

PAYMENT ACCOUNT FOR ALL – IF THE BANK LIKES IT

Survey on payment account access at debt counselling organisations

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Legal information

**Bundesverband der Verbraucherzentralen und Verbraucherverbände –
Verbraucherzentrale Bundesverband e.V.**

Team Monitoring Financial Markets

MBFinanzmarkt@vzbv.de

*Rudi-Dutschke-Straße 17
10969 Berlin*

The Federation of German Consumer Organisations (Verbraucherzentrale Bundesverband e.V.) is registered in the German Lobby Register and in the European Transparency Register. You can view the relevant entries [here](#) and [here](#).

SUMMARY

In November 2024, the Federation of German Consumer Organisations (Verbraucherzentrale Bundesverband e.V., vzbv) contacted Arbeitsgemeinschaft Schuldnerberatung der Verbände (AG SBV), a standing working group of non-profit associations active in debt counselling in Germany of which vzbv itself is member of. Experiences derived from the work of general consumer advice services provided by vzbv's member organisations indicated that opening a bank account can be particularly difficult for vulnerable groups. The aim of the outreach was to get an overall picture and to match these findings with the findings from organisations providing debt counselling that have extensive expertise when it comes to very vulnerable consumers. The feedback provided revealed that:

- When vulnerable customers without an account apply for one without mentioning the word 'basic bank account' a bank account is not always opened for them. These types of customers are prone to fail to obtain an account if they do not know the product and their right to a basic bank account and how to enforce access to it.
- Banks do not necessarily mention the right to a basic bank account when closing a so-called *Pfändungsschutzkonto* or P-accounts. (= bank accounts in a special state set by law in Germany allowing for a protected withdrawal and use of money even in the state where that account must be used to enforce payment claims). Customers in financially distressed situations may lose their account access as a result.
- Even if a basic bank account is explicitly requested by the consumer it may still be denied. It can take a lot of time and effort to open a basic bank account. Banks have been observed to apply three different circumvention strategies:
 - Employees: Debt counsellors report cases in which employees of credit institutions orally refuse to open basic accounts, using legally invalid arguments (for example, lack of permanent residence or a negative Schufa (creditworthiness register) entry). There is also reason to suspect that employees may not be familiar with the product if they claim that their own institution does not offer or does not have to offer a basic bank account.
 - Formal application requirements: Although there are no specific formal requirements by law for applying for a basic bank account, providers make applications burdensome. For example, an application to an online bank could only be made using a printed form. There are also reports that only the bank's own application forms will be accepted and that, for example, the standard form provided by the Federal Financial Supervisory Authority (BaFin) is rejected.
 - Opening process: Debt counsellors report situations in which applications submitted to the credit institutions are lost, unexpectedly rejected or other obstacles are created that can only be resolved with a great amount of time. It can also happen that employees treat applicants in such a way that they refrain from opening an account altogether.

The aforementioned obstacles created during the process of obtaining a basic bank account lead to the conclusion that the European Union's original aim of providing all customers with easy access to a payment account is not guaranteed. Groups of people

who appear unattractive to banks are repeatedly not offered a basic account, are deterred from opening one or are confronted with artificially created obstacles during the application and opening process. An account can sometimes only be obtained by time-consuming extra efforts of organisations not intended for this purpose, such as debt counselling services.