces Covenant Team** 

[ @callcreditgroup.com] **Sent:** 12 January 2016 10:22 To: Cc: Subject: RE: Press release for Thursday's financial services round table Trust you are well and had a good break. Thanks for the email. We have discussed this internally and have no objections to the inclusion in the press release. If I may though - just a minor point. Can you please update our company name to Callcredit.

"Experian, Equifax and Callcredit jointly announced the creation of a new BFPO data format for Armed Forces personnel to use when accessing financial services whilst posted overseas. The three credit reference agencies also pledged to support the new format's rollout across the industry during 2016. This important step will help the Armed Forces community to build up and maintain a strong credit history, in turn making it easier for them to access financial products such as mortgages and unsecured credit, both overseas and once they have returned home."

Our comms lead on this work is who can be contacted on or

Kind Regards

From: [ @mod.uk] **Sent:** 11 January 2016 18:21

To: Cc:

**Subject:** Press release for Thursday's financial services round table

Hi

I hope you're well and I'm delighted that will be joining us at Number 10.

Following on from all the brilliant work you've been leading (with the other 2 CRAs) on the agreed BFPO data format for SP, it occurred to me that announcing this on Thursday would be a great thing for the CRAs to bring to the table. I know that you're still working on dotting the 'I's and crossing the 'T's in terms of what needs to be included in the fields, but given that we are nearly there would you and your comms colleagues be comfortable with us including the following lines in a press release:

"Experian, Equifax and Call Credit jointly announced the creation of a new BFPO data format for Armed Forces personnel to use when accessing financial services whilst posted overseas. The three credit reference agencies also pledged to support the new format's rollout across the industry during 2016. This important step will help the Armed Forces community to build up and maintain a strong credit history, in turn making it easier for them

to access financial products such as mortgages and unsecured credit, both overseas and once they have returned home."

What are your thoughts? It would also be great if you could provide the details of your comms lead for this work at Call Credit, as there could obviously be other opportunities for us to work together on the day. For info I will also share the above lines with the other 2 CRAs.

Thanks – and if it's useful for us to discuss over the phone tomorrow morning then please just let me know

**Best** 

**Armed Forces Covenant Team** 

From: I [@equifax.com] **Sent:** 12 January 2016 13:39 To: Cc: Subject: RE: Press release for Thursday's financial services round table As just discussed, Equifax is happy to support the new BFPO data format and hereby authorise the PR quoted below. Regards Equifax UK @mod.uk] From: **Sent:** 11 January 2016 18:29 To: Cc: Subject: [IE] FW: Press release for Thursday's financial services round table and I hope you're well and I'm delighted that will be joining us at Number 10. As I know you're aware, has been leading a piece of work on the back of the Financial Services Steering Group aimed at delivering an agreed BFPO data format to be used across the industry. It occurred to me that announcing this on Thursday would be a great thing for the CRAs to bring to the table. I know that the CRAs are still working on dotting the 'I's and crossing the 'T's in terms of what needs to be included in the fields, but given that we are nearly there would you and be comfortable with us including the following lines in a press release: "Experian, Equifax and Call Credit jointly announced the creation of a new BFPO data format

"Experian, Equifax and Call Credit jointly announced the creation of a new BFPO data format for Armed Forces personnel to use when accessing financial services whilst posted overseas. The three credit reference agencies also pledged to support the new format's rollout across the industry during 2016. This important step will help the Armed Forces community to build up and maintain a strong credit history, in turn making it easier for them to access financial products such as mortgages and unsecured credit, both overseas and once they have returned home."

What are your thoughts? There could obviously be other opportunities for us to work together on the day. For info I have also shared the above lines with the other 2 CRAs.

Thanks – and if it's useful for us to discuss over the phone tomorrow morning then please just let me know

**Best** 

**Armed Forces Covenant Team** 

# <u>Financial Services Round Table: 14 January, 1715-1800, 10 Downing Street (brief provided to round table attendees)</u> Objective

To agree actions for the financial services sector in 2016 to ensure that the Armed Forces Community are treated fairly.

#### **Background**

Service life entails mobility for Service personnel and their families. They often have no choice in when and where they will be posted. This can cause difficulties accessing or using commercial products and services. The Covenant states that 'the Government should work with the commercial sector towards a situation where they have as good access to commercial products and services, including financial services, as any other citizen.' The Corporate Covenant continues to grow and we are grateful to those in the financial sector who have made commitments, but signatures must be underpinned by clear actions and advocacy for change.

In the last year we have made strong progress. The four largest mobile phone providers have made a commitment to allow Service personnel and their families to pause their contracts when they are posted overseas. A number of Banks have a long history of support for Service personnel, ranging from an establishing a separate Bank through to bespoke processes. Since January we have worked with representatives from across the financial services sector to develop a shared understanding of the challenges facing us, and to identify possible solutions. Therefore, the Secretary of State wants to increase the support provided by the financial services sector in three key areas.

### **Credit History**

Customer information at the Credit Reference Agencies (CRAs) is used when assessing applications for credit and information must be submitted with a correct address. The introduction of shadow British Forces Post Office (BFPO) postcodes in 2012 was a major step forward for the Armed Forces Community, but these are not being consistently used. Whilst a number of Banks have bespoke processes to manually review lending applications, the incorrect address will mean that Service personnel do not have a complete and accurate UK credit history, which can affect their ability to access unsecured credit and mortgages. We are therefore seeking the following commitments:

- 1. Providing data to credit bureau in an agreed format which will include the BFPO postcode
- 2. Downloading and making available in computer systems the BFPO Postal Address File annex to facilitate the automated reporting to the credit bureau
- 3. Working with MOD to ensure that new BFPO address format requirements are understood and used by both Service personnel and financial institutions for new and existing products

#### **Product Applications and Credit Policy**

Service personnel and their families are often posted overseas at short notice for up to 3 years. This can seriously hamper their ability to access financial services both whilst abroad, and for a substantial period of time once they are home. Lack of access to products such as mortgages was highlighted as a major problem by our people this year. We are therefore seeking the following commitments:

- **4.** Maintain credit policies to ensure Service personnel are not disadvantaged as a result of potential gaps in the address or credit history due to overseas service, and treating BFPO addresses in the same way as UK addresses
- **5.** Consider credit policy for Service personnel that need to let their UK residential property whilst serving an overseas tour for a period of time (retaining as a residential mortgage rather than switching to a buy-to-let mortgage)

#### <u>Insurance</u>

Postings overseas present particular difficulties for the Armed Forces community when accessing insurance: time spent abroad can often reduce or invalidate existing British No Claims Discounts (NCDs) whilst those who are posted overseas and have to cancel a policy mid-year face punitive fees. We are therefore seeking the following commitments:

- **6.** Insurance providers agree that when the Armed Forces community cancel their insurance policy mid year to be posted overseas they are given a pro rata rebate, waiving cancellation fees.
- **7.** Insurance providers to freeze the Armed Forces community's NCDs when posted overseas for up to 3 years.