Restoring Trust in the Financial Services Sector

A report published by the Industry and Parliament Trust

Notes from the Policy Event Meeting 'Restoring Trust in the Financial Services Sector'

Dr. Nicole Gillespie, University of Queensland
Gareth Owen, Industry and Parliament Trust

October 2013

INTRODUCTION

Restoring trust in the financial services sector has been identified as an important societal, business and government problem. However, despite widespread discussion and debate, the complexity of the endeavor coupled with opposing perspectives on the best way to reform the sector (e.g. tighten vs. relax regulation), has made for slow progress. In this briefing paper, Dr. Nicole Gillespie and Gareth Owen discuss why focusing on the trustworthiness of the banks themselves offers a tangible way forward. They outline the key principles and recommended reforms involved in repairing trust in the banks and the role of policy in supporting this process.

Nicole Gillespie is Senior Lecturer in Management at UQ Business School, the University of Queensland. She is a leading authority on organisational trust and trust repair and has consulted and conducted research on trust across a broad range of private and public sector organisations. Nicole can be contacted at n.gillespie@business.uq.edu.au

Gareth Owen is Head of Content and Development at the Industry and Parliament Trust. Gareth is a research associate at Warwick Business School working on organisational learning in crisis. His email details are GarethOwen@ipt.org.uk.

THE ISSUE: RESTORING TRUST IN THE FINANCIAL SERVICES SECTOR

The 2008 global financial crisis (GFC) destroyed not only wealth but also trust and confidence in banks and the financial sector. As Joseph Stiglitz, the Nobel Prize-winning economist observed, “financial markets hinge on trust, and that trust has eroded” (Stiglitz, 2008). The loss of trust has been exacerbated by subsequent prominent banking scandals including manipulation of LIBOR (London Inter-Bank Offered Rate), money laundering and mis-selling of payment protection insurance (PPI). Banking is now one of the least trusted industries in the UK.

A recent study on public trust in banking provides an up-to-date snapshot of UK public opinion (YouGov-Cambridge, 2013). It reports that only 4% of the public associate the UK Banking Industry with high ethical and moral standards, 6% believe it is trustworthy, and 17% trust the people running British banks to tell the truth. The report concludes that banks are considered “unsafe” institutions that “continue to be seen as greedy and untrustworthy, putting profit before people.” (p. 8) Only 21% of the public agree that “UK banks are learning from their mistakes and their behaviour is improving” (p. 16).

At the same time, banks play a unique and pivotal role in society, providing a foundation for exchange, growth and development, and the management of risk. The financial services sector is a central pillar of the UK economy. It accounts for approximately 10% of national output and is a significant employer, providing over one million jobs (City of London, 2011). Businesses, government, employees, customers and the community at large rely on the smooth functioning of banks. Given a bank’s social license to operate comes from the trust of its stakeholders, there is a clear need to restore the trustworthiness of the sector in order for the wider economy and society to function at its best.

A BRITISH, EUROPEAN AND GLOBAL CRISIS AND A REGULATORY CHALLENGE

Debates on restoring trust in the financial sector have been wide ranging in line with the common understanding that the financial crisis had multiple systemic causes and was the result of actions (and inaction) by a range of organisations operating in a global context (e.g. the banks, the Boards, government and regulatory bodies, credit rating agencies etc.). Reforming regulation is frequently cited as one way to ensure that the UK avoids another financial crisis. This regulatory debate often polarizes around the call for stronger regulation or a call to minimize regulation and allow a free market to operate. Less attention has been paid to the levels and ways in which the legislation and regulation functions, and its validity and utility within a global system.

In the old regulatory structure, active regulation and oversight was not undertaken by any single body. Rather the task was shared amongst a range of UK, European and global bodies. The potential impact of the credit bubble in the U.S. and Europe and the housing bubble in the U.S. were simply not understood by any of the individual organisations including banks, national regulators and governments. This was because elements of the risk spanned sectors and national boundaries, and its management required a high level of technical knowledge, as well as an ability to take an active macro-prudential perspective, which many of the individual components in the system lacked or were not created to handle.

Financial institutions operating in the UK are now regulated by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA). These 'twin peaks' have addressed the first challenge of macro-prudential oversight by dividing the role of the now defunct Financial Services Authority (FSA) in the UK into regulatory and prudential functions. The FCA has an overarching strategic objective to ensure that the relevant markets function well. The PRA on the other hand focuses on macro-prudential issues; it takes a broad perspective and uses a judgment-based approach to determine whether financial firms are safe, assessing firms not just against current risks, but also against those that could plausibly arise in the future and focusing on the issues and firms that pose the greatest risk to the stability of the UK financial system. This has gone some way to ensuring oversight of the system as a whole.

Regulation in the UK exists in a wider European regulatory environment and European legislation has also evolved to address the issue of macro-prudential oversight. The European Systemic Risk Board (ESRB) was set up in 2009 to fulfill a similar role as the PRA in the UK and it too would describe its role as a judgment-based regulator. Communication between the PRA and the ESRB is facilitated by a tri-partite layer of European regulation – the European Securities and Markets Authority (ESMA), the European Banking Authority (EBA) and the European Insurance and Occupational Pensions Authority (EIOPA).

REBUILDING TRUST AT THE ORGANISATIONAL LEVEL: A TANGIBLE WAY FORWARD

The complexity of the various levels and structural interaction of different aspects of UK and European regulation and legislation creates a series of challenges for an analysis of what actions are required to ensure the long term stability and trustworthiness of the financial system. The huge number of variables and bodies that need to be considered can make the task of rebuilding trust in the financial system as a whole seem overwhelming.

In contrast, there is existing understanding of how to restore trust at the organisational level. That is, we know how to reform organisations to make them more trustworthy. Siemens for example, implemented extensive strategic, structural, procedural and cultural reforms to restore its reputation in the wake of its bribery scandal. The UK water utility, Severn Trent Water, underwent a major transformation to demonstrate its renewed trustworthiness after its data manipulation problems. The specifics differ for each organisation depending on the nature of the violation and its unique context and design, however the key principles and approach remain the same, with accumulating research evidence of their effectiveness.

Hence, one important way to gain traction on repairing trust in the sector is to focus attention on restoring trust in the banks themselves. Indeed, the recent Salz Review provided an in-depth review and set of recommendations on how Barclays could restore stakeholder trust following its recent scandals, which are now being systematically implemented. If trust is repaired en masse at the level of the banks, then trust in the broader banking sector will follow. Encouragingly, the 2013 study on public trust in banking reports an acute awareness amongst the UK senior banking elite of the need to restore trust (YouGov-Cambridge, 2013).

Trust is, to a large extent, in the 'eye of the beholder.' However, when the object of trust is a bank with responsibilities to multiple stakeholders, the bank's treatment of one of its stakeholders (e.g. customers) can powerfully influence the level of trust held by other stakeholders (e.g. employees, regulators).

WHAT IS A TRUSTWORTHY BANK?

In order to restore trust, banks need to operate in a trustworthy manner. Banks are trusted when they are seen to consistently meet three conditions:

- Competence: Reliably delivering on commitments and fundamental responsibilities (e.g. to responsibly manage risk and allocate capital, to provide quality customer service, to deliver value to clients and investors, to adhere to regulations and legal requirements), and having the knowledge, skills and competencies to do so.
- Benevolence: Demonstrating due care and concern for the interests of its stakeholders, and having a positive, and not detrimental, impact on them (e.g. 'duty of care'). This requires understanding stakeholders' needs and expectations and is facilitated by the perception that the organisation has benevolent motives and aligned interests with the trustor.
- Integrity: Adhering to commonly accepted moral, ethical and legal principles and standards, including honesty, fairness, fulfillment of promises and contracts, and congruence between words and actions.

WHAT CAN BE DONE?

Repairing damaged trust fundamentally requires two processes: 1) providing consistent evidence of the organisation's renewed trustworthiness, and 2) convincing stakeholders that a future reoccurrence of the trust violation can be reliably prevented. That is, banks need to demonstrate to their stakeholders that they have reformed themselves sufficiently to be reliably trustworthy and resilient to future transgressions. A three stage process is recommended:

1.DIAGNOSING THE PROBLEM: WHAT HAPPENED AND WHY?

To restore trust, the bank first needs to understand what caused the trust failure. Hence, the first step involves conducting a rigorous, independent investigation which considers the contributory role played by internal organisational factors. The Salz Review of Barclays is an excellent example, as is the Woolf report into BAE Systems and Siemen's internal investigations. This then provides the blueprint for the organisational reforms required to convincingly repair trust.

The investigation report offers the bank's Board and senior executives the opportunity to explain to its stakeholders what went wrong and how it intends to fix it. Acknowledging and taking responsibility for problems, and where appropriate, apologizing, paying 'penance' and making amends to affected stakeholders for harm caused, are fundamental principles in trust repair (Gillespie & Dietz, 2009; Pfarrer et al., 2008). For example, after its data manipulation scandal, Severn Trent Water rebuilt its reputation by apologising, compensating customers and accepting regulatory fines.

It is also important to communicate clearly and convincingly how the bank is reforming itself to fix the problems. When perceived to be genuine, these are powerful symbolic acts that signal the organisation has 'learnt its lesson' and 'is putting its house in order.'

2. COMMITTING TO AND EMBEDDING REFORMS: WHAT IS CHANGING?

Organisations can be designed to be resilient to trust failures. This requires embedding trustworthiness into all components of the organisation's system and practices. Figure 1 identifies these organisational components and how they can reinforce trustworthiness.

Fig1:
Banks that design their organisational infrastructure to reinforce trustworthy conduct (competence, benevolence and integrity), over time, earn reputations of trust with their stakeholders.

This section reviews some of the central internal reforms recommended of banks to strengthen their trustworthiness, and hence restore trust. These recommendations draw on prior reviews and research on organisational trust repair (Dietz & Gillespie, 2012: Dietz & Gillespie, 2011; Galford & Drapeau, 2003; Gillespie & Dietz, 2009; Gillespie et al., 2012; Hurley et al., 2013; Pfarrer et al., 2008), as well as strategies for restoring trust specifically in the UK Banking Sector (Financial Stability Board, 2013; Parliamentary Commission on Banking Standards, 2013; The Salz Review, 2013; Tolley, 2013; YouGov Cambridge, 2013). Research suggests that organisational reforms are more effective at restoring trust when voluntarily implemented, rather than externally imposed, highlighting the benefits of banks proactively pursuing a reform agenda.

A) Bank Strategy

A bank's strategy sends strong signals to stakeholders about the organisation's motives, values and priorities. The coherence, effectiveness and sustainability of the strategy, its fit with the external environment and its impact on stakeholders (both intentional and unintentional), directly affect stakeholders' interpretations of the bank's competence, benevolence and integrity.

Banks have been publicly criticised for pursuing a myopic strategy of maximising short-term revenues and profits ('making the numbers') ahead of other purposes. This strategy serves the interests of those executives and bankers who receive lucrative bonuses, whilst in many instances failing to meet the expectations and long-term interests of other stakeholders, particularly customers, investors and the general public. When the balance goes beyond merely prioritising one stakeholder group over another, to serving one stakeholder group at the expense of or causing harm to another stakeholder group, a bank has entered the realm of unethical conduct. Some UK banks also pursued an overly-aggressive strategy of global expansion, without the necessary management processes in place to deal with the resultant complexity and coordination challenges. As witnessed, rapid expansion leaves an organisation vulnerable to manifold conduct, operational and reputational risks.

To be trustworthy, bank strategy needs to provide a clear, unifying mission that delivers on responsibilities to all stakeholders in a reliable and sustainable manner. It needs to articulate how the bank will deliver - not only on its financial goals - but also its broader social purpose and core responsibilities for managing risk and responsibly allocating capital, from a balanced, multi-stakeholder perspective. Drawing on an example from a different industry, after allegations of bribery and corruption, BAE Systems' revised strategy prioritised consideration and protection of corporate reputation when pursuing new business, even if it meant losing business to uphold ethical standards and social responsibilities.

B) Governance, leadership and management practice

Strong governance is essential for organisational trustworthiness. Bank Boards have been critiqued for not providing sufficient oversight in the lead up to the GFC. One of the Board's primary responsibilities is to challenge and review management. To do this effectively, they need to be independent of the executive team and free of conflict of interest, possess the required mix of specialist skills, knowledge and experience, receive high quality, open and transparent information, and be in regular communication with stakeholders. The Walker Review further recommends that banks establish a separate Board Risk Committee.

Ultimately the Board and senior executives are responsible for the bank's public reputation and trustworthiness, and for leading the trust repair effort. To do this well requires that the Board dedicates sufficient time to conduct regular reviews and evaluations of the bank's performance in delivering on its responsibilities to stakeholders (not merely shareholders), and its business practices and cultural values. Committing to make these reviews transparent keeps the focus on the reform efforts, and demonstrates the bank's openness and integrity.

Research attests that the right tone at the top is a critical ingredient in trust repair. A bank's senior leaders and management symbolise, role model and shape the conduct of the organisation and its employees, through their actions, words, decision-making and allocation of resources. Hence, part of the solution requires that bank executives and layers of managers act with integrity, consistently role model appropriate values and standards, and sanction unacceptable behavior. While challenging to achieve, this is not a magic bullet: reforms to other parts of the organisation, particularly the culture, reward, HR and control systems, will also be required to embed trustworthy conduct.

C) Bank Culture

Perhaps more than anything, bank culture has been cited as most in need of reform. Organisational culture is central to reform because norms, beliefs and values strongly influence conduct, including whether rules, policies and lines of authority are adhered to or not. Cultural control compensates for the limitations of rules: that is, it is impossible and inefficient to have a rule for every contingency. A strong ethical culture that engages and unifies employees to uphold firm wide values, encourages 'bad news' to be surfaced early and dealt with in a responsible manner, and makes deviant behavior salient, uncomfortable and unacceptable, enhances organisational trustworthiness and resilience to trust failures. Cultural reforms have been an essential ingredient in many high profile cases of trust repair (e.g. Siemens, The BBC, Severn Trent Water, and BAE Systems).

The historical image of a bank as a conservative pillar of society has been replaced by the current stereotype of excessive risk-taking and self-interest, with many viewing bankers as 'out of touch' with society. Reforms to banking culture need to shift the mindset away from short-term profitability and individual gain, to delivering long-term value, putting customers first, taking accountability for risk, and operating by the spirit and not just by the letter of the law. Such cultural change typically requires clear articulation of a set of trust-enhancing core values that connect with and reinforce the bank's broader social purpose, and then ensuring these values are not only espoused but also understood and enacted in the daily behaviour and decision making of all employees. Such cultural change is difficult and cannot be achieved without clear top management support and involvement, and extensive communication, training and education forums that enable staff to make sense of and incorporate the values into their daily work. Investments in aligning broader structures, HR processes and incentives are also typically required to embed cultural change.

D) Reward and HR processes

Much public anger towards banks comes from the perceived inequity of remuneration awarded to some executives and bankers. The scale of bonuses and remuneration has been viewed as unjustifiable and out of touch with reality, particularly in the context of banks receiving billions in taxpayer support. Rewards tangibly communicate what an organisation really values, and remuneration based solely on achievement of revenue targets is ill-equipped to drive trustworthy behaviour in line with ethical values. A recent CIPD report on attitudes to working in the UK Banking sector identifies that "65% of employees agree that some people in their organisation are still rewarded in a way that incentivises inappropriate behaviour" and 75% agree that "some people in their organisation are still paid excessively" (CIPD, 2013: 4). In most banks, only a relatively small proportion of staff receive high bonuses (typically investment bankers and top executives) yet this powerfully influences both internal and external perceptions of fairness, and is clearly an issue that remains to be addressed.

One way to do this is to align remuneration schemes with performance against a 'balanced scorecard' of indicators (see for example, the Salz Review). A balanced scorecard assesses not just 'making the numbers' but also how this is achieved, that is, whether behaviour is in line with firm values and ethical standards. Assessing an individual's fit to firm values and ethical conduct through other HR processes, particularly recruitment, selection, induction, performance management and promotion, further reinforces trustworthy conduct. Deferred bonuses and clawback (malus) schemes also help refocus attention on long-term value creation. The HR functions of banks need to be empowered to scale back excessive remuneration where appropriate, and introduce broader forms of recognition beyond pay, as well as ensure reward schemes are not unintentionally incentivising exploitative or dishonest practices.

E) Structures and control systems

Control systems and structures set parameters around acceptable behaviors and can instill trustworthiness by assigning roles, responsibilities and expectations on incumbents and constraining discretionary actions. Conversely, absent, unclear or unused structures and processes can facilitate, or fail to prevent, incompetent and/or dishonest behavior. It has been recognized that many banks did not give sufficient attention or clout to their governance, risk and compliance procedures across the spectrum of operational, conduct, reputational, credit and market risk. Clear, effective control mechanisms and accountability for risk are essential ingredients of a trustworthy bank.

All banks should have a code of conduct that sets high ethical standards and training processes to ensure all staff understand how to enact the code in their daily work. Robust procedures for surfacing and reporting exploitative or unethical conduct, and sanctioning unacceptable behaviour and value breaches demonstrates that that organisational values and code of conduct are not merely lip-service. Product development and service delivery processes and procedures need to be aligned with the organisation's trust-enhancing values and ensure clear, transparent and accessible information on products and services is available to ensure customers are only sold products and services appropriate to their needs.

F) External Regulation

Banking has largely become an impersonal system. While customers may know their bank manager or financial advisor, they rarely know the multitude of faceless people who collectively provide the financial products and services they use, or make investment decisions on their behalf. Furthermore, the sophistication and complexity of some financial products (particularly in investment banking), mean few customers can accurately evaluate value and risks without expert advice. Increasingly customers must depend on the highly specialized skills of unknown others to do the right thing and act in their best interests under conditions of considerable risk.

Knowing that there is a body of regulation that protects customer and investor interests and lays minimum standards for the industry, facilitates stakeholders to continue to invest in and trust the financial system. When effective, regulation facilitates a level playing field amongst competitors, and prevents banks from gaining unfair advantage through unscrupulous or illegal conduct. However the trust enhancing role of regulation is undermined by the perception that banks try to outlawyer or outsmart regulators, adopt an adversarial approach and use their considerable political and economic clout to contest, undermine or rebuke regulation.

Trust in banks is not served well by a public perception that banks are above the law, or perceive themselves to be more powerful (and hence unrestrained by) the government and regulators. In contrast, trust is well served by banks adopting a cooperative, open relationship with regulators, and working with them to implement a fair and effective set of regulation that lifts and maintains high standards across the UK banking industry. There is an opportunity for banks to establish their own professional regulatory body that sets, trains and enforces high standards amongst bankers. For example, there have been calls for a professional licensing system for bankers, similar to what is already in place for accountants and lawyers.

3. ONGOING EVALUATION: HAVE THE REFORMS BEEN SUCCESSFUL?

Clearly the reform agenda for banks is extensive and challenging. It will require significant investment of time, effort and resources over a sustained period of time to embed and integrate across the organisational components (see Figure 1). Ongoing evaluations of the effectiveness of the reforms and the extent to which the bank is delivering to stakeholders' expectations will be important for identifying areas that continue to fall short. Implemented effectively, regular evaluations maintain focus on the bank's trustworthiness (i.e. 'what gets measured gets done'), strengthen understanding of stakeholders' expectations, and provide evidence of the banks' renewed trustworthiness to its stakeholders.

WHAT CAN BE DONE? THE ROLE OF POLICY IN FACILITATING TRUST IN BANKS

While the banks must take the lead role in restoring the trustworthiness of their individual organisations, it is the mandate of policy makers to provide a conducive environment and the regulatory and legislative framework to support trustworthy conduct at the system level. In this section, we identify three broad strategies that policy makers can use to support the banks in their trust repair efforts.

Leadership through Legislation

To facilitate banks to adhere to legal and regulatory expectations, there needs to be a good deal more signposting for the sector about the precise role of legislation and regulation. This requires policy making to be clear what the expectations are of those operating in the sector, including the values to be upheld. Clearly legislation must provide a robust and enforceable legal framework which carries disincentives for banks and their senior executives to operate unethically or irresponsibly. However, it must go further than simply creating a 'ring fence' around banks' activities, to also tackle issues of ethics and values in a holistic way. There has been of late some very good examples of joined up policy-making between government departments, which has achieved this. The Plan for Growth, a joint initiative between Business Innovation and Skills (BIS) and the Treasury, is an excellent example and has helped signpost aspects of Government policy for business.

Forums for dialogue across Whitehall and a more joined up approach to the legislation related to the financial services sector would provide an environment in which the banks are clearer about the (tacit) expectations placed upon them from policymakers and regulators, rather than relying simply on the reactive penalties for a lack of compliance.

Ensuring communication and co-ordination with the sector

Sector-wide organisations such as the British Bankers Association (BBA) undertake the important function of creating consensus across a range of different types of banks on issues which affect the sector as a whole. However, the impetus is on policy-makers to proactively ensure that there is a dialogue between those making policy and those in the sector – not on lobby organisations per se. A consideration is the environment in which such dialogue takes place. Many of the current mechanisms such as Select Committee meetings can make dialogue between policy makers and those in the sector confrontational. In contrast, some of the All Party Political Groups (APPGs) have been successful in creating a space for those businesses that will be affected by legislation to share their views on the opportunities and the challenges that lie ahead in a more collegiate environment.

It is also important to consider who is taking part in the dialogue. Clearly there is a good level of exchange between banks and their counterparts in government and Whitehall. However, much of this is either curated by public affairs departments or is specific to a particular organisation. An environment where there is an equal footing between colleagues in the sector, government and Parliament to engage in a non-confrontational fashion might provide useful insights for those making policy and those in the sector.

Signposting future policy and regulatory directions

A third strategy for policy-makers is to enhance clarity in the regulation that governs the financial services sector. Clarity around the relative jurisdictions of EU and the UK legislation in particular would help to provide a more stable context for UK banks. There is currently little signposting for those in the sector to interpret precedent – particularly with the newness of the regulatory regimes. Signposting not only the current, but also future, Government policy is vital to the long term stability and success of London as a global financial centre.

CONCLUSION

There is a degree of resignation amongst commentators in Westminster and analysts in the City around the issue of trust repair in banks. This is in part because the recent financial crisis is not an isolated event. Rather a pattern of boom and bust in the financial services has emerged over time which has become accepted by many economists as an inevitable part of the modern business cycle. History is littered with examples of financial turbulence: the panic of 1837; the 'long depression' at the end of the 19th century; the 1929 crash; and more recently, the stagflation in the late 1970s; the dot.com bubble; and the current global financial crisis. However, as the global economy becomes more interconnected, the impact and complexity of these periods of financial turbulence have grown exponentially and the role of effective policy and macro-prudential regulation and legislation becomes more important.

In this policy note, we have identified two key challenges in repairing trust in the UK financial sector. The first is for the banks to undertake the task of rebuilding trust and legitimacy in their individual organisations. This job can only be done by the banks themselves and requires each organisation to first understand and acknowledge what has happened and then to design and embed internal reforms to reliably enhance the organisation's trustworthiness. The second challenge is for policy makers to provide an effective legislative and regulatory framework which supports and encourages trustworthy conduct by the banks, recognizing that there will not be a 'one-size-fits all' approach. This is facilitated by legislation that clarifies the expectations of banks, structures that enable effective communication and coordination across the sector, and signposting current and future policy and regulatory trends.

In sum, we have argued that the banks themselves need to take ownership for repairing the trust of the industry for it to be effective. Regulation and policy sets the tone and shapes the broader context, but only the banks themselves have the ability to fundamentally redesign themselves in the required ways. These changes will inevitably take significant and sustained investments over several years and require overcoming many challenges and obstacles. Research suggests that the rewards for banks that successfully navigate this journey and restore high levels of stakeholder trust include enhanced performance, repeat business and referrals, competitive advantage and reputational resilience.

REFERENCES AND FURTHER READING

City of London. (2011). An Indispensable Industry: Financial Services in the UK. London: City of London Corporation.

CIPD (2013). Employee Outlook: Focus on rebuilding trust in the City. London: Chartered Institute of Personnel and Development. Available at cipd.co.uk

Dietz, G. & Gillespie, N. (2012). The Recovery of Trust: Case Studies of Organisational Failures and Successful Trust Repair. London: The Institute of Business Ethics.

Dietz, G., & Gillespie, N. (2011) Building and Repairing Organisational Trust. London: The Institute of Business Ethics. ISBN: 978-0-9562183-8-4.

Galford, R., & Drapeau, A. S. (2003). The enemies of trust. Harvard Business Review, 81(2), 88-95.

Gillespie, N., & Dietz, G. (2009). Trust repair after an organisation-level failure. Academy of Management Review, 34(1): 127–145.

Gillespie, N., Hurley, R., Dietz, G., & Bachmann, R. (2012). Restoring Institutional Trust After The Global Financial Crisis: A systemic approach. In Kramer, R. & Pittinsky, T. Restoring Trust: Enduring Challenges and Emerging Answers. Oxford: Oxford University Press.

Hurley, R. (2012). The Decision to Trust: How Leaders Can Create High Trust Organizations" San Francisco: Jossey-Bass.

Hurley, R., Gillespie, N., Ferrin, D. & Dietz, G. (2013). Beyond Rogue Employees and Bad Apples: Engineering Trustworthy Organisations. Sloan Management Review, 54 (4), 75-85.

Parliamentary Commission on Banking Standards (2013). Changing Banking for Good: Volumes 1 & 2. London: UK Houses of Parliament.

Pfarrer M, DeCelles, K, Smith, K & Taylor, M. 2008. After the fall: Reintegrating the corrupt organisation. Academy of Management Review, 33 (3): 730–749.

Salz, A. (2013). The Salz Review: An Independent Review of Barclays' Business Practices. Available from www.salzreview.co.uk

Stiglitz, J. (2008). The fruit of hypocrisy; Dishonesty in the finance sector dragged us here, and Washington looks ill-equipped to guide us out. The Guardian, 16 September.

Tolley, S. (2013). Banking 2020: A Vision For the Future. London: New Economics Foundation.

YouGov-Cambridge. (2013). Public trust in Banking. University of Cambridge.

Industry and Parliament Trust
Suite 101, 3 Whitehall Court
London SW1A 2EL
T +44 (0)20 7839 9400
F +44 (0)20 7839 9401
W www.ipt.org.uk

Registered as a charity no. 287527
A company limited by guarantee, registered in England no. 1308583