Leading the way
for charity finance

Communicating with your bank

Raising an issue or concern

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Welcome

In 2024, CFG, NCVO and the Civil Society Group published Charity Banking Challenges 2024, a report exploring the barriers that charities encounter in accessing the banking services they need.

Over 90% of respondents had encountered difficulties with their banking services. The report also revealed that 64% of charity respondents had submitted a complaint to their bank within the past two years.

Only a small proportion however – just 4% – chose to escalate their concerns to the Financial Ombudsman Service. Perhaps most strikingly, more than half (57%) reported that their complaint had not been resolved to their satisfaction.

Communicating with banks and reaching a quick resolution to a problem is clearly an issue for charities.

This guide is designed to support charitable organisations to communicate with their bank and, if necessary, to help them through the complaints process. It also explains how to escalate an unresolved issue to the Financial Ombudsman Service.

It provides clear, step-by-step guidance, outlines key considerations and best practices, and brings together all the relevant requirements and resources in one place.

The guide also includes ready-to-use email templates to help charities communicate effectively with their banks. You can also use the email templates as the basis for letters, if that is your preference.

We hope you find this guide helpful. Please let the CFG team know if there's anything else you think we should be included.

In 2024, more than half of the the charities that responded to our survey said that a complaint to their bank had not been resolved to their satisfaction.



Dr Clare Mills, Deputy CEO, Charity Finance Group (CFG)

NEED TO KNOW

Is your charity ‘bank fit’?

Many delays and challenges that charitable organisations encounter arise because the information checked by the bank does not match the information the charity provides. Before contacting your bank, it’s a good idea to check the following:

1. Do you know where your governing document is held, in case the bank asks to see a copy of it?
Your governing document sets out the rules for how you run your charity. Depending on your organisation’s governance model, this could be your constitution, or memorandum and articles of association, or trust deed. For a Charitable Incorporated Organisation (CIO) this will be the model constitution, either the foundation or association version.

2. If you are registered with the Charity Commission for England and Wales, and/or the Office of the Scottish Charity Regulator (OSCR), check that all the details on your organisation are accurate and up-to-date.
This includes the organisation’s address and details of your trustees. From 1 January 2025, OSCR will be publishing the names of trustees for charities registered in Scotland. This brings the publicly-available information for Scottish charities in line with the information published by the Charity Commission for charities in England and Wales.

3. If your organisation is registered with the Charity Commission or OSCR, check that all your financial information has been filed, and that your Annual Return has been completed.

4. Do you have clear and robust financial procedures, to manage risk?
This could include your policies and procedures for handling cash, making payments and accessing your bank accounts.



NEED TO KNOW

The Consumer Duty

The Consumer Duty sets a standard of consumer protection in financial services.

It's designed to ensure that firms act in your best interests and deliver good outcomes. It applies to charitable organisations with an annual income up to £1m.

Under the Consumer Duty, you should expect:

- Support when you need it – timely, accessible help when things go wrong or you need assistance.
- Clear communication – information that is easy to understand, so you can make informed decisions.
- Products and services that meet your needs – including fair value and suitability for your circumstances.

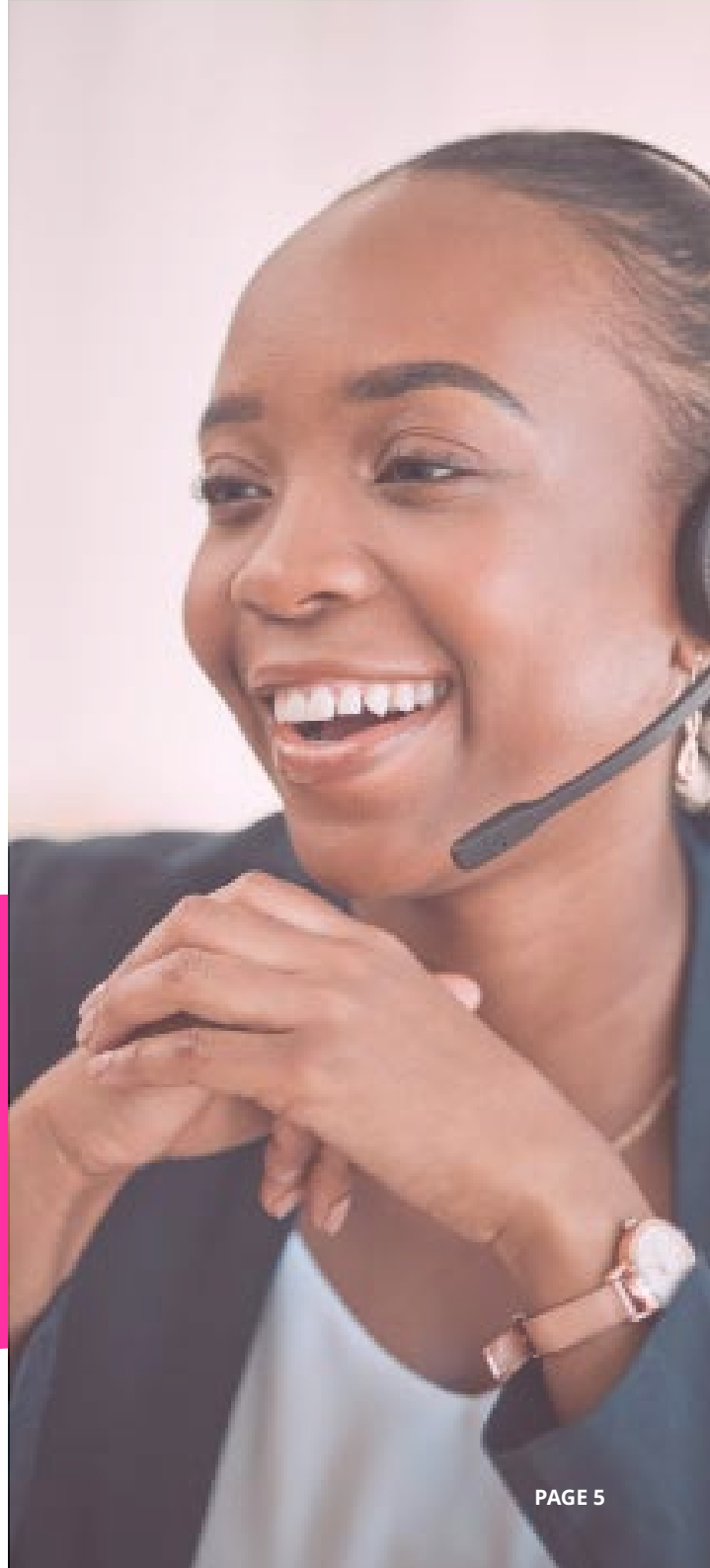
If your bank does not meet the Consumer Duty, you may have grounds for complaint to the Financial Ombudsman Service (FOS).

Read on to find out more about the FOS.

Further reading

Read the Financial Conduct Authority's (FCA) Consumer Duty [accessed November 2025]

Read NCVO's article on the introduction of The Consumer Duty [accessed November 2023]



NEED TO KNOW

Know Your Customer

KYC stands for know your customer, or sometimes know your client and, along with Anti-Money Laundering (see page 6), is part of Customer Due Diligence (CDD). KYC processes have two main purposes:

- To help banks and other financial institutions play an active role in preventing fraud and financial crime, money laundering and the financing of terrorism.
- To help banks and other financial institutions understand their customers and make appropriate risk assessments in relation to each customer.

Banks have flexibility in how they operate KYC processes. You may find that if you have accounts with two or more banks, the processes are different for each bank.

You are likely to be asked for information about your charitable organisation, as well as the people who will be the signatories on your bank account(s). In some cases, you may also be asked for information about all trustees or other people who have control over finances and decision-making.

KYC happens at the start of your relationship with your bank – when opening an account – but also needs to be kept up-to-date. You may find you need to review the information you supply to the bank whenever there is a change in signatories on the account, if you have any changes to your structure, or other major change.

Further reading

Read LexisNexis' What is a KYC check? [accessed November 2025]



NEED TO KNOW

Anti-Money Laundering

and Countering the Financing of Terrorism

Anti-Money Laundering (AML) refers to the regulatory and legal framework in place to prevent criminals from successfully covering up the origins of money obtained illegally. Banks and other financial institutions are registered with the Financial Conduct Authority as part of the regulations on AML.

Countering the Financing of Terrorism (CFT) is a set of policies and procedures that banks and financial institutions implement to prevent and detect the flow of money to terrorist organisations. CFT is closely related to AML efforts, as both aim to safeguard the financial system from illicit activities.

AML and CFT processes will involve banks:

- Carrying out due diligence on the organisations and people associated with an account: are they who they say they are?
- Monitoring transactions for suspicious patterns that could be evidence of money laundering or terrorist financing.
- Reporting suspicious activities to the relevant authorities.

AML and CFT contribute to maintaining the integrity of the country's banking system and protecting the public by disrupting crime and terrorism. Robust AML and CFT controls help maintain the country's reputation as a safe place with a secure banking system.

Further reading

Read Investopedia's guide AML: What it is, Its history and how it works [accessed November 2024]

Read Sanctions.io Guide to AML [accessed November 2024]



Responding to KYC and AML requests

To help you respond effectively to KYC and AML requests:

- Ensure your charity's internal governance documents are clear, up-to-date, and reflect any changes (e.g. new trustees have been added) - refer to page 4.
- For charities that are also companies, make sure your details on the Charity Commission/OSCR and Companies House registers match exactly. From January 2026, trustee details will be publicly available on the Charity Commission and OSCR websites, in line with where your charity is registered.
- If any questions from your bank are unclear, ask for clarification to ensure you're providing the right information.
- Identify and set out your understanding of the problem.

Further reading

Banking for Charities, by Gareth Anderson for ICAEW [accessed November 2024]

Your responsibilities under money laundering supervision, UK Government guidance [accessed November 2025]



Common challenges

The Charity Banking Challenges report, published by Charity Finance Group in 2024, identified a number of common difficulties that charities had experienced with banking.

These are some examples of common issues you can raise with your bank and seek resolution for:

- Communication with your bank
- Documents or information mislaid by your bank
- The length of time taken for a process e.g. opening an account or changing the mandate on an account
- Access to funds
- Charges on your account
- Account freezing
- Debanking (when a bank no longer provides services or accounts to a charitable organisation)

Other issues charities often encounter relate to Know Your Customer (KYC) and Anti-Money Laundering (AML) checks. Banks are required to carry out these checks as part of their legal obligations to prevent money laundering and terrorist financing.

It's important to respond to these requests promptly and accurately.

Further reading

Read the Charity Banking Challenges 2024 report by CFG in partnership with Civil Society Group and NCVO.

CFG will be running a new survey on Charity Banking Challenges in the near future. To have the chance to share your experiences, join our mailing list here and we'll keep you informed. Go to the form.



Raising an issue or concern

Identify the concern

- Think about the issue you are concerned about.
- Make notes and summarise the issue.
- Gather evidence related to the issue, including documents, emails, and records of conversations.

Make contact

- Contact your bank and ask for the contact details for the person responsible for managing your account.
- Use these details to call, email or write to your bank and set out your issue or concern.
- If you call your bank, make a note of the time and date you called and the length of time you were on the phone. If you speak to someone at the bank, keep a record of who you spoke to, what was discussed, any actions promised and timelines.

Example call note: 'Called at 1025 on 30 April 2025 and spoke to Cathy Smith. Said I was unhappy about length of time it was taking to change the mandate – completed forms were returned on 29 January 2025. Cathy agreed the bank had the forms and they were in the system. I asked when the changes would be completed, and she said it was hard to know for sure, but it should be by the end of May.'

Follow up by email or letter whenever possible to create a clear record of the complaint. You can use the template on page 13.

A formal complaint

If you are not satisfied with the way the bank is handling your concern, you can make a formal complaint in line with the bank's complaints process.

- Visit your bank's complaints page for contact details (see page 12 for links).
- You will need to do this in writing, either by email or post.
- Start with a short and clear summary of your complaint.

If you are complaining about more than one issue, number and list them, for example:

1. It has taken far too long for the bank to change the mandate on the account.
2. Correspondence from the bank has been sent to the wrong address despite the correct address being provided several times.

Example of a short summary of a complaint:

"We are unhappy about how long it is taking to change the mandate on our account. The completed forms were submitted on 29 January 2025, but the changes have still not been made. This delay has caused disruption to our ability to manage the account effectively."

- Make sure your email or letter to your bank is clearly labelled 'Complaint'.
- State your bank account number or reference number.
- Include the names of people you spoke to, dates and times you spoke to them, and copies of any relevant paperwork.
- State how you would like the matter to be resolved, including any compensation sought.

Continued over...

Raising an issue or concern (cont.)

You will need to send the FOS:

- The details of your original complaint and copies of correspondence with your bank.
- A final response letter from your bank or proof that eight weeks have passed without a response.

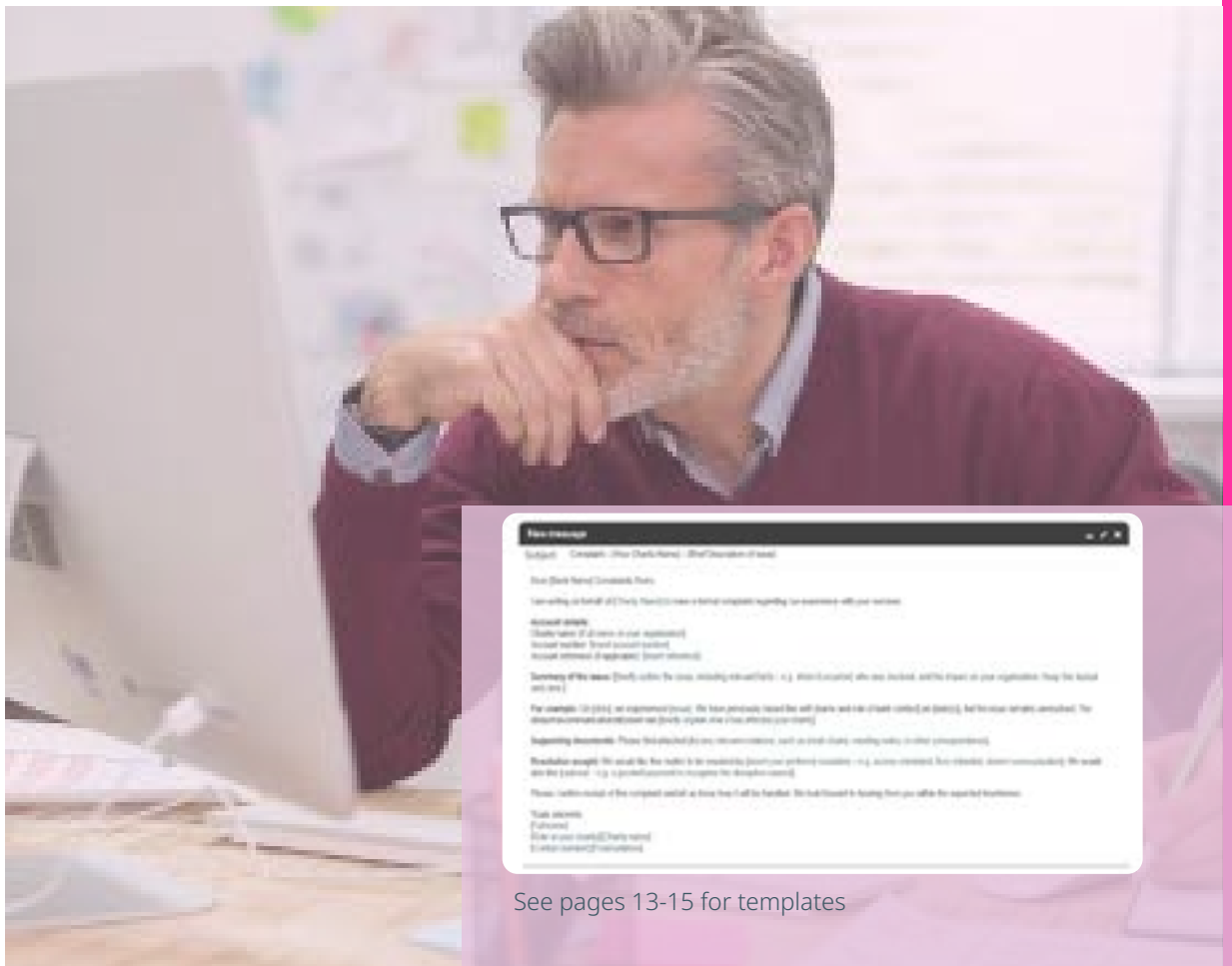
Further guidance:

The Financial Ombudsman Service receives complaints from charities about many issues which arise in the use of banking services. Some common issues include:

- Restrictions applied to an account due to incomplete anti-money laundering checks
- Delays in providing changes to a banking mandate.
- Fraudsters tricking charities through a host of sophisticated scams, such as impersonating their bank.

Best practices:

- Charities should engage pro-actively and promptly with bank requests for documentation and evidence as delays in providing information, for example to complete anti-money laundering checks, can cause banks to withdraw services.
- Charities should ensure they have clear and robust financial procedures in place to protect themselves from frauds and scams.



See pages 13-15 for templates

Raising an issue or concern (cont.)

Best practices:

- Keep a record of calls, emails, and all conversations you've had with your bank including dates, who you spoke to and what was said.
- Save all correspondence and complaint-related documents in the same place for easy reference.
- Make sure the documents are accessible to at least one other person at your charity (or trustee) in case someone else needs to manage the communications.

Awaiting a response

Timings to be aware of:

- Unless your bank resolves your complaint within three business days, they must reply in writing (email or post) to let you know they've received your complaint.
- Banks and financial providers must deal with complaints within eight weeks, or explain why they need more time to investigate.

When you receive the response

If you are happy with the response, that's great news! We recommend that you keep the correspondence in a safe place in case you need to refer back to it.

If you are unhappy with the response, make sure you have a final response letter from your bank. If eight weeks have passed without a satisfactory resolution, proceed to the next step of escalating to the Financial Ombudsman Service (see page 13).

Banks and financial providers must deal with complaints within eight weeks, or explain why they need more time to investigate.

NEED TO KNOW

Taking your issue or concern to the Financial Ombudsman Service

The Financial Ombudsman Service (FOS) is a free and easy-to-use service that has the power to settle complaints between charitable organisations and financial services providers. The FOS also supports individuals and small businesses.

Charities with an annual income of up to £6.5 million are eligible to use the FOS.

The FOS can help with complaints about:

- Banking and payments, including accounts, disputed transactions and merchant card services
- Credit and borrowing money
- Insurance
- Pensions
- How a financial institution responded to frauds and scams
- Crowdfunding (where the platform used is regulated by the Financial Conduct Authority)

The FOS was established by Parliament in 2001. If a financial business and a customer can't resolve a complaint between themselves, the FOS will give an unbiased answer about what has happened. If the FOS decides a person or organisation, such as a charity, has been treated unfairly, then the FOS will use its legal powers to put things right.

You should communicate directly with the FOS. You do not need to use any third party to raise a complain with the FOS and so not need to take legal advice.

Escalating to the Financial Ombudsman Service

Conditions:

- You can bring your complaint to the Financial Ombudsman Service if your annual income was less than £6.5 million at the time you complained to the financial business.
- If your complaint relates to an act or omission by a financial business which occurred before 1 April 2019, your annual income must have been less than £1 million.
- You must wait eight weeks before escalating and must submit your complaint to the Financial Ombudsman within six months of receiving the bank's final response letter.

Further reading:

Read more on the Financial Ombudsman Service website

Citizen's Advice Complaining to an Ombudsman

Useful links

Bank complaint pages

- Allied Irish Bank
- Bank of Ireland
- Bank of Scotland
- Barclays
- CAF Bank
- Charity Bank
- Co-operative Bank
- Danske Bank
- HSBC
- Lloyds Bank
- Metro Bank
- NatWest
- Reliance Bank
- Royal Bank of Scotland
- Santander Bank
- Starling Bank
- Triodos Bank
- Ulster Bank
- United Trust Bank
- Unity Trust Bank
- Virgin Money
- Zempler Bank

Financial Ombudsman Service

- Page for small businesses, charities and trusts
- Eligibility checker
- Page for customer advisers

Example email: formal complaint

New message

Subject Complaint – [Your Charity Name] – [Brief Description of Issue]

Dear [Bank Name] Complaints Team,

I am writing on behalf of [Charity Name] to raise a formal complaint regarding our experience with your services.

Account details:
Charity name: [Full name of your organisation]
Account number: [Insert account number]
Account reference (if applicable): [Insert reference]

Summary of the issue: [Briefly outline the issue, including relevant facts – e.g. when it occurred, who was involved, and the impact on your organisation. Keep this factual and clear.]

For example: On [date], we experienced [issue]. We have previously raised this with [name and role of bank contact] on [date(s)], but the issue remains unresolved. The delay/miscommunication/decision has [briefly explain how it has affected your charity].

Supporting documents: Please find attached [list any relevant evidence, such as email chains, meeting notes, or other correspondence].

Resolution sought: We would like this matter to be resolved by [insert your preferred resolution – e.g. access reinstated, fees refunded, clearer communication]. We would also like [optional – e.g. a goodwill payment to recognise the disruption caused].

Please confirm receipt of this complaint and let us know how it will be handled. We look forward to hearing from you within the expected timeframes.

Yours sincerely,
[Full name]
[Role at your charity] [Charity name]
[Contact number] [Email address]

Example email: follow-up

New message

Subject Follow-up on recent call – [Your Charity Name]

Dear [Bank contact name or Complaints Team],

I am writing to follow up on a phone call I had with [name of contact] on [date], regarding [outline your issue].

During the call, I outlined our concerns and was advised that [briefly summarise what was said or agreed during the call – e.g. the matter is being looked into, documents have been received, an update will follow].

I would be grateful if you could confirm the details of what was discussed and provide a clear update on the next steps and expected timeframes.

Please treat this as a written record of our conversation. I look forward to hearing from you soon.

Account details:
Charity name: [Full name of your organisation]
Account number: [Insert account number]
Account reference (if applicable): [Insert reference]

Best regards,
[Full name]
[Role at your charity] [Charity name]
[Contact number] [Email address]

Example email: letter/email to the FOS

New message

Subject Complaint referral – [Your Charity Name]

Dear Financial Ombudsman Service,

I am writing on behalf of [Charity Name] to refer a complaint about [Bank Name], which we have been unable to resolve directly with the bank. Our details:
Charity name: [Full name of your organisation]
Charity number (if applicable): [Charity registration number]
Annual income: [Insert annual income figure]
Bank account number/reference: [Insert if relevant]

Summary of the issue:
We raised a formal complaint with [Bank Name] on [date], concerning [brief summary of issue – e.g. delays in processing, communication failures, account restrictions]. Despite our efforts to resolve the matter, we remain dissatisfied with the response. We received the bank's final response on [date], which did not resolve the issue to our satisfaction. / We have not received a final response, and more than eight weeks have passed since we submitted our complaint.

Supporting documents:
Please find attached:
- A copy of our original complaint
- The bank's final response (if available)
- A timeline of events
- Relevant correspondence (e.g. emails, notes from phone calls)

Outcome sought:
We are seeking [briefly state what you would like the outcome to be – e.g. the issue resolved, compensation for disruption, etc.].

Please let us know if you require any further information to progress our case. We look forward to your response.

Yours sincerely,
[Full name]
[Role at your charity] [Charity name]
[Email address] [Contact number]



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