

Mr. Nikhil Rathi
Chief Executive
Financial Conduct Authority
12 Endeavour Square
London
E20 1JN

28th October 2020

Dear Mr. Rathi,

The NHS Test and Trace App

TSB is instructing staff to turn off the Government's Test and Trace app whilst at work. TSB is not alone; we are aware that many banks are giving the same instruction to their staff. Lloyds Banking Group changed its instruction to front-line staff a few weeks ago.

TBU is the largest independent trade union representing staff in TSB.

In response to a question on why employees in COVID secure workplaces still need to use the app, the Government says: "Every person who downloads the NHS COVID-19 app will be helping in the fight against coronavirus (COVID-19). The app will help the NHS understand where and how quickly the virus is spreading, so we can respond quickly and effectively. The app helps the NHS track the virus, not individuals". We have encouraged our members to download the app because it is the responsible thing to do.

In response to another question on the NHS website, the Government says: "If your employer's policy is to store phones whilst you're at work, you should speak to your employer to see if they will review their policy on storing phones".

TSB's policy is that smartphones should be stored in lockers whilst staff are working in branches or offices. In normal times, that's the right policy but we are not living in normal times and the bank should follow the spirit of the Government's guidelines, instead of always looking for opt outs.

TSB says that staff in branches are working behind Perspex screens and are exempt from using the app whilst at work. However, the reality in many branches is quite different. There are thousands of staff doing welcome roles, monitoring doors and helping with ATM and IDM machines who come into contact with large volumes of customers on a daily basis. Those staff are not behind Perspex screens. And many of those staff behind Perspex screens, can be called upon to help out their colleagues in the front of the branch at any time. We also know that many customers are either not wearing face coverings because they have exemptions or are fraudulently claiming exemptions. A member of staff could be exposed to contact with someone who later proves to be Covid positive but won't know because the NHS app is not being utilised by the bank. Equally, a customer who speaks to a TSB member of staff who later turns out to be infected would want to be notified. We all would, that's why 16 million of us have downloaded the app.

We would urge you to clarify the position on the use of the NHS Test and Trace app in bank branches. Furthermore, we would urge you to write to Mrs. Debbie Crosbie, TSB Chief Executive, instructing her to reverse the bank's policy on disabling the NHS Test and Trace app. We are all in this together and it's beholden on our business leaders to do the right thing.

Yours sincerely.

Mark Brown
General Secretary