

RESTORE UK PANEL'S REPORT

Panel's role

The panel is an independent check to ensure that in so far as is possible the correct list of names is published on the Restore UK website. The website list should relate to assets seized by HMG during the second world war period, where there may be a corresponding unclaimed bank account. The panel were asked to complete two tasks:

1. To review the process which has been undertaken in matching account details with Government records, and write a short report commenting on how well this arrives at the desired result.
2. To review the names which the computer matching has thrown up, in particular considering names which banks consider the computer has wrongly matched. The banks are aware that the Panel's decision is final.

The BBA's report 'The Restore UK Project' a summary (**Appendix 1**) explains the background to the project.

Membership of the Panel

The Panel's chair is Lord Newton of Braintree.

Other members are:

- Elizabeth Danbury, Director of International Projects and Research, School of Library, Archive and Information Studies, University College London
- Howard Davies Inspecting Officer, Public Record Office
- Terry Gourvish Director, Business History Unit, London School of Economics & Political Science
- Robin Impey, Head of EPCAP Secretariat, Department of Trade and Industry
- Stephen Ward Associate Director, The Holocaust Educational Trust

In drawing up their report the Panel considered

- BBA report and presentation on their management of the project (**Appendix 1**)
- Statements from each bank about how they had compiled their data (**Appendix 2**)
- PwC report and presentation on their operation of the project (**Appendix 3**)
- Bank evidence on matches they wished to query
- Work of independent experts Elizabeth Danbury and Terry Gourvish on interpreting the source data (**Appendix 4** comprises a letter from the experts dated 20 April 1999, the BBA's reply (dated 8 June 99), the further letter from the experts dated 20 March 2000 the BBA's reply dated 10 April 2000 to which is appended Richard Lambert (PwC)'s reply and the experts' letter of 2 May and the BBA's reply)

They also took account of the DTI's compensation scheme, helped by the fact of Robin Impey's membership of the Panel. (cross refer to DTI website)

The report

The panel's findings fall into the following areas:

- Banks' data –banks in the Restore UK scheme
- Banks' data – banks in the second tier
- Banks' data – banks which do not have unclaimed accounts from this period
- George Book data
- The matching process
- Publication of the list
- The claims process
- Arrangements for inclusion of further data in the future

The panel's findings:

Banks' data –banks in the Restore UK scheme

- The panel **endorsed** the decision for practical reasons to include all accounts over £10 within relevant dates.
- They **approved** the statements which the banks in the Restore UK Scheme had submitted about the way in which they had submitted their data, on the understanding that the Panel (and the BBA) had to take on trust what banks had told them. (**Appendix 2**).
- On behalf of the Panel, Lord Newton wrote to the Chairman of Barclays Bank to ask that the bank, which had initially supplied details of accounts over £100, should make every effort to supply similar information for those over £10. They were grateful to receive the assurance that it was the intention to do this, and the panel understands that relevant names will be published by the end of June. The panel will review any queried names before that date in the same way as they have reviewed names from the other banks (see below). (This correspondence is at **Appendix 5**).
- The panel **did not endorse** a suggestion from a bank that Far Eastern accounts should not be included, since the project set out to capture all Trading with the Enemy accounts.

Banks data – banks in the second tier

- The Panel **endorsed** the decision to have a system in place for a 'second tier' of banks who think it is very unlikely they have relevant accounts but from their records cannot be sure (for example, an ex-building society based in the north of England in the war years). These banks (named in the BBA's report¹) will receive regular circulars from the Restore UK agency detailing claims which do not relate to names on the published list but relate to the wartime period.
- The panel **commissioned** further work from the BBA to ensure that all banks which were taking deposits in the period submit a written response regarding whether they had accounts from this period. The panel has requested that this work be completed by the end of June. (**Appendix 2**).
- The panel **noted** that they (and the BBA) had to take on trust what banks had told them.
- The Panel **noted** that though the vast majority of banks operating in the UK belong to the BBA there are a few which do not. In terms of the period with which the Restore UK Scheme is concerned, having checked with the Bank of England it is apparent that there is no list of banks which were operating and taking deposits in the UK in 1939. The

¹ Appendix 1

notion of a bank receiving a licence from the Bank of England to authorise it to take deposits only dates back to the Banking Act 1979.

- The Panel **noted** that, whilst it is unlikely that building societies had accounts frozen, the Restore UK scheme includes some ex Building Societies in order to err on the side of caution, and that for the same reason the BBA has contacted the Building Societies Association² to enquire whether their members wish to participate. The Panel noted that the Nationwide Building Society and West Bromwich Building Society have become second tier members.

George Book³ data

- The panel **noted** the input of an archivist and historian on interpreting Government wartime records.
- The Panel **commissioned** further work from these experts (Panel members Elizabeth Danbury and Terry Gourvish) in meeting with PwC and BBA and studying some of the computerised George Books to check whether their earlier recommendations had been taken on board.
- The Panel **endorsed** the experts' further report indicating that most of their concerns have been addressed, and making two recommendations, which the banks plan to implement. These are,
 - Putting a note on the website and printed introduction to refer the difficulties inherent in the process [**Appendix 8**].
- If there is a second stage of the process, employing experts familiar with European languages and names to read and give judgement on selected entries in the George Books.⁴ The correspondence with the independent experts is included at **Appendix 4**.

The matching process

- The Panel **endorsed** the work undertaken by Price Waterhouse Coopers in matching the data, notwithstanding the recommendations of the independent experts, referred to above.
- The Panel **endorsed** the decision to publish levels 3 and 4 matches. The PriceWaterhouse Coopers report (**Appendix 3**) details the thoroughness and complexity of the matching undertaken, and the panel believes that publishing these matches strikes the right balance between including as many names as possible whilst not publishing matches which are unlikely to be genuine.

Publication of the list

- The Panel participated in and **endorsed** the work to ensure that as accurate as possible a list is published. The panel noted that quirks in the soundex routine can give odd results which would invalidate the process if all names were published. Some matches simply make no logical sense. The panel therefore agreed eight categories of names to remove. The process for this was for the banks to submit these names in the eight categories to Restore UK, for Restore UK to check and refer queries to BBA who would check these and also sample through others, and finally for the Panel to check and sample through the

² BBA letter to Building Societies Association is at Appendix 11

³ The George Books are held by Public Record Office (PRO Reference BT 271/807-815). The PRO enquiries service can be contacted on 020 8876 3444 or via www.pro.gov.uk

⁴ All of the correspondence referred to in this section is attached in Appendix 4

names. In the case of the 'wrong gender' category the panel instructed Restore UK to reject any proposal for removal where a woman might have used her husband's name and the title was lost in transcribing the George Books. [Eg if the Bank name was 'Alan Cooper' and the George Book name was 'Mrs A Cooper' the panel instructed that this must remain a match.]

- The panel **instructed** Restore UK to keep all of the matches which were rejected so that they can be returned to at a later date if this is required.
- The panel **endorsed** the banks' decision to focus this exercise on bank accounts, with the possibility of a further tranche of work which could include safe custody items.
- The Panel **endorsed** a proposal from a bank to include in the published list names which possibly were not frozen, but perhaps should have been. This is because they believe that this bank is being as inclusive as possible and opening up names for claim which may not otherwise have been published.
- The Panel **recommends** that the preamble to the website needs to make clear difficulties inherent in the process which has been undertaken, and urge people who have reason to think they may have a claim to make one.
- The Panel **recommends** that PwC's recommendations regarding the need for a secure website as outlined in their letters to the BBA dated 18 January and 18 March 2000 are followed. An extract from these letters is at **Appendix 10**. The BBA is arranging for this to be done.

The claims process

- The Panel **endorsed** the decision that the list of names and claim forms would be available in paper format and by phone as well as on the website.
- The Panel **recognises the need** to avoid 'double counting' of accounts which fall into both the DTI's scheme and this one. The situation could arise because the DTI has at various times restored assets, including bank accounts, to citizens of technical enemy countries. The BBA has agreed that the DTI will supply to Restore UK a list of relevant names. If Restore UK receives a claim relating to any of these names the claim will be processed in the normal way but the DTI will be informed. It will then be up to the DTI to liaise as appropriate with the bank(s) concerned. [**Appendix 6** comprises correspondence between the BBA and the DTI on this issue]
- The Panel **explored** whether the Banking Ombudsman could arbitrate between the banks' scheme and the DTI's. The OBO has confirmed to the BBA that they are not an arbitration scheme because an Ombudsman service has to give complainants ultimate recourse to the courts. The panel **recommended** that the BBA should reconfirm with OBO that they are willing to deal with complaints under this scheme and **noted** that OBO has done this.. [**Appendix 7** comprises correspondence between the BBA and the Office of the Banking Ombudsman on this point]

Arrangements for inclusion of further data in the future

Some of the data which this exercise has produced will not be ready for inclusion on 8 May, but should be added by the end of June. (see footnotes 4-7 of Appendix 1). This process was **endorsed** by the Panel. The Panel also **endorsed** the additional arrangements put in place by the BBA and Price Waterhouse Coopers to ensure that other banks can come into the scheme at a later stage⁵ if they uncover further records from the period. For example, the DTI has some records which the banks currently do not have access to; if work on these

The so-called 'second stage' of the process referred to in Appendix Four

sheds any further light extra data could be added. These arrangements would also allow banks who are currently members of the scheme to add further data (for example, on safe custody items).

Future of the Panel

The panel plans to stay in existence to deal with any queries which arise under any second stage and beyond.

List of appendices

1. BBA report on the project ('The Restore UK Project: A summary')
2. An examination of the account data that banks have included in the matching process (BBA summary and statement from each bank)
3. PwC report on their operation of the project
4. Work of independent experts Elizabeth Danbury and Terry Gourvish on interpreting the source data (a letter from the experts dated 20 April 1999, the BBA's reply (dated 8 June 99), the further letter from the experts dated 20 March 2000 and the BBA's reply dated 10 April 2000 to which is appended Richard Lambert (PwC)'s reply, the experts' letter of 2 May and BBA's reply of the same date)
5. Lord Newton's letter to Sir Peter Middleton and Sir Peter's reply.
6. Correspondence between the BBA and the DTI on the 'double counting' point.
7. Correspondence between the BBA and the Office of the Banking Ombudsman
8. Wording of 'tips on searching' to go on the website
9. Extract from PwC letters making recommendations on website security.
10. BBA letter to Building Societies Association inviting societies to join scheme or second tier.
11. Letter from Halifax to Lord Newton explaining matching process problems and asking for permission to postpone inclusion of Halifax names from the list to be published on 8 May to June 2000.