

## **Policy Statement** **PS24/8**

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# Access to Cash

Feedback to CP23/29 and final rules

**July 2024**

## This relates to

Consultation Paper 23/29 which is available on our website at [www.fca.org.uk/publications](http://www.fca.org.uk/publications)

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## Chapter 1

# Summary

### Supporting access to cash in an increasingly digital world

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- 1.1** In this Policy Statement, we set out the final rules and guidance for a new regulatory regime to support access to cash for the consumers and businesses that rely on it.
- 1.2** Reliable, efficient and inclusive ways of paying for goods and services play a critical part in the daily life of consumers and businesses around the UK and are essential to sustaining a healthy economy. The rapid and growing digitisation of payments in recent years has brought fast and convenient ways to pay for goods and services. At the same time, the notion of one size fits all for making payments is challenged through cash remaining vital for many consumers and small businesses. Our Financial Lives Survey found over 6% of adults (3.1 million) used cash to pay for everything or most things in the 12 months up to May 2022. This rises to 9% amongst vulnerable groups including consumers who are digitally excluded, that have poor health or are on low incomes where cash use might not be a choice but a necessity. It is important that the impact of any change is carefully managed, that the needs of local communities are reasonably supported, and those who rely on cash the most are not left behind.
- 1.3** The Financial Services and Markets Act (FSMA) 2023 set out Parliament's intention to protect access to cash. It gave us a new remit and powers for the purpose of 'seeking to ensure reasonable provision' of cash access services, meaning cash deposit and withdrawal services for personal and business current accounts. This includes access to both notes and coins, and access that is free of charge for consumers with personal current accounts.
- 1.4** On 24 May 2024, His Majesty's Treasury (the Treasury) announced the designation of the large banks and building societies which will be subject to our new access to cash regime. These firms will be required to assess and fill gaps, or potential gaps, in cash access provision that significantly impact consumers and businesses. The 14 designated firms are:
- AIB Group (UK) plc
  - Bank of Ireland (UK) plc
  - Bank of Scotland plc (including Halifax)
  - Barclays Bank UK plc
  - Clydesdale Bank plc (Virgin Money)
  - HSBC UK Bank plc
  - Lloyds Bank plc
  - National Westminster Bank plc (including Ulster Bank)
  - Nationwide Building Society
  - Northern Bank Limited (Danske)
  - Santander UK plc
  - The Co-operative Bank plc
  - The Royal Bank of Scotland plc
  - TSB Bank plc

The Treasury also designated 2 LINK entities (Link Scheme Limited and Link Scheme Holdings) as an operator of cash access coordination arrangements – which we refer to as a coordination body – and which will be subject to our new rules. This means LINK can coordinate cash access assessments on behalf of designated firms.

- 1.5** In December 2023, we consulted on establishing an access to cash regulatory regime (CP23/29). We are grateful to the many individuals and organisations that have engaged with us. This includes consumers and their representative organisations, firms and their trade bodies, small businesses, charities, parliamentarians, devolved administrations and legislatures across Wales, Scotland and Northern Ireland and other regulatory bodies. We have considered all feedback carefully in finalising our rules and guidance. We look forward to building on this constructive engagement in our implementation of the new regime.

## Who this affects

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- 1.6** This Policy Statement is relevant to:

- firms and coordination bodies designated by the Treasury under Part 8B of FSMA 2000, as they will be subject to the rules
- businesses involved in the supply of cash access services and operation of cash facilities, including non-designated personal current account providers with 10 or more branches, the Post Office and operators of payment systems through which cashback is provided, as they may be subject to new requests for information

- 1.7** It will also be of interest to:

- other firms providing current accounts to personal or business customers
- consumers, businesses and charities who rely on cash
- industry groups/trade bodies
- groups representing the interests of consumers and small businesses, including elected representatives

## The wider context

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### Our consultation

- 1.8** In recent years we have been monitoring and publishing data on cash access services, including ATMs, brick-and-mortar bank branches, mobile bank branches and Post Offices. As of June 2023, 95.0% of the UK population are within 1 mile of a free to use cash withdrawal point, such as cash machines and Post Office branches, with 99.7% of the UK population within 3 miles of one.

- 1.9** Our final rules have regard to the Treasury's August 2023 Cash Access Policy Statement (the Treasury's Statement). This sets out their understanding that, on a national level, the distribution of cash access services is 'broadly comprehensive', and a 'substantial redistribution or large-scale introduction of additional access points' is not required.
- 1.10** At the same time, the provision of cash access services including branch and ATM networks is changing. For example, our data suggests that in the 2 years to June 2023, 1,358 bank and building society branches closed. Importantly, and as set out in the Treasury's Statement, the cash needs of different local communities vary, and local circumstances and needs may change. We recognise that the loss of cash services can have significant impacts on consumers and businesses.
- 1.11** Industry, the Post Office, and consumer groups have set up a voluntary initiative through the Cash Action Group. LINK assesses community cash access needs where participating firms close their branches or local communities report gaps. If LINK determines that a new cash access service is needed, Cash Access UK (CAUK), a not-for-profit company owned and funded by 9 major high street banking providers, works to deliver them. We welcome the collaborative approach, but current delays to fill gaps through the voluntary initiative have resulted in several communities being without cash access services for over a year, causing unreasonable barriers and costs for consumers and businesses.
- 1.12** We consulted on proposals to introduce a new regime seeking to maintain reasonable provision of cash access. While focused solely on cash and not the wider services some facilities delivered under industry's voluntary scheme provide, the regime builds upon it and places it on a regulatory footing.

### **How our new access to cash regime links to our objectives**

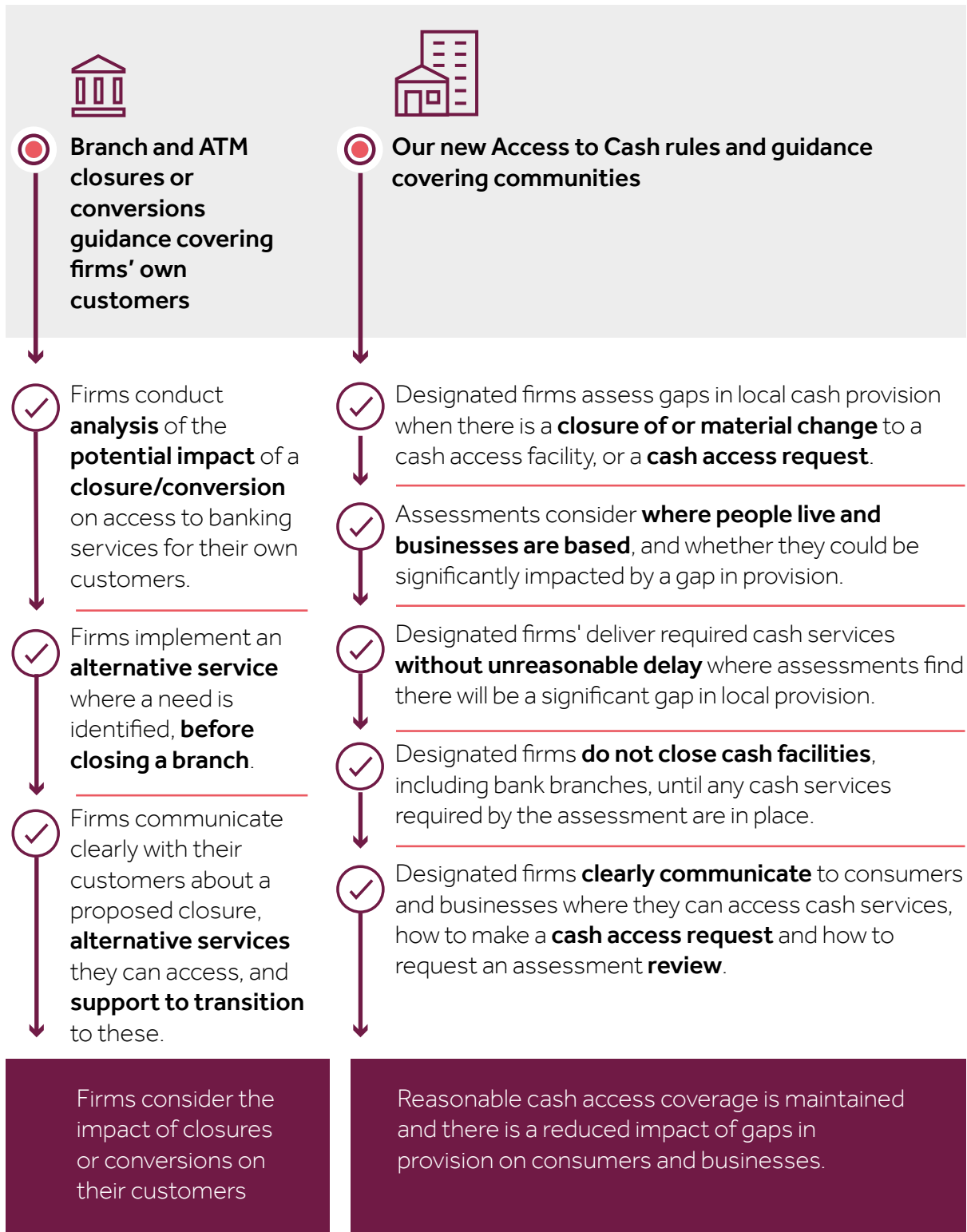
- 1.13** Our new cash purpose was set by Parliament through FSMA 2023. Our cash regime aligns with our strategic objective of ensuring the relevant markets function well. It seeks to ensure the reasonable provision of cash deposit and withdrawal services which will support transactions between consumers and businesses.
- 1.14** We have 3 operational objectives in support of our strategic objective – to protect consumers, to protect and enhance the integrity of the UK financial system, and to promote healthy competition between financial services providers in the interests of consumers. The legislation passed by Parliament gave us a standalone cash purpose that is distinct from our operational objectives, which are not applied when exercising our new cash functions.
- 1.15** While the new regime addresses cash access issues for communities as a whole, the Consumer Duty sets out our expectations for firms' treatment of retail customers, including those in vulnerable circumstances. As outlined in FG22/5 Final non-Handbook Guidance for firms on the Consumer Duty, firms should engage with us if they are considering withdrawing or restricting access to products or services in a way that will have a significant impact on vulnerable consumers or on overall market supply.

## What our rules change

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- 1.16** We want to prevent unreasonable barriers to accessing cash for consumers and businesses. Our regime goes further than the existing industry-run voluntary scheme. It requires designated firms to identify gaps in cash provision and assess a wider range of local needs. Following a trigger event, if an assessment finds a significant gap in provision, designated firms will need to promptly provide additional cash access services. There will be more transparency in the assessment process, with our rules setting out standards firms should meet when communicating and engaging with communities. These rules will reduce the cost burden on consumers and businesses that can arise from limited access to cash in their local area.

**1.17** The diagram below shows how our new cash access rules work alongside our existing Branch and ATM closures or conversions guidance (FG22/6).





## Outcomes we are seeking

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**1.18** Our access to cash regime is outcomes focused, with enough flexibility to accommodate different cash needs across local areas and changing cash usage trends. Our new rules and guidance seek to:

- **Reasonably address the local needs of consumers and businesses** – Designated firms focus on consumers and businesses in local areas who would be most affected by a lack of provision. Assessment processes adapt over time based on lessons learned, data analysis, and evolving needs.
- **Prevent unreasonable delays in the delivery of appropriate cash access solutions.**
- **Prevent unreasonable costs to accessing services** – Consumers and businesses who rely on cash can access it without facing unreasonable travel costs or travel time.
- **Maintain assisted services where needed** – Consumers and businesses who are unable to self-serve via an automated or digital service have reasonable access to cash services that help them deposit or withdraw cash as needed.
- **Ensure access to coins** – Consumers and businesses have reasonable access to coins as well as notes where required, giving them access to non-rounded amounts.
- **Maintain cash deposit services for local business** – Small businesses have reasonable access to cash deposit facilities so that they can accept cash and offer cashback. This will help ensure consumers who rely on cash are able to spend it at a wider variety of businesses.
- **Support continued innovation** – Encouraging new cash solutions that are efficient, cost-effective, can serve a wider range of customers and adapt to meet evolving consumer and business cash needs.
- **Enhance collaborative efforts by industry** – Designated firms deliver efficiencies around the independent assessment of local needs and shared cash access solutions.
- **Improve transparency and accountability of the assessment process** – Consumers and businesses understand how gaps are assessed and can request a review of an assessment outcome.

## Measuring success

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**1.19** The key outcomes we are measuring are:

### **Reasonable cash access coverage is maintained**

**1.20** The Treasury's Statement regards access to cash to be 'broadly comprehensive' based on current coverage of 95% of people in urban areas being within 1 mile, and people in rural areas within 3 miles, of a cash access point. The Treasury calls for this level of access to be maintained. We will continue to collect data from providers of cash access services to monitor cash coverage at a national level on a quarterly basis, and to report our findings publicly and to the Treasury. This will include continuing to look at the distances people live from cash access services.

- 1.21** This data will be supplemented by information from designated entities and others involved in the provision of cash access services to build a rich picture of whether our outcomes are being delivered. This additional data will look at the mix of cash services and cash access facilities in local areas.

### Reduced significant impacts on consumers

- 1.22** The Treasury's Statement requires us to have regard to deficiencies 'with significant impact'. We will continue to use our Financial Lives Survey to track the experience of consumers who rely on cash, including their numbers, the characteristics they share, and their experiences of accessing it. This will supplement local area data alongside our firm supervision work, stakeholder engagement and information shared through regulatory partners.

### Evaluating our rules are delivering intended policy outcomes

- 1.23** In line with our [Rule Review Framework](#), we will proactively monitor data and stakeholder feedback to assess how well our rules are working. Our rules should be flexible enough to adapt to consumers' and businesses' changing needs, but we will keep their suitability under review. You can use the [stakeholder feedback form](#) to provide evidence if you feel that our rules are not achieving their intended outcome.

## Supervision

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- 1.24** Our data-led supervisory approach will focus on getting the right outcomes for consumers and small businesses.
- 1.25** FSMA 2023 gave us powers to supervise and, where necessary, take action against designated firms and LINK, the designated coordination body, including:
- power to make rules and give directions
  - s.165 information gathering powers
  - s.166 skilled person review powers
  - enforcement and disciplinary powers
- 1.26** We also have s.165 information gathering powers to collect data from other entities involved in the provision of cash access services. This includes the Post Office, non-designated banks and building societies, and ATM networks and operators.
- 1.27** Data we collect from both designated and non-designated entities on the distribution of cash access services will help us identify where there are gaps in provision, and where these have the greatest impacts. We will collect information on cash access requests, assessments, and reviews through our ongoing supervisory engagement with designated entities, using information gathering powers where necessary, and use this to monitor compliance with our new rules.

- 1.28** We will intervene where we need to do so to protect reasonable access to cash. Where we identify serious or persistent breaches of our rules, we will use our full range of powers to tackle them.
- 1.29** We also continue to closely supervise firms' compliance with our Branch and ATM closures or conversions guidance (FG22/6).

## Summary of feedback and our response

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- 1.30** We received 151 responses from a variety of stakeholders including firms, industry groups, consumer organisations, charities, and individual consumers.
- 1.31** The vast majority of responses supported the need for a new regulatory regime to protect access to cash. Many respondents highlighted the importance of cash access for consumers in vulnerable circumstances, those who rely on cash for budgeting, and the small businesses, community groups and charities who regularly use local deposit services.
- 1.32** On certain issues there were diverging views between consumer groups and different industry respondents, and we received some challenge on specific rules. Reflecting this feedback, we will be making changes where necessary to make sure the new regulatory regime is proportionate, works effectively and delivers good outcomes. These changes are set out in this Policy Statement. However we do not consider that the final rules differ significantly from the draft rules we consulted on, as the changes are aligned with the policy intention we consulted on and do not significantly change the original cost benefit analysis (CBA). We summarise the responses and the main changes below.
- 1.33** Consumer representatives broadly welcomed our cash access assessment proposals. However, other respondents raised questions on appropriate methods for defining the relevant local area, factors that should be considered when assessing if there is a deficiency and its significance, and the provision of additional cash access services required following an assessment. In Chapters 2 and 3 we set out further detail of our approach, which continues to recognise the need for flexibility. We also explain in Chapter 3 that we have updated the definitions of rural and urban areas in Scotland to accurately reflect the analysis that informs the Treasury's Statement.
- 1.34** Many consumer representatives welcomed the broad range of events that will trigger cash access assessments. Other respondents requested more clarity on the different situations that would be considered a material reduction or change to a cash access service. Our approach remains largely as consulted on, but we have amended our rules and guidance to be clearer on when ATM closures and changes to assisted cash provision will trigger an assessment. This is set out in Chapter 2.
- 1.35** There was broad agreement with our approach to increasing accountability and transparency in the assessment process, but practical concerns about implementation were raised. Responses from both industry and consumer representatives told us the 8-week assessment and review timeframes we proposed were too short, and that a longer window to request a review was needed. As set out in Chapter 3, we have provided more time, while still requiring gaps in provision to be filled promptly.

- 1.36** When additional cash access services are required following an assessment, our rules require firms to deliver without unreasonable delay. We have kept the 3-month backstop for the delivery of services, but we have amended our rules to give firms longer in exceptional circumstances.
- 1.37** We received substantial feedback on our last branch in town proposals. After careful consideration, we are taking forward our approach largely as consulted on, subject to a small number of amendments which help better fulfil our policy intention. We discuss these in Chapter 3.
- 1.38** Respondents generally agreed with our proposal to hold designated firms jointly accountable for providing cash access services required following an assessment. Others felt alternative approaches to dividing responsibility would be fairer, and some raised practical concerns. We discuss these concerns in Chapter 5. We set out our position in Chapter 2 on why designated firms remain accountable for addressing gaps left by non-designated firms, including the Post Office. We also clarify in Chapter 5 our expectations on proportionality and why we do not expect a designated firm to have to duplicate services in area, where it has an existing facility in the same area that meets the needs identified in the assessment.
- 1.39** In response to feedback, we are making other changes to make sure our approach is proportionate. Our proposals required firms to put in place services which are reasonable to provide. We have added guidance to make it clear that firms can take into account additional cash services that are due to be provided independently of the assessment when considering what is reasonable for them to be required to deliver themselves. We also agreed with respondents who said it would be disproportionate to require cash services to be kept open indefinitely. We amended our rules to allow firms to stop providing a service required by an assessment a minimum of 2 years after it has been delivered, subject to a new assessment being carried out.
- 1.40** Respondents generally supported our proposals to keep communities informed, with some responses highlighting the importance of non-digital communication channels for digitally excluded customers. We discuss this in Chapter 6, where we set out our expectations for firms to consider the needs of their customers including those who are digitally excluded, in line with the Consumer Duty, our [Guidance for firms on the fair treatment of vulnerable customers](#) (FG22/5) and to comply with relevant equalities legislation.
- 1.41** Respondents also pointed to the importance of us continuing to supervise firms' compliance with other rules, in addition to their obligations under our new access to cash regime. As we set out throughout this Policy Statement, all firms, not just those designated by the Treasury for the purposes of our new rules, should continue to comply with their wider obligations, including their obligations under the Consumer Duty (in light of, where applicable, the expectations set out in FG22/6). We will continue to supervise firms' compliance with these.
- 1.42** Several responses also raised questions about the complaints processes. We respond to these in Chapter 7 and provide additional clarity where requested; however we will continue with the approach set out in our consultation.

## Implementation timetable/risk of retrospection

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- 1.43** Following feedback, we are providing an 8-week implementation period between publishing our Policy Statement and our rules coming into force to give designated entities time to familiarise themselves with our rules and establish the necessary processes to comply with them. So, our rules come into force on 18 September 2024. In Chapter 4 we set out what we expect from designated entities as our rules come in to force. This includes where they have already planned or announced closures of their facilities.

Where firms have already announced closures of cash access services that will be taking place before our rules come into force, these will not be subject to the new regulatory regime, as set out in Chapter 4. However, firms should not rush through closures during the 8-week implementation period. Doing so would not meet the expectation in FG22/6 that firms should communicate closures to customers at least 12 weeks before they take effect and would result in robust supervisory action.

- 1.44** This does not mean that where past closures have left gaps in provision with significant impacts that they cannot be filled.
- 1.45** The cash access request mechanism in our rules will allow communities to ask for an assessment of cash access services in their local area. Where there are gaps in provision with significant impacts, designated firms will be required to fill them within set timeframes. This may include cases where closures before our rules come into force have created deficiencies.
- 1.46** A change in publication date required us to amend the commencement date of our rules to maintain the 8-week implementation period. The legal instrument which did this is in Appendix 2.

## Cost Benefit Analysis

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- 1.47** In response to our CBA, industry respondents suggested that some of the costs were understated and the benefits overstated. Consumer representatives highlighted that the policy could have benefits that are not measurable in purely financial terms. As set out in Chapter 8, we think that the expected costs and benefits are proportionate.
- 1.48** The changes we have made to our rules and guidance do not significantly change our CBA. We discuss the changes throughout this Policy Statement and outline the impacts on the CBA in Chapter 8.

## Fees

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- 1.49** We consulted on recovering the costs of the access to cash project and regime from designated banks and building societies in CP23/29, and on the fee-rate in [CP24/6: FCA regulated fees and levies](#). We are publishing the fee-rate as part of this instrument, having recently consulted on the rate we would set if we implemented the access to cash proposals. On this basis, designated banks and building societies have been put into a new fee-block, A.24. The fee-rate for A.24 in 2024/25 has been set at £1.01 per £1m or part-£m of Modified Eligible Liabilities. The difference between the draft fee-rate published in CP24/6 and the final fee-rate is due to the variations between the estimated tariff data and final tariff data used to calculate fee-rates. The final rules on the new fee-block and rate are published in Annex B to the instrument in Appendix 1.

## Unintended consequences

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- 1.50** We have considered potential unintended consequences of our rules, including the risk that firms increase cash access service closures before our rules come into force. Some consultation responses also raised concerns that, once in force, our rules could encourage the closure of bank branches with some designated firms opting to participate in shared solutions, such as banking hubs. Our new rules, a clear transition to the new regime alongside FG22/6, and our assertive supervisory approach, seek to mitigate these risks. We will continue to monitor data to identify any unintended consequences.

## Exclusions and limitations

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- 1.51** We have been tasked with seeking to maintain 'reasonable' access to cash. The Treasury's Statement sets out their understanding that, on a national level, the distribution of cash access services is 'broadly comprehensive'. It also highlights the importance of taking account of local deficiencies that may have a significant impact, recognising that cash needs may differ by location, between individuals and businesses, and may change over time. So it is important that our rules are proportionate, and we are only going to require designated firms to provide additional services where there are significant impacts on local areas. Our channel-neutral approach to the type of facilities firms can provide also ensures a proportionate approach.
- 1.52** It is important to note there are other limits to the new access to cash powers.
- 1.53** Our new rules are about ensuring reasonable access to cash services is maintained, particularly for those consumers and businesses that rely on it the most. The powers we have been given do not extend to **the provision of wider banking services**, such as card and PIN management or fraud and scam support, which go beyond the provision of cash access services. This also means our new powers do not extend to **maintaining branch networks**, or **preventing bank branch closures** generally, as cash access services can be provided through other facilities which cost less to run than branches

offering a wider range of services. However, our rules impact when firms may close bank branches because of the cash access they provide, supplementing our existing guidance in FG22/6.

- 1.54** We received feedback on **firms' support for customers to transition to digital channels**. While our new rules do not create specific requirements in this area as the powers Parliament gave us are focused on access to cash services, it is important that firms support digitally excluded consumers. This is particularly important as these consumers are more likely to rely on cash. Firms should comply with the relevant parts of FG22/6 and the Consumer Duty when considering how they communicate with and support the digitally excluded.
- 1.55** Some respondents asked us to consider **the role of ATM interchange fees in sustaining an ATM network that delivers reasonable access to cash**. However, our oversight of LINK is limited to its role as a designated coordination body for access to cash. The Payment Systems Regulator (PSR) regulates LINK as a designated payment system under the Financial Services (Banking Reform) Act (FSBRA) 2013. As part of the PSR's first review of Specific Direction 12 (SD12), which requires LINK to maintain a broad geographic spread of free-to-use ATMs and meet service user needs, the PSR recommended that LINK consider the transparency of decision-making on setting interchange fees. As a result, LINK published a report on their approach.

## Working with partners

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- 1.56** We work closely with regulatory partners to deliver on our shared priorities in protecting access to cash.
- 1.57** The Bank of England was given new powers under FSMA 2023 to supervise wholesale cash distribution. In April, the Bank published its consultation response and final Codes of Practice for the wholesale cash distribution market, which sets out the minimum standards of conduct and practice that recognised firms must meet to enable an effective, resilient, and sustainable infrastructure, which can support retail access to cash. The Bank also sets targets for the denominational mix of notes in ATMs. We encourage firms to adhere to these targets, and to consider if they can align their denominational mix targets to those areas of the country which may have a particular need for access to lower denomination of notes.
- 1.58** We also work closely with the PSR. One of the PSR's strategic priorities is to make sure users have access to payment services that meet their needs. In March 2024, the PSR published a Call for Views as part of the second annual review of SD12, gathering information on how well SD12 is working and its role following the changes introduced by FSMA 2023. We continue to engage with the PSR to make sure our rules and supervisory approaches are effective and consistent, and to avoid unnecessary overlap between our respective regimes.

## Equality and diversity considerations

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- 1.59** We have evaluated the equality and diversity impacts that may arise from our rules. We consider that, by seeking to maintain reasonable access to cash services, our policy will have a positive impact on consumers who rely on cash. This includes those with protected characteristics, who in some cases may be more likely to rely on cash. For example, our 2022 Financial Lives Survey shows that those of an older age, with disabilities, or from minority ethnic backgrounds, are disproportionately more likely to rely on cash as a payment method compared to the population as a whole.
- 1.60** We do not consider that our proposals will negatively impact any groups that share protected characteristics under the Equality Act 2010.

## Effect on mutual societies

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- 1.61** Where the final rules differ from the draft rules we consulted on, we do not expect them to have a significantly different impact from the impact of the draft rules on (1) any mutual societies designated under Part 8B, or (2) any such mutual societies as compared to the impact on other authorised persons who are designated.

## Next steps

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- 1.62** Our rules will come into force on **18 September 2024**.
- 1.63** Designated firms and coordination bodies should use the time before then to familiarise themselves with our new rules, establish and publish their cash access assessment procedures, prepare to receive cash access requests, and prepare to comply with new reporting requirements.
- 1.64** Transitional arrangements and our expectations of firms during the implementation period are set out in Chapter 4.



## Chapter 2

# Cash access assessment triggers

- 2.1** In CP23/29, we set out proposals to require firms to undertake 'cash access assessments'. The purpose of these is to identify:
- where there are deficiencies in access to cash
  - if there are deficiencies, where they have significant impacts on local areas
  - where they do, which services designated firms should be required to put in place to address these impacts
- 2.2** CP23/29 also set out the 'trigger events' which would require firms to carry out an assessment. In this chapter, we set out and respond to feedback on these trigger events, including on:
- the types of facility where a closure or material reduction/change to services would trigger an assessment (including non-designated firms' facilities), and the scope of 'material' reductions or changes
  - temporary and unexpected closures
  - the cash access request scheme, including who can make a request, the scope of 'sufficient interest' and requests made by the FCA
  - circumstances in which firms would not be required to carry out assessments
  - proactive assessments
  - notification requirements on firms
  - duplication of assessments

## Trigger events for carrying out assessments

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- 2.3** Under the existing voluntary scheme run by LINK, assessment triggers are limited to requests by members of communities and closures of branches by its member banks and building societies.
- 2.4** We proposed that designated entities (designated firms acting individually, or designated coordination bodies acting on their behalf) should be required to carry out cash access assessments in response to:
- **Closures of, or material reductions/changes to the provision of cash access services at an existing facility This applies to:**
    - closures of designated firms' own cash facilities
    - closures of cash facilities operated by non-designated entities, including:
      - non-designated banks and building societies
      - Post Offices providing cash services
      - independent ATM deployers
      - any other cash facilities, including mobile ones.

Cashback, pay to use services for personal current accounts, and cash delivery/ collection services are, however, excluded.

- **Receipt of a cash access request** from a member of the local community, representative organisation, or others with a sufficient interest.

**2.5** These assessments would have to consider:

- the **specified services** (deposit or withdrawal services, for business and personal customers – which must be free for personal customers); and
- the **specified features** (functionality for a reasonable mix of both coins and banknotes to be deposited or withdrawn, or availability of assisted cash) which are the subject of the closure/material change or request.

**2.6** We also considered **circumstances in which it would not be proportionate to carry out cash access assessments**. These included where:

- a cash access assessment is ongoing or has been completed within the preceding 12 months, for substantially the same local area and the same issues;
- a requestor withdraws their request in writing;
- an assessment was triggered by a closure which is no longer happening;
- an ATM is closing, but there will remain one or more ATMs offering the same services at the same site.

**2.7** We asked 3 questions on trigger events. There was significant overlap in the responses we received, so we have chosen to respond to these collectively.

**Question 1:** *Do you agree with the proposed 'trigger events' for a cash access assessment resulting from a closure of or material reduction/change to a service? Are there any additional trigger events we should consider?*

**Question 2:** *Do you agree that our proposals will enhance communities' ability to proactively address cash access concerns in their areas?*

**Question 3:** *Should there be other events that should not trigger a cash access assessment? If so, what are they?*

## Triggers resulting from closures and material reductions/changes by designated and non-designated firms

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### Facilities in scope

- 2.8** Several respondents asked us to clarify which facilities' closures or material reductions/changes would trigger assessments. Some respondents requested that closures and material reductions/changes to mobile branches, cashback facilities, and ATM conversions be included.

#### Our response

- The trigger events we set out in our consultation paper already include closures or material reductions/changes to mobile branches and ATMs (including conversions from free-to-use to pay-to-use).
  - We will not, however, be extending the scope of assessment triggers to include cashback facilities. We do not think this would be proportionate, given the large numbers of these facilities.
  - However, if communities are significantly impacted by the loss of cashback within their communities, they can submit a cash access request.
  - Cash delivery and collection services (which take cash directly to and from consumers and businesses) are also excluded.
  - We have, however, updated the definition of a relevant closure in our rules to clarify that we would not expect changes to additional services put in place to meet a delivery requirement under our rules to trigger a new assessment, for as long as the delivery requirement continues to apply (as set out in Chapter 4, we have amended our rules so that the obligation to provide the services required by assessments only continues for a minimum of 2 years after they are delivered). Designated firms will still be required to continue to meet any delivery requirements, but can do so through other services without triggering a new assessment.
  - This would apply, for example, where firms close temporary facilities upon the opening of permanent ones. It would also apply where a new facility opened as part of a trial closes because the updated assessment resulting from that trial determines additional services are not required. But, it would not apply to the extent an existing service was relied on to deliver the trial – the usual assessment rules would apply to this scenario as the original assessment would have factored in the availability of the service.
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## Temporary and unexpected closures

- 2.9** Several respondents called for clarity on how our rules would account for temporary or unexpected closures, including the point at which designated firms would be expected to carry out assessments. Some were concerned about the potential burden on firms to carry out assessments for all temporary closures, particularly for unexpected closures due to physical damage, when in many cases quick repairs might resolve issues.

### Our response

- We agree it would not be proportionate to require assessments in all instances of temporary closures, noting that many facilities could be re-opened through quick fixes. However, we are aware of instances where cash access facilities have been 'temporarily' closed for over 2 years resulting in significant impacts on communities.
- Our proposals defined a 'relevant closure' as a full closure, or material reduction/change in services, which is reasonably anticipated to last, or has lasted, for at least 6 months. On this basis, we are taking forward our approach as consulted. We are satisfied our rules achieve the right balance between triggers for assessments being proportionately applied and ensuring communities are not left without access to cash for long periods of time.
- All authorised firms, not just those designated by the Treasury for the purposes of our new cash regime, must comply with their obligations under our Consumer Duty to provide a level of support that meets their customers' needs, regardless of how long facilities are closed for. This includes where issues arise with their services, which might include temporary works.

## Changes to facilities operated by non-designated firms

- 2.10** Consumer representatives (consumer groups, elected representatives, and individuals) widely welcomed the inclusion of closures of, or material reductions/changes to, facilities operated by non-designated firms as trigger events.
- 2.11** While several industry respondents supported this proposal, some firms argued imposing this requirement could incentivise closures by non-designated firms who would expect designated firms to fill all gaps in provision. They suggested this could result in designated firms subsidising the commercial decisions of non-designated entities over which they have no control. One such firm called for non-designated firms to be subject to a regulatory framework of their own. Another suggested any provider of cash access services, including the Post Office, significant enough to be capable of creating significant gaps in services should be designated.

- 2.12** Some also argued this could lead to excessive numbers of assessments, even where there is limited demand for additional services. They argued the cash access request scheme would be sufficient to identify any gaps in provision with significant impacts left by changes to non-designated firms' facilities.
- 2.13** Several firms also raised practical questions about how they would become aware of closures or material reductions/changes by non-designated firms and whether they would be required to proactively look for them.

### Our response

- We considered carefully whether we should remove closures and material reductions/changes to facilities operated by non-designated firms from the list of 'trigger events'. We have decided not to amend our proposals.
- Non-designated firms' facilities are a key part of the UK's access to cash infrastructure, and their closure or material reduction/change risks creating gaps with significant impacts on consumers and businesses. With a decline in branch services over recent years, facilities operated by non-designated entities also help provide reasonable access to cash within the distances set out in the Treasury's Statement, reducing the burden placed on designated firms.
- Post Offices, for example, are a critical part of the cash access landscape.
- We recognise some firms would like to see requirements to maintain cash access imposed on a wider range of entities. We have been tasked with ensuring reasonable provision of cash access services by Parliament and can only make rules applying to firms and coordination bodies designated by the Treasury.
- The responsibility for designating firms lies with the Treasury, and the Post Office has not been designated (and cannot be, as it is not a relevant current account provider). Removing the closure of non-designated firms like the Post Office as trigger events could result in reduced access to cash for communities without an appropriate assessment taking place to address any potential resulting gaps in provision.
- Our rules only oblige designated firms to provide services required by an assessment to their own customers: there is still an incentive for non-designated firms to continue providing services of their own should they wish to attract customers who value cash.
- While cash access requests are an important element of our rules, consumers in vulnerable circumstances may find it more challenging to make requests. We do not think it is right to rely solely on communities to raise concerns about gaps in provision.

- Our rules recognise that designated entities may not know in advance that a non-designated facility is closing or materially reducing/changing. We do not expect firms to proactively hunt for changes to non-designated firms' facilities and our rules only require designated entities to notify others of closures or material reductions/changes to non-designated entities' facilities when this information is already publicly available.
  - We do not think this requirement places a disproportionate burden on designated firms through requiring a large number of detailed assessments. In many cases, a deficiency may not be identified which will allow assessments to stop at step 1, without requiring the same level of detail as a step 2 assessment (see Chapter 3).
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## Areas with high numbers of alternative access points

- 2.14** Some industry respondents suggested assessments should not be required where the closure or material reduction/change to a facility takes place in a highly served area, and should instead only be triggered when a closure might meet the 'last branch in town criteria', set out in Chapter 5 of CP23/29 and discussed in more detail in Chapter 3 of this Policy Statement.

### Our response

- We are continuing with our approach set out in the consultation. What constitutes an area being highly served is dependent on a number of factors and will differ by location. Even where an area does have existing facilities, the demand placed on them by the closure or material reduction in services at another could exceed their capacity. We think it is important designated entities at least carry out step 1 assessments to consider the features, capacity, and actual travel time and costs to remaining facilities. This does not require the same level of detail as step 2 and, unless a deficiency is identified, the designated entity can stop here.
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## ATMs

- 2.15** We proposed that firms would not have to undertake assessments upon the closure of one or more ATMs, if at least one ATM offering the same services remained at the same site.
- 2.16** Several consumer groups raised concerns that a single ATM may not always be sufficient. They called for either an increase in the threshold to at least two ATMs, or for any closure or material reduction/change to ATMs to constitute a trigger event. One industry respondent, on the other hand, called for the ATM exception to be expanded to include where a second ATM is available within a reasonable distance.

## Our response

- We are amending the ATM exemption so that it only applies where the remaining ATM or ATMs are (between them) accessible 24 hours a day.
- We recognise respondents' concerns about the capacity of a remaining single ATM. However, in view of proportionality, we accept that in most scenarios where the number of ATMs at a single site is being reduced, it is likely such ATMs are not being used to their full capacity.
- We think pressures on the capacity of remaining ATMs are likely to be most keenly felt at sites with limited hours of availability. Where the remaining ATM is accessible less than 24 hours a day, designated entities will be required to carry out a cash access assessment, which could stop at step 1 if the remaining ATM's capacity is sufficient.
- Even where the remaining ATM is available 24 hours a day so the exemption can be relied upon, communities remain able to submit cash access requests where they consider provision to be inadequate.
- We are also making a further change to the exemption, to add a requirement that the remaining ATM or ATMs must, between them, have the same features as the ones being removed or changed. We recognise that increasing innovation by firms could see forms of virtual assistance or coin provision through ATMs become available more widely, and think it is important that an assessment takes place when these features are lost.
- We have chosen not to broaden the exemption to instances where a second ATM is available at another site within a reasonable distance. In some cases, geographical barriers and poor transport provision can make even short distances (as the crow flies) more difficult to travel. A step 1 assessment would be required in this instance to consider, for example, the journeys which have to be made and whether the time and cost of travel is reasonable.
- We expect firms to take a sensible approach when considering what a 'site' covers. Several banks of ATMs at a shopping centre might reasonably be considered to be at a single site, while banks of ATMs at shops on different sides of the road might not.
- In all cases where an ATM closure or conversion is proposed by an FCA authorised firm (both designated and non-designated), we will continue to expect firms to refer to FG22/6.

## Scope of 'material reductions/changes'

- 2.17** Several respondents, representing both industry and consumers, called for more detailed guidance on what constitutes a 'material change/reduction'. We are committed to an approach that provides designated entities with the flexibility to respond to changing local needs and do not consider a more prescriptive approach (for example, with specific thresholds) is appropriate. Setting thresholds could also incentivise designated entities to do the minimum to comply rather than to best meet the needs of local communities. We set out the specific points on which we received feedback and our response below.

- 2.18 Opening hours:** several respondents asked us to clarify when changes to opening hours would be considered 'material' and what constitutes a 'significant' reduction in hours. Some argued any reduction in opening hours should trigger an assessment.

#### Our response

- We think it is important to avoid a prescriptive approach to determining the materiality of any reduction in opening hours given variations between local needs. For example, a branch closing during peak hours may represent a significant reduction but the same closure in an off-peak period may not. Similarly, the loss of a full day's opening may be material, while (depending on specific circumstances) the same reduction in opening hours spread across several days where the branch remains open may not be.

- 2.19 Loss of an assisted cash service:** several respondents, covering a diverse range of stakeholders, asked us to clarify our definition of 'assisted cash', the loss of which we proposed would constitute a material change/reduction. Some argued assistance should always be in-person, while others thought virtual assistance may be appropriate in some cases. Industry respondents welcomed the flexibility to use virtual forms of assistance, but some called for more clarity on our expectations.

- 2.20** One consumer group called for a significant reduction in the availability of an assisted cash service to also trigger an assessment, not just the loss of it entirely.

#### Our response

- We are retaining the definition of an assisted cash service that we consulted on. This requires a person with the appropriate training to be available to offer support with withdrawing or depositing cash. A fully automated service would not constitute an assisted cash service. In some circumstances, however, we think it may be appropriate for assistance to be provided by someone not physically present, for example via a video link. Our rules are responsive to technological developments, allowing firms to support their customers in new and innovative ways. In doing so, it is important that all firms, whether designated or not, support their customers' needs through meeting their wider obligations under the Consumer Duty, follow our guidance for firms on the fair treatment of vulnerable customers ([FG21/1](#)), and comply with their obligations under equalities legislation.
- We also agree that a significant reduction in the availability of an assisted cash service, including reductions in hours or changes in format, could constitute a material change if this impacts its capacity, and have amended our guidance to reflect this. Our rules do not specify that designated entities must carry out assessments whenever the format of an assisted cash service is changed. Firms should consider the specific circumstances of each case. In addition,



as noted above, firms delivering cash services, whether designated or not, must be mindful of their wider obligations to ensure the services they deliver are suited to their customers' needs.

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**2.21 Removal of counters:** several respondents raised questions about the removal of counters (for example, at bank branches or Post Offices), including whether the removal of any counter constitutes a material change/reduction, or if this only applies where all counters at a given facility are removed. Respondents also asked if an assessment would be triggered if physical counters were removed but the services they provided remained.

#### Our response

- We will proceed with our approach as consulted. We consider the removal of a counter to be a material change to a cash access service which should trigger an assessment. Counters will offer various services alongside the provision of cash, meaning closures may have a greater impact on capacity compared to the closure of a solely cash service like an ATM.
  - However, our rules are clear that the extent of work involved in an assessment is dependent upon, and proportionate to, the circumstances of each case. It may be reasonable for firms to apply a less detailed assessment procedure in cases where some counter positions are closing because they are unused while others remain.
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**2.22 Replacement with equivalent services:** several firms questioned whether there were circumstances in which replacing one service with another should not require an assessment to be undertaken (eg replacing coin deposit machines with note-only machines, physical counters with equivalent automated services, or introducing new, more efficient technologies which do not decrease overall accessibility).

#### Our response

- When firms close or materially change a service, even if they intend to replace it with an equivalent service, this will usually be a trigger event. The assessment process will ensure that equivalent services continue to meet the community's reasonable cash access needs and provide transparency. However, we have provided additional guidance to clarify that the closure of an ATM (including a deposit ATM) for repair, enhancement or replacement (at the same location) will not trigger an assessment, provided the closure does not last more than 6 months and the same services will remain available via the repaired, enhanced or replaced machine. We would see the ATM after the repair, enhancement, or replacement as the same one. Our expectations that firms provide support to their customers during temporary closures, regardless of how long they last, continue to apply and are set out in our response under paragraph 2.9 ('temporary and unexpected closures').

- We expect firms to identify a relevant closure where there are material changes to specified features, including where there are significant reductions to capacity. This would include, for example, both the replacement of coin deposit machines with note-only machines and, as noted above, the loss of an assisted cash service. Both such changes would constitute the loss of a specified feature, and therefore a material reduction.
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**2.23 Conversion of free-to-use services to pay-to-use services:** several consumer groups felt strongly that conversion of a free-to-use cash access service to pay-to-use should act as a trigger. However, one firm suggested including these as triggers could have unintended consequences, resulting in a large volume of unnecessary assessments due to a high ATM churn-rate. Some respondents also questioned whether there was an expectation that services – particularly coin services – provided to businesses should be free-to-use.

#### Our response

- We will proceed with our approach as consulted. FSMA 2023 includes free cash access services for personal customers in our new cash purpose. Any such services changing from free-to use to pay-to-use would qualify as a material reduction and trigger an assessment. However, neither FSMA 2023 nor the Treasury's Statement set any expectations that cash access services should be free for business customers.
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**2.24 Withdrawal of designated firms from a shared services facility:** consumer organisations and several firms welcomed the inclusion of designated firms withdrawing from shared services facilities as a trigger event. However, one firm suggested this was disproportionate, pointing to occasions where designated firms withdraw from nationwide arrangements, which would trigger an assessment for every facility affected. They suggested that in cases where the services continue to be provided by other firms this should not trigger an assessment.

#### Our response

- We will proceed with our approach as consulted. In principle, we think it is important that the impacts of withdrawals from shared services facilities on their capacity to meet local needs are considered in assessments.
  - We recognise that withdrawals from national agreements may affect very large numbers of facilities and are mindful of the impacts of large numbers of concurrent assessments on firms. While we expect such scenarios to be rare, firms considering such a move should engage their supervisors at the earliest opportunity to discuss an appropriate and proportionate approach to assessment and withdrawal, whilst ensuring the diverse cash needs of affected communities are sufficiently addressed.
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**2.25 Deposit and withdrawal limits:** one respondent questioned whether we would consider the introduction of limits on the value of notes and coins that can be deposited and withdrawn as a trigger.

#### Our response

- We will proceed with our approach as consulted. A material change to a cash service could, in principle, include changes in withdrawal or deposit limits at a branch, Post Office or other facility. As with any other material change to a service, this would trigger an assessment by designated entities. However, we recognise that banks, building societies, and other firms undertaking certain financial activities are required by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 to take steps to prevent their services being used for money laundering and terrorist financing. These regulations require firms to take a risk-based approach, appropriate to firms' business models and customer base. Firms must assess and manage their risks in a way that is proportionate to the nature and scale of their activities. One way in which firms manage this risk is to implement cash withdrawal and deposit limits. We encourage firms to keep these under review, and different firms have different limits, suitable for their own customer base. So it would not be appropriate for our rules to say that changes in deposit or withdrawal limits are a specific event that must trigger an assessment, or require firms to deliver services with specific deposit or withdrawal limits. However, we strongly encourage firms to work to understand their customer needs and to create a tailored approach that will help ensure legitimate customers have access to the cash services they need.

**2.26 Changes unrelated to consumer access:** some industry respondents asked whether alterations in firms' back-end operations, which do not directly impact consumer access to cash, would be considered trigger events.

#### Our response

- Where operational changes do not impact consumers' or businesses' access to cash, the change would not be material and so would not constitute a trigger event.

**2.27 Changes due to regulatory compliance:** some industry respondents also argued adjustments or closures necessary for compliance with new regulations or legal requirements should not trigger assessments.

### Our response

- It would not be appropriate to provide a blanket exemption in our rules in all cases where new regulations place conflicting pressures on designated entities. In some instances, such cases could have significant impacts on communities' ability to access cash which would merit further assessment.
- When making changes to rules in other sections of our Handbook, we will consider the impact on designated entities and may amend our Access to Cash sourcebook as appropriate. If designated entities are affected by other changes to legislation or rules, they should promptly raise concerns with their supervisors, which we will address as appropriate.

## Cash access request scheme

- 2.28** Both industry respondents and those representing consumers and businesses recognised the value of the cash access request scheme. Many consumer groups noted the importance of communities being aware of the request scheme, and knowing what information they need to submit, for it to be effective. Some consumer groups also called for communities making requests to have more say in the solutions firms should deliver where there are gaps.
- 2.29** We discuss the cash access assessment process and the requirements imposed on designated firms to promote the cash access request scheme in Chapters 3 and 6 respectively.
- 2.30** Respondents raised several other points about assessments resulting from the cash access request scheme. These are set out below.

### Scope of 'sufficient interest'

- 2.31** We received lots of questions on the scope of 'sufficient interest'. Several respondents called for more guidance.
- 2.32** Consumer groups were keen to see the definition of 'sufficient interest' be drawn widely, suggesting vexatious requests were unlikely and attempts to limit them risked inhibiting communities' ability to raise concerns. One respondent noted the importance of requestors not being asked to produce specific documents to demonstrate they have a sufficient interest. Some respondents asked us to ensure national organisations responding on behalf of local members/branches were deemed to have sufficient interest.
- 2.33** Industry respondents, on the other hand, were keen to see stricter eligibility criteria. One respondent suggested 'persons who regularly visit the local area' in particular could be open to abuse and should be further defined. Some respondents suggested numerical thresholds should be met before assessments are triggered, or that the submission of requests should be limited to a prescribed list of representatives.

### Our response

- We are keeping the definition of 'sufficient interest' as consulted. As set out in CP23/29, we would expect those with sufficient interest to include local residents and business owners, and groups or individuals who represent the local area and reasonably seek to advance its interests, or otherwise have a legitimate interest. For example, local councils, local trader groups, elected representatives and those who regularly visit would be considered to have sufficient interest.
  - Our guidance sets out that groups or charities who help cash users in vulnerable circumstances in the local area would be legitimately able to make cash access requests. As such, national organisations could have sufficient interest where they are representing people in the local area. This would not apply where national organisations submit blanket requests without links to or concerns about specific local areas.
  - We agree firms should not require documentation from requestors to confirm they have a sufficient interest. This could impose an unnecessary barrier to those with a legitimate interest.
  - We do not agree with numerical thresholds needing to be met to trigger an assessment, and note that the current industry voluntary request scheme does not operate in this way. Our approach to limiting repeat requests is set out below.
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## FCA requests for assessments

- 2.34** We also proposed that we will have the power to request that designated firms assess cash provision in a particular local area with boundaries and population determined by us. Several respondents asked for more clarity on the circumstances in which we might make such a request. Some in industry called for designated entities to be able to appeal these requests.

### Our response

- We will focus any requests for assessments on areas our data or insights suggest may have gaps in provision with significant impacts. We will be proportionate in our approach and expect most areas will be picked up by cash access requests from communities themselves.
  - We think the costs of introducing a formal appeal mechanism would be disproportionate, for firms and for us, relative to the costs of carrying out assessments themselves. Instead, where designated entities disagree with our requests, we would encourage them to speak to their supervisors. It would remain open for us to withdraw requests where we think this is appropriate.
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## Reasons to reject a cash access request

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### Repeat requests

- 2.35** We proposed that designated entities should not have to act on a cash access request where a cash access assessment is ongoing, or has been completed within the preceding 12 months, for substantially the same local area and issues. This includes where an assessment covering the same specified services and features has already been undertaken because of either another cash access request or a closure or material reduction/change.
- 2.36** Respondents were split. Some, both inside and outside industry, agreed with our proposals on repeat requests. However, some consumer representatives were concerned 12 months was too long, while others in industry argued 12 months was not long enough. Some respondents representing consumers suggested significant changes to communities, including new schools or housing developments, or changes to public transport availability, should allow repeat requests to be undertaken sooner than 12 months. Several industry respondents called for no repeat assessments to be required at all (regardless of how much time had passed) unless there were significant changes to communities.

### Our response

- Based on the balance of views received, we are taking forward the approach we consulted on. We have, however, amended our sourcebook to clarify that assessments which are updated or revised following a trial or review during the 12-month period are also counted for the purposes of this rule.
  - We think that the 12-month period is a reasonable interval, and any changes to community demand can be reassessed following a community request after this period. It is important to note that the 12-month limit on repeat requests does not prevent a further assessment being carried out if there is a closure or material reduction/change in services during that period.
  - We do not consider responding to a repeat request after 12 months to be disproportionately burdensome. Our rules are clear that the extent and scope of the work involved in undertaking an assessment is dependent upon, and proportionate to, the circumstances of each case. If there are no significant changes to cash access or the characteristics of the local area after this period, carrying out a new assessment will not require firms to gather substantial amounts of new information.
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## Requestor withdraws their request

- 2.37** We proposed that designated entities would not be required to undertake assessments where the requestor withdraws their request in writing, which they may choose to do if made aware of other cash access facilities available to them. One industry respondent called for us to go further and allow firms to reject assessments where there are existing services (or where an assessment under the existing voluntary scheme has already taken place and new services are in the process of being set up) without requiring the requestor to withdraw.
- 2.38** Some industry respondents also called for firms to be given the ability to reject requests from certain areas which had either never had cash access services, or have not had them for some period of time, pointing to the Treasury's Statement and its understanding that current provision is broadly sufficient.

### Our response

- We do not agree that designated entities should be able to reject assessment requests without the requestor withdrawing if there are existing services. It is possible that existing services are inadequate due to a lack of capacity or certain features like assisted cash, or unreasonable travel time and costs. If the step 1 assessment finds there is no deficiency, further action is not required. Moreover, in cases where designated entities think existing facilities meet the requestor's needs, they can explain this to the requestor, who may not be aware they exist, at which point they could withdraw their request.
- We also consider it important that assessments are carried out even where designated entities know other facilities are being set up, to establish whether there are gaps in provision with significant impacts and, if so, what services are needed to address them. We accept that where future facilities are already due to be provided which will deliver these services, it may in some (but not all) cases be unreasonable for designated firms to deliver additional services as a result of the assessment. We have added guidance to step 3 to make this clearer, which we discuss in Chapter 3.
- Our rules will also allow for cash access requests in areas where there have never been cash access services. In such cases, designated entities may assess that there is not demand in these areas and stop after a step 2 assessment, but it is important that these requests are considered. While the Treasury's Statement said it understands that access to cash distribution is 'broadly comprehensive', it also recognises that reasonable provision should take account of local deficiencies with significant impacts and notes 'local circumstances and user needs may change over time with lack of access impacting locations differently'.

## Proactive assessments

- 2.39** Several groups representing consumers called for firms to be required to carry out assessments proactively, rather than in response to trigger events. They noted some consumers, particularly the most vulnerable, may not know about the cash access request scheme or feel capable of submitting one.

### Our response

- We do not think it would be proportionate to require firms to carry out proactive assessments of cash access when a trigger event has not occurred.
  - However, where communities feel there are gaps in provision in their area, the cash access request scheme allows them to ask designated entities to carry out an assessment. We expect the process to be set out in a way that supports consumers to act, using plain language and avoiding friction or sludge practices that could deter consumers or businesses from submitting a request. We set out in chapter 6 how we expect designated entities to raise awareness of the cash access request scheme.
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## Notification requirements

- 2.40** While not in response to any particular questions we asked, some respondents commented on the requirements imposed on designated entities to notify us and other designated entities when they become aware of trigger events.
- 2.41** One consumer organisation proposed that all firms should notify us of planned closures of cash services as soon as possible. They encouraged us to take steps to inform designated entities of upcoming closures or changes to cash services operated by non-designated entities in advance, where possible.
- 2.42** One industry respondent asked us to clarify whether designated firms themselves or any delivery body overseeing shared services (similar to Cash Access UK, under the existing voluntary scheme) would be responsible for complying with notification requirements.
- 2.43** Another industry respondent was concerned that requiring firms to notify others of closure decisions before making them public could raise competition concerns. They argued it would be better for us to collate information and share with designated entities as required.
- 2.44** One respondent asked whether non-designated firms could be told of cash access facility closures by designated firms before they are made public, in order to increase capacity of their own facilities (potentially even before an assessment takes place).



## Our response

- Our rules require designated entities to notify other designated entities and us of closures and material reductions/changes as soon as reasonably practicable, whether the facility is that of a designated firm or non-designated firm. This must be done in compliance with competition law which firms are required to self-assess. Our new rule-making powers only apply to designated entities, so we cannot require non-designated entities to share information or provide advanced notice to designated firms. It would not be appropriate for us to notify designated entities where we have advance notice of closure decisions as we are bound by an obligation not to disclose confidential information under s348 of FSMA.
  - The question of who has to notify a closure of a shared services facility, or a material reduction/change in services at such a facility, involves the application of the notification rules in the usual way. If it is a designated firm's facility, that firm must provide notification. If it is a non-designated firm's facility, a designated entity becoming aware of the closure/reduction/change through publicly available information must provide notification. Firms remain subject to FG22/6 which highlights the importance of firms providing sufficient and timely notifications to customers.
  - We acknowledge the concerns raised by some firms around compliance with competition law and sharing information. While it is important designated entities carrying out assessments are made aware of trigger events in a timely manner, we remind firms that it is their responsibility to ensure their own compliance with competition law. Where a designated entity becomes aware of the closure of or material change to a non-designated firm's facility, the requirement to notify other designated entities only applies when this information is publicly available. Firms may also feel that participating in a coordination body makes notifying other designated entities of their own facilities' closures or material changes easier, avoiding the need for information to be shared directly between competing firms.
  - In Chapter 6 we set out the requirement for designated firms to communicate the details of assessment outcomes, and the delivery of any additional facilities, before they close facilities. We think these requirements are proportionate and should allow non-designated firms to find out about closures of facilities. As such, our rules do not require designated firms to notify non-designated entities of their facilities' closure in advance of carrying out assessments and publishing their outcomes. However, we would encourage them to do so where this may help address gaps in provision left by their facilities' closure, subject to ensuring their compliance with competition law.
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## Duplication of assessments

- 2.45** Several respondents, both within industry and outside it, raised concerns about the potential for a high number of assessments to take place, potentially with different outcomes, if designated firms choose not to be part of a designated coordination body.

### Our response

- As we set out in CP23/29, we would strongly encourage designated firms to work through a single independent coordination body designated by the Treasury to carry out assessments. Participation in a coordination body can lead to efficiencies in processes and costs. Firms can, if they wish, participate in coordination bodies for the purposes of carrying out assessments while still choosing to deliver any services the assessment identifies as necessary by themselves.
- However, since we do not mandate participation in a coordination body, our rules provide a framework for designated firms to undertake their assessments without being a member of a coordination body.
- Firms acting outside of a coordination body will still be required to comply with all applicable rules relating to the assessment process, and we will hold them to the same standards as those that choose to join a coordination body.
- We will supervise firms to ensure compliance with our rules and will intervene where necessary to deliver the right outcomes for consumers and businesses.

## Other definitions

- 2.46** Industry respondents also asked for clarity on the definitions of 'current account', 'business customer' (and whether this included, for example, charities) and what constitutes a 'reasonable mix' of coins and notes.

### Our response

- The definition of a current account is set out in s.131O of FSMA. It is an account by means of which one or more named persons are able to:
  - a. place cash,
  - b. withdraw cash, and
  - c. execute and receive payment transactions to and from third parties, including the execution of credit transfers.
- Other relevant definitions including 'relevant personal current account' and 'relevant current account provider' are also set out in FSMA s.131O.

- Our new Access to Cash Sourcebook is clear that references to 'businesses' should be interpreted broadly, to include, for example, charity shops. References to businesses throughout this Policy Statement and our rules should be taken to include charities (alongside all other businesses, including small and medium sized enterprises (SMEs)), and firms should be taking account of their needs as appropriate when complying with the rules.
  - We are not taking a prescriptive approach to defining a 'reasonable mix' of coins and notes. Firms should consider the needs of consumers and businesses in different areas, as what is reasonable to meet demand in one area may be different elsewhere. Areas with lots of cash-reliant businesses, for example, may require greater access to coin withdrawal services so they can offer their customers change.
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**2.47** In Chapter 4 of CP23/29 which sets out assessment triggers, we also asked questions on assessment timeframes and transitional arrangements. We deal with these in Chapter 4.

## Chapter 3

# Cash access assessment process

- 3.1** In Chapter 5 of CP23/29, we set out our proposals for a 3-step assessment framework which designated entities would be required to follow when a cash access assessment is triggered.

Step 1 – Establish if there is, or would be after a closure/material reduction or change in services, a deficiency in cash access services in the local area.

Step 2 – If a deficiency does or would exist, consider whether it has or would have a significant impact.

Step 3 – If it has a significant impact, identify additional cash access services that would address the significant impacts and be reasonable to provide.

- 3.2** In this chapter, we set out and respond to feedback on our proposals on:
- how designated entities should identify the boundaries of the local area under assessment
  - the factors designated entities should consider when identifying if there is (or would be) a deficiency in cash access services with significant impacts
  - how assessments should consider 'last branch in town' scenarios
  - how designated entities should identify which cash access services should be put in place to address deficiencies with significant impacts
- 3.3** Diagrams summarising each step of the assessment process, as amended in response to the feedback we received, are also included.

## Step 1: Identifying if there is a cash access deficiency in the local area

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- 3.4** We proposed that, in order to establish whether a deficiency in access to cash exists, designated entities would have to consider what cash services are available (or will be available following a closure/material reduction or change in services) to the individuals and businesses in the local area.

### Identifying the local area

- 3.5** To conduct an assessment, it is necessary to establish the geographic area being assessed, which we refer to as the 'local area'.

- 3.6** We proposed to give designated entities some flexibility to develop their own methodology to define a local area, subject to consideration of:
- where people live or businesses are based
  - whether they could be affected by a deficiency in the cash access services being assessed

**3.7** We proposed that designated entities would be required to clearly define this local area by setting a boundary which identifies the population and businesses that could be affected if there was a deficiency in the cash access services being assessed, and by considering whether that local area is urban or rural. The examples we set out in CP23/29 showed how the location of retail centres and cash access facilities in rural areas could affect the people and businesses in the area, and therefore how the local area under assessment could be drawn up. For example, under our proposed approach designated entities may have to consider the residents of smaller satellite settlements who could be impacted by the loss of services in a nearby larger town.

**3.8** We asked:

**Question 6:** *Do you agree with the approach of establishing a local area by reference to the addresses of those who could be affected by a deficiency? Are there any other factors designated entities should be required to take into account when establishing the local area to be used in assessments?*

**3.9** Responses to this question were split, with consumer organisations and industry expressing different views. Consumer groups, elected representatives, and local authorities were broadly supportive of our approach. Several noted the limitations of LINK's existing approach which relies on a fixed radius from the nearest retail centre to determine who is affected by deficiencies. Geography can prevent settlements growing uniformly around a centre point or where nearby settlements rely on services in a larger 'hub' town. One respondent said that using a fixed radius is also challenging to apply in coastal areas or near the Northern Ireland land border. Respondents also pointed to features like public transport and connectivity as factors which may influence who is affected by a deficiency.

**3.10** Some respondents commented that people may access cash away from where they live, and called for links to nearest retailers or where people spend cash to also be considered. Several consumer groups also called for local communities to be consulted when the local area is being drawn up. Another suggested that nearby towns should be excluded from local areas where cash access requests are made on the basis requestors consider the facilities in those towns to be insufficient.

**3.11** Many industry respondents disagreed with our proposals and advocated for retaining the system used by LINK for defining local areas under the existing voluntary initiative. They argued there is a need for a uniform methodology to ensure consistency and would prefer simple standardised criteria are used to draw up local areas.

- 3.12** However, this sentiment was not universal amongst industry: 2 respondents agreed with our proposed approach, with 1 using an example of a community with dependent satellite towns as one that would benefit from our proposed approach to local areas.
- 3.13** Another respondent suggested the Post Office's published approach to monitoring accessibility as an alternative. This approach involves breaking the country down into census output areas and calculating accessibility by measuring the distance from the centre of the output area to its nearest Post Office. They did, however, acknowledge the removal of services may affect satellite villages so 'dependent local areas' may also need to be considered.
- 3.14** Several consumer-facing respondents questioned how the proposal would be implemented in practice, requesting more guidance on how local areas should be established to eliminate the risks of inconsistencies between designated entities leading to conflicting assessments.

### Our response

- We are taking forward the approach we consulted on.
- As set out in the consultation, we do not consider the approach taken under the current voluntary arrangement to be appropriate for all local areas. Drawing a fixed radius around the nearest retail centre may not, for example, include residents of nearby settlements who rely on the cash services available in a larger town. The approach we set out in our rules will require designated entities to take a more targeted approach to drawing up the boundaries of local areas and consider who has the potential to be affected by gaps in provision. This could, for example, include those who might rely on services in a larger 'hub' town. Similarly, consumers and businesses closer to one town could be affected by the closures of services in another which is further away if, for example, that is the only location they are connected to by public transport, or, in the case of Northern Ireland, where their closest town is across the border in the Republic of Ireland where a different currency is used.
- We do not think an approach similar to the Post Office's (set out in paragraph 3.13 above) would be suitable for the purposes of cash access assessments. Our rules are not aimed purely at maintaining the geographic spread of cash access services, but are also about ensuring coverage avoids leaving gaps with significant impacts. Using pre-set boundaries based on census output areas does not provide sufficient flexibility to consider impacts on all who may be affected by gaps in provision.
- We recognise, as some respondents note, that consumers may access cash away from where they live. Our guidance is clear that when considering who may be affected by a gap in provision, designated entities may consider the locations where people in the relevant surrounding area are likely to use cash regularly, for example retail areas, and the presence (or otherwise) of any cash access facilities there.

- Our approach is outcomes focused and we do not prescribe what data designated entities should collect. However, we expect designated entities to gather enough information from data sources and relevant stakeholders to satisfy themselves they are complying with our rules and identify who could be affected by gaps in provision. To this end, they may choose to engage with community stakeholders when determining the relevant local area to support their understanding of needs. In doing so, they should think about who in the community is best placed to input, which may not be the same in every case.
  - It is important firms draw up boundaries that capture those who could be affected by a deficiency, and what those boundaries look like will differ between areas. We think flexibility is important for this task, and as such do not think a more prescriptive approach would be appropriate. However, our rules are clear that designated entities must apply their methodology consistently across all assessments.
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## Rural versus urban areas

- 3.15** The Treasury's Statement sets out the distances (as the crow flies) within which it understands at least 95% of people have access to cash deposit and withdrawal services. This understanding was informed by our [Q2 2022 analysis](#) of access to cash coverage. The Treasury's policy is for this level of coverage (which it also regards as a suitable proxy for coverage for businesses) to be maintained.
- 3.16** Different distances were set out for rural and urban areas:
- For predominantly **urban** areas the relevant distance is within 1 mile of where at least 95% of people live.
  - For predominantly **rural** areas the relevant distance is within 3 miles of where at least 95% of people live.
- 3.17** As such, having identified the local area to be assessed, our proposals required designated entities to classify it as either urban or rural to before undertaking an assessment.
- 3.18** The draft rules set out in CP23/29 defined 'rural' as follows ('urban' had the converse definition, covering any local area which is not rural):
- a. for England and Wales, an area where the majority of the population live in a settlement of fewer than 10,000 people
  - b. for Scotland, an area where the majority of the population live in a settlement of fewer than 3,000 people, with a drive time of 30 minutes or more to a settlement of 10,000 people or more
  - c. for Northern Ireland, an area where the majority of the population live in a settlement of fewer than 5,000 people.
- 3.19** We did not ask a specific question on the use of urban/rural classifications, but we received several comments on them.

- 3.20** Several industry respondents pointed to the importance of having clear definitions of urban and rural. Other respondents raised questions about our proposals' alignment with the standard urban-rural classifications set by the Office for National Statistics (ONS) (for England and Wales), Scottish Government (for Scotland) and Northern Ireland Statistics and Research Agency (NISRA) (for Northern Ireland).
- 3.21** Several respondents pointed to the wide variation in the nature of rurality and unique challenges in specific regions like remote parts of Scotland. A handful of respondents suggested we consider a more granular approach to categorisation (based on more granular subclassifications in the established ONS, Scottish Government and NISRA methodologies). They argued this might allow for more representative consideration of local characteristics.

### Our response

- We are taking forward the approach we consulted on, subject to one change to correct an error which will ensure the definitions of 'urban' and 'rural' in our rules align with those used in the analysis which informed the Treasury's Statement.
- The definition in our draft rules erroneously reflected the Scottish Government's separate classification of a 'remote rural' area.
- We have therefore updated the definition of a rural area in Scotland to align with the standard definition set out by the Scottish Government. This means that for Scotland, a rural area will be one where the majority of the population live in a settlement of fewer than 3,000 people. We have similarly amended the definition of an urban area in Scotland, to be one where the majority of the population live in a settlement of 3,000 people or more.
- This is the definition used to inform our ongoing cash coverage monitoring, which informed the Treasury's understanding of the distribution of cash access services. As noted above, it is the Treasury's policy for this level of coverage to be maintained. This definition is also the one which informed the CBA of our consultation proposals.
- The definitions of 'urban' and 'rural' in our rules (as amended) are based on the standard urban-rural classifications set by the ONS, Scottish Government, and NISRA. These well-established urban-rural classifications are designed to reflect the different natures of rurality in each country and have been in use for several years. The definition used for Scotland, as amended, in particular is simpler than the one set out in CP23/29.
- We recognise the nature of rurality varies. However, in setting out what constitutes reasonable provision, the Treasury's Statement (which we must have regard to) refers to 'predominantly urban' and 'predominantly rural' areas. It would therefore not be appropriate to deviate from this approach, so we are not using more granular sub-classifications. It is also important that consumers and businesses can easily understand the classification, and that it is not overly difficult or burdensome for designated entities to use.



## Identifying whether there is a deficiency in the local area

- 3.22** Having identified the local area to be assessed, under our proposals designated entities must undertake a 'step 1' assessment.
- 3.23** At step 1, we proposed that designated entities would be required to consider:
- whether the specified services and features which are the subject of the assessment are accessible to at least 95% of people within the relevant distance (1 mile in urban areas, 3 miles in rural ones)
  - whether the facilities providing them have capacity to serve the local area
  - whether the actual time and cost of travel to the facilities is reasonable.
- 3.24** Where any of these criteria are not met, designated entities would be expected to identify a deficiency in cash access, and proceed to a more detailed step 2 assessment to understand its impacts.
- 3.25** In establishing what suitable cash facilities are available, we also proposed assessments should ignore:
- services that are expected to close
  - cash services for personal current accounts that are not free
  - cashback with a purchase
  - additional services that may result from any other assessment undertaken as a result of the same trigger.
- 3.26** In addition, where a cash service is expected to undergo a material reduction/change, designated entities would be expected to only consider the services and features which would remain after that reduction/change.
- 3.27** We also set out our expectation that, in considering the availability of cash access services, significant weight should be given to whether cash services are provided with consistency during stated opening hours. This could have particular implications for some facilities offering cashback without a purchase.
- 3.28** We asked :

**Question 7:** *Are there any additional factors that should be considered by designated entities in the Step 1 assessment process? Please detail what and why they are important to understanding if a local cash access deficiency exists?*

## Deficiency: relevant distances

- 3.29** Some respondents challenged the relevant distances. One respondent suggested the 1-mile distance in urban areas was too far, noting this can be a long way for those with mobility issues, and suggested the distance should instead reflect the walking distance in planning guidance of 800m. Others noted that challenges of physical geography can mean even facilities within short distances (as the crow flies) can be difficult to access.

### Our response

- The 1 and 3-mile distances for urban and rural areas respectively are set out in the Treasury's Statement as the coverage measures which they want to see maintained for at least 95% of people, and we are required by FSMA 2023 to have regard to this. However, our rules and guidance are clear that these distances cannot always be relied upon as a determining measure. Designated entities should also consider local geographical features and actual journey times and costs when establishing if a deficiency exists.

## Unreasonable travel times and costs

- 3.30** Respondents who commented agreed it was important for the assessment process to take account of actual journeys, including the cost and travel time to facilities. Some respondents called for clearer guidance on what constitutes 'unreasonable' cost or travel time and how designated entities should take account of geographic factors.
- 3.31** Some respondents group called for the step 1 assessment to consider the frequency and availability of availability of transport more generally, including in poor weather. For example, a bus which runs only once a week may not provide reasonable access, regardless of the journey's time or cost.

### Our response

- We are proceeding with our approach as consulted, which we consider proportionate and sufficiently flexible to account for various factors that affect journeys to cash access points.
- We do not take a prescriptive approach to what constitutes unreasonable travel times and costs, which may differ between urban and rural locations. We set out in guidance that a journey to a cash access facility may be unreasonable if it is substantially more time consuming or expensive than an equivalent journey travel to the nearest retail centre. This will differ between communities.
- We agree that the availability of transport is an important factor to consider when assessing whether communities have reasonable access to cash and refer to the impact of limited transport networks in our guidance. Infrequent public transport services will likely increase the time and cost of journeys. For example, a bus or ferry that is only scheduled weekly may require communities to use costly alternatives, or even mean they are unable to make journeys at all. We will expect designated entities to consider if the lack of availability of public transport would make the cost of journeys to cash facilities unreasonable.
- We also recognise that poor weather can disrupt journeys. Designated entities may need to consider if frequent and expected disruption to certain routes would limit provision for consumers and businesses in a local area. For example, if a firm is aware of tidal crossings that are

regularly closed, or bus routes that are frequently diverted, we would expect them to take this into account when considering the likely time and cost of travel.

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## Specified services and features (including availability of coins)

**3.32** Several industry respondents raised questions about:

- the four specified services:
  - free to use withdrawal services for personal current accounts
  - free to use deposit services for personal current accounts
  - withdrawal services for businesses
  - deposit services for businesses
- the two specified features:
  - availability of assisted cash
  - functionality for a reasonable mix of both coins and banknotes to be deposited or withdrawn

**3.33** One respondent asked for more clarity on exactly which facilities would meet the need for these services/features, including what we mean by assisted cash and whether mobile branches would meet our requirements.

**3.34** Several other respondents raised concerns about including the functionality to deposit or withdraw a reasonable mix of both coins and notes as a specified feature. They note they did not want to see consideration of the functionality to deposit or withdraw coins as a 'blanket' requirement. One raised concerns about the costs of provision of free coin deposit and withdrawal services to businesses, suggesting they should only be required to deliver free access to personal customers.

**3.35** Another respondent pointed to the complexity of coin provision, suggesting they would like a shared delivery body or the Post Office to be responsible for delivering this, rather than individual designated firms.

**3.36** Several industry respondents also raised concerns about the scope of assessments. They did not want designated firms to be required to carry out assessments or bridge gaps in provision for customer types they do not themselves serve.

### Our response

- We are taking forward the approach we consulted on. Our rules are channel neutral when it comes to the delivery of services and we do not wish to prescribe which facilities could deliver which services and features. We welcome and encourage continued innovation.

- However, we recognise respondents' desire for more clarity, and we consider some specific examples below:
    - A bank branch is likely to provide access to both assisted cash (with trained staff behind counters) and the ability for customers to withdraw and deposit a mix of both coins and notes.
    - A traditional ATM, on the other hand, may not offer deposit services, assisted cash (unless, for example, it allows for video calls with support staff) or access to a reasonable mix of coins.
    - Mobile branches may offer any or all of the specified services and features but it is important to note these are not the only factors designated entities will be required to consider at step 1. They must also, for example, consider whether facilities have the required capacity (discussed below) which, with mobile branches, may be more limited given they are likely to be present at sites for short windows
  - Designated entities will not be required to consider the provision of a reasonable mix of coins and notes by default as part of every assessment. As a specified feature, they will only be required to consider this when it is identified in a cash access request or is a feature that is subject to a closure or material reduction/change. We have changed some of the language in our rules to make this point clearer.
  - In line with the Treasury's Statement, we see reasonable provision for personal customers as meaning access to free services. Designated entities will be able to rely on paid services when carrying out assessments for business' needs – this applies to all services and features, not just the deposit of coins.
  - The ability to deposit and withdraw coins and notes can be an important part of cash provision, and is particularly important to some groups, including businesses who rely on change. While we note respondents' concerns around the complexity of coin provision, we do not have the power under the new regime to require non-designated entities like the Post Office to provide cash access services. However, our approach to delivery is channel neutral and we would encourage designated firms to consider how they can work with others to deliver services which may help reduce costs. We note, for example, that many firms already provide the ability to deposit and withdraw coins through shared services such as banking hubs. Our approach to delivery is discussed in Chapter 5.
  - Finally, our rules do not require designated firms to carry out assessments or bridge gaps in provision for customer types they do not themselves serve. For example, a firm which does not serve business customers would not be required to consider their needs.
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## Capacity and demand

- 3.37** Both industry and consumer representatives commented on our proposal that designated entities should be required to assess capacity at step 1 when identifying if there is or would be a deficiency following a trigger event.
- 3.38** One firm asked for more clarity on what we mean by 'capacity', and whether we considered the current LINK approach sufficient.
- 3.39** Some consumer groups called for opening hours (including whether cash access services are available 24-hours a day) to be included as part of firms' consideration of capacity. They noted that limited opening hours might have particular impacts for those who may have difficulty engaging during normal working hours.
- 3.40** Other respondents also called for designated entities to consider demand when looking at capacity. Some firms called for designated entities to be able to consider existing levels of demand and use of past services when carrying out assessments. Consumer groups noted the importance of considering both sustained demand (eg, areas with higher levels of cash usage, such as Northern Ireland) and of predictable fluctuations (eg, seasonal fluctuations or market days).

### Our response

- We are proceeding with our approach as consulted. We are not taking a prescriptive approach to what constitutes adequate capacity, as assessments should consider what is reasonable for the specific local area. Designated entities need to satisfy themselves that their methodology is working as intended, and we will expect them to keep this under review. This may change over time as consumers' and businesses' needs, and the use of cash evolves. As such, we do not think it would be appropriate to rule on the appropriateness of any particular approach, given that this may change over time.
- We agree demand is a key component of considering whether facilities have sufficient capacity. As set out earlier in this chapter, we do not take a prescriptive approach to the data designated firms use to support their assessment processes. Information about the use of past services may be relevant to assessments of demand and capacity, but designated entities should bear in mind assessments should focus on the cash needs of communities as a whole, not just particular firms' customers.
- We also recognise, as respondents noted, that demand may fluctuate. We would expect designated entities to consider how demand may change when assessing whether existing facilities have sufficient capacity. While we set this out explicitly at step 2 of the assessment process, we have also amended our guidance to make clearer our expectations that designated entities also consider predictable fluctuations in demand when considering capacity at step 1.

- Likewise, opening hours may be relevant to a cash access facility's capacity. For example, the facility may be open for so few hours each week that this leads to unacceptable queues or delays in service. We have amended our guidance to make clear opening hours may be relevant to consideration of capacity at step 1. We do not, however, think it proportionate to expect facilities to have extended opening hours to accommodate what may be a comparatively small number of customers, when they have capacity to accommodate all users within normal working hours. We have been tasked by Parliament with seeking to maintain 'reasonable' access to cash, and our approach is focused on addressing deficiencies which have significant impacts.
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## Northern Ireland

- 3.41** One respondent pointed to the specific challenges faced in Northern Ireland, on account of it being the only part of the UK to share a land border with another state, the Republic of Ireland. They suggested this has an ongoing impact on cash use, levels of demand and cash access in border areas, as a different currency is used in the Republic of Ireland.

### Our response

- We recognise that in border areas in Northern Ireland people from the Republic of Ireland may regularly cross the border, and place additional demand on cash access services in Northern Ireland. This may be relevant to designated entities' consideration of facilities' capacity. As set out above, proximity to the border may also be relevant to firms when drawing up the boundaries of the local area under assessment, as they consider who may be affected by a deficiency in cash access.
  - We recognise some people in Northern Ireland will also rely on euros. However, our powers extend only to cash as defined in s.131N(2) of FSMA. This includes only banknotes issued by the Bank of England, or an authorised bank in its capacity as an issuer of banknotes in Scotland or Northern Ireland, and to coins made by the Royal Mint.
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## Cashback without a purchase

- 3.42** A handful of respondents commented on consideration of availability of facilities offering cashback without purchase in assessments.
- 3.43** One firm welcomed our proposals on expecting significant weight to be given to whether cashback without purchase facilities provide consistency of service during opening hours. They suggested larger retailers may be more likely to provide such consistency. Another firm expressed concerns around our approach to cashback without purchase more generally. They noted it can play an important role in situations where other services may face limitations, such as where low demand may preclude

other, more costly, forms of cash access provision. They also noted many stores have long opening hours and pointed to checks operators of specific cashback schemes make to ensure retailers perform appropriately.

- 3.44** Conversely, other respondents called for cashback without a purchase to be excluded, raising concerns around consistency and capacity.
- 3.45** Several firms called for more guidance on consistency of service, without mentioning cashback explicitly.

### Our response

- We are taking forward the approach we consulted on. In Chapter 2, we explain our decision to exclude cashback without a purchase as an assessment trigger.
- We value the role cashback without a purchase can play in helping maintain communities' access to cash, particularly in some of the most remote communities where other forms of provision may not be feasible.
- However we think it is only reasonable for designated entities to consider cashback without a purchase facilities in their assessments, if they can demonstrate consistency of service during opening hours.
- As with other issues, we are not taking a prescriptive approach to defining consistency. Designated entities should keep tests they use under review, they may change as firms' understanding of what meets communities' needs evolves.
- We explain in Chapter 5 the limited scenarios whereby cashback without purchase can be used to address identified deficiencies with significant impacts.

### Inclusion and accessibility

- 3.46** Some respondents called for designated entities to be required to consider a wider range of demographic factors at step 1, including: age, levels of deprivation, digital exclusion, other characteristics of vulnerability, and different SME business types in a given local area. Another noted the importance of internet access to peoples' ability to use electronic payment methods.
- 3.47** Several respondents also drew attention to wider financial inclusion and accessibility issues. They called for step 1 assessments to consider features of existing facilities including: the language existing services are offered in (particularly relevant for Welsh language communities), their accessibility (beyond the presence of assisted cash), and the safety and security of existing facilities.

## Our response

- The purpose of a step 1 assessment is to consider what facilities are already present within the distances set out in the Treasury's Statement, whether they provide the services and features under assessment, whether they are reasonable to travel to, and whether they have sufficient capacity.
  - Where there are no such facilities, we would expect designated entities to identify a deficiency and undertake a fuller step 2 assessment. At that point we will expect them to consider a wide range of factors to assess the impacts of that deficiency on each local area. Our approach to these more detailed step 2 assessments is set out below.
  - Those providing cash access services are also already subject to a range of wider obligations concerning non-discrimination and safety. They are, for example, responsible for making reasonable adjustments for people with disabilities under the Equality Act 2010 in Great Britain and the Disability Discrimination Act 1995 in Northern Ireland. Similarly, those providing cash access services are responsible for complying with their obligations under health and safety law.
  - Firms we regulate must also comply with their obligations under the Consumer Duty to support consumer understanding, and give their customers information that meets their needs and is presented in a way they can understand.
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## Implementation

- 3.48** Several respondents asked more general questions on how the assessment process would work in practice.
- 3.49** Several firms expressed a preference for any assessment process to be aligned closely with the existing LINK process under the voluntary scheme, arguing even minor adjustments could have significant operational impacts.
- 3.50** Some industry respondents questioned the accessibility of the information needed to carry out assessments effectively. For example, one firm noted we expected step 1 assessments to involve 'reasonable assumptions' based on the types of facility present and characteristics of the local area. Some firms also questioned how capacity would be assessed if non-customer relationships must be considered, suggesting that any assessment of potential demand risked overprovision of services. They suggested Post Office and Independent ATM Deployer data would be essential for designated entities to properly understand capacity.
- 3.51** One firm asked whether we would consider it acceptable for step 1 assessments to be completed without in-person visits to local areas.
- 3.52** Several respondents representing consumers, and one industry respondent, called for designated entities to be required to consult local stakeholders at step 1 of the assessment process.



## Our response

- As we set out previously, we do not think the current LINK assessment process would deliver the right outcomes for consumers and businesses, on account of it only considering a limited number of factors to assess local demands and needs. In contrast, our rules require designated entities to go further and consider a wider range of factors.
  - Our approach is outcomes focused, and our rules do not prescribe the data designated entities should use to carry out their assessments, so long as they can satisfy themselves they are complying with our rules. However, we give guidance on sources of information that should be considered, and encourage designated entities to consult local stakeholders and visit local areas to inform their understanding of local needs. Designated firms may also find that joining a coordination body may make complying with our rules easier. A coordination body could gather data from all members to help inform the assessment process.
  - Any designated entity that thinks it will not be able to comply with our new rules should share its position with its supervisory contacts as soon as possible, together with its plans to close the compliance gap and address any resulting issues.
  - As set out in Chapter 1 and 4, we have introduced an implementation window to give designated entities time to familiarise themselves with our new rules and establish their assessment procedures before the rules come into force.
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### **'Last branch in town'**

- 3.53** Under the current voluntary arrangement, LINK, who carry out assessments of cash access and recommend facilities such as banking hubs (which also provide wider services than those covered by our new regime) to Cash Access UK, will not consider whether an area requires a new cash solution if there is a remaining bank or building society branch in town, subject to certain exceptions.
- 3.54** We noted in CP23/29 that we do not believe this approach will deliver the outcomes for reasonable provision we are seeking, and that the Community Cash Advisory Panel, that oversees LINK's existing work assessing branch closures, shared our concerns. We set out our view that where only one bank or building society branch is, or will be left, in a local area, it may be unreasonable to expect high levels of switching by consumers and businesses to retain over the counter access to withdrawal and deposit services locally.
- 3.55** So we consulted on a proposal that, regardless of trigger event, if the assessment finds there is only a single remaining branch providing a cash access service within the relevant distance (and no other facilities serving the customers of at least one other firm), the assessment would have to, by default, assume there is a deficiency and proceed to step 2.

**3.56** We also consulted on carveouts to the rule, whereby:

- the existence of an ATM at the branch could allow for an assessment of a cash withdrawal service to stop at step 1. This was on the basis an ATM would generally be expected to provide withdrawal services for other firms' customers as part of a network
- the last branch in town rule would not apply to assessments triggered by a closure of another branch of the same bank or building society, as this should not result in the same concern about levels of switching.

**3.57** We asked 2 questions on this 'last branch in town' proposal:

**Question 8:** *Do you agree with our last branch in town proposal?*

**Question 9:** *Are there other proposals for the last branch in town we should consider?*

**3.58** Responses to this question were split, with consumer representative and industry having different views. While consumer groups, business organisations, charities and individuals were generally supportive, most firms challenged our proposals. Only 3 industry respondents, none of which were a bank or building society, were supportive of our approach. It was evident, however, through the responses we received that many respondents needed further clarity or had misunderstood aspects of our approach.

**3.59** Banks and building societies challenged our approach and argued a full-service branch with an external ATM should meet the local area's needs. Several argued our approach could have the unintended impact of reducing branch provision by encouraging shared solutions and diminishing the commercial incentives for firms to keep a branch open. Some accepted that in some of the largest communities a single full-service branch may be insufficient but suggested these cases would be picked up by the consideration of capacity at step 1.

**3.60** Several industry respondents argued our proposals go beyond the intent set out in the Treasury's Statement, which understood coverage on a national level to be broadly comprehensive. They argued our proposals could lead to the overprovision of cash services.

**3.61** Several firms thought that customers, including customers with characteristics of vulnerability, should be expected to switch provider. They argued that, by not being present in a particular local area, banks are knowingly risking their customers switching to another bank, and that our approach could undermine the ability for firms to compete for customers by choosing locations for branches. They pointed to support from firms and services such as the Current Account Switch Service which make it easy for customers to switch provider. One firm noted the London Economics research used in our cost benefit analysis, that estimated switching costs to be low for customers.

**3.62** Some firms did, however, acknowledge a need to better support business customers and agreed communities would need additional services where a last branch does not serve small businesses. Two respondents discussed the potential for firms who do not

serve business customers to host services for other firms' SME customers in their own branches. One of these noted that some building societies have already trialled hosting kiosks at their branches which provide cash access services for non-members.

- 3.63** In contrast, most individuals, and respondents representing consumers, small businesses and charities, broadly supported our proposal and argued customers could not always be reasonably expected to switch to another provider. Respondents pointed to particular groups who may face barriers switching to suitable alternative accounts. These included voluntary organisations, who may struggle to find other accounts that meet their needs (which are often different from those of SMEs) and customers who need access to specific services (such as basic bank accounts, or counter or deposit services) where these are not offered by an area's remaining provider. One respondent suggested firms could do more to support customers to switch or transition to digital banking, but noted poor digital infrastructure can limit customer choice even where they do get support.
- 3.64** Several industry respondents misunderstood our 'last branch in town proposal' and assumed it meant they would be required to deliver additional services in every scenario where a local area had only a single branch. In contrast, some consumer organisations misinterpreted our proposal to mean that an assessment would never be triggered or proceed past step 1 whenever there were 2 or more branches in the area, irrespective of whether those branches had sufficient capacity or could serve the needs of all customer types.
- 3.65** Some respondents also asked for clarification on what we mean by a 'facility that serves at least one other bank or building society's customers', including whether this would include facilities such as deposit machines or Post Offices.

### Our response

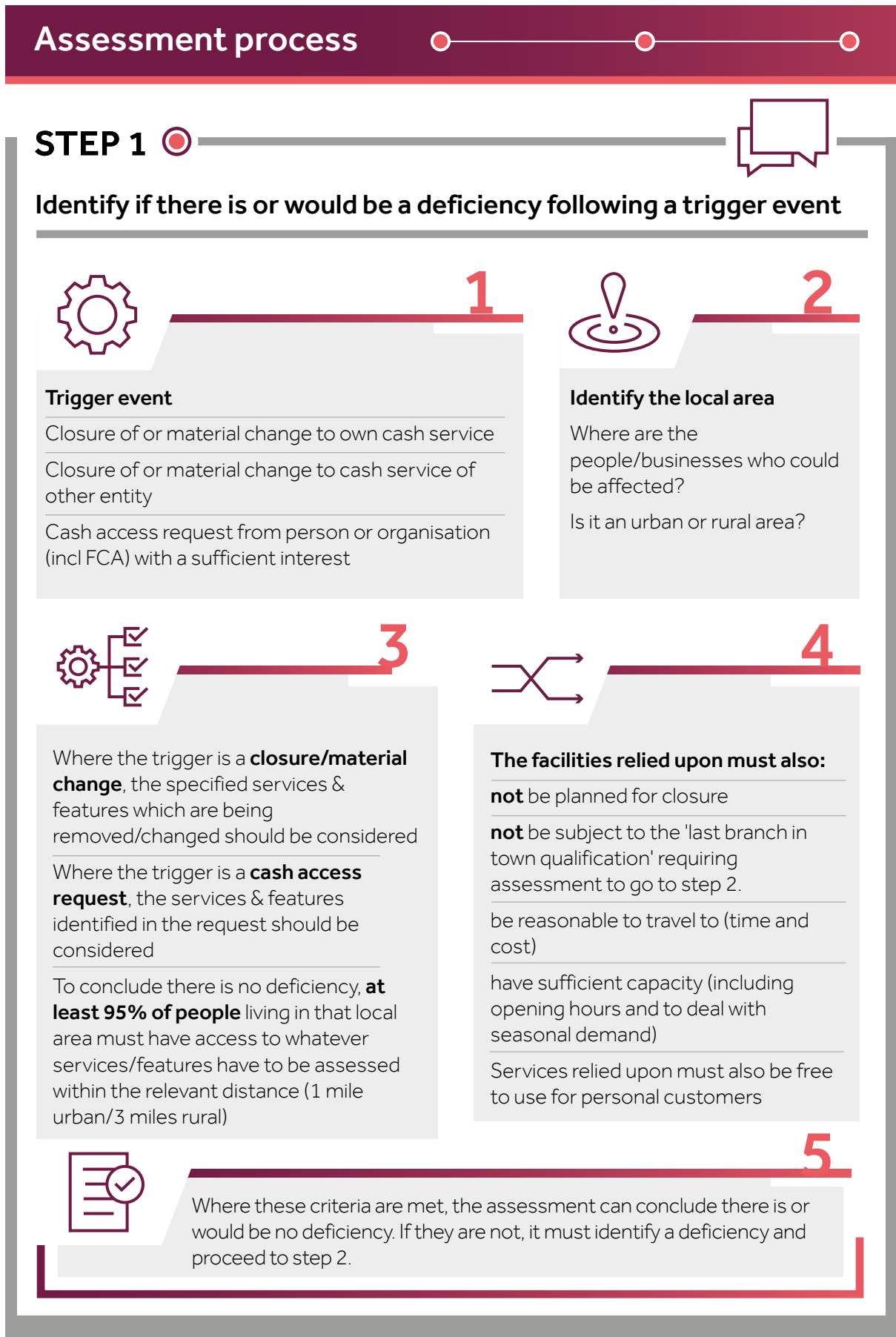
- We know communities left with single remaining branches have faced particular challenges in addressing cash access gaps under the criteria used by the existing voluntary scheme. We agree with respondents who noted some groups face particular barriers to switching (who may be most strongly impacted in areas with only one remaining provider, where they would have no alternatives to choose from at all).
- Having considered all sides, we are taking forward the approach we consulted on as we believe it is appropriate and balanced, subject to 3 changes to better fulfil the policy intention that we consulted on:
  - We have removed the requirement that the services available to customers of at least one other bank or building society have to be found at 'another' facility, separate to the 'last branch in town'. We recognise that in some cases, a last branch in town may serve the customers of other firms, giving consumers and businesses in those local areas a choice of firms to bank with. In such scenarios, it may be possible for the assessment to stop at step 1. However designated entities must still consider whether such branches have suitable capacity and whether travel times and costs are reasonable.

This rule change helps simplify the overall rule and goes further than the specific carveout for ATM withdrawals (so we have removed this carveout as it is no longer necessary).

- We are also making clear that to be able to rely on the availability of a service at a bank or building society branch at step 1 where a feature needs to be assessed alongside the service, that feature must also be available (alongside the service) to the customers of at least one other firm.
- We have also extended the carve-out for assessments triggered by a closure of another branch of the same bank or building society to assessments triggered by a material reduction/change to any branch of the same bank or building society. This means the last branch in town qualification does not apply to services and features left at the remaining branch where it is the one whose material reduction/change triggered the assessment. This fulfils the policy intention behind the carve-out, as the concern about levels of switching should not apply in this scenario either.
- Where there is, or will be, only a single remaining bank or building society branch within the relevant distance providing the cash access services and features under assessment, and no facilities serving at least one other bank or building society's customers (including businesses, where services for businesses are under assessment), designated entities will have to assume there is a deficiency and undertake a more detailed assessment.
- It is important to note that facilities serving at least one other firm's customers could take any form, including the same branch, Post Offices, and deposit machines. However, in all cases, even where facilities serving other firms' customers are present, any decision to stop at step 1 remains subject to consideration of facilities' capacity and whether they are reasonable to travel to.
- Some respondents felt that by considering capacity at step 1, cases where a single branch is insufficient would be identified. However, we think, given the barriers to switching noted above and the potential impacts upon those who find it hard to switch or have no choice of alternative provider, it is important that a more detailed step 2 assessment takes place in all cases where there is only a single branch serving only one firm's customers. This is necessary in order to look at a wide range of factors, including demographics and the needs of vulnerable people, and assess what impacts there may be on the community.

- We note respondents' concerns that the commercial incentives to keep a final branch in town open may be diminished where those in the local area can choose to be served by other facilities, including shared ones. However, for the reasons above, we do not think a single branch will necessarily address the needs of a community. We also note that our proposals are focused only on cash services. A bank branch is likely to provide a wide range of services broader than cash access (mortgages, savings products, card and PIN management) which may continue to attract footfall, even where other cash facilities exist nearby. Indeed, many firms are already part of national networks which provide cash services (for example, the LINK ATM network or Post Office Banking framework), which their branches have continued to coexist alongside.
  - It is important to note that our last branch in town qualification does not always result in the assessment outcome directing designated firms to provide additional cash access services. The step 2 assessment may conclude there are no significant impacts. On this basis, we do not agree that our 'last branch in town' proposal will lead to the overprovision of services. It may, however, mean additional services are needed in some communities which would not otherwise qualify for cash solutions under the voluntary scheme. This is consistent with the Treasury's Statement, which acknowledges that, while national coverage is broadly comprehensive, there may be local deficiencies with significant impacts.
  - However, it also does not mean 2 branches within the relevant distance, or a single branch plus one other facility, will always allow designated entities to stop at step 1. As above, they must also consider whether the facilities relied on have sufficient capacity, and whether they are reasonable to travel to, regardless of how many there already are.
  - We also note some respondents would like to see firms do more to support customers to transition to digital alternatives. As set out in Chapter 1, our new powers are focused on access to cash. However firms should continue to comply with their wider obligations, such as under the Consumer Duty, requiring them to offer their customers appropriate support, including those who are digitally excluded.
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3.66 Step 1 of the assessment process is summarised in the diagram below:



## Step 2: Assess if the impact of deficiencies is significant

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- 3.67** Under our proposals, where a step 1 assessment identifies that a deficiency in cash access provision in a local area, designated entities would be required to undertake a more detailed step 2 assessment to determine whether that deficiency has, or would have, significant impacts.
- 3.68** In undertaking a step 2 assessment, we would expect designated entities to consider a range of factors, including:
- the numbers of people and businesses likely to be affected
  - the nature of impacts on those affected, including the needs of vulnerable people
  - how far outside the relevant distances the nearest suitable cash services are, whether they have capacity, and travel times and costs to get to them
  - predictable fluctuations in demand
  - the need for assisted cash
  - whether there is a need for businesses to access a reasonable mix of notes and coins.
- 3.69** We did not propose setting numerical criteria or thresholds for numbers of consumers or businesses affected for assessing the significance of impacts.
- 3.70** We asked 2 questions about step 2 of the assessment process:
- Question 10:** *Do you agree with our proposals for Step 2 of the assessment process and the factors designated entities should take into account in establishing if a local deficiency causes or would cause significant impacts?*
- Question 11:** *Do you think there are additional factors that designated firms should consider? If so, what would these be?*
- 3.71** Only one respondent disagreed with our approach in principle. They said designated firms should be required to provide additional services wherever they identify a deficiency at step 1, without the additional requirement for a step 2 assessment to identify significant impacts.
- 3.72** Other respondents, representing both industry and consumers and businesses, broadly welcomed our proposals on step 2 assessments, and the factors we set out for designated entities to consider. However, respondents called for additional guidance or clarification on several terms, including: what would constitute a 'significant impact' or 'significant number of people affected', the meaning of 'assisted cash', and what constitutes a 'reasonable distance'.
- 3.73** Consumer groups welcomed the requirement for designated entities to consider the needs of those with characteristics of vulnerability, but called for more clarity on what specific characteristics should be considered. Respondents noted we referred specifically to people who may have difficulty accessing services due to disabilities, but pointed to other characteristics of vulnerability that might amplify the impacts of

deficiencies, including low incomes or digital exclusion. One respondent pointed to other characteristics, such as old age, which might be linked to reliance on cash but may not themselves be characteristics of vulnerability. The same respondent pointed to the variation of vulnerabilities, noting that some people will be unable to leave their houses to access nearby services.

- 3.74** One respondent also noted the need for firms to have regard to relevant legislation concerning characteristics of vulnerability such as disabilities.
- 3.75** Some respondents pointed to other specific factors they would like designated entities to consider:
- availability of telecoms services (if connectivity is limited, it will impact peoples' ability to move to alternative payment methods)
  - the specific needs of voluntary organisations, which may differ from other businesses and SMEs
  - the impacts of deposit limits on businesses
  - consumers' and businesses' need to transact to the penny (given ATMs only provide rounded denominations)
  - the need for some customers to have others act on their behalf: for example, for business employees to pay into their employer's business accounts, and transactions under Power of Attorney arrangements
  - population mobility
  - site safety and security, and the resilience of cash access if or when other payment methods are non-operational
  - differences in cash usage and provision in different parts of the UK (both in terms of demand, and in terms of the different providers of cash access services, such as credit unions)
- 3.76** Several respondents raised questions about the information designated entities would be expected to gather to undertake assessments.
- 3.77** Some industry respondents noted challenges with getting the information they would need to assess the impacts of deficiencies on everyone in a community, rather than just their own customer base. They called for more guidance on how to assess factors such as residents' digital proficiency. Others pointed to challenges with measuring the capacity of facilities which are not their own.
- 3.78** Some firms called for designated entities to be able to consider existing levels of demand and past use of services when carrying out their assessments.
- 3.79** Some respondents also called for designated entities to be required to engage with a range of local stakeholders (including retailers, consumer groups, and trade unions) and consider any issues they raise. Several firms pointed to the value of LINK's current 'on the ground' approach, noting that visits to communities help provide a comprehensive understanding of local conditions and access challenges. They called for this to remain part of assessment processes under our new rules.




## Our response

- We do not think it would be proportionate to expect a deficiency which does not have a significant impact to be addressed by designated firms in the new regime, noting the focus of both the legislation and Treasury's Statement on deficiencies with significant impacts.
- We discuss what we mean by assisted cash in Chapter 2. As with other parts of our regime, we do not think a more prescriptive approach to defining terms like 'significant impact', 'significant number of people affected' or 'reasonable distance' would be appropriate. Our framework must adapt to changing demands and different communities' diverse needs, and what is significant or reasonable may differ depending on locality. For example, a lack of availability would have a more significant impact on communities during peak times than it would in off-peak times. Setting specific thresholds could also risk incentivising designated entities to do the minimum to comply with them, instead of thinking more broadly about communities' different and evolving needs.
- We agree there are many types of vulnerability, and [FG21/1](#) sets out our approach to vulnerability. While we point specifically to the needs of vulnerable users, our rules require designated entities to consider the impacts on those in the local area likely to be affected, with consideration of peoples' characteristics more generally. We know, for example, that people who are digitally excluded are disproportionately likely to rely on cash. We also recognise that other characteristics, such as old age, which are not in themselves characteristics of vulnerability may indicate that someone is more likely to be adversely impacted by the loss of access to cash.
- As our guidance also notes, firms should be mindful of their obligations to continue to comply with equality and anti-discrimination legislation.
- We recognise there are a wide range of factors respondents would like designated entities consider when assessing impacts of deficiencies. Some of these are already explicitly covered in our rules. For example:
  - The ability to withdraw a reasonable mix of coins and notes is a specified feature, which designated entities will have to consider where applicable. The impact of the absence of this may be more pronounced in local areas with specific characteristics, such as high proportions of the population on low incomes.
  - Charities and voluntary organisations are covered under the wide definition of 'business' customers in our rules, as set out in Chapter 1. Designated entities should be considering their needs when carrying out relevant assessments.
  - As set out earlier in this chapter, demand is a key consideration when designated entities are considering whether existing facilities have sufficient capacity. Designated entities should think about how this may vary in different nations and regions and how it may fluctuate over time.

- We are also clear that the factors set out in our guidance are not exhaustive and we would expect designated entities to consider communities' needs on a case-by-case basis.
  - As set out earlier in this chapter, our approach is outcomes focused and we do not prescribe the data sources firms should use as part of their assessment process.
  - We encourage designated entities to use a wide range of open source and commercial datasets. Many look at specific indicators which may be relevant to the assessment process. For example, ONS census data covers a range of variables and a range of different area types. CACI sell datasets which include a range of vulnerability indicators, including one on digital exclusion.
  - Our guidance is already clear that designated entities should, in particular, have regard to any concerns raised by local representatives and organisations about the adequacy of cash access facilities. And while we do not prescribe them, visits to local areas and engagement with local stakeholders will also help inform firms' understanding of communities' needs.
  - Designated entities may also find data from existing or past services helps them to assess impacts on communities, which may also be relevant at step 3 of the assessment process, where designated entities consider what services may be reasonable for them to put in place.
  - Firms may also find joining a coordination body, which could use data from multiple participating designated firms without requiring firms to share data with one another directly, makes carrying out these assessments easier.
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3.80 Step 2 of the assessment process, as amended post-consultation, is set out below:


## STEP 2



### Identify if the deficiency has significant impacts on the local area



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The services assessed at step 1 should be considered



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The impact on **all people** and **businesses** in the area need to be considered – not just customers





#### The factors that should be considered to establish if a deficiency has significant impacts include –

- Number** of people and **businesses** likely to be affected?
- Time and cost of travel to **nearest suitable cash services** compared to nearest retail services.
- How **far outside the distances** are the nearest suitable cash services and do they have capacity?
- Likely impact on those affected – what are the needs of **vulnerable people**?
- Can **businesses** access reasonable mix of notes and coins?
- Is there a need for **assisted cash**?
- Are there any **seasonal or other fluctuations** to consider?

## Step 3: identifying additional cash access services required

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- 3.81** Where designated entities identify a deficiency in cash access services has or would have a significant impact on a local area, step 3 of our proposed assessment process requires them to identify what additional services would address these impacts and would be reasonable to provide.
- 3.82** This process would require designated entities to identify:
- which cash services are required
  - the area within which they should be located
  - what capacity the facility should have (including opening hours)
  - whether there is a need for assisted cash (and, if so, what form it should take)
  - whether there is a need to provide reasonable mix of coins and notes (for example, where the assessment identified significant impacts on businesses who needed to withdraw coins for change)
  - whether the services should be provided on a permanent or trial basis (and, if on a trial basis, the trial period).
- 3.83** Our proposals are channel neutral. We did not propose that assessments should specify the specific type of facility (eg, branch, banking hub, or ATM). Assessments would, however, have to be clear on the services and/or features designated firms must deliver, which would exclude any channels which do not provide them.
- 3.84** While we did not ask a specific question on step 3 of the assessment process, respondents commented on it throughout their answers.

### Channels of delivery

- 3.85** Our channel neutral approach was generally welcomed by industry. But some consumer groups, individuals, and campaign groups did not agree with it and called for us to do more to promote specific facilities. This included calls for us to require firms to keep branches open or for banking hubs to be recommended as the primary alternative. Another respondent suggested ATMs were their preferred choice, pointing to their widespread use and the 24/7 availability of many.
- 3.86** Several industry respondents called for more guidance on which services we would consider suitable to address gaps, particularly where assessments identify consumers and businesses with specific needs. They also asked whether we would be supportive of firms experimenting with a range of new solution types, including self-service ones.
- 3.87** Some consumer groups, and one industry respondent, also called for communities to have some input on the particular facilities designated firms must put in place.

#### Our response

- We will continue with our 'channel neutral' approach as consulted. We welcome and encourage continued innovation by firms across the delivery of cash services. Importantly, however, firms must ensure the

facilities they deliver address the significant impacts identified in the assessment. They must have the required services and features, and the capacity and opening hours identified in the assessment.

- We recognise respondents want more clarity on the kinds of facilities we would consider to provide certain services and features. We set out a non-exhaustive list of some examples in our response under paragraph 3.36.
  - It would not be proportionate to expect firms to respond to requests for particular facilities by communities. We have been tasked by Parliament with seeking to maintain 'reasonable' access to cash, and our approach is focused on addressing deficiencies in cash access which have significant impacts.
  - As explained in Chapter 1, our new powers also do not extend to the wider banking services, beyond cash access services, provided by facilities such as branches or banking hubs and as such we cannot require firms to deliver these under the new regime. We would, however, encourage firms to continue to consider the need to provide access to community banker support, alongside cash access services, using solutions such as banking hubs or other alternatives.
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## Identifying service features

- 3.88** One respondent commented on where cash access services should be located. They suggested consideration should be given to providing a cash access point at the nearest retail centre instead of in a location where it will not be as well used.
- 3.89** One firm also requested clarity on whether a solution which is recommended due to a deficiency created by seasonal demand (that is, a deficiency which exists for only part of the year) could also be seasonal, to avoid it going unused for long periods of time when demand is lower.
- 3.90** Many consumer organisations commented on the provision of assisted cash services. They noted the importance of ensuring they are provided in a way that is suitable for the customers who need them.

### Our response

#### Proximity to local areas

- We have amended our guidance to say that firms should consider proximity to areas where cash is most likely to be used, such as retail areas, when identifying at step 3 where facilities should be located.

#### Seasonal demand

- We have amended our guidance to make clear that seasonal changes in demand could be a relevant factor in identifying capacity needs and opening hours in step 3.

### Assisted cash

- At step 3, our rules require assessments to identify what type of assistance should be provided. They should consider what characteristics of the local area led to the conclusion in the assessment that a lack of assisted cash provision would result in significant impacts, and what type of assistance would address these. All firms, not just those designated for the purposes of our new regime, should also consider their wider obligations under the Consumer Duty as well as FG21/1 when providing services.
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## Ensuring solutions work as intended

- 3.91** Industry respondents welcomed having the ability to offer temporary or pilot solutions to gauge demand but called for more clarity on the circumstances where they would be considered appropriate.
- 3.92** One respondent questioned whether the FCA would play any role in determining whether a trial had succeeded.
- 3.93** Some firms also noted that facilities, once installed, may be used less than expected and, in such instances, would like to have the flexibility to remove services not being used.
- 3.94** One respondent called for there to be a mechanism to report issues with facilities, where solutions fail to deliver their intended value.

## Our response

### Trial services

- We do not wish to prescribe the exact circumstances in which services should be provided on a trial basis, as we think they may be appropriate in a variety of circumstances. However, we would particularly envisage the use of trial periods when an assessment has been done and the outcome is considered borderline.
- Our rules require an assessment which proposes a trial to determine how long the trial will last, why it is considered appropriate, and the criteria for deciding if it has been successful. This information, and any updates to the assessment following completion of the trial, should be published alongside the assessment outcome, as discussed in chapter 6. It is the responsibility of the designated entity who carried out the assessment to identify whether trial met the success criteria they identified, while anyone with a sufficient interest in the outcome can request a review of the updated assessment where appropriate. Our approach to reviews more generally is discussed in chapter 4.
- We have amended our rules to make clearer that updates to assessments following trials should be made in light of the lessons learned from the trial, and that a review can be requested of the updated

assessment. We have also made further amendments to our rules on trials to make them clearer, and ensure the rules on not closing the trialled services until certain events take place are more closely aligned with the similar rules about when a designated firm can close a facility or materially reduce/change a service.

### **Adapting to changing demand**

- We recognise that communities change over time. Services and features once required to address deficiencies with significant impacts may be used less than initially intended and, in time, no longer be required. We have amended our rules so that the obligation to provide or procure the provision of services required by assessments only continues for a minimum of 2 years after they are delivered. For services initially provided on a trial basis, the 2-year period begins when the services required by the updated assessment following the trial are delivered. We consider a 2-year minimum delivery obligation strikes a fair balance between giving designated firms the flexibility to close services there is no longer demand for and providing communities continuity of services.
  - Any facility closing before the 2 year minimum delivery period ends, without replacement services meeting the needs identified in the assessment, would be a breach of our rules.
  - After the 2-year period ends, a facility being closed will trigger a new cash access assessment, and designated firms will be required to deliver any services this identifies as required.
  - This change also led to us amending the rule about designated firms having to keep their own facilities open until they have carried out an assessment and delivered any services required by that assessment. This rule has been extended to apply to a designated firm choosing to withdraw, reduce or change any service that would trigger an assessment. This is to ensure that designated firms have to keep the service available even if they are providing it through someone else's facility or a shared solution such as a banking hub, so that there will be no gap while, for example, they undertake an assessment after the 2 year minimum delivery period.
  - Where customers identify issues with the facilities operated by designated firms, they may have the right to complain. The complaints process is dealt with in Chapter 7. Communities can also submit cash access requests where they feel cash access provision in their area is inadequate.
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## Risk of duplication

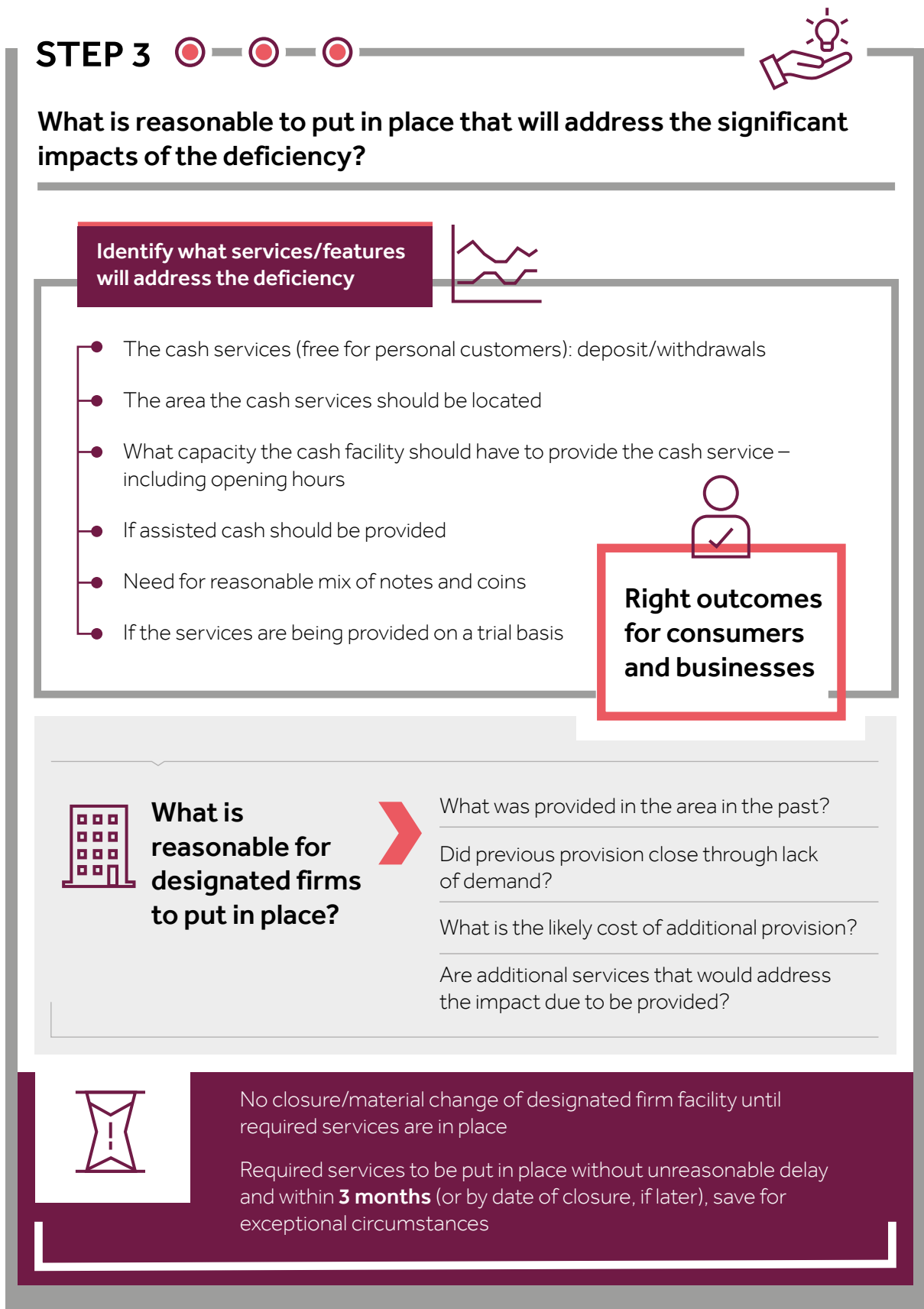
- 3.95** Several respondents, inside and outside industry, raised concerns about multiple assessments possibly resulting in inconsistency or overprovision. One industry respondent called for a coordinated platform where entities carrying out assessments can share information with one another and collaborate to ensure the delivery of effective solutions.
- 3.96** As noted in paragraph 2.45, one industry respondent also raised concerns about assessments being required to deliver services where an assessment under the existing voluntary scheme has already taken place and new services are in the process of being set up.

### Our response

- As set out in Chapter 2, while we do not require it, we would strongly encourage designated firms to work through a single coordination body designated by the Treasury to carry out assessments, reducing the number of assessments in total and allowing them to share costs.
  - We do not require firms to work together to deliver the services identified as required by assessments either but our rules allow this, and recognise this may reduce firms' costs.
  - We set out our approach to transitional arrangements and in-flight closures in Chapter 4.
  - Our rules only require firms to deliver services that are reasonable to put in place. We agree it may be unreasonable to establish additional cash access facilities when firms know others that would address the impacts identified are due to open independently of any assessments undertaken as a result of the same trigger event, bearing in mind the timeline for delivery of those new services. We have updated our guidance to reflect this. Where considering how the expected delivery timeframes of other facilities may compare to services designated firms could deliver themselves, we would expect designated entities to take into account the variety of different cash access solutions available, including the use of services they can deliver at speed, such as mobile services. In all cases, we would expect designated entities to have a high degree of confidence that facilities relied upon, even when delivered by third parties, will be put in place within the expected timeframes.
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3.97 The amended step 3 assessment process is set out in the infographic below:



## Chapter 4

# Governance, accountability, assessment timeframes, and transitional arrangements

- 4.1** In CP23/29, we set out proposals aimed at ensuring designated entities' assessment processes can be trusted by communities by holding designated entities accountable for reaching the right cash access assessment outcomes and completing them within set timeframes.
- 4.2** In this chapter, we set out and respond to the feedback on our proposals to require designated entities to:
- publish their assessment criteria and periodically review their effectiveness
  - establish processes allowing communities to request reviews of assessment outcomes
  - complete assessments and reviews within set timeframes

## Publication and periodic review of assessment criteria

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- 4.3** We proposed designated entities should be required to establish, assess and periodically review the effectiveness of their policies and procedures around assessments. We proposed they should be required to reflect on their own experience and feedback from stakeholders, in order to improve the quality of assessments and help them comply with the rules.
- 4.4** We also proposed that designated entities should be required to publish details of their policies and procedures, including their assessment criteria, and to notify us of any substantial changes they propose to make to them.
- 4.5** We asked:

**Question 12:** *Do you agree with our proposed requirement for designated entities to publish and periodically review their policies and procedures around cash access assessments? Are there other ways the accountability and transparency of the assessment process could be enhanced?*

## Reviews of policies and procedures

- 4.6** Both industry and consumer representatives agreed in principle with the need for designated entities' policies and procedures to be kept updated, but called for clarity and guidance in several areas.

- 4.7** Several respondents sought clarity on whether designated firms were expected to review assessment criteria or if they could be reviewed collectively via the coordination body where a designated firm was a member of one. Some other respondents called for our rules to require policies and procedures to be reviewed by independent third parties, rather than by designated entities themselves.
- 4.8** Several respondents asked about our role in a firm's review of procedures, including clarity on the information we would expect firms to report and the actions we would take if a firm's procedures fall below the standard required by our rules. Some firms objected to us mandating regular reviews, preferring designated entities to only be required to inform us of significant changes to procedures, or to evidence relevant stakeholder views have been considered.
- 4.9** Consumer groups, on the other hand, called for more prescriptive review requirements. One respondent asked for designated entities to be required to publicly consult on their assessment criteria, and another called for designated entities to be required to reach out to local stakeholders annually to request feedback on their policies.
- 4.10** Some firms said they would like to be able to revise their policies based on evidence of how solutions are being used.

### Our response

- We are taking forward our approach as consulted on, which we consider to sufficiently address the concerns raised above. However, we note the request for clarity in certain areas. We set out our responses to specific points below.
- The designated entity which undertakes assessments is accountable for keeping policies and procedures under review and having appropriate governance arrangements for approval by senior leaders or those who effectively direct the business. This means that, where a designated coordination body is carrying out assessments on behalf of firms, the coordination body is responsible for periodically reviewing the assessment criteria it uses and having the criteria signed off as appropriate.
- It is the responsibility of designated entities carrying out assessments to carry out reviews of their assessment criteria and ensure their policies and procedures remain compliant with our rules. However, they may wish to use an independent body to provide extra rigour. For example, under the existing industry voluntary scheme, the Community Cash Advisory Panel acts as an independent third party which oversees LINK's work as the coordinating body and provides independent challenge.
- We do not expect to sign off designated entities' assessment policies and procedures, however our rules require them to notify us where they propose to make significant changes. In line with our supervisory approach in other areas, it is the responsibility of designated entities to ensure they comply with our rules. We will supervise firms' compliance with a focus on ensuring they deliver the right outcomes for consumers and businesses.

- It would not be proportionate to require designated entities to publicly consult on their policies and procedures, and we will not prescribe a fixed timeframe for them to review them. Instead, designated entities should continually monitor outcomes and stakeholder feedback (which may include how solutions are being used) to identify where their assessment criteria may need amending. The frequency at which designated entities make changes to their procedures may also vary over time. For example, in the initial period after our rules come into force designated entities may need to revise the assessment criteria more frequently as their understanding of what does and does not work develops.
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## Publication requirements

- 4.11** Respondents agreed with the need for improved transparency of outcomes but several raised specific concerns about the practical implementation of our proposed publication requirements. Many respondents asked us to clarify expectations and one firm asked how our publication requirements would support communities.
- 4.12** Several industry respondents expressed concerns around the unintended consequences associated with any publication requirement that could result in firms divulging commercially sensitive information. They argued publishing only outcomes and a summary of the rationale behind them should be sufficient.
- 4.13** Several respondents requested that any information published on assessment criteria should be made accessible to all groups. They called on firms to do more than just publish information on their websites, and to think about publishing easy-read versions of policies, or versions in other languages, to reach groups including the digitally excluded and those whose first language is not English. Another respondent noted the importance of firms using clear terminology – pointing to different definitions of ‘regular users’ used by firms publishing information about planned branch closures, and the confusion this causes consumers.
- 4.14** Some consumer groups called for centralised publication of all designated firms’ and coordination bodies’ assessment procedures, either by us or by industry bodies.

### Our response

- We are taking forward the approach we consulted on. We believe in the importance of accountable and transparent decision making, so consumers and businesses have sufficiently clear information to understand and trust the assessment process, and the opportunity to challenge where necessary. We note the concerns raised by stakeholders we have engaged with that, under the existing voluntary scheme, communities do not always understand how outcomes have

been reached. Requiring firms to publish their assessment criteria will allow communities to understand how outcomes have been reached and may also help to reduce the number of review requests made.

- We do not think the requirement to publish assessment criteria risks forcing firms to release commercially sensitive information. As we explain in CP23/29, the publication requirement relates only to how cash access assessments are undertaken, not aspects of firms' broader commercial strategies or how, for example, they decide which branches to close. We were clear in our consultation that we recognise designated entities will want to publish assessment outcomes without revealing commercially sensitive information. The same applies to publishing their assessment policies and procedures.
  - We will consider what we can publish on our website to help communities find information on designated entities' current assessment criteria. While we cannot impose publication requirements under the new regime on other entities like trade associations, we would encourage them to share information (in compliance with competition law) which may benefit consumers and businesses.
  - We would strongly encourage all designated entities, including any coordination body, to make their communications (including the information they share on their assessment criteria) as clear as possible and consider how they can support groups who might otherwise struggle to access or understand information. Designated firms should also note their wider obligations towards customers, including under our Consumer Duty. They should think carefully about how they ensure their communications are suitable for their customers. As part of this, we would expect firms to define the terminology they are using. These concerns apply to our publication requirements more broadly. Our expectations are detailed in Chapter 6.
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## Requesting a review of a cash access assessment

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**4.15** We proposed designated entities who carry out assessments should be required to have a review process for assessment outcomes, regardless of the trigger.

**4.16** We proposed that a review would only be required to be undertaken where the following criteria are met:

- the request comes from someone with 'sufficient interest' in the local area (using the same test as for the submission of cash access requests set out in Chapter 2)
- it is to correct factual inaccuracies or supply new information, each of which could impact the outcome of the assessment
- the request is made within 21 days of the publication of the outcome of the assessment

**4.17** We asked:

**Question 13:** *Do you agree that only those with sufficient interest in the outcome of the assessment in a local area can ask for a review and do you agree that we should allow 21 days after the publication of an assessment to request a review?*

- 4.18** Both industry and consumer representatives broadly agreed with our proposal to restrict the ability to request reviews to those with sufficient interest. Many, however, called for greater guidance on what constitutes 'sufficient' and 'insufficient' interest, which we have explained further and addressed in Chapter 2.
- 4.19** Many firms also called for clearer guidance on the role of the coordination body in the review process, and on the review of assessments following the closure of a non-designated entity's facility.
- 4.20** On the 21-day review period, consumer and industry respondents were split. While most firms were satisfied with the 21 day review period, many consumer groups requested for the review period to be extended to 30 days or more. A limited number of industry respondents agreed, including one who called for an extension to a 60-day period to accommodate entities such as local councils that meet on a monthly basis.
- 4.21** On the grounds for requesting a review, several firms argued reviews should be restricted to when designated entities do not meet our published rules or fail to meet their own published policies. Some consumer respondents argued for to the grounds for a review to be broadened to include failure by a designated entity to follow assessment criteria or a failure to uphold a legitimate expectation. Another respondent suggested there should be no limit on who could raise a review request or the timeframe within which they can do so.

### Our response

- On account of the balance of responses received from both consumer representatives and industry respondents, we recognise there may be practical barriers in meeting the 21 days review request deadline. So we will extend this proposal to 28 days, to allow communities extra time. We will not be extending the period to request a review beyond 28 days, as further extensions could risk pushing back the delivery of any required cash access services, potentially adversely impacting the community in question.
- It would not be proportionate to require designated entities to undertake reviews in cases where there is no evidence of inaccuracies or missing information that would have affected the outcome of the original assessment. In addition, unlike other areas of regulation, the review process under our new regime is open not just to designated firms' own customers or potential customers, but to anyone with a sufficient interest making it more important that reviews are targeted. It is ultimately our

responsibility to monitor designated entities' compliance with our rules and take enforcement action where appropriate, including designated entities' failure to follow assessment criteria.

- Under our rules, the designated entity that carried out the assessment is responsible for the review, regardless of what triggered the original assessment. This means the coordination body will be responsible for carrying out a review where they were responsible for carrying out the assessment. Similarly, where an assessment was triggered by the closure of a non-designated entity's facility, it is the responsibility of whoever undertook the assessment to carry out the review.
  - The scope of 'sufficient interest' and our response to the feedback on it is discussed in Chapter 2.
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## Timeframes for carrying out assessments and reviews

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**4.22** We proposed that designated entities should be required to complete cash access assessments and reviews as soon as reasonably practical and, except in exceptional circumstances, within 8 weeks of the assessment trigger or request for review.

**4.23** We asked:

**Question 4:** *Do you consider that 8 weeks will be sufficient time to gather information and complete a cash access assessment? If not, please set out an alternative with reasons.*

**Question 14:** *Do you consider 8 weeks to be sufficient time to complete a review of a cash access assessment? If not, please state why and what you would consider a reasonable timeframe.*

**4.24** Most respondents only commented on assessment timeframes, and did not address reviews specifically in their responses. Many advocated to extend both assessments and review timeframes and requested timeframes are kept under review. Several consumer organisations also called for us to set out what action we will take where firms take too long to complete a cash access assessment or review.

### Timeframes for assessment

**4.25** Almost all industry respondents called for designated entities to be given more time to carry out assessments, advocating for this to be extended from 8 weeks to 12 weeks, in line with the existing voluntary scheme. They argued this would give designated entities more time to collect data, complete visits to local areas, and engage with local stakeholders. Only one industry respondent considered 8 weeks a sufficient assessment window.

- 4.26** Several industry respondents also suggested we hold designated entities to different timescales depending on the trigger event. This included the suggestion that designated entities are given more time to carry out assessments triggered by cash access requests or closures by non-designated firms as it may take them longer to collate information in such cases.
- 4.27** Consumer representatives were more evenly split. Some thought 8 weeks would be sufficient to carry out assessments, while others argued for an extension to 12 weeks, in line with the existing voluntary scheme. Those who argued for an extension thought this would give communities more time to engage with and feed into the assessment process.

### Timeframes for reviews

- 4.28** While some respondents felt 8 weeks was sufficient, one industry respondent said this was dependent on designated entities being adequately resourced. Several industry respondents called for an extension to 12 weeks. In contrast, one respondent called for the review timeframes to be shortened to 3 weeks as they felt designated entities could easily anticipate reviews where assessments do not result in additional services.

#### Our response

- In response to the balance of feedback received, we are extending the deadline for carrying out assessments and reviews to 12 weeks. This will give designated entities more time to gather data and engage with local stakeholders, a factor raised by both industry and consumer respondents.
- We are not introducing different timeframes for different trigger events. We note that designated entities are unlikely to be aware that other designated firms are considering closures until they are notified a decision has been made under the rules, at which point an assessment is triggered. The other designated firms required to carry out assessments in response to these closures will not have had time to collate information in advance. Assessment timeframes must be practical for all designated entities to meet on an equal footing.
- We are also keeping assessment and review timeframes aligned. While we recognise some designated entities may in some scenarios be able to carry out reviews more quickly than assessments, in many cases reviews will require assessments to be effectively rerun, possibly using a wide range of information not gathered previously.
- We will, however, keep assessment and review timeframes under review to ensure they remain appropriate as part of the ongoing monitoring that is standard under our new [Rule Review Framework](#).
- We have a wide range of powers we can use when firms fail to meet our expectations. We will take a risk-based approach to supervising compliance. This will include, where necessary, considering the reasons deadlines are being missed by designated entities and ensuring these are addressed. We will take relevant action where appropriate.



## Transitional arrangements

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**4.29** We also proposed a transitional arrangement which would give designated entities more time to complete cash access assessments for the first three months after the rules came into force (12 weeks, instead of the originally proposed 8). This was in recognition of the possibility of a high volume of cash access requests in the initial period after the rules come into force.

**4.30** We asked:

*Question 5: Do you agree with our transitional period of 3 months?*

### Assessment timeframes

**4.31** Most consumer groups who commented agreed that our transitional arrangement for assessments was reasonable, recognising there may be a high volume of requests in the period soon after our rules come into force. But they noted there are costs associated with communities being left without cash for long periods. A very limited number called for the transitional period to be extended beyond 3 months or to be kept under review. One suggested that any transitional period was not needed where the assessment window was extended to 3 months in perpetuity.

**4.32** Almost all industry respondents who commented called for a longer transitional period for assessments. One, who argued for an extension to assessment timeframes in perpetuity, called for a transitional period in the event we stuck to our original proposals, which would have left the general assessment timescale at 8 weeks. Only one industry respondent explicitly agreed with the 3-month transitional period for completing assessments, arguing that any longer risked leaving communities without cash services for longer.

### Transitional arrangements across other areas of the regime

**4.33** While we did not set out proposals for transitional arrangements beyond extended assessment windows, several industry respondents called for transitional arrangements to be applied more broadly, to give them more time to prepare to comply with our rules. One firm argued our rules should not be implemented until 2025, to allow industry more time to engage with us. Several other industry respondents called for broad implementation phases lasting 9 or more months to give them more time to allocate resources and address legal and operational challenges.

**4.34** Several industry respondents also asked for clarity on whether delivery timeframes would be applied retrospectively, where assessments have already taken place under the voluntary scheme before our rules came into force.

**4.35** Other respondents raised concerns about the impacts of closures by firms before the rules are in place, calling for a quick implementation of the rules. Other respondents suggested designated entities be required to carry out new assessments in locations that have already been assessed under the existing voluntary scheme.

## Our response

### Extended assessment timeframes

- As we have extended assessment timeframes to 12 weeks in perpetuity, we are not introducing an extended assessment timeframe in the initial period after the rules come into force.
- If any designated entities anticipate they will be unable to comply with the assessment timeframes we have set out, they should tell their supervisors as soon as possible. As set out previously, we expect designated entities to explain the reasons deadlines are being missed and how they will ensure these are addressed.

### Implementation window

- We recognise calls from industry for time to prepare to implement our rules. As noted in Chapter 1, we have decided to give an 8-week implementation period before the rules come into force. **This means the rules will come into force on 18 September.** This will give designated firms and coordination bodies time to familiarise themselves with our new rules, establish and publish assessment procedures, prepare to receive cash access requests, and prepare to comply with new reporting requirements. While we recognise several firms called for a longer implementation window (with some requesting 1 to 2 years), we are concerned that given the pace of recent closures, any greater delay to implementation risks leaving communities without reasonable access to cash for a longer period of time.

### In-flight closures

- **Closures which have already been announced and will be taking place before the implementation date are not subject to our new rules.** As set out below, we have added a transitional provision to the rules to make this clear. Firms must, however, continue to follow the expectations set out in [FG22/6](#) and meet their obligations under the Consumer Duty.
- **Designated firms should not, however, use the 8-week implementation window as an opportunity to rush through closures.** We will take robust supervisory action against any attempts to do so in breach of existing rules. In [FG22/6](#), which continues to apply, we are clear that we expect firms to communicate closures to customers and other relevant stakeholders no less than 12 weeks before a proposed closure or conversion would be implemented.
- **Any closures which are yet to be announced or which have already been announced as taking place after our new rules come into force fall under the requirements of our new regime.** This means designated entities will have to carry out cash access assessments, publish the outcomes, allow for any reviews, and (if the closure is of a designated firm's facility) deliver any additional cash services required before the closure can take place.

- We recognise that in very limited circumstances, where closures have already been announced and are due to take place very shortly after the rules come into force, firms may be in difficulty delaying them while new assessments are undertaken (for example, where leases are coming to an end and cannot be extended). In such cases, we would expect firms to raise this as soon as possible with their supervisors.
- We also recognise that many firms have voluntarily committed to keep branches open for up to 12 months until banking hubs are delivered where they have been recommended under the voluntary scheme. Our rules are clear that the scope of cash access assessments is dependent upon, and proportionate to, the circumstances of each case. In such cases, it may be reasonable for firms to undertake less detailed assessments in the knowledge a local area has newly received a banking hub.

### **Retrospection**

- Our new rules do not apply to past closures by firms. We have added a provision to the schedule of transitional provisions to make clear that designated firms are not required to notify others, or carry out assessments in response to, closures that were implemented before the rules came into force. Closures implemented before the rules come into force are subject to the rules that applied at the time. Also, delivery timeframes do not apply to solutions resulting from assessments carried out under the voluntary scheme as they only apply to assessments under the new rules.
  - As set out in Chapter 2, we do not think it would be proportionate to require firms to proactively carry out cash access assessments, including where assessments have already taken place under the existing voluntary scheme. However, where communities feel existing access to cash is inadequate, they can submit a cash access request which will require a new assessment to be undertaken (and any services required as a result to be delivered) within set timeframes.
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## Chapter 5

# Providing additional services

- 5.1** In CP23/29 we set out proposals on who is held responsible for providing the cash access services identified in cash assessments, the timeframes within which we require firms to deliver additional services and how this approach aims to deliver good outcomes for consumers and small businesses.
- 5.2** In this chapter, we set out and respond to the feedback on:
- our approach to holding all designated firms accountable for providing cash access services identified in assessments
  - the provision of services across a designated firm's entire area of designation
  - the requirement to only provide services to a firm's existing customer groups
  - expected timeframes for delivering services
  - the balance between our proposals being outcomes-based but including enough detail to allow firms to reach the right outcomes.

## Holding all designated firms accountable for delivery

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- 5.3** We proposed that all designated firms are held accountable for delivering cash access services identified in an assessment. To ensure proportionality and innovation designated firms will be able to choose the most appropriate facilities to deliver the additional services for the benefit of their own customers. They can choose to comply with this obligation acting collectively through a shared delivery body, or by providing or procuring facilities independently of other designated firms.
- 5.4** We asked:
- Question 15:** *Do you agree with our approach to holding all designated firms responsible for providing additional cash access services identified in the assessment undertaken by or for them? If not, how do you think accountability for delivering those services should be divided amongst individual firms?*
- 5.5** Of the respondents that answered this question, most supported our proposal to hold all designated firms accountable. Support was high among consumer groups, summarised by one respondent as preventing a 'race to the bottom' among firms to deliver the bare minimum of services, if all designated firms were held equally accountable for addressing gaps or potential gaps.
- 5.6** However, some questioned the effectiveness of holding multiple firms responsible for the same activity without a clear line of accountability, how delivery costs would be distributed between firms and how we would supervise compliance.

- 5.7** Some firms requested further clarity on how designated firms that chose not to participate in a shared delivery solution could be held accountable when acting independently. One respondent suggested a resolution mechanism to address disputes arising from conflicting assessment outcomes or where members belonging to a coordination body or shared delivery body disagree.
- 5.8** One respondent requested only the firm that closes its facilities should be responsible for carrying out assessments and funding any additional services required by those assessments.

### Our response

- Having considered the balance of views from across industry, consumer groups and individuals, we will implement our proposal as consulted to hold all designated firms accountable for delivering the necessary services identified in an assessment. We provide further clarity on certain aspects of our rules below.

#### **Shared accountability for delivering services**

- The intention of our approach is to improve the delivery of services and to reduce the likelihood communities experience similar gaps and lengthy delays to cash access services they face today. Maintaining reasonable cash access is the responsibility of all designated firms under our rules. Holding every designated firm responsible for providing access to cash should prevent any firm avoiding its obligations by unfairly relying on the services of another designated firm.
- We disagree that only firms closing facilities should be solely accountable for filling gaps in local services created through their own facility's closure. Firstly, our powers to require gaps to be filled only apply to firms designated by Treasury. Secondly, such an approach risks rewarding firms for closing facilities before our rules are implemented and overlooks the contribution of past closures by other firms in creating the deficiencies impacting communities today. Firms that have never invested in a community would also be partly responsible for creating a deficiency in that community.

#### **Reducing the burden on firms that have chosen to maintain their existing cash access facilities and branch networks**

- We further clarify, as set out in CP29/23, that our rules do not require a firm to provide any additional services identified in an assessment:
  - where it already provides the same services set out in the assessment outcome (including the right location and opening hours)
  - it continues providing that service for the 2-year minimum delivery period.
  - Where an existing facility does not quite meet the criteria in the outcome, it can be modified to do so. This includes, for example, enhancement of a Post Office or increasing the opening hours of a firm's existing branch to meet the assessment requirements.

- We have amended our rules and guidance to make these points clearer, including the addition of a definition for 'required cash access services', being the services identified in an assessment which must be delivered.

### **Cost of shared solutions**

- We recognise the benefits of firms participating in shared delivery solutions including the sharing of costs. Such arrangements remain commercial and voluntary, with the responsibility sitting with participant firms to negotiate and agree the terms for dividing costs between them, as is currently the case under the existing industry initiative. We do not believe a separate and mandatory resolution mechanism to address disputes arising from conflicting assessment outcomes or between participant members of a shared delivery solution is required. As our rules hold individual firms accountable for compliance with our rules, we treat failure to deliver by a shared delivery body as failure to deliver by each of its participant firms, and will intervene appropriately to address breaches of our rules. Further clarity on our supervisory approach is set out in Chapter 7.
  - As we set out in Chapter 3, we welcome and strongly encourage continued innovation in the sector. Our approach is not intended to prevent designated firms from acting independently or prescribe one shared solution over another. We expect firms to comply with all aspects of our sourcebook and their obligations under law generally, including competition law.
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## **The provision of services across an entire area of designation**

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**5.9** We proposed that within their area of designation (Great Britain, Northern Ireland or the whole of the UK) our rules will require every designated firm to provide the cash service(s) identified in the assessment for that area, regardless of whether they have a high or low number of customers in that area.

**5.10** We asked:

**Question 16:** *Do you agree with our proposal to hold designated firms responsible for delivering services across their entire area of designation, including where they have a minimal footprint?*

**5.11** Most respondents from across industry and consumer representative organisations agreed with our approach to delivery, with several firms noting its consistency with the current industry voluntary approach.

- 5.12** A minority of respondents considered it unfair that a firm should be responsible for either assessing or delivering services in regions where they have never previously had a footprint. However, one said that, while some firms may have a minimal footprint in a particular region of designation, many will be providing cash services more broadly in any given area through their membership of the Post Office's Banking Framework.
- 5.13** Some consumer groups highlighted that our proposals should dissuade firms from exiting facilities in areas to avoid service obligations in a way that could adversely affect consumers' access to cash, a risk more likely in rural and less profitable areas.

### Our response

- We will implement our proposal as consulted. We do not agree that limiting firms' obligations to only areas where they have a current footprint will deliver the appropriate outcomes.
- As set out previously, most firms already provide services across the UK more broadly through their participation in the Post Office Banking Framework and the LINK network, via ATMs.
- As recognised by the Treasury (Explanatory Notes to FSMA 2023), consumers also use cash services in areas other than where they live. For example, they may need to access cash services in the area where they work or do business.
- It would also be difficult to establish a fair historical cut-off point from when firms stopped having a customer base in a region to determine it had or never had a presence.
- We also note the risk set out by several respondents that limiting designation to certain regions and not others could lead to an unintended consequence of incentivising firms to exit regions, adversely impacting smaller, rural areas.

## Firms only providing services to their existing customer group

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- 5.14** We proposed that firms will not be required to deliver services to a customer group they do not already serve.

- 5.15** We asked:

**Question 17:** *Do you agree with our proposal not to require designated firms to deliver services aimed at customer groups they do not already serve (for example, not requiring firms who do not provide business current accounts to their customers to deliver services for SMEs)?*

- 5.16** Only one firm supported an ‘all-in’ approach whereby all designated firms would be required to provide services to both personal current account and business current account customers. They argued this would make it easier to implement shared solutions to delivery.
- 5.17** While not disagreeing with our approach, respondents representing small businesses were concerned that firms may intentionally reduce services being offered to certain groups of consumers (ie small businesses) before our rules are implemented to reduce their future responsibilities. They cautioned that this could lead to an overall reduction in services to certain groups over time. Countering this view, one firm was concerned that our approach could lead to the overprovision of services, such as deposit solutions, for groups of consumers that were less likely to use them, such as retail customers.
- 5.18** Some respondents wanted us to confirm that if a specific group of customers, such as businesses, was not being served by any remaining branch in the area, this would still be assessed as a deficiency and would result in the recommendation of services to support that group.

#### Our response

- We will implement our proposals as consulted. Our rules seek to ensure reasonable access to cash for both consumers and business current account users and services on both types of account are covered by the assessment process. But it remains a commercial decision for designated firms as to whether they choose to serve either personal current account or business current account customers, or both. Designated firms should not have to provide additional services to customer groups they do not serve.
- We do not agree that our approach could lead to the wholesale withdrawal of services to certain groups. We believe firms will continue to support their existing customer groups rather than exit an entire sector to reduce their access to cash obligations. Further, any decision by a firm to withdraw services from certain consumer groups would need to be carefully reviewed on the basis of firms’ obligations under the Consumer Duty.
- We also do not believe our approach will lead to the overprovision of services. However, we accept that demand can change over time. It is not our intention that any new services identified through assessments should be available in perpetuity where proven demand for that service has fallen. As set out in Chapter 3, we have changed our rules to make clear that, where demand for a new service has fallen, the firm may stop providing any required services 2 years after delivery, subject to a new assessment being undertaken.



## Cashback without a purchase

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**5.19** Cash can be provided through a range of facilities or venues such as bank branches, Post Offices, banking hubs and ATMs. What is important is that the service is consistent, accessible and free-to use to meet the demands of the local community. The advantage of cashback without a purchase is that it is not conditional on the consumer making a purchase. However, it may only be available at the discretion of the retailer, and balance inquiries are not always available. While we recognise the value of cashback for some communities, variations in services mean that we proposed that designated firms should only consider cashback without a purchase as a solution where they can show there is consistency of service.

**5.20** We asked:

**Question 18:** *Do you agree with our approach to cashback without a purchase and if not, why?*

**5.21** Of the few respondents that directly answered this question, most agreed that cashback without a purchase should only be used in limited scenarios where consistency of services can be proven. Both industry and consumer organisations also requested further clarity in our guidance of what constitutes consistent service and sufficient opening hours.

**5.22** Another respondent believed that that there should be no requirement for firms to prove consistency of service as the existing model of provision for cashback, which relies on mystery shopping checks by industry, is sufficient. Some respondents referred to the provision of cashback without a purchase in supermarkets as an example of consistent provision. However, one organisation representing small businesses said any specific test on consistency of service could disadvantage smaller retailers not offering longer opening hours.

**5.23** One respondent disagreed that cashback without a purchase should be considered a sustainable form of cash access as it was expensive to facilitate and often placed a burden on small businesses to offset fees and the cost of insurance for cash delivery. Whereas some were concerned that even where consistency was proven, a lack of consumer awareness of the scheme rendered it unreliable. Some consumer groups also shared that customers with low financial resilience may be embarrassed requesting the service and feel compelled to make a purchase.

### Our response

- We will implement our proposals as consulted. We recognise the value that cashback without purchase can provide, particularly in rural areas. However, we agree with the majority of respondents that cashback without purchase in most cases should not be relied on as the sole cash access point but considered as supplementary to other cash access facilities in the area.

- Cashback without a purchase may only be available at the discretion of the retailer. We recognise that there are costs attached to delivering the service which may deter some retailers from offering it, and this may contribute to inconsistency of provision. We also note research by the consumer organisation Which? concluded that there was limited awareness of cashback without a purchase with only with 1 in 6 consumers knowing about it.
  - Designated firms should only consider cashback without a purchase as a solution where they can prove consistency of service, including within the stated opening hours of the cashback provider. Smaller retailers should not need to change their approach or incur increased costs. We note that consumer insight such as robust mystery shopping exercises may be a helpful tool for firms when satisfying themselves on consistency of service.
  - Balance inquiries can also be limited through the facility which may hinder those with low financial resilience. For this reason, we will maintain our approach that where cashback without a purchase is used to deliver a service required by an assessment, it must have a balance enquiry service.
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## Timeframes for delivering additional cash services

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- 5.24** We intend our proposed rules to reduce any unnecessary delay to the provision of new cash services in a local area where gaps are identified. Delays place a significant burden on both consumers and local businesses, and we want firms to do everything in their power to support the timely delivery of services. So, we have proposed rules for the timelines within which designated firms must deliver required services.
- 5.25** When services are required following a cash access request, or any proposed closure of or material change to existing cash access services (regardless of whether these are planned or unplanned, or by designated or non-designated firms), we proposed designated firms must provide them without unreasonable delay, and in any event, within 3 months of the publication of the assessment outcome or the conclusion of any review, or (where applicable) by the time of the closure/change if later.
- 5.26** We also proposed that if the trigger event was the planned closure of or change to a facility of a designated firm, that firm must not close or change the facility until an assessment had been undertaken, and any services identified by the assessment are in place.
- 5.27** We asked:

**Question 19:** *Do you consider these timescales to be reasonable? If not, what do you consider to be reasonable?*

## Set timeframes for delivering additional services

- 5.28** There was a significant split in views between consumer and industry respondents on this question. Most consumer groups and individuals strongly supported our proposal to impose 3-month delivery timescales. Several expressed frustration with delays under the existing voluntary scheme, leaving some communities without local cash access services for over 12 months. These concerns were expressed by both personal and business current account customers.
- 5.29** One consumer group recognised the complexity of multiple firms delivering services within the proposed 3-month timeframe. They suggested as an alternative that firms use reasonable endeavours to deliver new services within 6 months unless there are exceptional circumstances.
- 5.30** Most industry respondents disagreed that 3 months would allow designated firms sufficient time to deliver services. Reasons provided for delays included locating sites, securing planning permission, negotiating leases or unexpected issues relating to adequately fitting out a premise or making it safe for the public. They argued that the provision of banking hubs can take up to 12 months, with temporary hubs taking on average between 4 to 6 months (with up to 3 months to secure planning permission to install a hub).
- 5.31** Several firms expressed concerns particularly when having to address gaps resulting from closures by non-designated firms or the conversion of free to use ATMs to pay to use. In such cases, firms were concerned with not having sufficient advance knowledge of the change to prepare. Overall, most firms requested an extension to our proposed set timeframes from 3 months to 6 to 12 months. In some cases, respondents asked for any set timeframes to be regularly reviewed. Only one industry respondent commented that the 3-month timeframe was achievable.

## Keeping branches open until additional services are in place

- 5.32** Most industry respondents agreed or made no specific comment on our proposal that designated firms must keep their own facilities open until any services required following an assessment are in place.
- 5.33** Some firms asked us to provide further clarity on the use of temporary services to plug gaps in provision between a branch closing and a permanent alternative solution being in place. Many supported the idea of trial periods and pilots for additional services, providing firms and communities with some flexibility ahead of permanent options being in place.
- 5.34** Most individuals and consumer groups directly answering this question also agreed with this approach. They shared several accounts of the impact of closures and the existing delays by firms to install additional services, noting the impact particularly on vulnerable consumers and small businesses.

## Our response

- Our approach intends to prevent unreasonable delays to new cash access services being installed and reduce gaps in community provision that have been detrimental to both consumers and businesses. Cash Access UK's delivery of banking hubs and deposit solutions, under the existing industry voluntary initiative has faced delays. Since the inception of the scheme, LINK have recommended 146 banking hubs but only 67 have been delivered. 129 deposit solutions have been recommended with only 37 delivered which includes 23 Enhanced Post Offices (EPOs) and 14 deposit ATMs. 32 communities have been waiting more than 12 months for a deposit solution since it was announced. Our approach thus aims to address these shortcomings.

### **Keeping branches open until additional services are in place**

- We will continue with our approach as consulted. The majority of both industry and consumer organisations supported our approach that designated firms must not close their facilities until any services required following an assessment are in place. As set out previously, we have extended this requirement to the withdrawal, reduction or change of any service of a designated firm that would trigger an assessment.

### **Use of temporary services**

- Our rules do not distinguish between a 'temporary' solution and a 'permanent' one. We will expect firms to put in place services that meet the requirements identified by assessments, without unreasonable delay and, save for exceptional circumstances, within set timeframes (discussed below). Firms may find temporary solutions help them meet this delivery requirement in the short-term, in advance of opening a more permanent one. Firms will be required, however, to meet any delivery requirements without interruption and ensure there is a seamless transition from a temporary to a permanent facility.
- As set out in Chapter 2, we have updated the definition of a relevant closure in our rules to clarify that the closures of new services put in place to meet the requirements of our new regime will not trigger a further assessment for as long as the delivery obligation continues to apply. This would apply where a temporary facility closes upon the opening of a permanent one.

### **Set timeframes for delivering services**

- We remain committed to our overarching expectation that designated firms must deliver services without unreasonable delay. We expect the backstop for delivery services to remain at 3 months. However, we have amended our rules to allow firms longer than 3 months in exceptional cases. Even in such exceptional cases the requirement to deliver without unreasonable delay will still apply.
- We believe this change achieves the right balance between ensuring communities are not left without cash access for long periods and what is practical for designated firms to deliver. We do not want to deter

firms from delivering more extensive services including banking hubs or the replacement of full branches, where planning and preparation of a suitable permanent site may require more time. If we judge a firm's delay in delivering services to be unreasonable, which includes not introducing temporary or permanent solutions where they could have easily done so, this is likely to be a breach of our rules. We will then take appropriate action, as set out in Chapters 1 and 7.

- We have not received any empirical evidence of the number of delays, many industry respondents reflected on the planning process as a primary cause of delayed deployment. We encourage designated entities and local authorities to work together to support consumers and businesses in the local area, sharing best practice between them (where competition law allows). We note the work of CAUK working closely with local authorities to facilitate temporary banking hubs offering the same services as a permanent hubs, located in council buildings, community centres and libraries.

## Outcomes-based approach to assessment and delivery

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**5.35** Our assessment framework and rules on the delivery of services, set out in Chapters 4 to 7 of CP23/29, are intended to be focused on delivering the right outcomes for consumers and businesses.

**5.36** We want our new rules and guidance to deliver sustainable outcomes in local service provision, be flexible enough to accommodate different cash needs in different areas and be responsive enough to adapt to trends in cash usage. So we do not propose to prescribe what cash access facilities (for example, banking hubs or deposit solutions) should be provided for any particular scenario. We want designated entities, when carrying out detailed assessments, to sufficiently consider the wide-ranging cash access needs of a community as a whole.

**5.37** However, we consider it important to require firms to consider certain specific features when undertaking their assessments (i.e. capacity, travel times) to make sure they are sufficiently comprehensive.

**5.38** We asked:

**Question 20:** *Do our proposals strike the right balance between being outcomes-based and having the right level of detail? If not, could they be changed to better deliver cash access outcomes?*

**5.39** Some firms welcomed the flexibility of the framework to adapt to local needs but believed it was critical to assess not just rising but falling demand by a community.

**5.40** One firm reflected that the existing voluntary industry approach is inconsistent, resulting in consumers not getting optimal outcomes. They said more should be included in our proposals to actively encourage firms to trial new and innovative cash access facilities and shared delivery models.

- 5.41** Both industry and consumer groups requested a clearer definition of 'significant impacts'. One respondent asked for tighter definitions of 'periodically' within our approach to reporting, 'local areas' for assessments and 'publishing information' in the context of the suitability of web or mail-based approaches in certain scenarios. Some also requested greater clarity on the role of the coordination body.
- 5.42** Several respondents commented that clear, transparent, and evidence-based supervision was central to making our outcomes-based approach work. They requested the publication of examples of good and poor practices to support industry and consumers' understanding of how we monitor firms' compliance and the delivery of consumer outcomes.
- 5.43** Some respondents suggested that an outcomes-based approach should be reconsidered under different scenarios, with a more detailed and prescriptive approach implemented by designated entities when undertaking reviews.
- 5.44** One respondent said that too much flexibility in the rules, risks firms providing only the most limited cash access services to comply. They felt this would particularly impact the most vulnerable.
- 5.45** Some industry respondents felt that any approach that went beyond the existing voluntary LINK assessment approach was disproportionate, onerous and may lead to the overprovision of services. In particular, the last branch in town approach was seen as disproportionate. A few firms warned that imposing a significant cost on industry would ultimately be passed on to consumers, therefore not driving good consumer outcomes.
- 5.46** Several industry respondents said that removing closures by non-designated firms as a 'trigger event' would lead to a more proportionate outcome. It was also suggested that designated entities should not have to respond to community cash access requests unless there had been substantial changes to cash services in a local area.
- 5.47** Some firms requested clarification that designated firms that chose to be part of a shared delivery solution, and firms that chose to work independently, would be expected to meet the same outcomes.

### Our response

- We welcome the support for our outcomes-based approach and the flexibility it provides to respond to different local needs as demand changes across different communities and over time.
- We accept there is a need for clarity in some areas and have addressed these throughout this Policy Statement. In Chapter 3 we set out our approach to defining local areas and assessing significant impact. Chapter 4 has further information on periodic reviews. Chapter 6 considers timing and format for publishing information.
- We give further clarity on the role of the coordination body when carrying out assessments in Chapter 3. While we strongly encourage

firms to work through a coordination body to conduct assessments, it is at the discretion of designated firms whether they chose to be part of shared delivery solutions.

- We will supervise the outcomes of assessments, delivery and review processes to ensure the right outcomes are provided, whether firms act as part of a coordination body or individually. Our approach to supervision is set out in Chapters 1 and 7. We will also consider sharing examples of good and poor practice on our website.

### **Proportionality**

- It is important our rules are proportionate. The cost benefit analysis sets out the costs to industry, which we consider are proportionate to the benefits. We did not receive substantial challenge on this basis, nor have we been provided with data that would suggest the burden on firms is unduly onerous.
  - Our regime builds on the benefits of the existing voluntary scheme, going further to deliver good outcomes for consumers and businesses (while remaining focused solely on cash access). However, we do not prescribe that every closure will require additional provision of services. Instead, the assessment process sets out the steps to determine whether additional provision is required.
  - Community cash access requests and closures or material changes to designated and non-designated firms' cash access services will require designated entities to undertake an assessment to establish if there is reasonable access to cash in the relevant local area. If there is no deficiency, further assessment is not required, and if there are no significant impacts even where there is a deficiency, further provision is not required. Additionally, step 3 of the assessment process only requires firms to put in place services that would be reasonable to provide. So we do not consider that the rules will lead to disproportionate outcomes and as set out in Chapters 2 and 3, will continue with the proposals we consulted on.
  - We considered concerns around the proportionality of cash access requests, making changes to non-designated firms' facilities be trigger events, and our last branch in town proposals in Chapters 2 and 3.
  - Our proposals are channel neutral so do not prescribe the type of facility to deliver required services. We are committed to supporting innovative solutions to providing cash access where these solutions comply with our rules and provide the right outcomes for consumers and businesses.
  - We do not agree that our flexible, outcomes-focused approach will encourage firms to implement the most limited provisions. By avoiding rigid minimum standards, our rules are flexible enough to accommodate the evolving cash needs of different local areas.
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## Chapter 6

# Keeping communities informed

**6.1** In CP23/29 we set out our proposed rules for designated firms on communicating information on cash access to consumers, businesses, and relevant local stakeholders.

**6.2** In this chapter, we set out and respond to the feedback we received on our proposed requirements for designated firms, or (where relevant) coordination bodies acting on their behalf, to:

- publish information on where consumers and businesses can access cash
- raise awareness of the cash access request scheme and how to make a request, and, where assessments take place, how to request a review of the outcome
- publish information on the outcomes of cash access assessments, including where these are revised following trial periods or reviews
- publish information on the cash access facilities to be provided as a result of an assessment

## Telling customers where cash access facilities are

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**6.3** To help consumers and businesses understand where they can access cash, we proposed to require designated firms to publish information on the range of cash access services available to their customers. We also proposed to require designated firms to promote this information by using accessible signage at their cash access facility, where there is a planned closure or material reduction/change in the cash access services it provides.

**6.4** We asked:

**Question 21:** *Is there any other information which should be published for consumers and SMEs?*

**Question 22:** *Are there any other opportunities and formats designated firms could use to communicate to customers about where they can access cash?*

**6.5** Both industry and non-industry respondents recognised the importance of consumers being aware of where they can access the cash services they need. There was widespread agreement with our proposal to require designated firms to publish this information.

**6.6** Some industry respondents highlighted the need to ensure our new rules on communicating information about cash access services are aligned with FG22/6.



## Cash locator tool

- 6.7** Several industry respondents told us they would like to continue using a centralised cash locator tool (currently provided by LINK under the voluntary industry scheme) managed by a coordination body, to meet the requirement under our new rules to publish information telling customers where they can access cash services.
- 6.8** Some consumer organisations also commented that a single cash locator tool, hosted by a coordination body, would be useful for consumers.
- 6.9** Two industry respondents suggested that designated entities may need time to review and update existing information on their websites. Respondents indicated this is to ensure information is relevant and accurately reflects our requirements and presented in a way that can be appropriately accessed by their customers.
- 6.10** One industry respondent requested clarity on whether designated firms can rely on a coordination body for a centralised cash access locator tool to meet our requirements and on what we would consider an 'easily accessible' area of a website to be for customers.
- 6.11** One industry respondent argued that designated entities should seek to include non-designated firms on their cash locator tool. Another suggested that getting data from IADs (independent ATM deployers) would be a challenge and that they should only be expected to make 'reasonable efforts' to get and publish this information.
- 6.12** A few responses from organisations representing consumers and businesses recommended that designated entities engage with local retailers that provide cash access services before publishing information about these services on their websites. The responses indicated that this would help ensure relevant details such as accessibility and opening hours can be included.

### Our response

- We agree that a single cash locator tool would make it easier for consumers and businesses to access information about cash services. We strongly encourage designated entities to work together to maintain a shared tool. Our rules allow this to be hosted by a designated coordination body on their website, providing designated firms signpost to the tool on their own websites and provide the coordination body with enough information to enable it to fulfil its obligation to keep this published information up to date. As set out in our sourcebook, we would consider information to be 'easily accessible' if in the case of a designated firm, it is prominently displayed on its homepages for relevant current accounts, or in the case of a designated coordination body, if it is prominently displayed on a homepage dealing with its role in relation to access to cash.
- We would expect a cash locator tool to have information about designated firms' cash access facilities as a minimum. We would also expect details of where their customers can access cash services at

non-designated firms' facilities as set out in Chapter 8 of CP23/29 to be included, where designated entities can reasonably get this information. We recognise that designated entities may need time to update their websites with this information and to comply with our new rules. So, we will be granting an 8-week implementation period beginning on the date of publication of this statement, before our rules come into force. We encourage designated entities to engage with local retailers and other relevant stakeholders, particularly where this will help them to provide more detailed information about the range of cash access services available to customers and to raise awareness of the cash locator tool within local communities. While our rules only cover cash access services, they will be supplemented by FG22/6. As such, we recognise the need to take the relationship with FG22/6 into consideration and have reviewed our rules against the guidance.

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## Other communication methods

- 6.13** Several consumer organisations noted in their responses that cash is often relied on most by consumers with characteristics of vulnerability who may be digitally excluded and raised concerns about the challenges they would face if information about cash access services was only published online. They pointed to the importance of designated entities sharing this information in non-digital formats, to ensure digitally excluded consumers can easily access it. The examples respondents gave included offering information about cash access services in leaflet form via phone request, sending this information to consumers and businesses via postal delivery and making this available to request in other formats such as braille or large print, putting up notices at local community venues, and publishing adverts in local and regional newspapers.
- 6.14** Two industry respondents suggested that designated firms could contact their customers directly using communication methods such as emails, text messages and in-app notifications to provide alerts about local cash access services.
- 6.15** One consumer organisation proposed that where an ATM is temporarily out of service or has run out of cash, it would be helpful for it to display messaging directing customers to the nearest free cash access point or directing customers to where they can find that information. For example, by providing a QR code to an online cash locator tool.
- 6.16** Two respondents representing consumers recommended that designated firms analyse their customer data to identify potential customers that could be affected by closures of cash access facilities and proactively contact these customers, to offer them support on transitioning to alternative services.
- 6.17** One local authority suggested that when closing a branch, designated firms should be required to provide information on all local alternative cash services to consumers, although suggestions for what format they should use to do this were not given.

- 6.18** Feedback from a local authority and a business organisation recommended that data on the distribution of cash access services should be published for consumers. One respondent suggested that this should include separate categories for pay-to-use and free-to-use services, and the other suggested that this data should be broken down by council district.

### Our response

- We recognise the importance of raising awareness about the availability of cash access services within local communities, which is why we are requiring designated firms to promote this information on signage at cash facilities that are closing or undergoing material reductions/changes. However, as set out in CP23/29, we would encourage firms to consider using additional methods of communication to their customers beyond this and our online publication requirements. For example, promoting the information they publish about the availability of cash access services to organisations that support consumers with specific characteristics of vulnerability, including those that may be digitally excluded. We would also urge firms to consider their obligations under the Consumer Duty or Principle 7 in their communications with customers. Firms should take particular care when communicating with consumers in vulnerable circumstances, taking account of their needs. They should follow our Guidance for firms on the fair treatment of vulnerable customers (FG22/5). Firms also have a legal duty under the Equality Act 2010 in Great Britain and equivalent legislation in Northern Ireland, to anticipate the needs of disabled customers and provide reasonable adjustments to enable them to use a service. This can include providing information in an accessible format. For example, it may be reasonable to provide information in braille or audio format, for a customer with a visual impairment.
- We encourage designated firms to use new and innovative ways of communicating information to their customers, such as using messaging on ATMs to direct customers to the nearest alternative cash access services or to the cash locator tool. We also support using existing channels such as emails, text messages and in-app notifications to promote the cash locator tool and update customers on cash access services in their local area.
- We expect firms to follow FG22/6 when planning a full or partial branch closure and closure or conversion of an ATM. In line with this guidance, we expect firms to conduct a robust analysis of the impact of a proposed closure or conversion on their customers before deciding to proceed with a closure. If going ahead with a closure or conversion, firms should ensure they inform affected customers and provide clear and accessible information on the alternatives they can access. They should communicate this information at any affected sites, on their websites, to other relevant stakeholders, and in cases of branch closures, by providing written notification directly to affected customers. In addition to these existing expectations, our new rules will require designated

firms to use accessible signage at any of their facilities which are subject to a closure or material reduction/change in cash access services. This must set out the details of any cash access services required by an assessment under the new rules and signpost customers to where they can find published information about the availability of cash access services (eg, the cash locator tool).

- We already regularly publish data on cash access coverage in the UK, broken down by geographical area, on our website. This captures the locations of cash access services and other relevant information such as fees, temporary closures, opening hours, and accessibility. This data covers brick-and-mortar bank and building society branches, mobile bank branches, ATMs, and the Post Office network. We supplement this information with annual data on cashback locations.
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## Communicating the cash access request scheme

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**6.19** To raise awareness of the cash access request scheme amongst consumers and businesses, we proposed to require designated entities to promote the scheme by clearly setting out on their websites what a cash access request is, and how individuals or organisations can submit one.

**6.20** We also proposed to require designated firms or a designated coordination body acting on their behalf, to inform local authorities, Members of Parliament (MPs), and members of devolved national legislatures of the scheme, to help raise further awareness.

**6.21** We asked:

**Question 23:** *Do you agree with our approach to designated entities raising awareness of the cash access request scheme?*

**6.22** Most respondents broadly agreed with our proposals, with several responses commenting on the importance of ensuring consumers and other stakeholders are aware of the cash access request scheme and how to successfully submit a cash access request.

**6.23** As with responses to questions 21 and 22, many consumer organisations stated the need for designated firms to consider non-digital methods of communication to reach consumers with characteristics of vulnerability who may be digitally excluded. Examples of non-digital communication methods suggested were face-to-face engagement events, posting physical notices in places such as GP surgeries and libraries, and working with a wide range of stakeholders to raise awareness including local authorities, MPs (our rules already require designated entities to notify local authorities and MPs of the scheme), community organisations, local retailers, trade unions, SME member organisations and others whose remit involves helping consumers with their finances. One industry respondent also commented that publishing information about the cash access request scheme online does not go far enough to raise awareness among local

communities. But they did not offer any alternative communication methods, other than supporting our proposals to require designated entities to inform local authorities, MPs, and members of devolved national legislatures of the scheme.

- 6.24** Some consumer organisations argued that designated firms should proactively hunt for gaps in cash access provision, rather than relying on the cash access request scheme as a backstop. One respondent suggested that our approach puts too great a responsibility on consumers as they are expected to seek out information and then take steps to have the gaps addressed. They noted that this is particularly relevant for consumers with characteristics of vulnerability, who are more likely to be impacted by gaps in cash access provision.
- 6.25** One industry respondent challenged our proposal to require designated firms to inform local authorities, MPs, and members of devolved national legislatures of the scheme. They argued this may be overly burdensome and that this information could instead be available on a voluntary basis from the coordination body.
- 6.26** Two industry respondents requested clarity on the role that the coordination body can play in promoting the cash access request scheme, on behalf of designated firms.

### Our response

- We are proceeding with our proposed approach to designated entities raising awareness of the cash access request scheme.
- For the cash access request scheme to operate effectively, there needs to be sufficient awareness among communities of the scheme and how it works. Local authorities, MPs and members of devolved national legislatures are well placed to promote the scheme and to work with other key local stakeholders such as charities, consumer organisations and organisations that support consumers with specific characteristics of vulnerability, to further raise awareness. We agree with the importance of using non-digital methods of communication to raise awareness about the cash access request scheme. We believe that notifying relevant local stakeholders can help distribute this information more widely within the community, including among those who may be digitally excluded. So, we consider it proportionate to require designated firms to inform these stakeholders of the scheme. We also remind them of their obligations under the Consumer Duty or Principle 7 in their communications with customers, and to follow FG22/5 when communicating with customers in vulnerable circumstances.
- Under our new rules, designated firms will be required to respond to a range of trigger events by conducting cash access assessments. We do not think it would be proportionate to require them to carry out proactive assessments of cash access in the absence of a trigger event. We do, however, think that requiring designated firms to raise awareness of the cash access request scheme strikes an appropriate balance, as it enables those with a sufficient interest to submit cash access requests.

- Designated firms may choose to use a designated coordination body to fulfil stakeholder notification requirements on their behalf. Designated firms may also choose to use a designated coordination body to promote the cash access request scheme online. But they must still clearly set out in an easily accessible place on their own websites what the cash access request scheme is and how individuals or organisations can submit one. Designated coordination bodies who undertake assessments in response to cash access requests must also provide this information on their websites.
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## Publishing information following an assessment

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- 6.27** In CP23/29, we proposed that designated entities must publish the assessment criteria they will use and the details of the process they will follow to conduct assessments and reviews.
- 6.28** We also proposed that designated entities must publish information about the outcomes of all cash access assessments they undertake. This includes assessments which conclude that there is no deficiency or that a deficiency has no significant impact on the local area.
- 6.29** Where an assessment identifies the need for a cash access service, we proposed designated firms must publish further information about that service.
- 6.30** We set out the details that the above information must include, proposed that designated entities publish this information in an easily accessible place on their websites as soon as reasonably practicable, and that it be kept up to date.
- 6.31** We asked:
- Question 24:** *Do you agree with our proposals for publishing information about the outcomes of cash access assessments? If you believe there is further information that designated entities should provide, please give details.*
- Question 25:** *Do you agree with our proposals for publishing information about additional cash access facilities? If you believe there is further information that designated entities should provide, please give details.*
- 6.32** Most respondents agreed with our proposals for publishing information about the outcomes of cash access assessments and about cash access facilities that will deliver any services identified in the assessment.

- 6.33** While industry respondents agreed with the need for transparency around assessment processes, some raised concerns about the risk of potentially exposing commercially sensitive information when publishing detailed information. One gave the example of a commercial transaction involving a lease for a facility, where they have been unable to agree terms with a landlord and argued details of this disagreement should not be a matter of public record.
- 6.34** Some industry respondents requested guidance on how to manage the information they publish if previously communicated plans and dates unexpectedly change due to delays and for instances where they are unable to provide exact details, such as the opening date of a new cash access facility.
- 6.35** Some respondents, including both industry respondents and consumer organisations, argued that designated firms should ensure that the information they publish online is also provided offline to account for digitally excluded consumers and in other formats such as braille.

### Our response

- We are proceeding with our proposals for publishing information about the outcome of cash access assessments and required cash access facilities, as set out in CP23/29.
- Our proposals intend to ensure there is transparency and consistency around the processes that designated entities use for cash access assessments. This is important to enable consumers and businesses to trust and understand assessment processes and the rationale behind decisions, while ensuring they can easily access relevant information that is up to date. We understand that assessment decisions may contain commercially sensitive information and do not expect designated entities to publish details that may risk exposing commercially sensitive information.
- We recognise that designated entities may not always be able to give a definitive date for when cash access services will become available. In such cases, we will expect them to provide their best estimate of the expected date or range of dates, along with an explanation of why they are unable to provide a specific date. Where previously published plans and dates change due to unexpected delays, we expect designated entities to amend this information with the updated details, as soon as they become aware of any changes.
- Firms must consider the communication needs of their customers in line with the Consumer Duty or Principle 7. Firms should also follow FG22/5 when communicating with customers with characteristics of vulnerability. This includes considering the needs of vulnerable customers who may be digitally excluded or have specific communication requirements. Firms must also comply with the Equality Act 2010 in Great Britain and equivalent legislation in Northern Ireland, to provide reasonable adjustments to enable disabled customers to use their services, such as providing information in an accessible format.

## Notification when closing cash access facilities

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- 6.36** Where a designated firm is planning a closure of a cash access facility or a material reduction or change in the cash access services it provides, we proposed that the designated firm or designated coordination body acting on its behalf must inform the following persons about this and of the details of the assessment, including outcome, and information about any facility it will use to provide cash access services required under the assessment:
- relevant local authorities
  - relevant MP
  - any members of the devolved national legislatures representing the relevant local area
- 6.37** We also proposed that designated firms must use accessible signage at the relevant cash facility, setting out the details of any facility it will use to provide cash access services required under an assessment and signposting information about the availability of cash access services on the designated firm's or designated coordination body's website. We proposed that this signage should be in place until the closure or material change takes effect.
- 6.38** We asked:
- Question 26:** *Do you agree with our proposals for sharing information on the closure of a facility? If you believe there are other stakeholders that designated entities should engage with, please give details.*
- 6.39** Most responses to this question were supportive of our proposals for sharing information on the closure of a facility, but some argued that designated entities should engage with more stakeholders. The groups of stakeholders that respondents suggested were local authorities (who are already required under our rules to be notified of a closure), local business representatives, local community organisations, and local charities that represent vulnerable consumers.
- 6.40** One consumer organisation proposed that designated entities should have a broader obligation, similar to the expectation in FG22/6, to proactively identify and engage with relevant stakeholders who may have an interest in a closure, beyond the list of stakeholders set out in CP23/29.
- 6.41** Another consumer organisation suggested that in addition to our proposals for signage at a closing facility, similar notices should also be placed at other existing cash access facilities operated by the designated firm, given that the facility being closed may not be the only one that local customers use.
- 6.42** Multiple industry respondents emphasised the need to ensure our proposals for sharing information on the closure of a facility are proportionate and suggested that our approach should differ according to the type of closure, with branch closures seen as requiring more stakeholder engagement than ATM closures. Examples given by respondents included not being required to engage with stakeholders on temporary closures, on ATM closures, or ATM conversions from free-to-use to pay-to-use.



## Our response

- We are proceeding with our proposals as consulted on. We consider notification to local authorities, MPs, and members of devolved national legislatures to be a key method of raising awareness of a closure in a local area, especially as they can disseminate this information to other local stakeholders, who can then further raise awareness amongst consumers and businesses. Where a firm is planning on closing a branch or closing or converting an ATM, we expect it to follow FG22/6. Under this guidance, firms should identify and engage with relevant stakeholders including customers, notifying them of the closure or conversion as soon as possible after making this decision and no less than 12 weeks before a closure or conversion is due to be implemented. Firms should consider any feedback they receive from customers and other stakeholders following these communications, particularly where feedback relates to customer needs or the appropriateness of proposed alternative services. Therefore, as we already expect firms to engage with a range of stakeholders ahead of a closure or material change, we will not be prescribing in the new rules any other stakeholders that they must notify of a closure or material reduction/change to a facility.
  - For reasons of proportionality, we will not be requiring designated firms to deploy signage at facilities other than the facility that is earmarked to close or undergo a material change. We consider our proposals for signage at the facility setting out details of any required cash access services and signposting information about the availability of cash access services on designated entities' websites to be sufficient, combined with the obligation to notify relevant local stakeholders.
  - We consider ATMs to be a vitally important way in which consumers and businesses can access cash services. They account for the highest proportion of cash access facilities in the UK and are often located externally, which allows for 24-hour access that is typically not available using other means. Responses to earlier questions (see Chapter 2) agreeing with our proposals to make ATM closures, conversions, and material changes events that trigger assessments, also highlight the importance of ATMs to consumers and businesses that rely on cash. We therefore consider it appropriate to require designated firms to engage with stakeholders on these trigger events and will be proceeding with our approach regarding ATMs as planned.
  - Our proposals for sharing information on the closure of a facility apply to 'relevant closures'. We defined these as a full closure, or material reduction/change in services, which is reasonably anticipated to last, or has lasted, for at least 6 months. We are taking forward our approach as consulted and so will require designated firms to share information on the relevant closure of a facility with the specified stakeholders, as set out in CP23/29.
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## Chapter 7

# Monitoring, reporting, and complaints

- 7.1** In CP23/29 we set out proposals to gather data from firms to monitor compliance, the demand for cash access services and where the withdrawal of services is likely to have the greatest impact. We also set out where a consumer or business can go if they have complaints about firms' actions in relation to our new cash access rules.
- 7.2** In this chapter, we set out and respond to the feedback we received on:
- data we proposed to collect on the availability of cash access services from both designated and non-designated entities, and any barriers to supplying it
  - our approach to gathering information about assessments, reviews, delivery of services and complaints
  - complaints-handling in relation to our access to cash rules
  - not providing a private right of action

## Our data-led approach to supervision

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- 7.3** As set out in Chapter 1, our data-led supervisory approach will focus on securing the right outcomes for consumers and businesses.
- 7.4** We have a broad range of powers over designated entities. These include enhanced information-gathering powers, the power to make rules and give directions, and a full suite of enforcement and disciplinary powers, up to and including the power to issue financial penalties.
- 7.5** We also have s.165 information gathering powers to collect data from other entities involved in the provision of cash access services. This includes the Post Office, non-designated banks and building societies, and ATM networks and operators.
- 7.6** We will use a range of supervisory tools and methods to assess the effectiveness of designated entities' approaches and their compliance with our rules.
- 7.7** We will be collecting cash coverage data from a range of entities. These include some of the largest personal current account (PCA) providers (both designated and non-designated), LINK (as the operator of the UK ATM network), the Post Office, and the operators of payment systems through which cashback is provided. The data we will request includes data on facility locations, opening hours, features, and accessibility. This data builds upon our existing coverage monitoring and will provide a comprehensive overview of access to cash at a national level. This data will also help supervisors identify the individual closures with the greatest impacts, ensuring our efforts are focused on the gaps in provision affecting consumers and businesses most.

- 7.8** Through our ongoing supervisory engagement with designated entities, we will collect additional information about cash access requests, assessments and reviews, using formal information gathering powers where necessary. This information will help us to monitor and actively supervise whether the assessments and reviews designated entities are undertaking are compliant with our rules.
- 7.9** We will intervene where we need to do so to protect reasonable access to cash. Where we identify serious or persistent breaches of our rules, we will use our full range of powers to tackle them.

## Monitoring reasonable access: data from designated firms

- 7.10** In CP23/29, we proposed introducing new rules to require designated firms to submit quarterly data on their branch networks and any planned branch closures. We proposed to collect this data 3 times a year, in submission windows aligned with those used by LINK under the existing industry voluntary scheme.
- 7.11** The information we proposed to collect is summarised below:

Information required	Handbook location of requirement	Frequency
Branch data including: <ul style="list-style-type: none"> <li>• locations</li> <li>• opening hours</li> <li>• facilities (eg, counters, ATMs)</li> <li>• accessibility (eg, wheelchair, hearing, visual impairment)</li> <li>• activity and usage (eg, numbers of personal/business customers and transaction volumes)</li> </ul> Branch closure data: <ul style="list-style-type: none"> <li>• details on planned branch closures</li> </ul>	SUP 16, with guidance in the annex to SUP 16	3 windows per year to submit data: <ul style="list-style-type: none"> <li>• 1-14 February (for branch data covering Q3 and Q4 of the previous year)</li> <li>• 1-14 June (for branch data covering Q1 of the current year)</li> <li>• 1-14 October (for branch data covering Q2 of the current year)</li> </ul>

- 7.12** For designated firms, these rules would replace the existing ongoing quarterly branch data request which informs our monitoring of access to cash coverage.
- 7.13** We asked the following question:

**Question 27:** *Are there any barriers to designated firms providing the suggested data? If so, is there any other information we could gather from designated firms to help us to understand the availability of cash access services?*

- 7.14** The majority of consumer and industry respondents agreed with our overall approach to requesting data from firms.
- 7.15** Several industry respondents, however, raised questions about how our proposed reporting requirements aligned with existing data submission arrangements.
- 7.16** Some firms noted we already collect quarterly branch data from firms as part of our existing cash coverage monitoring and called for new reporting requirements under our access to cash regime to align with this. One firm asked whether the assessments firms are expected to undertake when closing branches under FG22/6 meant our proposed reporting requirements were unnecessary.
- 7.17** Several firms also called for our reporting requirements to align with the data firms participating in the existing voluntary scheme already submit to LINK.
- 7.18** Some industry respondents suggested LINK should be held responsible for collecting and submitting data on behalf of firms in their role as a coordination body, for both consistency and efficiency.
- 7.19** Several firms also asked us to clarify our proposed notification requirements: they asked whether we would expect to be notified of designated firms' closures only during reporting windows, or also at the point of internal discussions, as per their current practice under FG22/6.
- 7.20** We were also asked to clarify our expectations concerning several specific data items. This included questions on cross-brand servicing: on our approach to gathering data on branches which serve customers of multiple brands, and on how we would distinguish counters or deposit ATMs which serve only one firm's customers from those which serve the public more widely. We were also asked what we mean when we ask about support for customers using deposit machines, what we mean by 'registered personal customers' (particularly in the context of branches allowing for cross-brand servicing) and 'personal banking customers', and whether we expected services for customers without any card to be captured in data fields referring to non-chip cards.
- 7.21** One consumer organisation suggested we also gather data on accounts held by charities and community organisations.
- 7.22** Two industry respondents – 1 trade body and 1 firm – also raised concerns about the practicality of data submission, arguing some firms may struggle to meet reporting requirements due to current system limitations, without significant investment or manual effort.
- 7.23** Conversely, 1 respondent from a consumer organisation had questions about our ability to challenge firms' data and how we would address non-compliance by firms.

## Our response

### Reporting requirements

- We are taking forward our approach as consulted in most areas. Through this approach, our aim is to make the best use of data and analytics to support effective interventions and supervisory decision-making. We are also committed to ensuring that our reporting requirements are proportional, minimising the burden on firms.
- As set out above, for designated firms our new reporting requirements replace our existing quarterly branch data request, allowing designated firms to submit this information efficiently via RegData, in line with their other regular reporting requirements, instead of by email.
- We have also worked closely with LINK, firms, and our regulatory partners to streamline the information we collect, align formatting and frequency of submission and reduce duplication. This includes having aligned the submission windows for designated firms with those used by LINK under the existing voluntary scheme. We intend to make it easier for firms to send us data but accept they may sometimes face challenges when moving to any new process. We have developed our approach in alignment with our [Data Strategy](#) (updated in 2022) and will continue to engage with firms and regulatory partners to make improvements and increase efficiencies where we can.
- We do not agree the assessments we expect firms to undertake when closing branches under FG22/6 render our new reporting requirements unnecessary. Those assessments happen only in response to closures, and focus only on the impacts of closures on firms' own customers. As such, they do not provide the comprehensive and ongoing overview of cash coverage we need to effectively supervise our new regime.
- We also do not agree that only LINK should be held responsible – through its role as a designated coordination body – for collecting and submitting all data from designated firms. By requiring firms to continue to directly submit data to us via our RegData platform, we help maintain clear lines of accountability, and materially reduce the risk of data entry mistakes.

### Notification requirements

- Our new notification requirements (discussed in more detail in Chapter 2) are not restricted to reporting submission windows. Firms must notify both us and other designated entities of closures and material reductions/changes to services as soon as reasonably practicable. This allows designated entities to undertake assessments in response to trigger events, and enables us to supervise them. These notification requirements sit alongside both our new reporting requirements (which replace our existing collection of quarterly coverage data) and firms' existing obligations under FG22/6 (which continues to apply to both designated and non-designated firms).

### **Our approach to supervising submissions**

- We have a wide range of powers we can use when firms fail to meet our expectations, including where they fail to submit required data. These powers are set out above and in Chapter 1.
- As with the rest of our regime, we will take a risk-based approach to supervising firms' compliance with our rules. Where a designated firm believes it will be unable to comply with our reporting requirements, it should notify its supervisors as soon as possible, and share its plans to close the compliance gap. We will review these instances on a case-by-case basis.

### **Requested clarifications**

- Where designated firms' branches serve customers of multiple brands, the SUP 16 form they submit should state the main brand of the branch, which must be recognised and associated with the firm submitting. We have amended the SUP 16 form to make this clear. This means each designated firm in a larger group, for example, must submit data relating to its own branches. Where firms do have arrangements for local cross-brand servicing, they should inform their supervisors. We do not expect this information to be provided for individual branches as part of regular reporting.
- Firms' SUP 16 form submissions should only include deposit ATMs which serve their own customers or other brands' customers through specific cross-brand servicing agreements. Where firms' branches host 'universal' deposit ATMs, we will expect these to be reported by LINK. We have amended SUP 16 to make this clear. We ask firms to report counters separately – as above, we will expect supervisors to be notified of local cross-brand servicing arrangements separately from regular reporting.
- Firms' SUP 16 form submissions should report any in-person support for deposit ATMs – including support which is only available on request to those who need it, and support for any 'universal' deposit ATMs the branch hosts. We have amended the SUP 16 form to make this clearer.
- As the SUP 16 form we consulted on sets out, by 'registered personal customers' we mean those customers actually registered or domiciled at the branch. We ask a separate question about numbers of regular customers and ask firms to clarify the definition they are using. Where we ask whether a branch has services for 'personal banking customers' we mean any such services, including those accessible only to a firm's own customers.
- The field referring to whether the branch has facilities to provide withdrawals and/or deposits for customers without a chip-enabled card refers specifically to customers with cards without chip-and-pin functionality. We ask separate questions about counter and face-to-face services which we expect to capture those branches which can serve customers without cards at all.
- We also do not consider it necessary to add new fields to separately gather data on accounts held by charities. As set out in Chapter 2, our

new Access to Cash Sourcebook is clear that references to 'businesses' should be interpreted broadly, and to include, for example, charities. We would expect firms to interpret references to businesses in the same way when complying with the reporting requirements set out in SUP 16.

#### **Further amendments to Handbook text**

- We have made further amendments to the SUP 16 form we consulted on which will be reflected in the forms we require designated firms to submit via RegData. These are changes to avoid duplication and amend field names and notes for clarity, and do not represent a change in the data we will be collecting from firms.
- We have replaced references to quarters and quarterly reporting periods with references to reporting periods. This will not change the frequency of the required reports but will allow for a more flexible form that non-designated banks and building societies can use to submit data on an annual basis.
- For consistency with the Access to Cash sourcebook and to align with industry terminology, we have also replaced references to ADMs (automated deposit machines) and ATMs with references to deposit ATMs and withdrawal ATMs, respectively.

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## **Monitoring reasonable access: data from non-designated firms and non-regulated entities**

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- 7.24** In CP23/29, we set out our proposals to gather information on the availability of cash provision in local areas from non-designated firms and non-regulated entities.
- 7.25** This included information on branch coverage (but not proposed closures) from non-designated personal current account providers with 10 or more branches. The other entities we proposed to collect data from were the Post Office, LINK (as the operator of the UK ATM network), and operators of payment systems through which cashback is provided (Visa and Mastercard).
- 7.26** The frequency and type of data we proposed to collect varied by entity – these are set out in CP23/29.
- 7.27** We also set out our intention to collect information on proposed ATM closures from LINK in the future.
- 7.28** We asked respondents for their views on the following question:

**Question 28:** *Are there any barriers to these non-designated firms or non-regulated entities providing the suggested data?*

- 7.29** Several respondents called for us to gather data from a wider range of non-designated entities.

- 7.30** Several firms asked us to extend our data requests to IADs. Another suggested extending our regular data collection to fintech firms exploring innovative cash solutions, while others suggested we collect regular monitoring data on cashback without purchase.
- 7.31** One respondent also suggested individual retailers may be able to supply basic data on cash access facilities and opening hours, although noted more detailed data requests would impose a significant additional burden on them.
- 7.32** One respondent called for us to collect ATM opening hours data from LINK, potentially by proxy. Another called for us to set out when we would collect proposed ATM closures data from LINK.
- 7.33** One respondent from a consumer organisation requested we regularly review the criteria of the data we ask for from non-designated entities to ensure it remains appropriate.

### Our response

- We are largely proceeding with our approach as consulted. The data we will collect builds on data that non-designated firms and non-regulated entities have previously submitted to us voluntarily to help our understanding of cash access and coverage.

#### Entities in scope

- We carefully considered gathering data from IADs but do not think this is necessary or proportionate. Given that virtually all UK ATMs are connected to the LINK network, we consider the ATM data we will regularly collect from LINK to be sufficient for our monitoring of access.
- As we set out in CP23/29, we also do not think it is necessary to gather regular data from cashback without purchase providers. It is currently available at a relatively small number of retailers, and transaction volumes are still relatively low. For similar reasons, we do not think it is currently necessary to collect regular monitoring data from fintech firms developing new cash solutions.
- We also do not think it would be proportionate to gather data from individual retailers. We will continue to gather data on cashback provision (location, opening hours and activity) from operators of the payment systems which provide cashback.
- We will already, as set out in CP23/29, be collecting data on whether ATMs are external or internal. We do not think it is reasonable to expect LINK to supply regular detailed data on ATM opening hours. We note, for example, that many ATMs are located inside premises whose opening hours neither LINK, nor LINK members, are likely to have control or oversight over. Even using proxies presents data quality and consistency challenges, given some ATMs may be used relatively infrequently. We would, however, encourage industry to consider where they may be able to obtain further detail on the opening hours of ATMs to enhance existing ATM locator tools and further transparency.



- As part of our supervision of LINK, we will agree in future when and where additional data (which could include proposed ATM closures) may be relevant to our oversight of them, as their business and the regulatory landscape evolve.
- We have also set out some more detail on the frequency of the data collection we consulted on below:
  - As set out in CP23/29, we will be requiring non-designated banks and building societies to submit data once a year, as opposed to 3 times a year for designated firms. We will expect these firms to submit between 1 and 14 February, to line up with one of the submission windows for designated firms.
  - We will also now be gathering monthly data from LINK and the Post Office (within the first 5 working days of the month). This is an increase in frequency from the proposals we set out in CP23/29. We have already notified LINK and the Post Office of this change.

### **Changes to forms**

- The changes to SUP 16 referenced above have also, where relevant, been made to the forms which will be submitted by non-designated and non-regulated entities. For example, we have, where appropriate, replaced references to ADMs and ATMs with references to deposit ATMs and withdrawal ATMs.
- We have also made minor changes to the forms to be submitted by the Post Office and LINK. These include the removal of a handful of fields in response to consultation feedback, and some other changes which will improve clarity and consistency with the branch data and closures reporting forms designated firms will submit, and do not represent a change to the data either entity will be expected to submit.
- We set out the updated templates we will be using to collect data from the Post Office and LINK in Annex 2.

### **Keeping our approach under review**

- In line with our Data Strategy, we will regularly review our data collection to ensure its quality and accuracy, and ensure we get the data we need to support our new cash purpose at the lowest possible cost to industry.
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**7.34** The table below summarises the full set of data we will regularly collect to monitor cash provision, from both designated and non-designated entities:

Entity	Frequency (per year)	Type of data for regular submission	Location	Opening Hours	Facilities (eg, counters, ATMs)	Accessibility	Activity and usage
Designated banks and building societies	3	Branch monitoring and proposed closures data.	Yes				
Non-designated banks and building societies with 10 or more branches	1	Branch monitoring data only. Notifications of proposed closures to continue as per FG22/6.	Yes				
Non-designated banks and building societies with 10 or more branches	0	None. Notifications of proposed closures to continue as per FG22/6.	N/A				
Post Office	12	Post Office monitoring data	Yes				
LINK	12	ATM monitoring data	Yes	No	Yes		
Payment systems through which cashback is provided (Visa/Mastercard)	1	Cashback monitoring data	Yes		No		Yes

## Gathering information about assessments, reviews, delivery of services

**7.35** In CP23/29, we set out our intention to monitor designated entities' compliance with our rules on cash access requests, assessments, and reviews through our ongoing supervisory engagement, using information gathering powers where necessary.

**7.36** Our proposals set out that we expect firms to provide information and take reasonable steps to overcome any barriers to meeting timeframes. Where there are consistent failures, we would use the full range of our supervisory toolkit, including public censure, the power of direction (s.131W FSMA), and consider other enforcement action in the most egregious cases.

**7.37** In taking this approach, we did not propose to create more detailed rules for regular reporting of cash access requests, assessments, reviews or complaints.

**7.38** We asked the following question:

**Question 29:** *Do you agree with our approach to gathering information about assessments, reviews, delivery of services and complaints related to our access to cash rules?*

**7.39** There was widespread agreement across both industry and consumer organisations with our proposed approach. Respondents did, however, call for clarification in several areas.

**7.40** Several industry respondents had questions about how we would supervise different designated entities consistently. One said it was important the final rules were clear to enable consistent application by designated firms and ensure everyone interprets them in the same way. One respondent suggested a more prescriptive approach, with a template with specific data points designated firms should consider in an assessment, could help ensure consistency. They also suggested firms participating in a coordination body could help drive consistency.

### Our response

- We are proceeding with our approach as consulted and are not creating more detailed rules for reporting cash access requests, assessments, reviews or complaints.
- As set out in CP23/29, we consider that the flexibility offered by our supervisory engagement with designated entities will better enable us to identify and keep up to date with any emerging problems. Our approach to requesting data is outcome-focused, and will allow us to adapt and adjust the information we gather in response to emerging issues and trends.
- However, we will keep our approach under review and may consider whether additional regular reporting requirements or changes are necessary in the future.
- We accept there is a need for more clarity in some areas of our rules, and have addressed these in the relevant chapters throughout this Policy Statement. We do not, however, think a more prescriptive approach would be appropriate. As set out in Chapter 5, our outcomes-based approach is intended to be flexible enough to accommodate different cash needs in different areas and be responsive enough to adapt to trends in cash usage.

- While we would strongly encourage designated firms to work through a single independent coordination body designated by the Treasury to carry out assessments, our rules provide a consistent framework for all designated firms to undertake their assessments, holding them to the same standards irrespective of them being a member of a coordination body.
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## Complaints handling for our Access to Cash rules

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**7.41** In CP23/29 we set out where consumers and SMEs can go if they have complaints involving our proposed access to cash rules.

**7.42** In this section we set out our approach to addressing complaints about:

- access to cash, including closures
- cash access assessments
- the delivery of additional cash access services

## Complaints about access to cash including closures or material reductions/changes to cash access services

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**7.43** We set out in CP23/29 that where someone is concerned about the provision of cash access in their local area, they can submit a cash access request. To this end, we encourage designated firms, non-designated firms or the Ombudsman service to direct complaints or signpost to information about submitting cash access requests where appropriate. We set out in Chapter 6 further obligations on designated firms to promote awareness of the cash access request scheme.

**7.44** In most scenarios where a firm has withdrawn a cash access service or made a material change to a service, this would trigger a cash access assessment to assess the needs of the local community. However, the firm's customers can also complain directly to the firm about the impact of that withdrawal of services to them. Where a customer is not satisfied with their firm's response, they may be able to complain to the Ombudsman Service. The Ombudsman Service's decision would be dependent on the nature of the complaint and its specific impact on the customer. Separate to this, a closure of a cash access facility would be a trigger event under the new rules and would require designated firms to undertake a cash access assessment.

## Complaints about cash access assessments

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- 7.45** In Chapter 4 we set out that anyone (or group) with sufficient interest in the local area can request a review of a cash access assessment, where concerns about factual inaccuracies or missing information could have had an impact on the assessment outcome. As set out in CP23/29, complaints about cash access assessments would not normally fall under the scope of the FCA's Dispute Resolution: Complaints Sourcebook (DISP). Neither would they come under the scope of the Ombudsman Service's jurisdiction. This is why we require designated entities to set out and follow a transparent and accountable review process to efficiently and fairly address complaints about cash access assessments from local consumers and businesses.

## Complaints about the delivery of required cash access services

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- 7.46** Where a customer wants to complain to their firm about the delivery of additional cash access services following an assessment, this could fall under the FCA's DISP sourcebook definition of complaints. Firms would be required to follow the rules under DISP. This includes investigating and considering appropriate remedial action, and also relevant complaints-reporting. Customer complaints about their firm's failed delivery could include unreasonable delays to installing services. In some circumstances, including where there may be financial loss or distress, customers can also complain to the Ombudsman Service about their firm's failure to provide cash access services if they are not satisfied with the firm's response to their complaint.

- 7.47** We asked respondents the following question:

**Question 30:** *Do you have any comments on how complaints about our proposed access to cash rules will be handled?*

- 7.48** Most industry and consumer representatives agreed with our proposals in principle but asked for greater clarification in certain areas.
- 7.49** Several industry respondents were satisfied with the existing LINK complaints process under the voluntary scheme (in which LINK, in the first instance, considers complaints, with appeals to an Independent Assessor allowed where complainants are unhappy with the outcome). Some queried the jurisdiction between LINK, designated firms and the Ombudsman Service in addressing certain categories of complaints.
- 7.50** Several industry respondents also argued that all complaints regarding delays in providing cash access services should be handled by the coordination body, for ease and consistency of responses.
- 7.51** Various representatives from consumer organisations raised the concern that the complaints process does not go far enough in providing clear, accessible directions to complainants and asked for further clarification for providing appropriate redress to consumers, especially in cases where the complaints cannot be redirected to the

Ombudsman Service. One respondent called for referral mechanisms to redirect complaints submitted to the wrong entity.

- 7.52** Some consumer organisations raised questions about the scope of the Ombudsman Service's jurisdiction, including the kinds of activity to which complaints dealt with by the Ombudsman Service can relate and who is eligible to escalate their complaints to the Ombudsman Service. Some respondents pushed to extend the definition of eligible complainants to cover people and bodies who are not customers of firms.
- 7.53** Several consumer organisations also argued the Ombudsman Service should have the power to consider complaints about cash access assessments and reviews.

### Our response

- We are proceeding with our approach as consulted.
- The consumer awareness rules in DISP 1.2 already require firms to publish appropriate information regarding their internal procedures for the reasonable and prompt handling of complaints for their own customers. They must also provide information about the Ombudsman Service to eligible complainants. We do not think extending the definition of eligible complainants to cover people and bodies which are not customers or potential customers of firms would deliver additional clarity for consumers or lead to more efficient handling by firms.
- We believe that the process set out in our cash access regime to allow those with a sufficient interest to raise cash access requests is sufficient to enable communities to raise cash access issues with firms. As set out above and in CP23/29, while complaints about cash access assessments would not normally come under the scope of the Ombudsman Service's jurisdiction, our rules will require designated entities to establish a review process (set out in Chapter 4) which will help deal with complaints about the outcomes of cash access assessments from local consumers and businesses. Our rules require designated firms to publicise how to request a review of an assessment outcome.
- We will monitor if firms are addressing customers' complaints appropriately, through both the firm-specific data and aggregate data at a market-level we collect and publish every 6 months and through our more direct supervisory engagement on access to cash.

### Ombudsman Service

- As we set out in Paragraph 7.40, where a customer of a firm is unhappy with the firm's decision on a complaint, or they do not hear from them in the right time frame, the Ombudsman Service may be able to help.
- However, only eligible complainants who are customers or potential customers of a firm will be able to refer a complaint about the firm to the Ombudsman Service. The activity to which the complaint relates must also fall within the scope of the Ombudsman Service's jurisdiction.

- The scope of the Ombudsman Service’s jurisdiction, and the definition of an eligible complainant, are set out in DISP 2.2 and DISP 2.7 respectively. Eligible complainants include consumers, micro-enterprises, small businesses and some charities and trusts.
- We will continue to work closely with the Ombudsman Service, including sharing insights on emerging issues and trends on complaints. This will support our supervision of firms’ compliance with our cash access rules and further assess if firms are resolving complaints appropriately.

#### Use of a third-party to process complaints

- DISP 1.1.19G explains that firms are not prevented from using a third-party administrator to handle or resolve complaints. In such cases, LINK could act as the third-party administrator for the designated firms’ complaints.

**7.54** The diagram below summarises who consumers could complain to in different scenarios:



#### Concerns relating to access to cash including closures

Firms\* & potentially the Ombudsman Service\*\*



#### Concerns relating to cash access assessments

Firms & Coordination body\*\*\*



#### Concerns about the delivery of required cash access services

Firms & potentially the Ombudsman Service\*\*

\* Can signpost to Cash Access Requests if appropriate

\*\* No Ombudsman Service rights where complainant is not an existing or potential customer, or if the respondent is multiple designated entities

\*\*\* For those with sufficient interest in the local area, the review of a Cash Access Assessment process can be followed

## The proposal to not use a Private Right of Action (PROA) for breaches to our access to cash rules

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**7.55** In this section, we summarise the feedback on whether to apply a PROA for breaches of our access to cash rules.

**7.56** FSMA provides that a private person (generally, individuals, not businesses) who suffered loss through a firm's breach of one of our rules has a right to take legal action for damages against the firm. We proposed not to provide a PROA for breaches of our access to cash rules. Our new powers aim to ensure cash provision for local communities rather than any one individual.

**7.57** We asked the question:

**Question 31:** *Do you agree with our proposal to not provide a private right of action for breaches of our access to cash rules?*

**7.58** Industry respondents overwhelmingly agreed with our proposal not to provide a PROA for breaches of our access to cash rules. They said that the current framework for complaints sufficiently allows for redress for customers.

**7.59** However, respondents from consumer organisations and small businesses challenged this proposal. They argued that a PROA should be provided in cases where our intervention could not guarantee the delivery of effective solutions for customers, or where the Ombudsman Service had limited powers and jurisdiction. Some respondents added that allowing a PROA would empower customers to hold firms accountable for not complying with new cash rules or not acting in the best interests of consumers. Others argued making a PROA available could help incentivise firms to act in consumers' interests, to avoid legal risk.

**7.60** One respondent suggested providing a PROA may have wider benefits – with litigation allowing courts to develop the law on firms' duties towards their customers, which they argued could have benefits to consumers beyond our access to cash regime.

**7.61** One respondent agreed with our proposal not to provide a PROA on the condition designated entities cooperate to deliver additional cash access services. But they argued we should keep our position under view and consider applying a PROA if there is resistance or a lack of participation from designated entities.

### Our response

- We will take forward our approach as consulted.
- As we set out in CP23/29, we consider it reasonable not to apply a PROA to our cash access rules. This is because the rules are intended to make sure designated firms are responsible for providing reasonable cash access to communities generally, rather than to any 1 individual in that community. If we apply a PROA to our new cash access rules, we



think that would lead to the imposition of a disproportionate burden on multiple designated firms in potentially having to deal with large numbers of claims from people they have no customer relationship with.

- As explained earlier in this chapter, we have a range of robust mechanisms to make firms accountable for breaches. These include:
  - the right to ask for a review of an assessment in certain circumstances, and
  - our supervision of the new rules and powers to intervene where we need to do so to protect reasonable access to cash

These are the prime routes to accountability for a breach of the new rules.

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## Chapter 8

# Cost benefit analysis

- 8.1** In [CP23/29](#) we set out our cost benefit analysis (CBA) of our consultation proposals.
- 8.2** This chapter summarises the feedback to the CBA, how we have considered it and updates to our CBA based on the final set of proposed rules.
- 8.3** In our CBA, we set out that the most significant costs to industry from our proposals would be the costs of providing any additional cash access services that would not be incurred under the counterfactual. Equally, the most significant benefits would be reduced significant negative impacts to consumers and businesses (in particular, SMEs) that rely on cash services through providing additional cash access services.
- 8.4** We discussed how these costs and benefits were difficult to measure as cash access assessments would need to make judgments about the necessary provision in local areas, within the framework of our rules and guidance. These would themselves differ from each other in terms of their geographic, demographic, and other characteristics. As costs and benefits are driven by these and other uncertainties such as rate of closures and thresholds for delivery, including the units of analysis (local areas) firms use, we provided illustrative examples of the potential scale of costs and benefits of provision. We assessed the proportionality of our rules with a break-even analysis of the costs of providing cash services solutions. Table 1 summarises our assessment of the estimated costs and benefits of our consultation proposals and guidance.

**Table 1: Summary of assessment of costs and benefits**

	Total one-off costs	Total ongoing (annual) costs
<b>Familiarisation and gap analysis</b>	£0.2m	-
<b>Assessing cash access</b>	£0.5m	£2m (including existing operational costs)
<b>Provision of cash access services</b>	<p>The solutions delivered will depend on judgments about provision in local areas within the framework of our rules and guidance. To provide an illustrative example, we estimate the cost of delivering banking hub recommendations in response to bank branch closures and cash access requests in 2023 as a guide for annual costs. We estimate:</p> <p>Total one-off costs incurred to set-up 41 banking hubs: £12.4m</p> <p>Total ongoing costs per year for 41 banking hubs: £7.5m</p> <p>If another 41 banking hubs were recommended in year 2 then the total costs in year 2 would be £12.4m to set-up 41 additional banking hubs and £15m to operate 82 banking hubs.</p> <p>Note, our proposals are likely to increase the overall number of solutions and result in additional costs.</p>	

	Total one-off costs	Total ongoing (annual) costs
<b>Providing information on cash access</b>	£0.5m	£0.3m
<b>Data reporting</b>	£0.2m	£0.2m (including existing data collection costs)
<b>Benefits</b>	<p>Continued or improved access to cash services without incurring significant impacts, such as unreasonable travel-related costs for individuals and businesses, particularly for those that rely on cash access services and for consumers with characteristics of vulnerability. See pages 118-123 of the CBA for quantitative estimates of the costs that would be avoided.</p> <p>Reduced likelihood of individuals or businesses being excluded from using cash due to lack of access to cash services.</p> <p>Consumers are better informed about where to access cash services and how to raise issues around access, resulting in any significant impacts being addressed.</p>	
<b>Breakeven analysis</b>	<p>We expect that the cost of providing additional solutions could be net beneficial if these solutions serve multiple local areas. Based on the proximity of local areas to nearby local areas we consider this to be reasonably possible.</p> <p>See pages 123-129 of the CBA for more details.</p>	

Table note: All estimates are in 2023 prices as in the CBA in CP23/29.

## Our response to feedback on the CBA

**8.5** We asked respondents for their views on the following questions:

**Question 32:** *Do you have any comments on our cost benefit analysis, including our analysis of costs and benefits to firms, consumers and the market?*

**Question 33:** *Do you have any comments on the assumptions used in our analysis of the costs and benefits to firms, consumers and the market?*

## Risk of oversupply of cash services

- 8.6** A small number of respondents suggested our proposals risk an oversupply of cash services in the long run if reliance on cash continues to decline.

### Our response

- Our rules and guidance do not prescribe a specific level of cash services provision. Instead, they require designated firms to fill gaps in local provision, which have significant impacts and are reasonable to provide. If there is further decline in cash reliance in the future, our proposed assessment framework is flexible enough to accommodate this and allows for the level of provision required under our rules to also decline. We have estimated the costs and benefits of providing cash access services using scenarios based on solutions recommended in recent years. However, the actual costs and benefits will depend on how demand for cash evolves over time.
- Paragraph 1.23 (page 10) of this Policy Statement explains how we will keep the regime under review to ensure it operates as intended.

## Costs of provision of cash services

- 8.7** Feedback from several respondents suggested that we need to account for:

- costs for firms with a branch presence to fill gaps in areas where deficiencies might be identified
- costs to firms outside the voluntary arrangement that might need to deploy branches to address the identified deficiencies
- costs passed on to consumers
- costs of providing other, sometimes lower cost solutions that we did not provide cost estimates for (eg automated deposit facilities)

### Our response

- Designated firms who have an existing facility that already provides services meeting the criteria in the outcome of an assessment are not required to provide additional services to fill gaps in provision. Where an existing facility does not meet the criteria in the outcome, it might be that it can be modified to do so. This may mean that firms incur some costs that it is not reasonably practicable to quantify. In the areas where designated firms do not have an existing presence and will be required to fill gaps in provision along with other designated firms, our proposals are channel-neutral and do not require them to open a brick-and-mortar branch.
- Designated firms can decide what type of facility to deploy to provide the required cash access services an assessment has identified in the most cost-effective way. There are alternatives to brick-and-mortar

branches that may meet the requirements for a solution as identified by the assessment. For example, ATMs that accept deposits or mobile branches (assuming they have the required features). These facilities are significantly less costly and do not operate exclusively via designated coordination bodies. Therefore, we have not accounted for the cost of brick-and-mortar branches, including for firms outside a coordination agreement in our CBA's break-even analysis.

- In paragraph 174 of our CBA, we acknowledge that firms may pass on the costs of provision (through their fees and interest rates) to their customers. However, we do not explicitly account for this in our estimates to avoid double counting.
  - The available infrastructure and the associated costs of provision are based on the information available at the time we drafted the CBA. In paragraph 90 of our CBA, we note that we expect industry to continue to innovate to find more cost-effective solutions to provide cash access services.
- 

## Benefits of our proposals (avoided costs of loss of access)

**8.8** A range of respondents suggested that we should account for the following additional benefits:

- avoided costs to the voluntary sector from loss of access to cash services, ie consumers who make cash donations, charity organisations who accept cash donations and need access to cash services
- avoided costs to consumers from increased travel distance in rural areas due to cash service solutions provided
- one respondent suggested that we should account for benefits to consumers from reduced provision, eg consumers might switch to digital payment methods and avoid the travel related costs

**8.9** A range of respondents suggested that we should account for the following costs that could lower the benefits of the alternative cash service solutions:

- costs to consumers from using shared solutions rather than their usual branch
- higher costs for disabled people to access services at alternative locations
- increased CO<sub>2</sub> emissions from increased travel distances
- costs of ATM outages
- costs to consumers for parking when traveling to alternative locations

### Our response

- As a reminder, in the CBA we discussed the research we commissioned from London Economics to estimate the costs that consumers and SMEs (as businesses more likely to rely on cash) face when losing

access to cash access services at their usual provider. The results of this research can be found [here](#) and the details of their methodology can be found [here](#).

- Switching to alternative payment methods is a strategy to avoid the additional cost involved in losing access to cash services. For example, consumers might switch to digital payments to avoid the increased travel-related costs that would be the direct effect of the closure of their existing cash facility. However, the estimates of costs from loss of access in London Economics' research also implicitly take into account the potential benefits to some consumers from switching to alternative methods of payments (eg avoiding travel costs).
  - The following costs (among others) are already included in the estimated average costs from loss of access either explicitly or implicitly:
    - costs to consumers from accessing cash services at alternative locations rather than their usual branch
    - costs to consumers for increased travel distance in rural areas
    - increased costs for disabled people
    - costs to consumers who use cash for charity purposes
  - It is not reasonably practicable to estimate the costs to charity organisations from losing access to cash services. We expect these costs to be on average similar to the costs SMEs face from losing access to cash services. However, we are unable to reasonably estimate the overall number of the voluntary organisations in the UK and even more so those that use cash services.
  - Due to data unavailability, it is not reasonably practicable to estimate the following impacts:
    - increased CO<sub>2</sub> emissions from increased travel distances
    - cost of ATM outages
    - costs to consumers for parking
    - some non-economic benefits to cash reliant consumers and cash accepting SMEs
- 

## Assumptions

- 8.10** One respondent noted that because of the large number of assumptions in our CBA, we might not fully capture the impacts of our proposals on consumers and designated firms.

### Our response

- We used all the data that is reasonably practicable for us to obtain.
- We have used data from a range of sources, including internal data, data provided by industry, and external data providers that are available for free and for a cost. We also commissioned research from London Economics to inform the assessments of benefits (avoided costs of

loss of access to cash services) in our CBA. We describe our main data sources in the CBA, and the cost estimates provided by firms and other stakeholders in the 'Costs' section (eg Table 6 on page 103 and Table 8 on page 106).

- However, we need to rely on some assumptions for the data it is not reasonably practicable to obtain. We do this to provide the best possible estimates of our proposals' costs and benefits to give the public and our stakeholders all the reasonably available information. This also enables us to assess the impact and implications of our proposals. In the CBA, we state our assumptions throughout and acknowledge the limitations of our analysis in the 'Risks and Uncertainties' section in paragraphs 167 to 174 (see pages 129-130).
- We also discuss in Chapter 1 of this Policy Statement how we will monitor outcomes on an ongoing basis to ensure that they achieve the policy's intentions. Further, we expect that our Financial Lives Survey (FLS) will allow us to track cash reliance and outcomes for consumers over time.
- Since publishing our CP, we have published our analysis on the characteristics associated with cash reliance. As noted in the CBA, this analysis informed our understanding of the types of consumers that may be more likely to be disproportionately impacted by a loss of access to cash services.

## Impacts of rules and guidance changes

- 8.11** In the table below we outline the main changes we are making in the final rules and guidance compared with the proposals in CP23/29, and their expected cost and benefit impacts relative to the CBA in CP23/29.
- 8.12** We consider that the rest of the changes to the rules and guidance relative to CP23/29 (eg language clarification) have negligible impacts on the costs and benefits in our CBA in CP23/29. We thus omit these changes from the table.

**Table 2: Changes to rules and guidance and their impact on the CBA**

Changes	Impact on costs and benefits
<p><b>Consultation proposal:</b> no implementation window proposed.</p> <p><b>Final rules:</b> introducing an implementation period of 8 weeks (ending 18 Sept) after the Policy Statement is published. See paragraphs 4.33 to 4.35, page 73.</p>	<p><b>Negligible impact</b></p> <p>Full benefits and costs of the proposals will be delayed slightly.</p>

Changes	Impact on costs and benefits
<p><b>Consultation proposals:</b></p> <ul style="list-style-type: none"> <li>Firms have 8 weeks to carry out assessments and reviews, with an extended 12-week deadline in the first 3 months of implementation.</li> <li>Stakeholders have 21 days from publishing the assessment outcome to submit a request for a review.</li> </ul> <p><b>Final rules:</b></p> <ul style="list-style-type: none"> <li>Firms have 12 weeks to complete assessments and reviews in perpetuity. See paragraph 4.28, page 72.</li> <li>Stakeholders have 28 days from publishing the assessment outcome to submit a request for a review. See paragraphs 4.17 to 4.21, page 70.</li> </ul>	<p><b>Small impact</b></p> <p>Under our consultation proposals, allowing 8 weeks to complete an assessment plus the 21 days (11 weeks) was less than the counterfactual of 12 weeks based on <a href="#">FG22/6</a>. We thus expected no additional costs to industry in our CBA of the consultation proposals.</p> <p>Extending the window to request a review to 28 days in addition to the 12-week assessment window means that a designated firm's facility that is proposed to close, or undergo a material change, will be required to remain open for a maximum of 4 weeks more than in the counterfactual. During this window, firms will be required to maintain their facility. Therefore, there is an additional cost to industry due to this rule change.</p> <p>For brick-and-mortar branches, this means an additional £50k (£620k per year divided by 12, based on Table 8, page 107 of CP23/29) for each proposed closure. For other cash facilities the additional cost is negligible as they are much less costly than branches.</p> <p>Benefits of maintained access are as described in the CBA of our consultation proposals for designated firms' closures, as there would be no additional gaps from closures or material reductions in service due to this change. Relative to our CBA of the consultation proposals, there may be an additional 8 weeks with a gap in service due to the closure of a non-designated entity's facility or a gap identified through a cash access request. Therefore, there may be a small and temporary reduction in the benefits compared to what we expected in the CBA. Stakeholders will have an extra week to engage with assessment outcomes.</p>
<p><b>Consultation proposal:</b> services required by assessments must be delivered within 3 months of the assessment or conclusion of any review, whichever occurs later.</p> <p><b>Final rules:</b> keep default delivery timeframe to 3 months, allowing for longer timeframes in exceptional cases. See paragraphs 5.28 to 5.34, page 83.</p>	<p><b>Negligible impact</b></p> <p>Costs are as we expected them in the CBA of our consultation proposals. This is because we assumed that firms would be able to deliver the required solutions within 3 months without any additional costs from capacity and delivery constraints. In exceptional circumstances, there could be short temporary gaps or longer existing gaps in service provision, depending on the trigger event. These would result in negligible negative impacts on cash reliant consumers and cash accepting businesses.</p>



Changes	Impact on costs and benefits
<p><b>Consultation proposal:</b> delivery obligation does not specify an end and firms would be required to provide identified services indefinitely.</p> <p><b>Final rules:</b> delivery obligation ceases after a minimum of 2 years, subject to a new assessment (as with any other facility's closure). See paragraphs 3.91 to 3.94, page 62.</p>	<p><b>Negligible impact</b></p> <p>In our CBA we used a 10-year appraisal period following the Government's <u>Green Book</u>. This means that our CBA accounts for the costs and benefits of solutions for a maximum of 10 years depending on when they are provided, not for providing solutions indefinitely. Under the final rules, additional solutions can be withdrawn or scaled down subject to an assessment if triggered. This means that firms would not face costs of provision unless recommended through an assessment. This could be the case when a previously recommended solution is no longer required in a local area due to a fall in demand or alternative service becoming available. This is in line with our approach in the break-even analysis of the CBA.</p> <p>Benefits are still as we described them in the CBA, as significant impacts to cash-reliant consumers and cash-accepting businesses would still be avoided. Any subsequent closure would have to go through the assessment process to protect cash-reliant consumers and cash-accepting businesses.</p>
<p><b>Consultation proposal:</b> closure of, or material change to, an ATM does not trigger assessment where at least 1 ATM with the same services remains at a single site, regardless of opening hours and service features.</p> <p><b>Final rules:</b> narrow exemption to apply only when the remaining ATM is accessible 24/7 and has the same features (assisted cash, mix of coins and notes). See paragraphs 2.15 to 2.16, page 22.</p>	<p><b>Negligible impact</b></p> <p>There will be a negligible increase in the costs compared to the CBA of our consultation proposals. Under the final rules, firms can use the exemption from assessment in a slightly smaller number of instances compared to our consultation proposals. Where additional assessments are generated, firms will incur approximately £1k for the assessment and the costs of solutions if recommended (given this circumstance, likely an ATM at approximately an estimated £15k per year).</p> <p>Benefits are as we described them in the CBA as we continue to expect significant impacts to consumers and businesses to be avoided.</p>

Changes	Impact on costs and benefits
<p><b>Consultation proposal:</b> firms must put in place additional services which are 'reasonable to provide' to address any significant impacts.</p> <p><b>Final guidance (no change in rules):</b> we include an additional circumstance in our guidance on what might not be considered 'reasonable' provision. It might not be reasonable to expect designated firms to provide additional services if there are separate plans to put appropriate services in place (eg as part of an earlier assessment under the voluntary scheme). See paragraphs 3.95 and 3.96, page 64.</p>	<p><b>Negligible impact</b></p> <p>There will be a negligible decrease in the costs compared to the CBA of our consultation proposals. There is a reduced instance of firms duplicating services and incurring costs without benefits under our final guidance compared to our proposals.</p> <p>Benefits are as we described them in the CBA, as significant impacts to cash reliant consumers and cash accepting businesses would still be avoided.</p>
<p><b>Consultation proposal:</b> material changes in services trigger assessments, guidance sets out that the loss of access to assisted cash services should be considered material.</p> <p><b>Final guidance (no change in rules):</b> clarify in guidance that significant reductions in assisted cash services (eg, to hours of availability) should also be considered material. See paragraphs 2.19 and 2.20, page 24.</p>	<p><b>Small impact</b></p> <p>We note that this is a clarification in guidance for our proposal rules which firms may have interpreted in this way regardless. However, in line with the approach in our CBA, we expect there will be a very small increase in the costs compared to the CBA because of this clarification. Firms will incur the following costs:</p> <ul style="list-style-type: none"> <li>• adapt the assessment process (estimated £45k one-off and £85k ongoing) to track any reductions in capacity of assisted cash services</li> <li>• conduct assessments (average £1k per assessment) when an assessment is triggered, although we expect this will be infrequent</li> <li>• if solutions are recommended, firms will incur costs to deliver them, but we expect this to be infrequent and proportionate to the negative impacts of the significant reductions</li> </ul> <p>Benefits are as we described them in the CBA. The final rules and guidance will ensure potential significant impacts to consumers and businesses from any material reduction in opening hours is considered and addressed.</p>

Changes	Impact on costs and benefits
<p><b>Consultation proposal:</b> to rely on services provided at a 'last branch in town' at Step 1 of the assessment, the same services must be available to customers of at least 1 other firm at another facility within the relevant distance.</p> <p><b>Final rules:</b></p> <ul style="list-style-type: none"> <li>• Remove requirement that the services have to be found at 'another' facility, so they may be at the same branch.</li> <li>• Adapt related guidance as appropriate.</li> </ul> <p>See paragraphs 3.58 to 3.65, pages 50 and 51.</p>	<p><b>Small impact</b></p> <p>There would be a slight reduction in how often firms incur costs for assessments (average £1k per assessment) and provide any recommended solutions, relative to our CBA. For the illustrative scenarios (see Figure 5 on page 110 of the CBA), if the branch closing in any of the estimated 103 local areas with 1 remaining branch serving customers of 2 firms, the closure would not proceed past stage 1 and no solution would be recommended. This would reduce the total estimated solutions in our illustrations, depending on how many of the closing branches serve customers of 2 firms.</p> <p>Benefits are still as we described them in the CBA, as significant impacts to cash-reliant consumers and cash-accepting businesses would still be avoided.</p>
<p><b>Consultation proposal:</b> see proposal in previous row.</p> <p><b>Final rules:</b> Add requirement that the features that need to be assessed alongside the service (assisted cash, mix of coins and notes) must also be available to customers of at least one other firm. Also, remove carve-out for ATM withdrawal services at the branch.</p> <p>See paragraphs 3.58 to 3.65, pages 50 and 51.</p>	<p><b>No impact</b></p> <p>The CBA of our consultation proposals reflects the policy intention we consulted on. The estimated assessment outcomes in the illustrative scenarios of the impact of the 'last branch in town' account for specific types of facilities in a local area that can provide the same services with the same features. Therefore, the facilities we considered were a bank branch or a post office branch. See Figure 5 on page 110 of the CBA.</p>

Changes	Impact on costs and benefits
<p><b>Consultation proposal:</b> for Scotland, a rural area is defined as one where the majority of the population live in a settlement of fewer than 3,000 people, with a drive time of 30 minutes or more to a settlement of 10,000 people or more. An urban area is defined as one where the majority of the population live in a settlement of 3,000 people or more, or where the majority of the population live in a settlement of fewer than 3,000 people but are less than a 30-minute drive from a settlement of 10,000 people or more.</p> <p><b>Final rules:</b> Amend definitions of urban and rural areas in Scotland as follows:</p> <ul style="list-style-type: none"> <li>• 'Urban': for Scotland, an area where the majority of the population live in a settlement of 3,000 people or more.</li> <li>• 'Rural': for Scotland, an area where the majority of the population live in a settlement of fewer than 3,000 people.</li> </ul> <p>See paragraphs 3.15 to 3.21, pages 39 and 40.</p>	<p><b>No impact</b></p> <p>The CBA of our consultation proposals reflects the definitions in our final rules. These definitions align with the standard classifications set by the Scottish Government, and are the ones used in our access to cash coverage monitoring and in the development of local area archetypes. This means that the archetypes used in our breakeven analysis, described on pages 95-97 of the CBA, reflect the final rules.</p>

**8.13** After considering feedback on our consultation, we have made some changes to the rules and guidance, the main ones being outlined in the table above. Overall, we believe that the changes will have small or negligible impacts on the estimated costs and benefits. We have also considered feedback on our CBA as described above. Based on these assessments, we consider the conclusions reached in the CBA in CP23/29 are unchanged.

## Annex 1

# List of non-confidential respondents

12th Tonbridge Guide Company  
ACRE  
Age Scotland  
Age UK  
Alan I Mckenzie  
Anne Coke  
Association of Convenience Stores  
Barclays  
Brian Butterfly  
Building Societies Association (BSA)  
Carrosyl Community Association  
Cash Access UK  
Chartered Banker Institute  
Christina Bass  
Citizens Advice Scotland  
Claire Hope  
Community Cash Advisory Panel  
David Baker  
David Gardner  
Derek French  
Erne East Community Partnership Ltd  
Fair By Design  
FCA Practitioner Panel  
Federation of Small Businesses (FSB)  
Fossway District Community Council  
Financial Inclusion for Scotland  
Financial Services Consumer Panel  
Fran Long  
Glenfarg Community Council  
Jim Hampson  
Joanna Caisley

LINK  
Lloyds Banking Group  
Michael Herrity  
Mick Drewry  
Mole Valley District Council  
Money and Mental Health  
Mr and Mrs J Watkins  
Nationwide Building Society  
Natwest Group  
Nicola Kearns  
OneBanx  
Patricia Read  
Paypoint Group  
Peter Snell  
Portmoak Community Council  
Positive Money UK  
Post Office  
Robert Douglas  
Sally McKay  
S C Fuller  
Scottish Grocers' Federation  
Serenity Hair  
Sians Emporium  
Siobhan McDaid  
Susan Francis  
Tatton Liberal Democrats  
The Patchworking Garden Project  
Tonbridge and Malling Borough Council  
Tonbridge and Malling Green Party  
Tonbridge Needs Access to Cash  
UK Cash Supply Alliance  
UK Finance  
Unite  
Welsh Government  
Which?

## Annex 2

# Abbreviations used in this paper

<b>Abbreviation</b>	<b>Description</b>
<b>ATM</b>	Automated Teller Machine
<b>CAUK</b>	Cash Access UK
<b>CBA</b>	Cost Benefit Analysis
<b>CP</b>	Consultation Paper
<b>DISP</b>	Dispute Resolution: Complaints Sourcebook
<b>FCA</b>	Financial Conduct Authority
<b>FG</b>	Finalised Guidance
<b>FLS</b>	Financial Lives Survey
<b>FSBRA</b>	Financial Services (Banking Reform) Act
<b>FSMA</b>	Financial Services and Markets Act
<b>IAD</b>	Independent ATM Deployer
<b>MP</b>	Member of Parliament
<b>NISRA</b>	Northern Ireland Statistics and Research Agency
<b>Ombudsman Service</b>	Financial Ombudsman Service
<b>ONS</b>	Office for National Statistics
<b>PCA</b>	Personal Current Account
<b>PROA</b>	Private Right of Action
<b>PSR</b>	Payments Systems Regulator
<b>SD12</b>	Specific Direction 12
<b>SME</b>	Small and Medium Sized Enterprise
<b>the Treasury's Statement</b>	Cash Access Policy Statement

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## Appendix 1

# Made rules (legal instrument)

## ACCESS TO CASH SOURCEBOOK INSTRUMENT 2024

### Powers exercised

- A. The Financial Conduct Authority (“the FCA”) makes this instrument in the exercise of the following powers and related provisions in the Financial Services and Markets Act 2000 (“the Act”):
- (1) section 131V (FCA rules);
  - (2) section 137T (General supplementary powers);
  - (3) section 137T (General supplementary powers) as applied by section 131V;
  - (4) section 138D (Actions for damages);
  - (5) section 139A (Power of the FCA to give guidance); and
  - (6) paragraph 23 (Fees) of Schedule 1ZA.
- B. The rule-making powers listed above are specified for the purpose of section 138G(2) (Rule-making instruments) of the Act.

### Commencement

- C. This instrument comes into force on 10 September 2024.

### Amendments to the Handbook

- D. The modules of the FCA’s Handbook of rules and guidance listed in column (1) below are amended in accordance with the Annexes to this instrument listed in column (2) below.

(1)	(2)
Glossary of definitions	Annex A
Fees manual (FEES)	Annex B
Supervision manual (SUP)	Annex C

### Making the Access to Cash sourcebook (ATCS)

- E. The FCA makes the rules and gives the guidance in accordance with Annex D to this instrument.
- F. The Access to Cash sourcebook (ATCS) is added to the Specialist sourcebooks block within the Handbook, immediately before the Collective Investment Schemes sourcebook (COLL).

### Notes

- G. In the Annexes to this instrument, the notes (indicated by “*Editor’s note:*”) are included for the convenience of readers but do not form part of the legislative text.

**Citation**

- H. This instrument may be cited as the Access to Cash Sourcebook Instrument 2024.
- I. The sourcebook in Annex D to this instrument may be cited as the Access to Cash sourcebook (ATCS).

By order of the Board  
12 July 2024

## Annex A

### Amendments to the Glossary of definitions

In this Annex, underlining indicates new text, unless otherwise stated.

Insert the following new definitions in the appropriate alphabetical position. The text is not underlined.

<i>assisted cash access service</i>	provision of the support of an appropriately trained individual, whether physically present or not, to assist with a <i>cash access service</i> .
<i>ATCS</i>	the Access to Cash sourcebook.
<i>cash access assessment</i>	the assessment required by <i>ATCS</i> 4.1.1R and which must be undertaken in accordance with <i>ATCS</i> 5.
<i>cash access coordination arrangements</i>	has the meaning given in section 131N of the <i>Act</i> , which is arrangements: <ul style="list-style-type: none"> <li>(a) which are designed to coordinate the provision of <i>cash access services</i> by 2 or more providers of such services; but</li> <li>(b) which do not directly provide <i>cash access services</i> to any <i>person</i>.</li> </ul>
<i>cash access facility</i>	a branch, banking hub, mobile facility, automatic teller machine or other physical facility, or a <i>cash</i> delivery or collection service, in each case through which any <i>cash access service</i> is provided.
<i>cash access request</i>	a request in writing from a <i>person</i> to review the adequacy of the provision of <i>cash access services</i> for any local community in the <i>UK</i> : <ul style="list-style-type: none"> <li>(a) to a <i>designated person</i> who undertakes <i>cash access assessments</i> under <i>ATCS</i> 4.1.1R(3) for the part of the <i>UK</i> to which the request relates;</li> <li>(b) submitted in accordance with the details provided under <i>ATCS</i> 3.1.2R(4) or <i>ATCS</i> 3.1.3R(2); and</li> <li>(c) which indicates the location of the community by reference to an address, street or retail area.</li> </ul>
<i>cash access requester</i>	the <i>person</i> or <i>persons</i> who make(s) a <i>cash access request</i> .
<i>cash access service</i>	has the meaning given in section 131N of the <i>Act</i> , which is: <ul style="list-style-type: none"> <li>(a) a service which enables <i>cash</i> to be placed on a <i>relevant current account</i>; or</li> </ul>

	(b) a service which enables <i>cash</i> to be withdrawn from a <i>relevant current account</i> .
<i>cash deposit service</i>	has the meaning given in section 131N of the <i>Act</i> , which is a service which enables <i>cash</i> to be placed on a <i>relevant current account</i> .
<i>cash withdrawal service</i>	has the meaning given in section 131N of the <i>Act</i> , which is a service which enables <i>cash</i> to be withdrawn from a <i>relevant current account</i> .
<i>cashback facility</i>	a retail store where the only <i>cash access services</i> : <ul style="list-style-type: none"> <li>(a) are provided by the retailer (whether as <i>principal</i> or agent); and</li> <li>(b) fall within paragraph 2(e) (cashback with a purchase) or 3 (cashback without a purchase) of Schedule 1 to the <i>Payment Services Regulations</i>.</li> </ul>
<i>designated coordination body</i>	a <i>person</i> with responsibility for operating or managing <i>cash access coordination arrangements</i> designated by the Treasury pursuant to section 131R of the <i>Act</i> for the purposes of Part 8B of the <i>Act</i> .
<i>designated firm</i>	a <i>relevant current account provider</i> designated by the Treasury pursuant to section 131R of the <i>Act</i> for the purposes of Part 8B of the <i>Act</i> .
<i>designated person</i>	a <i>designated coordination body</i> or a <i>designated firm</i> .
<i>non-participating designated firm</i>	a <i>designated firm</i> that does not participate in <i>cash access coordination arrangements</i> operated or managed by a <i>designated coordination body</i> .
<i>participating designated firm</i>	a <i>designated firm</i> that participates in <i>cash access coordination arrangements</i> operated or managed by a <i>designated coordination body</i> .
<i>relevant closure</i>	the following events, whether they are planned, unplanned, yet to happen or have already happened (as the context requires), and which are reasonably anticipated to last, or have lasted, for at least 6 <i>months</i> : <ul style="list-style-type: none"> <li>(a) a full closure of a <i>cash access facility</i>; or</li> <li>(b) a material reduction in the <i>cash access services</i> provided at a <i>cash access facility</i>, or a material change in the nature of such provision;</li> </ul> but excluding such events insofar as they relate to: <ul style="list-style-type: none"> <li>(c) a <i>cashback facility</i>;</li> <li>(d) a <i>cash</i> delivery or collection service;</li> <li>(e) any <i>cash access service</i> in relation to <i>relevant personal current accounts</i> that is not provided free of charge; or</li> </ul>

- (f) any *required cash access service* where the closure, reduction or change in provision takes place within the minimum timescale under *ATCS 8.1.1R(1)* or *ATCS 8.1.1R(2)* for provision of the relevant service, save to the extent that:
  - (i) a *designated firm* relied on an existing service to meet the requirements of *ATCS 8.1.1R* in respect of the *required cash access service* for the purposes of a trial; and
  - (ii) *ATCS 8.1.1R* ceases to apply to the service as a result of *ATCS 8.1.14R* following completion of the trial.

*relevant current account* has the meaning given in section 131O of the *Act*, which is in summary an account provided by a *relevant current account provider* in reliance on its *Part 4A permission to accept deposits* by means of which one or more named *persons* are able to:

- (a) place *cash*;
- (b) withdraw *cash*; and
- (c) execute and receive *payment transactions* to and from third parties, including the execution of *credit transfers*.

*relevant current account provider* has the meaning given in section 131O of the *Act*, which is in summary a *person* (other than a *credit union* or *friendly society*):

- (a) who has a *Part 4A permission to accept deposits*; and
- (b) who provides *relevant current accounts* in reliance on that *permission*.

*relevant personal current account* has the meaning given in section 131O of the *Act*, which is a *relevant current account* held by one or more individuals for purposes outside any business, trade, craft or profession of that individual or those individuals.

*required cash access services* the type or types of *cash access service* identified in a *cash access assessment* under *ATCS 5.5.1R* which must be provided, or the provision of which must be procured, in accordance with *ATCS 8.1.1R*.

*specified cash access facility feature* the following features of a *cash access facility* insofar as they relate to a *specified cash access service*:

- (a) the functionality for a reasonable mix of both coins and banknotes to be deposited or withdrawn (as appropriate); or
- (b) the availability of an *assisted cash access service*.

*specified cash  
access service*

the following types of *cash access service*:

- (a) a *cash deposit service* in relation to *relevant personal current accounts* that is provided free of charge;
- (b) a *cash deposit service* for businesses;
- (c) a *cash withdrawal service* in relation to *relevant personal current accounts* that is provided free of charge; or
- (d) a *cash withdrawal service* for businesses.

Amend the following definition as shown.

*cash*

- (1) (except as specified in this definition) in accordance with section 189(1) of the *CCA*, includes money in any form.
- (2) (in *ATCS*) has the meaning given in section 131N of the *Act*, which is:
  - (a) banknotes issued by the Bank of England, or an authorised bank in its capacity as an issuer of banknotes in Scotland or Northern Ireland (see Part 6 of the Banking Act 2009); or
  - (b) coins made by the Mint, within the meaning of the Coinage Act 1971 (see section 11 of that Act).

## Annex B

### Amendments to the Fees manual (FEES)

In this Annex, underlining indicates new text and striking through indicates deleted text, unless otherwise stated.

#### 4 Periodic fees

...

#### 4.2 Obligation to pay periodic fees

...

Modifications for persons becoming subject to periodic fees during the course of a fee year

4.2.7E R (1) (a) *A firm* (other than an *ICVC*~~7-a~~, or an *issuer of regulated covered bonds*) which becomes authorised or registered, or whose *permission* and/or activities *is/are* extended, during the course of the *fee year* must pay a fee based on its projected valuation for the first ~~twelve~~ 12 months of its new business.

...

(2) ...

(b) ...

(3) (a) If a firm becomes a designated firm during the course of the fee year, it must pay a pro-rata share of the fees related to designated firm status.

(b) For the purposes of (a), the pro-rata share of the fees related to designated firm status is calculated by applying the formula  $(A \times B) \div 12$ , where:

A = the amount of fees related to designated firm status for a full year (as determined by identifying the tariff rates becoming relevant to the firm as a result of becoming a designated firm, and applying those to the tariff base); and

B = the number of calendar months (inclusive) between the calendar month during which the firm became a designated firm and the last calendar month of that fee year.

...

Calculating all other fees in the second and subsequent years of authorisation where a full year of tariff data is not available



...

4.2.7K R ...

Table A: calculating tariff data for second and subsequent years of authorisation when full trading figures are not available

Fee-block	Tariff base	Calculation where trading data are not available
...		
A.23	...	
<u>A.24</u>	<u>See A.1 (Deposit acceptors)</u>	
...		

...

Extension of Time

...

4.2.11 R Table of periodic fees payable to the *FCA*

1 Fee payer	2 Fee payable	3 Due date	4 Events occurring during the period leading to modified periodic fee
Any <i>firm</i> (except an <i>ICVC</i> )	As specified in <i>FEES</i> 4.3.1 R in relation to <i>FEES</i> 4 Annex 2AR and <i>FEES</i> 4 Annex 11 R	(1) Unless (2) applies, on or before the relevant dates specified in <i>FEES</i> 4.3.6 R.  (2) If an event specified in column 4 occurs during the course of a fee year, 30 days after the occurrence of that event, or if later the dates specified in <i>FEES</i> 4.3.6 R.	<i>Firm</i> receives <i>permission</i> , or becomes authorised or registered under the <i>Payment Services Regulations</i> , article 8 of the <i>MCD Order</i> , the <i>DRS Regulations</i> or the <i>Electronic Money Regulations</i> ; or <i>firm</i> extends <i>permission</i> or its <i>payment service</i> activities; or <i>firm</i> becomes a <u><i>designated firm</i></u>

...			
-----	--	--	--

...

**4.3 Periodic fee payable by firms (other than AIFM qualifiers, ICVCs and UCITS qualifiers)**

...

4.3.2 G (1) The amount payable by each *firm* will depend upon the category (or categories) of *regulated activities* or *payment services* it is engaged in (fee-blocks) ~~and~~, whether it is issuing *electronic money*, and whether it is a *designated firm*, and on the amount of business it conducts in each category (tariff base). The fee-blocks and tariffs are identified in *FEES 4 Annex 1AR* (and guidance on calculating certain of the tariffs is at *FEES 4 Annex 12 G* and *FEES 4 Annex 13G*) while *FEES 4 Annex 2AR* sets out the tariff rates for the relevant *fee year*. In the case of *firms* that provide *payment services* and/or issue *electronic money*, the relevant fee blocks, tariffs and rates are set out in *FEES 4 Annex 11R*.

...

Modification for firms with new or extended permissions or designations

4.3.4 G (1) A *firm* which becomes authorised or registered during the course of a *fee year* will be required to pay a proportion of the periodic fee which reflects the proportion of the year for which it will have a *permission* or the right to provide particular *payment services* or the right to issue *electronic money* –see *FEES 4.2.5 G* and *FEES 4.2.6 R*.

(2) Similarly a *firm* which extends its *permission* or its right to provide particular *payment services*, or becomes a *designated firm*, so that its business then falls within additional fee blocks will be required to pay a further periodic fee under this section for those additional fee blocks, but discounted to reflect the proportion of the year for which the *firm* has the extended permission or *payment services* activity –see *FEES 4.2.6 R* and *FEES 4.2.7 R* or is a *designated firm*.

...

Firms Applying to Cancel or Vary Permission, etc. Before Start of Period

4.3.13 R (1) If:

(a) a *firm*:

...

(v) ...

(vi) receives notice of cancellation of its status as a designated firm; or

...

(b) the *firm, issuer or sponsor* makes the application or notification referred to in (a), (aa) or (ab) respectively, or receives notice of cancellation of designated firm status, before the start of the *fee year* to which the fee relates;

*FEES 4.2.1 R* applies to the *firm* as if the relevant variation or cancellation of the *firm's permission* or authorisation or registration under the *Payment Services Regulations, MCD Order, DRS Regulations* or the *Electronic Money Regulations, cancellation of designated firm status,* de-listing or removal from the list of approved *sponsors*, took effect immediately before the start of the *fee year* to which the fee relates.

(2) But (1) does not apply if, due to the continuing nature of the business, the ~~variation, cancellation, de-listing or removal~~ change is not to take effect on or before 30 June of the *fee year* to which the *fee* relates.

...

Cancellation and variation of Part 4A permission under Schedule 6A, and cancellation of designated firm status

4.3.18 G The *FCA* will not refund periodic fees if, after the start of the period to which they relate, a *person's Part 4A permission* is cancelled under Schedule 6A ~~or~~, the *person's Part 4A permission* is varied, reducing its permission under Schedule 6A, or a firm receives notice of cancellation of designated firm status (but see *FEES 2.3* (Relieving Provisions)).

...

#### 4 Annex FCA activity groups, tariff bases and valuation dates 1AR

##### Part 1

This table shows how the *FCA* links the ~~regulated activities~~ activities (for which a *firm* has permission or designation) to activity groups (fee-blocks). A *firm* can use the table to identify which fee-blocks it falls into based on its permission or its other activities.

Activity group	Fee payer falls in the activity group if:
...	
<b>A.23 Funeral plan intermediaries and funeral plan providers</b>	...
<b><u>A.24 Access to cash – designated firms</u></b>	<i>it is a <u>designated firm</u>.</i>
...	

...

Part 3

This table indicates the tariff base for each fee-block set out in Part 1.

The tariff base in this Part is the means by which the *FCA* measures the amount of business conducted by a *firm* for the purposes of calculating the annual periodic fees payable to the *FCA* by that *firm*.

Activity group	Tariff base
...	
<b>A.23</b>	...
<b><u>A.24</u></b>	<b><u>MODIFIED ELIGIBLE LIABILITIES</u></b> <u>These are determined in the same manner as the relevant tariff-base in the A.1 fee-block.</u>
...	

...

Part 5

This table indicates the valuation date for each fee-block. A *firm* can calculate its tariff data in respect of fees payable to the *FCA* by applying the tariff bases set out in Part 3 with reference to the valuation dates shown in this table.

Activity group	Valuation date
----------------	----------------

...	
<b>A.23</b>	...
<b><u>A.24</u></b>	<u>This is determined in the same manner as the relevant date in fee block A.1.</u>
...	

**4 Annex 2AR FCA Fee rates for the period from 1 April 2024 to 31 March 2025**

<p>Part 1</p> <p>This table shows the tariff rates applicable to each of the fee blocks set out in Part 1 of <i>FEES</i> 4 Annex 1AR.</p>
---

...

Activity group	Fee payable	
...		
A.23	...	
<b><u>A.24</u></b>	<u>Band width (£ million of Modified Eligible Liabilities (MELs))</u>	<u>Fee (£/£m or part £m of MELs)</u>
	<u>&gt;0</u>	<u>1.01</u>
...		

...

## Annex C

## Amendments to the Supervision manual (SUP)

In this Annex, underlining indicates new text and striking through indicates deleted text unless stated otherwise.

## 16 Reporting requirements

### 16.1 Application

...

- 16.1.3 R Application of different sections of SUP 16 (excluding SUP 16.13, SUP 16.15, SUP 16.22 and SUP 16.26)

(1) Section(s)	(2) Categories of firm to which section applies	(3) Applicable rules and guidance
...		
<i>SUP 16.31</i>	...	
<u><i>SUP 16.32</i></u>	<u><i>A designated firm</i></u>	<u>Entire section</u>
...		

...

### 16.3 General provisions on reporting

...

Structure of the chapter

- 16.3.2 G This chapter has been split into the following sections, covering:

...

(25) the Baseline Financial Resilience Report (*SUP 16.30*); ~~and~~

(26) *financial promotion approval reporting (SUP 16.31)*; ~~and~~

(27) *access to cash reporting (SUP 16.32)*.

...

Insert the following new section, SUP 16.32, after SUP 16.31 (Financial promotion approval reporting). The text is not underlined.

### **16.32 Access to cash reporting**

Application: who?

16.32.1 R This section applies to every *designated firm*.

Application: where?

16.32.2 R Where *rules* in this chapter require a *designated firm* to do or refrain from doing anything, the *designated firm* is required to do or refrain from doing that thing in relation to:

- (1) the *UK*, if it is designated by the Treasury pursuant to section 131R of the *Act* in relation to the whole of the *UK*; or
- (2) the part of the *UK* in relation to which it is designated.

16.32.3 G (1) The effect of *SUP* 16.32.2R is that, if a *designated firm* is designated by the Treasury pursuant to section 131R of the *Act* in relation to only part of the *UK*, the reporting requirements in *SUP* 16.32 only apply in respect of the part of the *UK* in relation to which the *designated firm* is designated.

- (2) If a *designated firm* is designated by the Treasury pursuant to section 131R of the *Act* in relation to only part of the *UK*, and that *designated firm* also has branches in another part of the *UK*, the *FCA* may use the information gathering power in section 165 of the *Act*, as applied by section 131Y of the *Act*, to require the *designated firm* to provide information in respect of its branches in the part of the *UK* in relation to which it is not designated in order to assist the *FCA* in exercising its functions under Part 8B of the *Act*.

Purpose

16.32.4 G The purpose of this section is to require *designated firms* to submit information on their branch data and proposed branch closures in a standard format to the *FCA*. This information will assist the *FCA* in exercising its functions under Part 8B of the *Act*.

Reporting requirement

16.32.5 R A *designated firm* must submit to the *FCA* the Branch Data and Closures Report in the format set out in *SUP* 16 Annex 56 in accordance with this section.

Frequency and timing of Branch Data and Closures Report

- 16.32.6 R (1) A *designated firm* must submit the Branch Data and Closures Report during each of the following windows:
- (a) 1 to 14 February;
  - (b) 1 to 14 June; and
  - (c) 1 to 14 October.
- (2) The information to be included in relation to branch data in a Branch Data and Closures Report relates to a corresponding quarterly reporting period. The table below sets out the quarterly reporting periods and applicable windows for submitting the related Branch Data and Closures Report.

Quarterly reporting period data relates to	Window for submitting data
1 January to 31 March	1 to 14 June of the same calendar year
1 April to 30 June	1 to 14 October of the same calendar year
1 July to 30 September	1 to 14 February of the following calendar year
1 October to 31 December	1 to 14 February of the following calendar year

- 16.32.7 G (1) A *designated firm* will be required to submit 2 Branch Data and Closures Reports during the 1 to 14 February window: one containing information relating to branch data for 1 July to 30 September of the previous calendar year, and one containing information relating to branch data for 1 October to 31 December of the previous calendar year.
- (2) The information to be included in relation to proposed branch closures in a Branch Data and Closures Report will be forward-looking.

#### How to submit Branch Data and Closures Reports

- 16.32.8 R A *designated firm* must submit the Branch Data and Closures Report:
- (1) online through the appropriate systems accessible from the *FCA's* website; or



- (2) if the appropriate systems are unavailable, via email to [branchclosuredata@fca.org.uk](mailto:branchclosuredata@fca.org.uk).

After SUP 16 Annex 55 (Categories of investment for notifications and reports relating to approvals of financial promotions) insert the following new Annex as SUP 16 Annex 56. The text is not underlined.

**16        Branch Data and Closures Report**  
**Annex**  
**56R**

This annex consists of a form which can be found through the following link:

[*Editor's note:* insert link]

## Branch Data and Closures Report

The following data reporting fields must be completed, where applicable, for all branches. We ask that you provide your submission as an XML file, following the formatting guidelines as far as possible. We recommend reviewing previously processed returns you have been provided with for further guidance on the formatting of fields that are similar.

### Notes

**ATM IDs:** By ‘ATM IDs’ we mean the IDs used by the LINK Scheme Ltd., which they normally obtain from you. ATM ID formats vary. The most common case is an 8-symbol ID containing both letters and numbers (it can also be prepended by a 6-digit firm ID). Please contact us directly if in doubt or if the proposed format is not suitable.

**Deposit ATMs:** where we ask specific questions about deposit ATMs, unless otherwise specified please report those accessible only by your firm’s own customers (or others served through a specific cross-brand servicing agreement). Universal deposit ATMs will be reported by the LINK Scheme Ltd.

**Proposed closures:** these data reporting fields must be completed for any and all branches that are proposed to be permanently closed. Branches which were submitted as proposed closures in a previous hopper but are not yet publicly announced as closures should be submitted and the “Previous hopper” field inputted as “Yes”.

**Planned weekday closures:** These should be provided separately to your firm supervisor, with [branchclosuredata@fca.org.uk](mailto:branchclosuredata@fca.org.uk) copied into your response.

**Community bankers:** These locations should be included and labelled according to the column “Community banker” provided. Note, however, that Banking Hub locations should not be included in the submission.

Further information on how to submit the data:

- Please endeavour to submit as much information as you can. It is important that you list all branches, including agency and ‘cashless’ branches, if applicable, but excluding branches that have already been permanently closed. If a permanent closure of a branch has been announced or decided upon, but has not yet eventuated, the branch should still be included, even if it is temporarily closed.

- The submission should contain one row per branch or one row per mobile stop, if present. A mobile branch is a collection of one or more mobile stops. The first row should include column names (single row) as per the template. Should you need to include custom header names which require notes, please provide such notes separately (for example, by including an explanation in an email).
- In all cases, empty cells should only be used to indicate unknown, unavailable, or not applicable. Zeroes in numeric cells should only denote known zero values, etc.
- Please let us know of any data quality concerns or where data has not been cleaned/checked, etc.

Data reporting field identifier	Data reporting field definition	Type	Notes
<b>All branches</b>			
<b>A: Identifying information</b>			
FRN	Your firm's Financial Services Register reference number (FRN); see <a href="https://register.fca.org.uk/s/">https://register.fca.org.uk/s/</a>	6- or 7-digit number	Must be recognised as a known FRN.
BUID	A unique ID used by your organisation to identify branches.	any	<p>The values must be unique for a given FRN (ie, for a given firm) and there must be no missing IDs. If any branch unique IDs (BUIDs) are missing or non-unique, all values will be replaced by a range from 1 to the total number of branches.</p> <p>If you are adding new branches, these should have new unique IDs. There should be no repeating IDs unless these are referring to a mobile 'branch'.</p>

			<p>If you wish to update BUIDs for existing records, please keep the original BUID column and include a new column, eg, BUID New, for unique branch IDs.</p>
MUID	<p>A unique ID used by your organisation to identify mobile stops/branches.</p>	any	<p>This column also distinguishes mobile stops from physical branches. Please keep this column empty for non-mobile branches.</p> <p>Note that by a ‘mobile branch’ we mean a collection of mobile stops (if more than one); ie, a single van (= ‘branch’) can be stopping at different locations on its route.</p> <p>Ideally, a stop will be defined by a unique location, but we understand that this will not always be possible.</p> <p>If you are adding new mobile stops, these should have new unique IDs (within a given BUID).</p> <p>If you wish to update mobile stop unique IDs (MUIDs) for existing records, please keep the original MUID column and include a new column, eg, MUID New, for unique mobile stop IDs.</p> <p><b>In all cases, please keep this column empty for non-mobile branches.</b></p>

Branch name	Branch name	text	Must be recognised and associated with the FRN.
Brand	Brand or trading name (if different from the firm name).	text	Please provide this information if branches belonging to multiple brands are included in the same file. Where a single branch serves customers of multiple brands, this should be the main brand of the branch.  Must be recognised and associated with the FRN.
Sort code	Branch sort code <b>with no hyphens.</b>	6-digit code	Sort code associated with the branch.
Other ID	Any other identifying information, if applicable.	any	Free format
Leasehold	This branch is a leasehold which is due to expire <b>within the next 12 months.</b>	Yes/No/NA	
<b>B: Location information</b>			
Postcode	Postcode	text	Preferred format: <outcode><single space><incode>, where: <ul style="list-style-type: none"> <li>the outcode contains 2, 3 or 4 alphanumeric characters and is of the form AN, ANN, AAN, ANA, AANN, or AANA, with</li> </ul>

			<p>A denoting a letter and N denoting a digit; and</p> <ul style="list-style-type: none"> <li>the incode is 1 digit and 2 letters (NAA).</li> </ul> <p>For example, “E20 1JN”.</p> <p>If possible, please ensure any terminated postcodes are replaced with their correct live versions.</p>
Address	Branch address, excluding postcode.	text	<p>Please include building name/number(s), where applicable. Please avoid abbreviations as far as possible.</p> <p>For example, “Financial Conduct Authority, 12 Endeavour Square, London”.</p> <p>For mobile stops, please include the nearest available address where possible.</p> <p>A single line address is preferred, but it is acceptable to include separate columns for Address 1, Address 2, etc.</p>
Easting	Branch location: British National Grid (BNG) coordinates (OSGB 1936 / EPSG: 27700), easting and northing.	numeric	<p>Note that BNG is used for all of the UK, including Northern Ireland. Various databases for Northern Ireland will commonly use versions of the Irish National Grid instead (typically either IRENET95, EPSG: 2157 or TM75, EPSG: 29903).</p>
Northing		numeric	

Latitude	Branch location: World Geodetic System 1984 (WGS) coordinates (WGS 84, EPSG: 4326), latitude and longitude.	numeric	Note that these are reprojected BNG coordinates.
Longitude		numeric	
Other location	Any other information which might help to precisely locate the branch, if applicable.	any	Free format
<b>C: Branch opening hours</b>			
Monday	<b>Current</b> branch opening hours.	text	<p>Here, ‘current’ should be taken to mean typical in the most recent period. Generally, these will be the opening hours at the end of the reporting period.</p> <p>However, please do not report any very short-term temporary changes, eg, when a branch happened to be closed on a particular day during the last week of the reporting period, but such a change was a one-off.</p> <p>For the purposes of this definition, ‘short-term’ should be taken to mean a period of less than 2 weeks. Changes ‘until further notice’ are generally not short term.</p> <p>Examples:</p>
Tuesday			
Wednesday			
Thursday			
Friday			
Saturday			
Sunday			

			<ul style="list-style-type: none"> <li>• ‘09:00-16:00’ denotes a branch open from 9am to 4pm without a break.</li> <li>• ‘08:45-12:30; 13:30-15:00’ denotes a branch open from 8:45am to 12:30pm, closing (eg, for lunch) from 12:30pm to 1:30pm, and then open from 1:30pm to 3pm.</li> </ul> <p>If a branch is closed on a given day, this should be recorded using a single keyword ‘closed’. Note that this is not the same as an empty cell, which indicates that the opening hours for this branch are unknown.</p> <p>Please adhere to the formatting guidelines as much as possible:</p> <ul style="list-style-type: none"> <li>• A single time should be recorded as HH:MM, where HH is a zero-padded hour between 00 and 23 (24-hour clock) and MM is a zero-padded minute between 00 and 59. (This is the reduced precision extended ISO 8601 format without seconds and with the qualifier ‘T’ omitted as there is no risk of ambiguity.)</li> <li>• A range should be recorded as &lt;from&gt;-&lt;to&gt; (separated by a</li> </ul>
--	--	--	---



			<p>single dash), with both ‘from’ and ‘to’ in the HH:MM format, and the ‘from’ time earlier than the ‘to’ time.</p> <ul style="list-style-type: none"> <li>Multiple ranges should be separated by a semicolon.</li> </ul>
Reduced	These opening hours have been reduced relative to pre-Covid-19 levels, ie, relative to February 2020.	Yes/No/NA	This should be ‘Yes’ if any opening hours have been reduced.
Temporary closed days	How many days has this branch been closed for in the reporting period to which the data relates?	numeric	Please approximate if the precise count is not available. Enter 0 if no such closures; leave empty if unknown.
Temporary closed reason	Reason(s) for temporary closure(s), eg, ‘maintenance’.	text	<p>If more than one reason, please enter a semicolon-separated list (preferably in order of importance).</p> <p>If one of the reasons is clearly more important, you do not need to list all of them. For example, if a branch has been closed for 5 days due to maintenance and for 1 day due to, for example, weather conditions, please include maintenance as the main reason.</p>
Other hours	Any other information on opening hours, if applicable.	Any	Free format

<b>D: Branch characteristics and internal facilities</b>			
Agency	This is an agency branch.	Yes/No/NA	
Dependent	This branch is operationally dependent on or 'twinned' with a neighbouring branch (eg, due to shared staffing, rotas, etc).	Yes/No/NA	
Community banker	This location is for a community banker.	Yes/No/NA	Community bankers are locations where staff can support customers in a local area, typically offering drop-in or appointment sessions in local venues. These locations are frequently set up to support customers in areas that have experienced branch closures and are often cashless. Note that Banking Hub locations should not be included in the submission; this field captures community banker locations that are unique to your firm.
Counter face to face	This branch has assisted services, ie, either a counter or face-to-face services or both.	Yes/No/NA	

<p>Consumer deposits</p>	<p>This branch has <b>internal free-to-use facilities</b> for <b>personal</b> banking customers to make cash deposits.</p>	<p>Yes/No/NA</p>	<p><b>Any</b> facilities qualify, including counter-based, ‘Smart ATMs’ with deposit function, etc.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>• a branch will be considered ‘business only’ if it has no free-to-use internal facilities for cash deposits or withdrawals available to personal banking customers; and</li> <li>• a branch will be considered ‘cashless’ if all 4 statements regarding business and consumer deposits and withdrawals are ‘No’ (ie, there are no free-to-use internal facilities for cash deposits or withdrawals available to either business or personal banking customers).</li> </ul> <p>If a branch does <b>not</b> deal with current accounts and has no ATMs or other such facilities for cash withdrawals or deposits, but still deals with <b>savings accounts</b> (so that customers can, at least in principle, withdraw cash from or deposit it into their savings accounts), <b>please answer ‘Yes’ to the relevant question(s) and make a</b></p>
--------------------------	--	------------------	---

			<p><b>note in Other Type = “Savings only”.</b></p>
<p>Business deposits</p>	<p>This branch has <b>internal free-to-use facilities</b> for <b>business</b> banking customers to make cash deposits.</p>	<p>Yes/No/NA</p>	<p><b>Any</b> facilities qualify, including counter-based, ‘Smart ATMs’ with deposit function, etc.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>• a branch will be considered ‘business only’ if it has no free-to-use internal facilities for cash deposits or withdrawals available to personal banking customers; and</li> <li>• a branch will be considered ‘cashless’ if all 4 statements regarding business and consumer deposits and withdrawals are ‘No’ (ie, there are no free-to-use internal facilities for cash deposits or withdrawals available to either business or personal banking customers).</li> </ul> <p>If a branch does <b>not</b> deal with current accounts and has no ATMs or other such facilities for cash withdrawals or deposits, but still deals with <b>savings accounts</b> (so that customers can, at</p>

			<p>least in principle, withdraw cash from or deposit it into their savings accounts), <b>please answer ‘Yes’ to the relevant question(s) and make a note in Other Type = “Savings only”</b>.</p>
<p>Consumer withdrawals</p>	<p>This branch has <b>internal free-to-use facilities</b> for <b>personal</b> banking customers to make cash withdrawals.</p>	<p>Yes/No/NA</p>	<p><b>Any</b> facilities qualify, including counter-based, withdrawal ATMs, etc.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>• a branch will be considered ‘business only’ if it has no free-to-use internal facilities for cash deposits or withdrawals available to personal banking customers; and</li> <li>• a branch will be considered ‘cashless’ if all 4 statements regarding business and consumer deposits and withdrawals are ‘No’ (ie, there are no free-to-use internal facilities for cash deposits or withdrawals available to either business or personal banking customers).</li> </ul> <p>If a branch does <b>not</b> deal with current accounts and has no ATMs or other such facilities for cash withdrawals or deposits, but still deals with <b>savings</b></p>

			<p><b>accounts</b> (so that customers can, at least in principle, withdraw cash from or deposit it into their savings accounts), <b>please answer ‘Yes’ to the relevant question(s) and make a note in Other Type = ‘Savings only’.</b></p>
<p>Business withdrawals</p>	<p>This branch has <b>internal free-to-use facilities</b> for <b>business</b> banking customers to make cash withdrawals.</p>	<p>Yes/No/NA</p>	<p><b>Any</b> facilities qualify, including counter-based, withdrawal ATMs, etc.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>• a branch will be considered ‘business only’ if it has no free-to-use internal facilities for cash deposits or withdrawals available to personal banking customers; and</li> <li>• a branch will be considered ‘cashless’ if all 4 statements regarding business and consumer deposits and withdrawals are ‘No’ (ie, there are no free-to-use internal facilities for cash deposits or withdrawals available to either business or personal banking customers).</li> </ul> <p>If a branch does <b>not</b> deal with current accounts and has no ATMs or other such facilities for cash withdrawals or deposits, but still deals with <b>savings</b></p>

			<b>accounts</b> (so that customers can, at least in principle, withdraw cash from or deposit it into their savings accounts), <b>please answer ‘Yes’ to the relevant question(s) and make a note in Other Type = ‘Savings only’.</b>
Business balance enquiries	This branch offers balance enquiry services for business accounts.	Yes/No/NA	
Last branch in town	Do you classify this branch as last branch in town/last branch in community?	Yes/No/NA	This is based on your firm’s internal definition.
Internal free to use ATM IDs	IDs of all internal free-to-use withdrawal ATMs.	text	<p>Enter a semicolon-separated list if more than one internal free-to-use withdrawal ATM (FTU withdrawal ATM) is present.</p> <p>Enter ‘none’ if no internal FTU withdrawal ATMs are present.</p> <p>Leave empty only if unknown (alternatively, indicate this by a single keyword ‘unknown’).</p> <p>In the unlikely event that these IDs are unknown to you, please provide information about the number of such withdrawal ATMs - enter an integer (0, 1, 2, ...).</p>

<p>Internal pay to use ATM IDs</p>	<p>IDs of all internal pay-to-use withdrawal ATMs.</p>	<p>text</p>	<p>Enter a semicolon-separated list if more than one internal pay-to-use withdrawal ATM (PTU withdrawal ATM) is present.</p> <p>Enter 'none' if no internal PTU withdrawal ATMs are present.</p> <p>Leave empty only if unknown (alternatively, indicate this by a single keyword 'unknown').</p> <p>In the unlikely event that these IDs are unknown to you, please provide information about the number of such withdrawal ATMs - enter an integer (0, 1, 2, ...).</p>
<p>Counter all</p>	<p>Please provide an estimate of the total number of counters within the branch which serve either personal and/or SME customers.</p>	<p>numeric</p>	<p>A counter is classified as a staffed unit which provides cash deposit facilities for customers.</p> <p>Please include any counter which is staffed. Do not include counters which are never staffed or which do not allow for cash deposit and withdrawal.</p>
<p>Counter personal</p>	<p>Please provide an estimate of the total number of counters within the branch which serve personal customers.</p>	<p>numeric</p>	<p>A counter is classified as a staffed unit which provides cash deposit facilities for customers.</p> <p>Please include any counter which serves personal customers.</p>



<p>Counter SME</p>	<p>Please provide an estimate of the total number of counters within the branch which serve SME customers.</p>	<p>numeric</p>	<p>A counter is classified as a staffed unit which provides cash deposit facilities for customers.  Please include any counter which serves SME customers.</p>
<p>ATM all</p>	<p>Please provide an estimate of the total number of deposit ATMs (for your own customers) within the branch which allow personal and/or SME customers to deposit notes and/or coin.</p>	<p>numeric</p>	<p>A deposit ATM is classified as a machine within the branch which allows customers to deposit cash (either notes and/or coin).  Please report deposit ATMs accessible only by your firm’s own customers (or others served through a cross-brand servicing agreement).</p>
<p>ATM personal</p>	<p>Please provide an estimate of the total number of deposit ATMs (for your own customers) within the branch which allow personal customers to deposit notes and/or coin.</p>	<p>numeric</p>	<p>A deposit ATM is classified as a machine within the branch which allows customers to deposit cash (either notes and/or coin).  Please include any deposit ATM which serves personal customers.  Please report deposit ATMs accessible only by your firm’s own customers (or others served through a cross-brand servicing agreement).</p>
<p>ATM SME</p>	<p>Please provide an estimate of the total number of deposit ATMs (for your own customers) within the</p>	<p>numeric</p>	<p>A deposit ATM is classified as a machine within the branch which allows customers to deposit cash (either notes and/or coin).</p>

	branch which allow SME customers to deposit notes and/or coin.		<p>Please include any deposit ATM which serves SME customers.</p> <p>Please report deposit ATMs accessible only by your firm’s own customers (or others served through a cross-brand servicing agreement).</p>
ATM note	Please provide an estimate of the total number of deposit ATMs (for your own customers) within the branch which allow a personal and/or SME customer to deposit notes <b>only</b> .	numeric	<p>A deposit ATM is classified as a machine within the branch which allows customers to deposit cash (either notes and/or coin).</p> <p>Please include any deposit ATM which allows note deposit.</p> <p>Please report deposit ATMs accessible only by your firm’s own customers (or others served through a cross-brand servicing agreement).</p>
ATM coin	Please provide an estimate of the total number of deposit ATMs (for your own customers) within the branch which allow a personal and/or SME customer to deposit coin <b>only</b> .	numeric	<p>A deposit ATM is classified as a machine within the branch which allows customers to deposit cash (either notes and/or coin).</p> <p>Please include any deposit ATM which allows coin deposit.</p> <p>Please report deposit ATMs accessible only by your firm’s own customers (or others served through a cross-brand servicing agreement).</p>

<p>ATM cash IDs</p>	<p>IDs of all deposit ATMs.</p>	<p>text</p>	<p>Enter a semicolon-separated list if more than one deposit ATM is present. Enter 'none' if no deposit ATMs are present. Leave empty only if machines do not have IDs or they are unknown. Please report deposit ATMs accessible only by your firm's own customers (or others served through a cross-brand servicing agreement).</p>
<p>ATM support</p>	<p>This branch provides in-person support to customers who use deposit ATMs that allow customers to deposit cash (notes and/or coin) into their accounts.</p>	<p>Yes/No/NA</p>	<p>This should be 'Yes' if support is provided for any of the machines (including any universal deposit ATMs accessible by those other than your own customers). This includes support available on request to those who need it.</p>
<p>Non chip card</p>	<p>This branch has facilities to provide cash withdrawals and/or deposits for customers without a chip-enabled card.</p>	<p>Yes/No/NA</p>	
<p>Other type</p>	<p>Any other branch characteristics (covering cash access services) not captured by the above</p>	<p>any</p>	<p>Free format</p>

	questions, if applicable (except 'mobile branch').		
<b>E: Branch accessibility</b>			
Wheelchair	This branch is wheelchair accessible.	Yes/No/NA	
Step free	This branch has step-free access.	Yes/No/NA	
Hearing	This branch has a hearing/induction loop available.	Yes/No/NA	
Visual impairment	This branch has a speaking withdrawal ATM or counter service available.	Yes/No/NA	
Other access	Any other branch accessibility information, if applicable.	any	Free format
<b>F: External facilities</b>			
External deposit	This branch has external machines or safes that allow customers to deposit cash into their accounts.	Yes/No/NA	<p>Examples may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• envelope deposit machines;</li> <li>• smart deposit machines;</li> <li>• ATMs that accept cash deposits.</li> </ul>

			This should be 'Yes' if any such machines are available.
External free to use ATM IDs	IDs of all external free-to-use withdrawal ATMs.	text	<p>Enter a semicolon-separated list if more than one external free-to-use withdrawal ATM (FTU withdrawal ATM) is present.</p> <p>Enter 'none' if no external FTU withdrawal ATMs are present.</p> <p>Leave empty only if unknown (alternatively, indicate this by a single keyword 'unknown').</p> <p>In the unlikely event these IDs are unknown to you, please provide information about the number of such withdrawal ATMs - enter an integer (0, 1, 2, ...).</p>
External pay to use ATM IDs	IDs of all external pay-to-use withdrawal ATMs.	text	<p>Enter a semicolon-separated list if more than one external pay-to-use withdrawal ATM (PTU withdrawal ATM) is present.</p> <p>Enter 'none' if no external PTU withdrawal ATMs are present.</p> <p>Leave empty only if unknown (alternatively, indicate this by a single keyword 'unknown').</p>

			In the unlikely event these IDs are unknown to you, please provide information about the number of such withdrawal ATMs - enter an integer (0, 1, 2, ...).
External 24/7 use	The external facilities at this branch are accessible 24/7.	Yes/No/NA	
Other external	Any other external facilities (covering cash access services), if applicable, or any additional notes.	any	Free format
<b>G: Usage level</b>			
Consumer footfall	Your best estimate of the number of personal customers served at this branch in the reporting period to which the data relates.	numeric	<p>The total footfall would include all personal customers who made use of any internal facilities regardless of the service (ie, this includes people who came in to ask a question about their account, for example). This does not include personal customers who only used external facilities (eg, external ATMs).</p> <p>This is the sum of every visit by personal customers. Account openings should be included in this figure but footfall relating to safe deposit boxes should be excluded.</p>

Business footfall	Your best estimate of the number of business customers served at this branch in the reporting period to which the data relates.	numeric	<p>The total footfall would include all business customers who made use of any internal facilities regardless of the service (ie, this includes people who came in to ask a question about their account, for example). This does not include business customers who only used external facilities (eg, external ATMs).</p> <p>This is the sum of every visit by business customers. Account openings should be included in this figure but footfall relating to safe deposit boxes should be excluded.</p>
Consumer volume withdrawal	Your best estimate of the total volume, in pounds (ie, the total value, or the sum of all the transaction amounts), of in-branch personal cash withdrawals in the reporting period to which the data relates.	numeric	<p>Note that this is the total pound value of withdrawals from accounts, not the total amount of transactions. This figure should include withdrawals made from accounts that thereafter closed during the reporting period.</p> <p>Please do <b>not</b> include the currency symbol (all values should be in pounds) or any thousands separators (commas). Use a dot as a decimal separator if the number includes pence (but this is unnecessary).</p>

<p>Business volume withdrawal</p>	<p>Your best estimate of the total volume, in pounds (ie, the total value, or the sum of all the transaction amounts), of in-branch business cash withdrawals in the reporting period to which the data relates.</p>	<p>numeric</p>	<p>Note that this is the total pound value of withdrawals from accounts, not the total amount of transactions. This figure should include withdrawals made from accounts that thereafter closed during the reporting period.</p> <p>Please do <b>not</b> include the currency symbol (all values should be in pounds) or any thousands separators (commas). Use a dot as a decimal separator if the number includes pence (but this is unnecessary).</p>
<p>Consumer volume deposit</p>	<p>Your best estimate of the total volume, in pounds (ie, the total value, or the sum of all the transaction amounts), of in-branch personal cash deposits in the reporting period to which the data relates.</p>	<p>numeric</p>	<p>Note that this is the total pound value of deposits into accounts, not the total amount of transactions. This figure should include deposits made into accounts that thereafter closed during the reporting period.</p> <p>Please do <b>not</b> include the currency symbol (all values should be in pounds) or any thousands separators (commas). Use a dot as a decimal separator if the number includes pence (but this is unnecessary).</p>
<p>Business volume deposit</p>	<p>Your best estimate of the total volume, in pounds (ie, the total value, or the sum of all the transaction amounts), of in-branch</p>	<p>numeric</p>	<p>Note that this is the total pound value of deposits into accounts, not the total amount of transactions. This figure should include deposits made into</p>



	business cash deposits in the reporting period to which the data relates.		accounts that thereafter closed during the reporting period.  Please do <b>not</b> include the currency symbol (all values should be in pounds) or any thousands separators (commas). Use a dot as a decimal separator if the number includes pence (but this is unnecessary).
Consumer withdrawal transactions	Your best estimate of the total number of in-branch personal withdrawal transactions in the reporting period to which the data relates. This is inclusive of internal withdrawal ATM transactions.	numeric	
Business withdrawal transactions	Your best estimate of the total number of in-branch business withdrawal transactions in the reporting period to which the data relates. This is inclusive of internal withdrawal ATM transactions.	numeric	
Consumer deposit transactions	Your best estimate of the total number of in-branch personal deposit	numeric	

	transactions in the reporting period to which the data relates. This is inclusive of internal deposit ATM transactions.		
Business deposit transactions	Your best estimate of the total number of in-branch business deposit transactions in the reporting period to which the data relates. This is inclusive of internal deposit ATM transactions.	numeric	
Consumer balance enquiries	Your best estimate of the total number of in-branch personal balance enquiries in the reporting period to which the data relates. This is inclusive of internal ATM transactions.	numeric	
Business balance enquiries	Your best estimate of the total number of in-branch business balance enquiries in the reporting period to which the data relates. This is inclusive of internal ATM transactions.	numeric	

Number of registered personal customers	Your best estimate of the total number of personal customers registered/domiciled at this branch as at the end of the reporting period to which the data relates. This should be inclusive of youth and graduate accounts.	numeric	
Definition of regular personal customer	Your definition of a regular personal customer.	any	Free format Regular customers may differ from registered customers as those registered at one branch may regularly use another branch – eg, a city centre branch may have a much greater number of regular customers than registered customers as those registered at other branches use a city centre branch because their workplace is nearby.
Number of regular personal customers	The number of personal customers regularly using this branch based on the above definition of regular personal customer. This should be inclusive of youth and graduate accounts.	numeric	

Number of online customers	The number of regular personal customers (as per the above definition) who access accounts online at least once a month. This should be inclusive of youth and graduate accounts.	numeric	
Number of mobile banking customers	The number of regular personal customers (as per the above definition) who access accounts via mobile banking at least once a month. This should be inclusive of youth and graduate accounts.	numeric	
Number of phone banking customers	The number of regular personal customers (as per the above definition) who access accounts via telephone banking at least once a month. This should be inclusive of youth and graduate accounts.	numeric	
Definition of regular SME customer	Your definition of a regular SME customer.	any	Free format
Number of regular SME customers	The number of SME customers regularly using	numeric	

	this branch based on the above definition of regular SME customer.		
Number of SME deposit customers	Your best estimate of the total number of regular SME customers using this branch for cash deposits as at the end of the reporting period to which the data relates, based on the above definition of regular SME customer.	numeric	
Number of SME withdrawal customers	Your best estimate of the total number of regular SME customers using this branch for cash withdrawals as at the end of the reporting period to which the data relates, based on the above definition of regular SME customer.	numeric	
Number of registered SME customers	Your best estimate of the total number of SME customers registered/domiciled at this branch as at the end of the reporting period to which the data relates.	numeric	

Other usage	Any other usage information (covering cash access services) and relating to the reporting period to which the data relates.	any	Free format
<b>H: Customers in vulnerable circumstances</b>			
Number of vulnerable customers	The number of regular personal customers (as per the above definition) identified as vulnerable.	numeric	Regular customers may differ from registered customers as those registered at one branch may regularly use another branch – eg, a city centre branch may have a much greater number of regular customers than registered customers as those registered at other branches use a city centre branch because their workplace is nearby. Where relevant, these fields should be inclusive of youth and graduate accounts.
Number of passbook non chip customers	The number of regular personal customers (as per the above definition) who use accounts such as passbook or use non ‘chip and pin’ enabled cards.	numeric	Regular customers may differ from registered customers as those registered at one branch may regularly use another branch – eg, a city centre branch may have a much greater number of regular customers than registered customers as those registered at other branches use a city centre branch because their workplace is nearby. Where relevant, these fields

			should be inclusive of youth and graduate accounts.
Number of basic accounts	The number of regular personal customers (as per the above definition) who use basic bank accounts at this branch.	numeric	Regular customers may differ from registered customers as those registered at one branch may regularly use another branch – eg, a city centre branch may have a much greater number of regular customers than registered customers as those registered at other branches use a city centre branch because their workplace is nearby. Where relevant, these fields should be inclusive of youth and graduate accounts.
Other vulnerable	Any other information on particular aspects of the vulnerable population identified.	any	Free format
<b>I: Support strategy for vulnerable customers</b>			
Support strategy	Please provide the name of the document(s) which outline the support strategy (covering cash access), as it relates to branch closures, specifically for vulnerable customers and customers who use	any	Free format The documents referred to in this response should be provided to your firm supervisor, with <a href="mailto:branchclosuredata@fca.org.uk">branchclosuredata@fca.org.uk</a> copied in, alongside the return of this report.

	passbook and/or non ‘chip and pin’ enabled cards.		
<b>J: Removal of Saturday hours</b>			
Saturday closure	This branch is planned to have Saturday hours removed.	Yes/No/NA	
Saturday closure residual	Specify any residual services (covering cash access services) planned if removing Saturday hours (with details).	any	Free format
<b>K: Proposed closure</b>			
Proposed closure	This branch is proposed to be permanently closed.	Yes/No	<p>Note that if:</p> <ul style="list-style-type: none"> <li>no proposed closures are planned (ie, all branches are input as ‘No’ in this field); or</li> <li>the proposed closure template is being completed and returned in a Branch Data and Closures Report covering a later reporting period that is being submitted during the same window for submitting data,</li> </ul> <p>the proposed closure template should not be completed or returned.</p>



<b>Proposed closures</b>			
<b>L: Proposed closure details</b>			
Branch closure date	Intended date of branch closure in DD/MM/YYYY format.	date	If you do not have an intended date of closure (for instance, because the branch is remaining open until the opening of a Banking Hub, and the opening date of the Banking Hub is unknown), leave this field empty.
Branch closure announcement date	Date of intended public announcement in DD/MM/YYYY format.	date	If this is unknown, leave this field empty.
ATMs remaining	IDs of all withdrawal ATMs which will remain open after the branch closure, if any.	text	Enter 'none' if all withdrawal ATMs at this branch will close. Enter 'unknown' if the IDs are unknown. Leave empty only if there are no withdrawal ATMs at this branch.
Previous hopper	This branch was submitted as proposed to be closed in a previous hopper, but the closure has not yet been publicly announced.	Yes/No/NA	
<b>M: Communication around closures</b>			
Less than 12 weeks	Less than 12 weeks' notice will be provided for this closure.	Yes/No/NA	

Local stakeholders	Please provide the name of the document(s) which list the specific names of the local stakeholders who are to be engaged post-announcement.	any	Free format Within these documents, where an organisation is referred to, include the local contact details. These documents should be provided to your firm supervisor, with <a href="mailto:branchclosuredata@fca.org.uk">branchclosuredata@fca.org.uk</a> copied in, alongside the return of this request.
Engagement strategy	Please provide the name of the document(s) which outline the engagement strategy (covering cash access services) with customers up to and post-closure (in addition to letters).	any	Free format These documents should be provided to your firm supervisor, with <a href="mailto:branchclosuredata@fca.org.uk">branchclosuredata@fca.org.uk</a> copied in, alongside the return of this request.
<b>N: Timing of provision of alternative access point</b>			
Provision gap	Will there be a timing gap between the closure of the branch and the availability of any residual services (covering cash access services)?	Yes/No/NA	
Provision gap time	If “Yes” is entered in the Provision Gap field, the length of time in weeks of the provision gap.	numeric	

	Otherwise, this field should be left empty.		
Provision gap details	If “Yes” is entered in the Provision Gap field, please provide any other details of the timing gap and the availability of any residual services (covering cash access services). Otherwise, this field should be left empty.	any	Free format
<b>O: Details of available Post Offices</b>			
Nearest Post Office postcode	Postcode of nearest Post Office.	text	<p>Preferred format: &lt;outcode&gt;&lt;single space&gt;&lt;incode&gt;, where:</p> <ul style="list-style-type: none"> <li>the outcode contains 2, 3, or 4 alphanumeric characters and is of the form AN, ANN, AAN, ANA, AANN, or AANA, with A denoting a letter and N denoting a digit; and</li> <li>the incode is 1 digit and 2 letters (NAA).</li> </ul> <p>For example, “E20 1JN”.</p> <p>If possible, please ensure any terminated postcodes are replaced with their correct live versions</p>

Nearest Post Office address	Address of nearest Post Office, excluding postcode.	text	<p>Please include building name/number(s), where applicable. Please avoid abbreviations as far as possible.</p> <p>For example, “Financial Conduct Authority, 12 Endeavour Square, London”.</p> <p>For mobile stops, please include the nearest available address where possible.</p> <p>A single line address is preferred, but it is acceptable to include separate columns for Address 1, Address 2, etc.</p>
Is the Post Office enhanced?	The nearest Post Office is an enhanced Post Office.	Yes/No/NA	
Is the Post Office outreach?	The nearest Post Office is an outreach Post Office.	Yes/No/NA	
Nearest Post Office in driving time	Driving time <b>in minutes</b> to the nearest Post Office from the branch.	numeric	
Nearest Post Office in public transport time	Travel time on public transport <b>in minutes</b> to the nearest Post Office from the branch.	numeric	
Monday opening hours		text	

Tuesday opening hours	<b>Current</b> opening hours of nearest Post Office.	text	<p>Here, ‘current’ should be taken to mean typical in the most recent period. Generally, these will be the opening hours at the end of the reporting period (that is, the last week of the reporting period).</p> <p>However, please do <b>not</b> report any very short-term temporary changes, eg, when a Post Office happened to be closed on a particular day during the last week of the reporting period, but such a change was a one-off.</p> <p>For the purposes of this definition, ‘short-term’ should be taken to mean a period of time less than 2 weeks. Changes ‘until further notice’ are, generally, not short term.</p> <p>Examples:</p> <ul style="list-style-type: none"> <li>• ‘09:00-16:00’ denotes a Post Office open from 9am to 4pm without a break.</li> <li>• ‘08:45-12:30; 13:30-15:00’ denotes a Post Office open from 8:45am to 12:30pm, closing (eg, for lunch) from 12:30pm to 1:30pm, and then open from 1:30pm to 3pm.</li> </ul> <p>If a Post Office is closed on a given day, this should be recorded using a</p>
Wednesday opening hours		text	
Thursday opening hours		text	
Friday opening hours		text	
Saturday opening hours		text	
Sunday opening hours		text	

			<p>single keyword ‘closed’. Note that this is not the same as an empty cell, which indicates that the opening hours for this branch are unknown.</p> <p>Please adhere to the formatting guidelines as far as possible:</p> <ul style="list-style-type: none"> <li>• A single time should be recorded as HH:MM, where HH is a zero-padded hour between 00 and 23 (24-hour clock) and MM is a zero-padded minute between 00 and 59. (This is the reduced precision extended ISO 8601 format without seconds and with the qualifier ‘T’ omitted as there is no risk of ambiguity.)</li> <li>• A range should be recorded as &lt;from&gt;-&lt;to&gt; (separated by a single dash), with both ‘from’ and ‘to’ in the HH:MM format, and the ‘from’ time earlier than the ‘to’ time.</li> <li>• Multiple ranges should be separated by a semicolon.</li> </ul>
Post Office capacity	Does the Post Office identified have sufficient capacity to take on new	Yes/No/NA	

	customers diverted from the closing branch?		
Post Office suitability	Highlight any capacity or suitability issues (covering cash access services) with identified Post Offices (including access for those with mobility issues).	any	Free format
Other Post Offices	The addresses and postcodes of up to 2 additional nearest Post Offices.	any	Only complete if they are deemed to be likely alternatives, otherwise leave blank.
<b>P: Impact of Post Office deflection on SMEs</b>			
Number of SME Post Office deflection	Number of SMEs registered at the closing branch that will be able to conduct all their cash transactions at the nearest Post Office.	numeric	
Number of SME other deflection	Number of SMEs registered at the closing branch that would need to migrate to another branch, or cash delivery (or collection).	numeric	
SME residual	Please provide the name of the document(s) which	any	Free format

	specify the SME specific residual service planned (with details).		These documents should be provided with the return of this request.
SME costs	Will the cost to SMEs in this population of depositing and/or withdrawing cash change following the closure?	Yes/No/NA	
SME contact strategy	Please provide the name of the document(s) which outline the contact strategy for this SME population.	any	Free format These documents should be provided with the return of this request.
Number of SME excess deposits	Your best estimate of the number of SME deposits that exceeded your Post Office deposit limit in the current year to date (to the end of last month).	numeric	
<b>Q: Details of remaining branches and deflection analysis</b>			
Nearest branch postcode	Postcode of nearest branch <b>of your brand.</b>	text	Preferred format: <outcode><single space><incode>, where: <ul style="list-style-type: none"> <li>the outcode contains 2, 3, or 4 alphanumeric characters and is of the form AN, ANN, AAN, ANA, AANN, or AANA, with A denoting a letter and N denoting a digit; and</li> </ul>



			<ul style="list-style-type: none"> <li>the incode is 1 digit and 2 letters (NAA).</li> </ul> <p>For example, “E20 1JN”.</p> <p>If possible, please ensure any terminated postcodes are replaced with their correct live versions</p>
Nearest branch address	Address of nearest branch <b>of your brand</b> , excluding postcode.	text	<p>Please include building name/number(s), where applicable. Please avoid abbreviations as far as possible.</p> <p>For example, “Financial Conduct Authority, 12 Endeavour Square, London”.</p> <p>For mobile stops, please include the nearest available address where possible.</p> <p>A single line address is preferred, but it is acceptable to include separate columns for Address 1, Address 2, etc.</p>
Nearest branch driving time	Driving time <b>in minutes</b> to the nearest branch <b>of your brand</b> .	Numeric	
Nearest branch public transport time	Travel time on public transport <b>in minutes</b> to the nearest branch <b>of your brand</b> .	Numeric	

Nearest branch Monday opening hours	<p><b>Current</b> opening hours of the nearest branch <b>of your brand</b>.</p>	<p>text</p>	<p>Here, ‘current’ should be taken to mean typical in the most recent period. Generally, these will be the opening hours at the end of the reporting period (that is, the last week of the reporting period).</p> <p>However, please do <b>not</b> report any very short-term temporary changes, eg, when a branch happened to be closed on a particular day during the last week of the reporting period, but such a change was a one-off.</p> <p>For the purposes of this definition, ‘short-term’ should be taken to mean a period of time less than 2 weeks. Changes ‘until further notice’ are, generally, not short term.</p> <p>Examples:</p> <ul style="list-style-type: none"> <li>• ‘09:00-16:00’ denotes a branch open from 9am to 4pm without a break.</li> <li>• ‘08:45-12:30; 13:30-15:00’ denotes a branch open from 8:45am to 12:30pm, closing (eg, for lunch) from 12:30pm to 1:30pm, and then open from 1:30pm to 3pm.</li> </ul> <p>If a branch is closed on a given day, this should be recorded using a single</p>
Nearest branch Tuesday opening hours			
Nearest branch Wednesday opening hours			
Nearest branch Thursday opening hours			
Nearest branch Friday opening hours			
Nearest branch Saturday opening hours			
Nearest branch Sunday opening hours			

			<p>keyword ‘closed’. Note that this is not the same as an empty cell, which indicates that the opening hours for this branch are unknown.</p> <p>Please adhere to the formatting guidelines as far as possible:</p> <ul style="list-style-type: none"> <li>• A single time should be recorded as HH:MM where HH is a zero-padded hour between 00 and 23 (24-hour clock) and MM is a zero-padded minute between 00 and 59. (This is the reduced precision extended ISO 8601 format without seconds and with the qualifier ‘T’ omitted as there’s no risk of ambiguity.)</li> <li>• A range should be recorded as &lt;from&gt;-&lt;to&gt; (separated by a single dash), with both ‘from’ and ‘to’ in the HH:MM format, and ‘from’ time earlier than ‘to’ time.</li> <li>• Multiple ranges should be separated by a semicolon.</li> </ul>
<p>Opening hours deflection</p>	<p>A period of operating hours for the nearest alternative branch will reach 95-100% or over 100% of capacity</p>	<p>Yes/No/NA</p>	

	following the proposed closure as a result of diversion of customers from the closed branch.		
Services deflection	Highlight any services (covering cash access services) available at the closing branch and not at this branch.	Any	Free format
Suitability deflection	Highlight any capacity or suitability issues (covering cash access services) with the identified nearest branch (including access for those with mobility issues).	Any	Free format
<b>R: Details of remaining building societies and withdrawal ATMs</b>			
Nearest building society postcode	Postcode of nearest building society.	text	<p>Preferred format: &lt;outcode&gt;&lt;single space&gt;&lt;incode&gt;, where:</p> <ul style="list-style-type: none"> <li>the outcode contains 2, 3, or 4 alphanumeric characters and is of the form AN, ANN, AAN, ANA, AANN, or AANA, with A denoting a letter and N denoting a digit; and</li> <li>the incode is 1 digit and 2 letters (NAA).</li> </ul>

			<p>For example, “E20 1JN”.</p> <p>If possible, please ensure any terminated postcodes are replaced with their correct live versions</p>
Nearest building society address	Address of nearest building society, excluding postcode.	text	<p>Please include building name/number(s), where applicable. Please avoid abbreviations as far as possible.</p> <p>For example, “Financial Conduct Authority, 12 Endeavour Square, London”.</p> <p>For mobile stops, please include the nearest available address where possible.</p> <p>A single line address is preferred, but it is acceptable to include separate columns for Address 1, Address 2, etc.</p>
Nearest building society distance	Distance to the nearest building society from the branch <b>in miles</b> .	numeric	
Nearest FTU ATM postcode	Postcode of nearest <b>free-to-use</b> withdrawal ATM.	text	<p>Preferred format: &lt;outcode&gt;&lt;single space&gt;&lt;incode&gt;, where:</p> <ul style="list-style-type: none"> <li>the outcode contains 2, 3, or 4 alphanumeric characters and is of the form AN, ANN, AAN, ANA, AANN, or AANA, with</li> </ul>

			<p>A denoting a letter and N denoting a digit; and</p> <ul style="list-style-type: none"> <li>the incode is 1 digit and 2 letters (NAA).</li> </ul> <p>For example, “E20 1JN”.</p> <p>If possible, please ensure any terminated postcodes are replaced with their correct live versions</p>
Nearest FTU ATM address	Address of nearest <b>free-to-use</b> withdrawal ATM, excluding postcode.	text	<p>Please include building name/number(s), where applicable. Please avoid abbreviations as much as possible.</p> <p>For example, “Financial Conduct Authority, 12 Endeavour Square, London”.</p> <p>For mobile stops, please include the nearest available address where possible.</p> <p>A single line address is preferred, but it is acceptable to include separate columns for Address 1, Address 2, etc.</p>
Nearest ATM distance	Distance to the nearest <b>free-to-use</b> withdrawal ATM from the branch <b>in miles</b> .	numeric	<p>Free format. Only complete if they are deemed to be likely alternatives, otherwise leave blank.</p>
Other ATMs	The addresses and postcodes of up to 2	any	

	additional nearest withdrawal ATMs.		
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## Annex D

### Access to Cash sourcebook (ATCS)

In this Annex, all the text is new and is not underlined.

## 1 Introduction

### 1.1 Purpose

- 1.1.1 G (1) This sourcebook sets out *rules* and *guidance* in the service of the *FCA's* purpose under Part 8B of the *Act* of seeking to ensure reasonable provision of *cash access services* in the *UK* or a part of the *UK*.
- (2) The purpose in (1) includes seeking to ensure reasonable provision of *cash access services* which are free of charge in relation to *relevant personal current accounts*.

### 1.2 Application

Who?

- 1.2.1 R This sourcebook applies to:
- (1) a *designated firm*; and
- (2) a *designated coordination body*.

What?

- 1.2.2 G (1) This sourcebook applies as described in its *rules*.
- (2) The *rules* in this sourcebook are made under the *FCA's* powers in section 131V (as well as section 137T, as applied by section 131V, and section 138D) of the *Act*. *GEN 2.2.17R* is accordingly not applicable.

Where?

- 1.2.3 R Where *rules* in this sourcebook require a *designated person* to do or refrain from doing anything, the *designated person* is required to do or refrain from doing that thing in relation to:
- (1) the *UK*, if it is designated by the Treasury pursuant to section 131R of the *Act* in relation to the whole of the *UK*; or
- (2) the part of the *UK* in relation to which it is designated by the Treasury pursuant to section 131R of the *Act*.



- 1.2.4 G *ATCS 1.2.3R* applies to the entire *ATCS* sourcebook. This means that where a *designated firm* is designated in relation to only part of the *UK*, it will not, for example, be required by any *rules* in the sourcebook to:
- (1) make any notifications in relation to areas outside that part;
  - (2) undertake *cash access assessments* for areas outside that part;
  - (3) provide *required cash access services* outside that part; or
  - (4) publish any information for areas outside that part.
- 1.2.5 R Where *rules* in this sourcebook require a *designated person* to give notification of a matter to another *designated person*, the notification must be given to a *designated person* who is designated by the Treasury pursuant to section 131R of the *Act* in relation to the part of the *UK* to which the matter relates.
- 1.2.6 G The effect of *ATCS 1.2.5R* is that where, for example, a *designated firm* is required to give notification under *ATCS 2.1.1R* of a *relevant closure* of one of its *cash access facilities* in *Great Britain* to another *designated person*, it must give that notification to a *designated person* who is designated in relation to the *UK* or *Great Britain*.
- 1.2.7 R Where *rules* in this sourcebook permit a *designated coordination body* to take an action required by the *rules* for its *participating designated firms*, the body may only take such action if it relates to a part of the *UK* in relation to which it is designated by the Treasury pursuant to section 131R of the *Act*.

### 1.3 Interpretation

- 1.3.1 G References to ‘businesses’ in this sourcebook should be interpreted broadly, to include, for example, charity shops.

### 1.4 Data protection

- 1.4.1 R Where any *rules* in this sourcebook impose requirements on a *designated person* to publish information, the *designated person* must first redact all personal data contained therein.
- 1.4.2 G (1) *Designated persons* should comply with all applicable *data protection legislation*.
- (2) *Designated persons* should refer to *data protection legislation* to establish what constitutes ‘personal data’.

### 1.5 Publication of information

- 1.5.1 G This sourcebook contains various *rules* requiring *designated persons* to publish information in an easily accessible place on their websites. The *FCA* would view the information as ‘easily accessible’ if the information,

or a link to the webpage(s) on which the information is published, is prominently displayed:

- (1) in the case of a *designated firm*, on its (or the relevant brand's) homepages for *relevant current accounts*; and
- (2) in the case of a *designated coordination body*, on a homepage dealing with its role in relation to access to *cash*.

## 1.6 Actions for damages

- 1.6.1 R A contravention of the *rules* in this sourcebook does not give rise to a right of action by a *private person* under section 138D of the *Act* (and each of those *rules* is specified under section 138D(3) of the *Act* as a provision giving rise to no such right of action).

## 1.7 Regular reporting

- 1.7.1 G See *SUP 16.32* for *rules* and *guidance* on regular data reporting by *designated firms* on access to *cash*.

## 1.8 Other applicable requirements

- 1.8.1 G When undertaking activities in connection with this sourcebook, a *designated person* should continue to follow any other legal or regulatory requirements as applicable, including equality and anti-discrimination law, consumer protection law, competition law and other *Handbook* provisions.

## 2 Notification of closures

### 2.1 Closures of facilities of designated firms

- 2.1.1 R When a *cash access facility* of a *designated firm* is the subject of a *relevant closure*, the *designated firm* must give notification in writing to:

- (1) the *FCA*;
- (2) any *designated coordination body*; and
- (3) any *non-participating designated firm*.

- 2.1.2 R Notification under *ATCS 2.1.1R* must:

- (1) in the case of a planned *relevant closure*, be given as soon as reasonably practicable once the *designated firm* has made its decision;
- (2) in the case of an unplanned *relevant closure*, be given as soon as reasonably practicable once the *designated firm* is satisfied that it will happen; and
- (3) give details of the *relevant closure*, including:

- (a) the address or location of the *cash access facility*;
  - (b) details of the *specified cash access services* that will be lost if it is a full closure, or how they will be impacted if it is not;
  - (c) details of any *specified cash access facility features* that will be lost if it is a full closure, or how they will be impacted if it is not; and
  - (d) the expected date of the *relevant closure*, if known.
- 2.1.3 G *ATCS 2.1.2R(2)* acknowledges that there may be circumstances where events outside a *designated firm's* control lead to a *relevant closure*, such as a decision by a landlord not to renew a lease or the site suffering physical damage.
- 2.1.4 R Where a *designated firm* has given notification under *ATCS 2.1.1R* but decides or is satisfied at any time thereafter that the *relevant closure* will no longer happen, it must promptly give notification of the change in writing to the *persons* set out in *ATCS 2.1.1R*.
- 2.2 Closures of facilities of persons other than designated firms**
- 2.2.1 R When a *designated person* becomes aware of a *relevant closure* of a *cash access facility* of a *person* other than a *designated firm* as a result of information that is publicly available, it must give notification in writing to:
- (1) the *FCA*;
  - (2) any *designated coordination body*; and
  - (3) any *non-participating designated firm*.
- 2.2.2 R Notification under *ATCS 2.2.1R* must:
- (1) be given as soon as reasonably practicable after the *designated person* becomes aware of the *relevant closure* as a result of publicly available information; and
  - (2) contain at least the following information, insofar as the *designated person* is aware of it:
    - (a) the address or location of the *cash access facility*;
    - (b) the name of the *person* who operates or operated it; and
    - (c) the expected date of the *relevant closure* or, if it has already taken place, the approximate date on which it took place.

- 2.2.3 R *ATCS 2.2.1R* does not apply where another *designated person* has already provided the required notification under it in respect of the same *cash access facility*.
- 2.2.4 R Where notification has been given under *ATCS 2.2.1R* and a *designated person* undertaking a *cash access assessment* as a result is satisfied at any time on the basis of publicly available information that the *relevant closure* will no longer happen, it must promptly give notification of the change in writing to the *persons* set out in *ATCS 2.2.1R*.

### 2.3 Guidance relating to both types of closure

- 2.3.1 G (1) The *Glossary* definition of *relevant closure* excludes events relating to a *cashback facility* or a *cash* delivery or collection service. A retail store where *cash access services* are provided by or under arrangements with the Post Office would not be regarded as a *cashback facility*.
- (2) The definition of *relevant closure* also excludes events insofar as they relate to *cash access services* which are not provided free of charge in relation to *relevant personal current accounts*. The effect is that:
- (a) if *cash access services* provided at a *cash access facility* in relation to *relevant personal current accounts* are subject to a charge, and other *cash access services* in relation to *relevant personal current accounts* are provided free of charge or *cash access services* are also provided for businesses, the facility is not excluded; and
- (b) if the only *cash access services* provided at a *cash access facility* relate to *relevant personal current accounts* and these services are all subject to a charge, the facility is excluded.
- (3) By way of example, the full closure of an automatic teller machine which charges for use would be a *relevant closure* if businesses can use it to withdraw *cash*.
- (4) *ATCS 2.1.1R* applies to *cash access facilities* of *designated firms* so it does not apply where, for example, the *relevant closure* is a full closure of a Post Office branch. This would fall within scope of *ATCS 2.2.1R*.
- 2.3.2 G (1) A *relevant closure* includes a reduction in *cash access services* provided at a *cash access facility*, or a change in the nature of such provision, where the reduction or change is material. Materiality relates to the nature and extent of the reduction or change rather than involving an assessment at this stage of the impact on users of *cash access services*. For example, a nominal reduction in opening hours from 40 to 39 hours a week should not be treated as material.

- (2) Reductions or changes which should be regarded as material include:
- (a) conversion of a free-to-use *cash access service* provided in relation to *relevant personal current accounts* to pay-to-use;
  - (b) removal of a counter or a significant reduction in opening hours;
  - (c) removal of the functionality for a reasonable mix of both coins and banknotes to be deposited or withdrawn;
  - (d) loss of or a significant reduction in an *assisted cash access service*; or
  - (e) withdrawal of a *cash access service* by a *designated firm* from a *cash access facility* through which it provides *cash access services* alongside other providers.
- (3) The list in (2) is not exhaustive.

### 3 Cash access requests

#### 3.1 Raising public awareness

##### Publication of information

- 3.1.1 R A *designated firm* must publish information about *cash access requests* in writing in an easily accessible place on its website.
- 3.1.2 R The information required to be published under ATCS 3.1.1R must include the following details:
- (1) a description of what a *cash access request* is;
  - (2) the circumstances in which a *cash access assessment* must be undertaken under ATCS 4.1.1R(3), including the exceptions set out in ATCS 4.1;
  - (3) whether the *designated firm* undertakes *cash access assessments* itself under ATCS 4.1.1R(3) or a *designated coordination body* undertakes them for it; and
  - (4) how a *cash access request* can be submitted to the *designated firm* or *designated coordination body* (as appropriate).
- 3.1.3 R (1) Where a *designated coordination body* undertakes *cash access assessments* under ATCS 4.1.1R(3), it must publish information about *cash access requests* in writing in an easily accessible place on its website.

- (2) The information required to be published by a *designated coordination body* under (1) must include the details in *ATCS 3.1.2R(1)* and *ATCS 3.1.2R(2)*, together with details of how a *cash access request* can be submitted to it.
- 3.1.4 G See *ATCS 4.2* for *rules* and *guidance* on the role of a *designated coordination body* in undertaking *cash access assessments*.
- 3.1.5 R The methods for submitting a *cash access request* must:
- (1) be sufficiently diverse and straightforward to accommodate the various communications needs of *persons* who may make *cash access requests*; and
  - (2) enable the *cash access requester* to indicate clearly which *specified cash access services* and which (if any) *specified cash access facility features* the *cash access request* relates to.
- 3.1.6 G (1) A *cash access request* must be made in writing. See *GEN 2.2.14R* and *GEN 2.2.15G* on use of the expression ‘in writing’.
- (2) The methods for submitting a *cash access request* should take account of people who may have difficulty dealing with online submissions.

#### Requiring specification

- 3.1.7 R A *designated person* who undertakes *cash access assessments* under *ATCS 4.1.1R(3)* must ask a *cash access requester* to indicate which of the *specified cash access services* and which (if any) of the *specified cash access facility features* their *cash access request* relates to.
- 3.1.8 R A *designated person* must:
- (1) allow the *cash access requester* to provide more information (if they wish) about the *specified cash access services* and any *specified cash access facility features* they have indicated;
  - (2) not seek any additional information from the *cash access requester* unless it would be relevant for the purpose of undertaking the *cash access assessment*;
  - (3) set out in plain language the types of *specified cash access service* and *specified cash access facility feature*, as well as any request for additional information; and
  - (4) ensure any form it uses is easy to navigate.
- 3.1.9 G The *Glossary* definition of *specified cash access service* is broken down by 4 types of service. It may not be immediately obvious to a *cash access requester* which type or types is/are their area of concern. The *designated*

*person* referred to in ATCS 3.1.7R should give the *cash access requester* the opportunity to provide sufficient information about the *relevant current accounts* their concern relates to so that the *designated person* can establish what type or types of *specified cash access service* the *cash access request* relates to.

### 3.2 Notification of information

#### Persons to be notified

- 3.2.1 R A *designated firm* must notify the following in writing of the information set out in ATCS 3.1.2R:
- (1) Members of Parliament, Members of the Senedd, Members of the Scottish Parliament and Members of the Northern Ireland Assembly; and
  - (2) *local authorities*.

#### Role of designated coordination body

- 3.2.2 R (1) Where a *designated coordination body* undertakes *cash access assessments* under ATCS 4.1.1R(3), that body may make the notifications required under ATCS 3.2.1R for its *participating designated firms*, subject to the modification that the information to be notified is that set out in ATCS 3.1.3R(2).
- (2) Compliance by the *designated coordination body* with the requirements of ATCS 3.2.1R, as modified by (1), will be treated as compliance by its *participating designated firms* with ATCS 3.2.1R.

### 3.3 Action on receipt of cash access request

#### Acknowledging receipt

- 3.3.1 R A *designated person* who undertakes *cash access assessments* under ATCS 4.1.1R(3) must promptly acknowledge receipt of a *cash access request* it receives, and at the same time provide the *cash access requester* with the following information:
- (1) confirmation of whether or not the *cash access request* has triggered the requirement to undertake a *cash access assessment*;
  - (2) if it has not triggered the requirement, an explanation of why not;
  - (3) if it has triggered the requirement:
    - (a) confirmation that it will be undertaking a *cash access assessment*;
    - (b) an estimated timeframe for completion;

- (c) how the *cash access requester* can find out the outcome; and
  - (d) how the *cash access requester* can ask for a review in accordance with ATCS 9; and
- (4) contact details for any other *designated person* who will be undertaking a *cash access assessment* as a result of the *cash access request*.

#### Communications procedures

- 3.3.2 R *Designated persons* who undertake *cash access assessments* under ATCS 4.1.1R(3) must establish, implement and maintain effective and transparent procedures for the handling of communications received from a *cash access requester*.
- 3.3.3 G The procedures referred to in ATCS 3.3.2R should:
- (1) recognise that communications can be sent by the *cash access requester* by any reasonable means; and
  - (2) ensure that the *designated person* responds to any such communications promptly.
- 3.3.4 G (1) A *cash access request* must reference an address, street or retail area. This ensures that *cash access requests* are directed at local community issues, and that a *designated person* undertaking a *cash access assessment* as a result can identify the local area they need to consider in the assessment. Where the *cash access request* has sought to reference an address, street or retail area but further clarification is needed, this should be sought from the *cash access requester*. This should be done prior to any notification under ATCS 3.3.6R.
- (2) A *cash access request* may be withdrawn. See ATCS 4.1.16R and ATCS 4.1.17G for further details.
- 3.3.5 R Where a *designated firm* receives a *cash access request* which should have been submitted to a *designated coordination body* in accordance with ATCS 3.1.2R, it must promptly provide the *cash access requester* with contact details for the *designated coordination body*.

#### Notification of receipt of cash access requests

- 3.3.6 R When a *designated person* who undertakes *cash access assessments* under ATCS 4.1.1R(3) receives a *cash access request*, it must promptly give a copy to:
- (1) any *designated coordination body*; and
  - (2) any *non-participating designated firm*.



- 3.3.7 G (1) *ATCS 3.3.6R* does not apply to receipt of a *cash access request* by a *designated firm* who does not undertake *cash access assessments* under *ATCS 4.1.1R(3)*. In those circumstances, the *designated firm* must comply with *ATCS 3.3.5R*.
- (2) Where all *designated firms* participate in the *cash access coordination arrangements* of one *designated coordination body* which undertakes *cash access assessments* under *ATCS 4.1.1R(3)* for them, there is no one to notify under *ATCS 3.3.6R*.
- 3.3.8 G The impact of the time it takes to obtain clarification from the *cash access requester* in the circumstances set out in *ATCS 3.3.4G* will be taken into account in considering the timing of any notification under *ATCS 3.3.6R*.
- 3.3.9 R Where notification has been given by a *designated person* under *ATCS 3.3.6R* and the *cash access requester* withdraws their *cash access request* in accordance with *ATCS 4.1.16R* at any time before the *cash access assessment* is completed, the *designated person* must promptly give notification of the withdrawal in writing to any *persons* set out in *ATCS 3.3.6R*.

## 4 Cash access assessments

### 4.1 When a cash access assessment must be undertaken

#### General rule

- 4.1.1 R Subject to *ATCS 4.2*, each *designated firm* is responsible for undertaking a *cash access assessment* in the following circumstances:
- (1) when a notification under *ATCS 2.1.1R* (concerning closures of *designated firms*) is received by a *designated coordination body* in whose *cash access coordination arrangements* the *designated firm* participates, or is given or received by it as a *non-participating designated firm*;
- (2) when a notification under *ATCS 2.2.1R* (concerning closures of *persons* other than *designated firms*):
- (a) is received by a *designated coordination body* in whose *cash access coordination arrangements* the *designated firm* participates, or is given or received by it as a *non-participating designated firm*; or
- (b) (where there is no one else to notify under *ATCS 2.2.1R*) is given by a *designated person* to the *FCA*; and
- (3) in relation to *cash access requests*:
- (a) when a notification under *ATCS 3.3.6R* is received by a *designated coordination body* in whose *cash access*

*coordination arrangements* the *designated firm* participates, or is given or received by it as a *non-participating designated firm*; or

(b) (where there is no one to notify under *ATCS 3.3.6R*) when a *designated person* receives the *cash access request*.

- 4.1.2 G *ATCS 4.2* explains when a *designated coordination body* may undertake a *cash access assessment* for a *designated firm*, and contains *rules* and *guidance* about the *designated coordination body's* role when it does.
- 4.1.3 R The *cash access assessment* must be undertaken in accordance with *ATCS 5*.
- 4.1.4 R *ATCS 4.1.1R* is subject to the exceptions set out in *ATCS 4.1.7R* to *ATCS 4.1.16R*.
- 4.1.5 G (1) The exceptions in *ATCS 4.1.7R*, *ATCS 4.1.9R* and *ATCS 4.1.10R* apply to the requirement to undertake a *cash access assessment* in the case of a *relevant closure*.
- (2) The exceptions in *ATCS 4.1.11R*, *ATCS 4.1.13R* and *ATCS 4.1.16R* apply to the requirement to undertake a *cash access assessment* following a *cash access request*.

#### Timing

- 4.1.6 R Where the requirement for a *cash access assessment* is triggered under *ATCS 4.1.1R*, it must be completed:
- (1) as soon as reasonably practicable; and
- (2) save in exceptional circumstances for reasons beyond the control of the *designated person* undertaking it, within 12 weeks of the notification or other circumstances described in *ATCS 4.1.1R* as triggering the requirement.

#### Exception: ATMs at same site

- 4.1.7 R *ATCS 4.1.1R(1)* and *ATCS 4.1.1R(2)* do not apply where the *relevant closure* relates to one or more automatic teller machines located at the same site provided:
- (1) one or more automatic teller machines will remain at the site after the *relevant closure*; and
- (2) *specified cash access services* of the type subject to the *relevant closure* will continue to be provided along with any *specified cash access facility feature* subject to the *relevant closure* through the remaining machine(s) (individually or collectively) 24 hours a *day*.

- 4.1.8 G (1) There is no requirement in *ATCS 4.1.7R* that the *specified cash access services* at the remaining machine(s) must be provided by the same provider(s) who provided them through the machine(s) which is/are the subject of the *relevant closure*. The focus is on the availability of the type of *specified cash access service*, not on the identity of the provider.
- (2) Where an automatic teller machine is closed for repair, enhancement or replacement at the same location, the repaired, enhanced or replaced machine should be regarded as the same machine. As long as the work will not result in a material reduction or change in provision of *cash access services* provided through the machine and the closure does not last for 6 months or more, it is not a *relevant closure*.

Exception: change in circumstances

- 4.1.9 R A *cash access assessment* does not have to be undertaken under *ATCS 4.1.1R(1)* (or completed, if already begun) where the *designated firm* whose *cash access facility* was the subject of the *relevant closure* gives any notification required by *ATCS 2.1.4R*.
- 4.1.10 R A *cash access assessment* does not have to be undertaken under *ATCS 4.1.1R(2)* (or completed, if already begun) where any notification required by *ATCS 2.2.4R* is given with respect to the *cash access facility* that was the subject of the *relevant closure*.

Exception: earlier cash access assessment covering same ground

- 4.1.11 R *ATCS 4.1.1R(3)* does not apply to the extent that a *cash access assessment* is already being undertaken or has been completed within 1 year prior to receipt of the *cash access request* (including by way of update or revision under the *rules* in this sourcebook), which covers:
- (1) the same or substantially the same local area as the one to which the *cash access request* relates; and
- (2) the *specified cash access services* and *specified cash access facility features* covered by the *cash access request*.
- 4.1.12 G (1) See *ATCS 5.3.2R* and *ATCS 5.3.3G* on how to establish the local area.
- (2) See *ATCS 5.3.7R* on how to establish which *specified cash access services* and *specified cash access facility features* a *cash access request* is treated as covering.
- (3) The effect of *ATCS 4.1.11R* is that where some, but not all, of the same *specified cash access services* and *specified cash access facility features* covered by the *cash access request* are being or were assessed in the earlier *cash access assessment*, a new *cash*

*access assessment* will need to be undertaken in respect of those that are/were not covered.

Exception: insufficient interest

- 4.1.13 R *ATCS* 4.1.1R(3) does not apply where the *cash access requester* has insufficient interest in whether there is reasonable provision of *cash access services* in the local area to which the *cash access request* relates.
- 4.1.14 R *Cash access requesters* with sufficient interest for the purposes of *ATCS* 4.1.13R include:
- (1) the *FCA*;
  - (2) the *persons* referred to in *ATCS* 5.3.2R;
  - (3) *persons* who regularly visit the local area; and
  - (4) authorities, organisations, groups and other *persons* who represent those in (2) and reasonably seek to advance their interests, or otherwise have a legitimate interest in the outcome of the *cash access assessment*.
- 4.1.15 G (1) Examples of *cash access requesters* who should be regarded as falling within *ATCS* 4.1.14R(4) include:
- (a) local community groups;
  - (b) groups or charities who help *cash* users in vulnerable circumstances in the local area, such as local carers or mental health support groups or charities;
  - (c) the Member of Parliament and any Member of the Senedd, Scottish Parliament or Northern Ireland Assembly for the relevant local area; and
  - (d) the relevant *local authority*.
- (2) See *ATCS* 5.3.2R and *ATCS* 5.3.3G on how to establish the local area.

Exception: cash access request withdrawn

- 4.1.16 R A *cash access assessment* does not have to be undertaken under *ATCS* 4.1.1R(3) (or completed, if already begun) where, prior to its completion, the *cash access requester* clearly indicates in writing to the *designated person* to whom they submitted the *cash access request* in accordance with *ATCS* 3.1.2R(4) or *ATCS* 3.1.3R(2) that they are withdrawing it.
- 4.1.17 G There may be cases where a *cash access requester* is not fully aware of all the *cash access services* available to them in an area. If the relevant

*designated person* engages with them to explain what is available, this may in some cases lead to the *cash access request* being withdrawn.

## 4.2 Role of designated coordination body

- 4.2.1 R A *designated coordination body* may undertake a *cash access assessment* required by ATCS 4.1.1R for its *participating designated firms*.
- 4.2.2 R Where a *designated coordination body* has agreed to undertake *cash access assessments* for its *participating designated firms* and the requirement for a *cash access assessment* is triggered under ATCS 4.1.1R:
- (1) the *designated coordination body* must comply with the relevant requirements in ATCS 4.1, ATCS 5 to ATCS 7, ATCS 8.1.12R and ATCS 9; and
  - (2) compliance by the *designated coordination body* with the requirements of the *rules* in ATCS 4.1 and ATCS 5 will also be treated as compliance by its *participating designated firms* with those *rules*.
- 4.2.3 G Part 8B of the *Act* envisages that *designated firms* may want to use *cash access coordination arrangements* (subject to compliance with any applicable legal or regulatory requirements, including competition law).
- 4.2.4 G The effect of ATCS 4.2.1R and ATCS 4.2.2R is that:
- (1) where the requirements in ATCS 4.1 and ATCS 5 are met by the *designated coordination body*, they will also be treated as met by its *participating designated firms*, so they do not have to meet these requirements separately; and
  - (2) where any requirements in ATCS 4.1 and ATCS 5 are not met by the *designated coordination body*, they must still be met by its *participating designated firms*.

### Notification of cessation of participation

- 4.2.5 R (1) A *designated firm* must give the *FCA* notification in writing as soon as reasonably practicable in advance of it ceasing for any reason to be a *participating designated firm*.
- (2) The notification in (1) must include details of when cessation of its participation in the *cash access coordination arrangements* is due to take place and the reason for the cessation.

## 5 Process for cash access assessments

### 5.1 Interpretation

- 5.1.1 R In this chapter, references to:

- (1) 'local area' means the relevant area established in accordance with *ATCS 5.3.1R* and *ATCS 5.3.2R*;
- (2) 'relevant distance' means the distance set out in *ATCS 5.3.5R* or *ATCS 5.3.8R* (as appropriate);
- (3) 'urban' means:
  - (a) for England and Wales, an area where the majority of the population live in a settlement of 10,000 people or more;
  - (b) for Scotland, an area where the majority of the population live in a settlement of 3,000 people or more; and
  - (c) for Northern Ireland, an area where the majority of the population live in a settlement of 5,000 people or more;
- (4) 'rural' means:
  - (a) for England and Wales, an area where the majority of the population live in a settlement of fewer than 10,000 people;
  - (b) for Scotland, an area where the majority of the population live in a settlement of fewer than 3,000 people; and
  - (c) for Northern Ireland, an area where the majority of the population live in a settlement of fewer than 5,000 people.

## 5.2 Overview

The 3 steps

- 5.2.1 R The *cash access assessment* must be a reasonable assessment of the following:
  - (1) step 1 – whether there is, or would be after a *relevant closure*, a local deficiency in provision of *cash access services*;
  - (2) step 2 – if there is or would be such a deficiency, whether its impacts are or would be significant; and
  - (3) step 3 – if there is or would be such a deficiency with significant impacts, what additional *cash access services* it would be reasonable to provide.
- 5.2.2 G *ATCS 5.3* to *ATCS 5.5* contain detailed *rules* and *guidance* about the steps referred to in *ATCS 5.2.1R*.
- 5.2.3 R The extent and scope of the *cash access assessment* and the work the *designated person* must do to undertake it are dependent upon, and proportionate to, the circumstances of each case.

## General qualifications

- 5.2.4 R *ATCS 5.2.5R* contains restrictions on what can be taken into account in a *cash access assessment* when considering:
- (1) what *cash access services* are or will be available following a *relevant closure*, where the requirement for the *cash access assessment* was triggered under *ATCS 4.1.1R(1)* (concerning closures of *designated firms*) or *ATCS 4.1.1R(2)* (concerning closures of *persons* other than *designated firms*); and
  - (2) what *cash access services* are available, where the requirement for the *cash access assessment* was triggered under *ATCS 4.1.1R(3)* (concerning *cash access requests*).
- 5.2.5 R The restrictions referred to in *ATCS 5.2.4R* are as follows:
- (1) no account is to be taken of the availability of *cash access services* at a *cash access facility* in respect of which a full closure is expected;
  - (2) account may only be taken of the availability of *cash access services* at a *cash access facility* where there is expected to be a material reduction in provision of *cash access services*, or a material change in the nature of such provision, on the basis of the *cash access services* the facility will provide after such reduction or change has taken place;
  - (3) no account is to be taken of the availability of *cash withdrawal services* of the type falling within paragraph 2(e) of Schedule 1 to the *Payment Services Regulations* (cashback with a purchase);
  - (4) no account is to be taken of the availability of any *cash access service* in relation to *relevant personal current accounts* if it is subject to a charge; and
  - (5) where more than one *cash access assessment* is undertaken as a result of the same trigger event under *ATCS 4.1.1R*, no account is to be taken in any of those *cash access assessments* of the availability of additional *cash access services* that might be provided as a consequence of any of the other *cash access assessments*.
- 5.2.6 R Where any *rules* or *guidance* in *ATCS 5* refer to distance to, proximity of, or travel to a *cash access facility*, or where the context otherwise so requires, a *cash access facility* does not include a *cash* delivery or collection service.
- 5.2.7 G *ATCS 5.2.6R* applies where *rules* and *guidance* in *ATCS 5* are only relevant to *cash access facilities* which users of *cash access services* can visit, as opposed to, for example, a service which delivers *cash* to or collects *cash* from people's homes.

- 5.2.8 G In considering the availability of *cash access services* (as described in ATCS 5.2.4R(1) or ATCS 5.2.4R(2)), significant weight should be given to whether it can be demonstrated that *cash access services* provided at any *cash access facility* under consideration are provided with consistency during stated opening hours. See ATCS 8.1.6G for guidance in this context on cashback without a purchase.

#### Sources of information

- 5.2.9 R (1) A *cash access assessment* must be based on sufficient information of which the *designated person* undertaking it is aware at the time it is undertaken, and obtained where appropriate from other sources, to enable it to be a reasonable assessment.
- (2) The *designated person* undertaking a *cash access assessment* must consider:
- (a) the types of information to use;
  - (b) the content and level of detail of the information to use; and
  - (c) whether and to what extent to obtain information from other sources.
- 5.2.10 G (1) Other sources from whom *designated persons* should consider obtaining relevant information include those that might help them to understand the demographic characteristics of the local area and the need for *cash access services*, as well the range of local matters that could impact this understanding such as transportation issues and planned housing developments. Examples of such sources could be:
- (a) local community groups;
  - (b) *local authority* departments with responsibility for planning or for cohorts who may be particularly reliant on *cash*;
  - (c) *consumer* groups;
  - (d) the local office of *persons* listed in ATCS 3.2.1R(1);
  - (e) groups or charities who help local *cash* users in vulnerable circumstances, such as local carers or mental health support groups or charities;
  - (f) staff of *designated firms*; and
  - (g) *customers* of *designated firms* (for example, through surveys).
- (2) The list of possible sources of information in (1) is not exhaustive.



### 5.3 Step 1: Identifying local deficiencies

What is the local area?

- 5.3.1 R (1) In order to identify whether there is a local deficiency under *ATCS* 5.2.1R(1), a *cash access assessment* must establish the local area according to the methodology referred to in *ATCS* 5.3.2R.
- (2) The methodology must be used consistently by a *designated person* for its *cash access assessments*.
- (3) Where a *cash access request* is submitted by the *FCA*, the *FCA* may specify the local area for the purposes of the *cash access assessment*.
- 5.3.2 R (1) The *cash access assessment* must use an appropriate methodology which enables it to draw a boundary for a local area that takes in the addresses of the *persons* who could be affected if there was a deficiency in the *specified cash access services* being assessed.
- (2) Where a *cash access assessment* is triggered under *ATCS* 4.1.1R(1) (concerning closures of *designated firms*) or *ATCS* 4.1.1R(2) (concerning closures of *persons* other than *designated firms*), the *persons* referred to in (1) are the people or businesses in the area surrounding the *cash access facility* which is the subject of the *relevant closure* who have the potential to be more than nominally affected by the *relevant closure*.
- (3) Where a *cash access assessment* is triggered under *ATCS* 4.1.1R(3) (concerning *cash access requests*), the *persons* referred to in (1) are the people or businesses in the area surrounding the address, street or retail area referenced in the *cash access request* who would have the potential to be more than nominally affected if:
- (a) there was a *relevant closure* of a hypothetical *cash access facility* at the address, street or retail area referenced in the *cash access request*; and
- (b) the *specified cash access services* being assessed were provided through it.
- 5.3.3 G (1) *ATCS* 5.3.2R involves the need to establish who could be affected. The work undertaken to do this should be reasonable and proportionate, bearing in mind that this is not the *cash access assessment* itself. It involves looking at the potential for effects rather than reaching a conclusion on whether there are actual effects. It should not involve the need to establish whether any *persons* actually use *cash*, nor to undertake any of the detailed steps in *ATCS* 5.2.1R. The purpose is to establish the grouping of residents and businesses (by reference to an area) that those steps should be directed at.

- (2) In determining the people who could be affected under *ATCS* 5.3.2R, one consideration may be where people in the relevant surrounding area who might use *cash* are likely to use it regularly, such as retail areas, and the presence (or otherwise) of *cash access facilities* there. For example, if a *relevant closure* takes place in a village, residents of a nearby town may not be regarded as people who could be affected if it is reasonable to expect that they do not make regular use of the relevant *cash access facility* in the village because of the presence of *cash access facilities* in the town.
- (3) *ATCS* 5.3.2R(3) involves the application of a hypothetical test of who could be affected if a *relevant closure* was to take place. The methodology for determining the *persons* referred to in *ATCS* 5.3.2R(2) and *ATCS* 5.3.2R(3) should accordingly be consistent.
- (4) If the methodology adopts a radius measurement extending from the relevant reference point that is the same for every *cash access assessment*, that is unlikely to be regarded as an appropriate methodology as it would not take account of the potential for differing local circumstances, such as differences in geography.
- (5) Where the requirement for a *cash access assessment* is triggered under *ATCS* 4.1.1R(1) (concerning closures of *designated firms*) or *ATCS* 4.1.1R(2) (concerning closures of *persons* other than *designated firms*), the local area is unlikely to be appropriately drawn if it does not at least include the addresses of any *persons* who, as a result of the *relevant closure*, are or would no longer be within the relevant distance of one or more *cash access facilities* which, between them, provide the *specified cash access services* and *specified cash access facility features* being assessed at step 1.

#### Closures: scope

- 5.3.4 R Where the requirement for a *cash access assessment* is triggered under *ATCS* 4.1.1R(1) (concerning closures of *designated firms*) or *ATCS* 4.1.1R(2) (concerning closures of *persons* other than *designated firms*):
- (1) an assessment must be made of whether there is or would be, after the *relevant closure*, a local deficiency in provision of each *specified cash access service* that is or was (as the case may be) subject to closure, reduction or change at the *cash access facility* as a result of the *relevant closure*, taking into account any *specified cash access facility feature* subject to the closure, reduction or change;
  - (2) where a *designated firm* undertakes a *cash access assessment*, it does not have to assess a *specified cash access service* that relates to *relevant personal current accounts* if it does not provide any such accounts, and it does not have to assess a *specified cash access service* that relates to businesses if it does not provide any *relevant current accounts* for businesses;

- (3) where a *designated coordination body* undertakes a *cash access assessment* for its *participating designated firms*, the body does not have to assess a *specified cash access service* that relates to *relevant personal current accounts* if none of those *firms* provide any such accounts, and it does not have to assess a *specified cash access service* that relates to businesses if none of those *firms* provide any *relevant current accounts* for businesses;
- (4) an assessment may cover more *specified cash access services* or *specified cash access facility features* than those referred to in (1); and
- (5) *ATCS 5.3.5R* applies.

Closures: application of relevant distance

- 5.3.5 R If at least 95% of people living in the local area have access to one or more *cash access facilities* within:
- (1) 1 mile of where they live, if the local area is predominantly urban; or
  - (2) 3 miles of where they live, if the local area is predominantly rural,
- through which:
- (3) a *specified cash access service* is provided which is of a type that is or was subject to closure, reduction or change as a result of the *relevant closure*, along with any *specified cash access facility feature* subject to the closure, reduction or change,

the *cash access assessment* may find that there is or would be no local deficiency in provision of that *specified cash access service* after the *relevant closure*, subject to *ATCS 5.3.9R*.

- 5.3.6 R Where more *specified cash access services* or *specified cash access facility features* are assessed than those referred to in *ATCS 5.3.4R(1)*, *ATCS 5.3.5R* applies as if *ATCS 5.3.5R(3)* refers to:
- (1) each *specified cash access service* being assessed; and
  - (2) each *specified cash access facility feature* being assessed in relation to the service.

Cash access requests: scope

- 5.3.7 R Where the requirement for a *cash access assessment* is triggered under *ATCS 4.1.1R(3)* (concerning *cash access requests*):
- (1) an assessment must be made of whether there is a local deficiency in provision of each *specified cash access service* indicated in the *cash*

*access request*, taking into account any *specified cash access facility feature* indicated in relation to the service;

- (2) where a *designated firm* undertakes a *cash access assessment*, it does not have to assess a *specified cash access service* that relates to *relevant personal current accounts* if it does not provide any such accounts, and it does not have to assess a *specified cash access service* that relates to businesses if it does not provide any *relevant current accounts* for businesses;
- (3) where a *designated coordination body* undertakes a *cash access assessment* for its *participating designated firms*, the body does not have to assess a *specified cash access service* that relates to *relevant personal current accounts* if none of those *firms* provide any such accounts, and it does not have to assess a *specified cash access service* that relates to businesses if none of those *firms* provide any *relevant current accounts* for businesses;
- (4) an assessment may cover more *specified cash access services* or *specified cash access facility features* than those referred to in (1); and
- (5) *ATCS 5.3.8R* applies.

Cash access requests: application of relevant distance

- 5.3.8 R If at least 95% of people living in the local area have access to one or more *cash access facilities* within:
- (1) 1 mile of where they live, if the local area is predominantly urban; or
  - (2) 3 miles of where they live, if the local area is predominantly rural,
- through which:
- (3) a *specified cash access service* being assessed is provided, along with any *specified cash access facility feature* being assessed in relation to the service,

the *cash access assessment* may find that there is no local deficiency in provision of that *specified cash access service*, subject to *ATCS 5.3.9R*.

Step 1 qualifications

- 5.3.9 R *ATCS 5.3.5R* and *ATCS 5.3.8R* cannot be relied on where:
- (1) the time or cost of travelling for those living in the local area to any *cash access facility* that would otherwise be relied on to meet the requirements in those *rules* is such that it would not be reasonable to regard the relevant distance as an appropriate determining measure; or

- (2) the *cash access facility* or *cash access facilities* which would otherwise be relied on to meet the requirements in those *rules* do not, or would not after a *relevant closure*, have sufficient capacity between them to accommodate users of the relevant *cash access service* from the local area.
- 5.3.10 R For the purposes of establishing whether there are *cash access facilities* that meet the requirements in *ATCS 5.3.5R* or *ATCS 5.3.8R*, account may only be taken of the availability of a *specified cash access service* and any *specified cash access facility feature* relating to the service at a branch of a *bank* or *building society* within the relevant distance if one of the conditions in *ATCS 5.3.11R* or *ATCS 5.3.12R* is satisfied.
- 5.3.11 R The first condition referred to in *ATCS 5.3.10R* is that the same type of *specified cash access service* and (where relevant) *specified cash access facility feature* are available to *customers* of another *relevant current account provider* besides the *bank* or *building society* referred to in that *rule* at a *cash access facility* within the relevant distance.
- 5.3.12 R The second condition referred to in *ATCS 5.3.10R* is that:
- (1) the requirement for the *cash access assessment* was triggered under *ATCS 4.1.1R(1)* (concerning closures of *designated firms*) or *ATCS 4.1.1R(2)* (concerning closures of *persons* other than *designated firms*); and
- (2) the *cash access facility* which is the subject of the *relevant closure* is a branch of the *bank* or *building society* referred to in *ATCS 5.3.10R*.

## Guidance

- 5.3.13 G (1) The *cash access assessment* begins by considering whether there is a local deficiency in provision of *cash access services* by reference to what is available within the relevant distance. Exclusions from consideration of what *cash access services* are available for the purposes of *ATCS 5.3.5R* or *ATCS 5.3.8R* are set out in *ATCS 5.2.5R* and *ATCS 5.3.10R*. The effect of *ATCS 5.2.5R(1)* is that where a *cash access assessment* is undertaken as a result of an expected full closure of a *cash access facility*, that facility must be ignored for the purposes of *ATCS 5.3.5R* or *ATCS 5.3.8R*. Where the assessment results from a material reduction or change in provision of *cash access services* expected at a *cash access facility*, the effect of *ATCS 5.2.5R(2)* is that the facility can be taken into account but only to the extent of the *cash access services* it will provide after the reduction/change.
- (2) See *ATCS 4.1.12G(3)* on the impact of *ATCS 4.1.11R* on the *specified cash access services* and *specified cash access facility features* that must be assessed in accordance with *ATCS 5.3.7R(1)*. *Designated persons* may want to bear this in mind when considering the scope of *cash access assessments*. Unless assessments are

undertaken on a holistic basis (ie, by assessing all *specified cash access services* and *specified cash access facility features*), they could in theory have to act on multiple *cash access requests* indicating different issues in respect of the same or substantially the same local area within a 12-month period.

- (3) There is no requirement in *ATCS 5.3.5R(3)* that the *specified cash access service* at a *cash access facility* within the relevant distance must be provided by the same provider that provided it at the *cash access facility* which is the subject of the *relevant closure*. The focus is on the availability of the type of *specified cash access service*, not on the identity of the provider.
- (4) Reliance on *ATCS 5.3.5R* or *ATCS 5.3.8R* is not dependent on all the *specified cash access services* under assessment being provided at the same *cash access facility*. They may be provided through a combination of 2 or more *cash access facilities*.
- (5) *ATCS 5.3.9R(1)* is most likely to apply in rural areas – for example, where:
  - (a) geographical barriers mean that it takes substantially longer for people living in the local area to travel to the relevant *cash access facility* or *cash access facilities* than it does to travel to their nearest retail areas; or
  - (b) limited transport networks mean that it costs people living in the local area substantially more to travel to the relevant *cash access facility* or *cash access facilities* than it does to travel to their nearest retail areas.
- (6) An example of where *ATCS 5.3.9R(2)* may apply is if a *cash access facility* subject to a full closure has several service counters, and the only other *cash access facility* within the relevant distance with equivalent *specified cash access services* and *specified cash access facility features* has one counter. If this means the other *cash access facility* would be unable to accommodate the additional demand from users of *cash access services* in the local area following the *relevant closure*, *ATCS 5.3.5R* cannot be relied on.
- (7) Opening hours may be relevant to consideration of a *cash access facility's* capacity under *ATCS 5.3.9R(2)*. For example, the facility may be open for so few hours each week that this leads to unacceptable delays in service or queues.
- (8) Predictable fluctuations in demand may also be relevant to consideration of capacity. For example, where a local area receives a significant influx of visitors during the holiday season or on market days, which puts pressure on the *cash access facility*.

- (9) The effect of *ATCS 5.3.10R* is that if the only *cash access facility* within the relevant distance is a branch of a *bank* or *building society*, and the condition in *ATCS 5.3.12R* is not met, the only *specified cash access services* provided at the branch that it may be possible to take into account for the purposes of *ATCS 5.3.5R* or *ATCS 5.3.8R* are services which are also available to *customers* of at least one other *relevant current account provider*. An example of this is a *cash withdrawal service* provided through an automatic teller machine which is part of the LINK network. If *cash withdrawal services* are being assessed, it may be possible to find there is no local deficiency in them where there is such a machine, subject to any *specified cash access facility features* that also need to be assessed and the qualifications in *ATCS 5.3.9R*. But if any *cash deposit services* are being assessed in this scenario and these are not also available to *customers* of another *relevant current account provider*, they will have to proceed to step 2.

#### Background to relevant distances

- 5.3.14 G (1) Under section 131U(5) of the *Act*, a local deficiency in the provision of *cash access services* is: ‘a circumstance which limits the ability of persons in any locality in a part of the United Kingdom to (a) withdraw cash from a relevant current account, or (b) place cash on a relevant current account’.
- (2) Under section 131U(6) of the *Act*, in determining whether there are local deficiencies, the *FCA* must have regard to the Treasury’s Cash Access Policy Statement published under section 131P(6) of the *Act* which is currently in effect, as well as such other matters as the *FCA* considers appropriate.
- (3) The relevant distances are taken from the Treasury’s Cash Access Policy Statement published on 18 August 2023. These distances are measured in a straight line.
- (4) The distances in the Cash Access Policy Statement do not include distances for business premises from *cash access facilities*. However, the statement says: ‘the distance relative to the residential population is considered here to be a suitable proxy’. No separate distances are given in this chapter relative to business premises.

#### Going to step 2

- 5.3.15 R If *ATCS 5.3.5R* or *ATCS 5.3.8R* cannot be relied on, it must be found that there is, or would be after a *relevant closure*, a local deficiency in provision of the relevant *specified cash access service*.

## 5.4 Step 2: Assessing significance of impacts of local deficiency

### Scope

- 5.4.1 R (1) Under *ATCS 5.2.1R(2)*, an assessment must be made of the significance of the impacts of the local deficiency found in the provision of any of the *specified cash access services* that were assessed at step 1.
- (2) The assessment must consider the significance of the impacts on users of *cash access services* in general in the local area, not just *customers of designated firms*.

#### Factors

- 5.4.2 R Subject to *ATCS 5.4.1R*, the factors a *cash access assessment* must have regard to when considering whether the impacts of a local deficiency are or would be significant include the following:
- (1) the number of *persons* in the local area likely to be affected, including:
- (a) the number of holders of *relevant personal current accounts* likely to be affected; and
  - (b) the number of businesses which accept *cash* payments likely to be affected;
- (2) the likely impact on those in the local area likely to be affected, bearing in mind in particular:
- (a) their characteristics;
  - (b) the impact on those in vulnerable circumstances;
  - (c) the extent of the need for *assisted cash access services*;
  - (d) the extent of the need for businesses which accept *cash* payments to use *cash access services* for both coins and banknotes;
  - (e) the extent to which those likely to be affected may be outside the relevant distance when considering proximity to the nearest suitable *cash access facilities* with (between them) sufficient capacity to accommodate users of *cash access services* from the local area;
  - (f) whether the additional travel time for those likely to be affected to get to the *cash access facilities* referred to in (e) over and above the travel time to their nearest retail areas is unreasonable;
  - (g) whether those likely to be affected have to incur unreasonable costs in travelling to the *cash access facilities*



referred to in (e) over and above the costs of travel to their nearest retail areas; and

- (h) the impact of any predictable fluctuations in demand for *cash access services*.
- (3) The list of factors in (1) and (2) is not exhaustive.

#### Guidance on factors

- 5.4.3 G (1) An assessment under *ATCS 5.2.1R(2)* is only required where it has been identified that there is or would be a local deficiency under *ATCS 5.2.1R(1)*.
- (2) Subject to *ATCS 5.4.1R*, an assessment will need to be made of the degree to which users of *cash access services* in the local area (both people and businesses) are impacted.
- (3) *ATCS 5.2.5R* excludes consideration of the availability of certain *cash access services* at step 2.
- (4) The degree to which the nearest suitable *cash access facilities* with (between them) sufficient capacity may be outside the relevant distance is a factor. For example, if they are only just outside the relevant distance, that may indicate (leaving aside other factors) that the deficiency does not or would not have significant impacts. This factor should involve looking at issues such as:
- (a) the *cash access services* available at, the features of and the capacity of the nearest *cash access facilities*;
  - (b) the distance to the nearest *cash access facilities* needed to reasonably meet the cumulative demand of users of *cash access services* from the local area; and
  - (c) how far outside the relevant distance these *cash access facilities* might be – in particular, the furthest such facility.
- (5) Opening hours may be relevant to a *cash access facility's* capacity. For example, the facility may be open for so few hours each week that this leads to unacceptable delays in service or queues.
- (6) The other factors set out in *ATCS 5.4.2R* also involve the question of degree. For example, where a substantial number of people in the local area are likely to be affected, that would suggest significant impacts.
- (7) In having regard to the number of businesses likely to be affected and the impacts on them, consideration should, in particular, be given to types of businesses that might be expected to be heavily dependent on *cash*.

- (8) The impact on those with characteristics of vulnerability is a factor. This should involve identifying when users of *cash access services* with characteristics of vulnerability, including those who may have particular difficulties with accessing *cash access services* due to disabilities, are or would be significantly impacted. *Designated persons* should refer to Finalised Guidance (FG) 21/1 (Guidance for firms on the fair treatment of vulnerable customers) for more information on our approach to characteristics of vulnerability.
- (9) An example of predictable fluctuations in demand for *cash access services* and their impact is where a local area receives a significant influx of visitors during the holiday season or on market days, which puts pressure on the *cash access facilities* in the area.
- (10) Regard should be had to any concerns raised by local community representatives and organisations about the adequacy of *cash access facilities*.

## 5.5 Step 3: Assessing reasonable additional provision

### Identifying additional cash access services

- 5.5.1 R The assessment under *ATCS* 5.2.1R(3) must identify the additional *cash access services* that would:
  - (1) address the significant impacts of any local deficiency identified by the assessment under *ATCS* 5.2.1R(2); and
  - (2) be reasonable to provide.
- 5.5.2 R The identification in accordance with *ATCS* 5.5.1R must:
  - (1) detail which of the *specified cash access services* are to be provided;
  - (2) state that any *cash access services* to be provided in relation to *relevant personal current accounts* are to be free of charge;
  - (3) specify whether each *specified cash access service* should allow for a reasonable mix of both coins and banknotes to be deposited or withdrawn (as appropriate);
  - (4) identify whether any *assisted cash access services* should be provided and, if so, the type of assistance;
  - (5) specify the area within which any *cash access facilities* that will provide the *cash access services* should be located;
  - (6) specify the capacity needs and opening hours of any *cash access facilities* which will provide the *cash access services*; and

- (7) specify whether the *cash access services* are to be provided on a permanent or trial basis and, if the latter, the trial period.

Guidance on identification and reasonableness

- 5.5.3 G (1) *ATCS 5.5.1R* does not require the *cash access assessment* to identify the *cash access facilities* from which the additional *cash access services* are to be provided. The *rules* are accordingly channel-neutral in this respect, subject to the matters set out in *ATCS 5.5.2R*.
- (2) The definition of *assisted cash access service* is channel-neutral in terms of how the assistance should be provided, so this could involve the physical presence of the appropriately trained individual or the provision of assistance by them via, for example, video link. The exact nature of any assistance needed in the circumstances must be identified in accordance with *ATCS 5.5.2R(4)*.
- (3) In delivering any *cash access services*, *designated firms* should be mindful of the duty to make reasonable adjustments for people with disabilities under the Equality Act 2010 in *Great Britain* and the need to comply with equivalent legislation in Northern Ireland. While *cash access assessments* are not expected to make judgments about compliance with such legislation, they should explain their findings on the impact on those who have particular difficulties with accessing *cash access services* due to disabilities. Those findings may assist *designated firms* in ensuring they meet any obligations under the relevant legislation.
- (4) *ATCS 5.2.5R* excludes consideration of the availability of certain *cash access services* at step 3.
- 5.5.4 G (1) The question of reasonableness in terms of the identification required under *ATCS 5.5.1R* and *ATCS 5.5.2R* is likely to depend on matters specific to the local area, which could include:
- (a) whether any *cash access services* have been provided in the local area in the past and, if so, their nature and extent;
- (b) the reasons, if known, for any *relevant closures* in the local area in the past;
- (c) the likely cost of additional provision of a particular service;
- (d) whether any additional *cash access services* which would wholly or partly address the significant impacts of the local deficiency identified by the *cash access assessment* are due to be provided by anyone independently of the assessment and any other *cash access assessment* undertaken as a result of the same trigger event, and the timeline for such additional provision;

- (e) in terms of the identification of the location of any *cash access facilities* under *ATCS 5.5.2R(5)*, proximity to areas where *cash* is most likely to be used, such as retail areas; and
- (f) in terms of the identification of capacity needs and opening hours of any *cash access facilities* under *ATCS 5.5.2R(6)*, any predictable changes in demand for *cash access services*.

(2) The list of matters in (1) is not exhaustive.

- 5.5.5 G Given the number of different solutions available, it should only be concluded at step 3 in very exceptional cases that it is not reasonable for any additional *cash access services* to be provided.

#### Trials

- 5.5.6 G It may be appropriate in some cases for additional *cash access services* to be provided for a trial period. In such cases, *ATCS 6.1.2R(10)*, *ATCS 6.1.5R*, *ATCS 6.1.6G*, and *ATCS 8.1.12R* to *ATCS 8.1.15G* apply.

## 6 Publication of outcome of cash access assessments

### 6.1 Action on completion

- 6.1.1 R As soon as reasonably practicable after completion of a *cash access assessment*, the *designated person* who undertook it must publish in writing the information set out in *ATCS 6.1.2R* in an easily accessible place on its website.

#### Information to be published

- 6.1.2 R The information that must be published under *ATCS 6.1.1R* is as follows:
- (1) the date of the *cash access assessment*;
  - (2) why it was undertaken;
  - (3) where the requirement for the *cash access assessment* was triggered by a *relevant closure* which has not happened yet, when the *relevant closure* is expected to take place (if known);
  - (4) a summary of the criteria and rationales used to undertake the assessments required by *ATCS 5.2.1R*;
  - (5) the local area established in accordance with *ATCS 5.3.1R* and *ATCS 5.3.2R*, and the methodology used to establish it;
  - (6) the outcomes of the assessments required by *ATCS 5.2.1R* with respect to the provision of additional *cash withdrawal services* and *cash deposit services* for:

- (a) people living in the local area; and
  - (b) businesses in the local area;
  - (7) a summary of the outcome of the matters set out in *ATCS 5.5.2R(3)* to *ATCS 5.5.2R(6)*;
  - (8) a statement that any additional *cash access services* in relation to *relevant personal current accounts* are to be provided free of charge;
  - (9) whether any additional *cash access services* are to be provided on a permanent or trial basis;
  - (10) where any additional *cash access services* are to be provided on a trial basis:
    - (a) a summary of the reasons for considering that a trial is appropriate;
    - (b) the criteria for determining whether the trial is successful; and
    - (c) the trial period;
  - (11) details of who can request a review under *ATCS 9* and how one can be requested;
  - (12) who must provide or procure the provision of any *required cash access services* in accordance with *ATCS 8.1.1R(1)* or *ATCS 8.1.1R(2)*; and
  - (13) the relevant timescale in *ATCS 8* for delivery of any *required cash access services*.
- 6.1.3 G (1) The requirement in *ATCS 6.1.1R* can be met by publishing the *cash access assessment* itself if it clearly sets out all the information set out in *ATCS 6.1.2R*.
- (2) See *ATCS 9.2.3R* for the requirement to update the information published under *ATCS 6.1.1R* following completion of a review under *ATCS 9*.
- (3) Identification under *ATCS 6.1.2R(12)* of the *designated firms* with a delivery obligation under *ATCS 8.1.1R(1)* or *ATCS 8.1.1R(2)* involves identifying any *designated firms* who might meet the delivery obligation through an existing *cash access facility* as well as those who will not. See further *ATCS 8.1.2G(3)*.
- 6.1.4 R Where notification has been given under *ATCS 2.1.4R* or *ATCS 2.2.4R* that a *relevant closure* is no longer happening, the information published under

*ATCS 6.1.1R* must be updated to explain that any additional *cash access services* no longer have to be provided as a result of *ATCS 8.1.11R*.

#### Trials

- 6.1.5 R (1) Where a *cash access assessment* is updated in accordance with *ATCS 8.1.12R* following completion of a trial period, the *designated person* updating it must, as soon as reasonably practicable, update the information published under *ATCS 6.1.1R* as appropriate.
- (2) The updated information under (1) must include the following:
- (a) the date on which the *cash access assessment* was updated;
  - (b) how the information in *ATCS 6.1.2R* has been updated in light of the trial; and
  - (c) a summary of the reasons for updating the information in this way.
- 6.1.6 G See *ATCS 9.2.3R* for the requirement to update the information published under *ATCS 6.1.5R* following completion of a review under *ATCS 9*.

## 7 Policies and procedures

### 7.1 Maintaining effective policies and procedures

- 7.1.1 R A *designated person* who undertakes *cash access assessments* must:
- (1) establish, implement and maintain clear and effective policies and procedures:
    - (a) to enable it to undertake *cash access assessments* in accordance with *ATCS 4* and *ATCS 5*, and reviews under *ATCS 9*; and
    - (b) setting out the principal factors and criteria it will take into account in undertaking them;
  - (2) set out the policies and procedures in writing;
  - (3) have the policies and procedures approved by its board of directors, committee of management or other governing body, or those *persons* who effectively direct the business; and
  - (4) publish the policies and procedures in writing in an easily accessible place on its website and keep the published information up to date.

### 7.2 Keeping under review

- 7.2.1 R A *designated person* who undertakes *cash access assessments* must:

- (1) assess and periodically review:
  - (a) the effectiveness of the policies and procedures referred to in *ATCS 7.1.1R*, taking into account in particular its own experience and feedback from users of *cash access services* and other stakeholders; and
  - (b) its compliance with the policies and procedures, and with its obligations under *ATCS*;
- (2) in the light of (1), take appropriate measures to address any deficiencies in the policies and procedures, or in its compliance with its obligations; and
- (3) establish, implement and maintain robust governance arrangements and internal control mechanisms designed to ensure compliance with *ATCS 7*.

7.2.2 R Where a *designated person* proposes to update the policies and procedures referred to in *ATCS 7.1.1R*, it must submit a report to the *FCA* containing a description of any substantial changes.

## 8 Implementation

### 8.1 Required cash access services

#### Provision

- 8.1.1 R
- (1) Where a *cash access assessment* compliant with *ATCS 5* is undertaken by a *designated coordination body*, each of the *participating designated firms* for whom the body undertook the assessment must provide or procure the provision of the *required cash access services* in the manner set out under *ATCS 5.5.2R* for at least 2 years.
  - (2) Where a *cash access assessment* compliant with *ATCS 5* is undertaken by a *designated firm*, it must provide or procure the provision of the *required cash access services* in the manner set out under *ATCS 5.5.2R* for at least 2 years.
  - (3) The *required cash access services* that a *designated firm* must provide under (1) or (2) relate to the *relevant current accounts* it provides to its *customers*.
  - (4) Any *required cash access services* that relate to *relevant personal current accounts* must be provided free of charge.
  - (5) A balance enquiry service must be available alongside any *required cash access service* that is a *cash withdrawal service*.

- 8.1.2 G (1) A *designated firm* has to provide or procure the provision of the *required cash access services* for its own *customers*.
- (2) A *designated firm* is not required to alter its practices, policies or procedures with respect to the offering or opening of *relevant current accounts*. If, for example, it does not offer *relevant current accounts* to businesses, it does not have to start doing so.
- (3) A *designated firm* may be able to establish that it is already meeting the requirements in ATCS 8.1.1R through an existing *cash access facility*, such as one of its branches. Alternatively, a *designated firm* may be able to meet these requirements by making modifications at an existing *cash access facility*.
- (4) It may be economic and efficient for *designated firms* to deliver the *required cash access services* through shared facilities, such as a banking hub or a shared automatic teller machine, rather than through individual facilities (subject to compliance with any applicable legal or regulatory requirements, including competition law).
- (5) This sourcebook does not prescribe the arrangements for enhancing or installing any *cash access facilities* through which the *required cash access services* may be provided. But *designated firms* will need to ensure that any necessary arrangements are in place so that they are in a position to comply with ATCS 8.1.1R.
- (6) *Designated firms* should also consider any other applicable law. This includes, but is not limited to, equalities legislation such as the Equality Act 2010 or equivalent legislation in Northern Ireland. See ATCS 5.5.3G(3) on the duty to make reasonable adjustments.
- (7) ATCS 8.1.1R does not preclude the provision of other services at the *cash access facilities* that will be used to deliver the *required cash access services*.
- (8) The *rules* are neutral as to the legal model for the provision of the *required cash access services*. So, they may be provided directly by a *designated firm*, or through its agent, or procured through a third party who provides a service as *principal*.

#### Consistency of service

- 8.1.3 R When a *designated firm* is deciding on the type of *cash access facility* to be used to deliver *required cash access services*, it must take reasonable account of whether the facility will provide consistency in delivery of the *cash access services* during its stated opening hours.
- 8.1.4 G Where a *designated firm* proposes to provide *required cash access services* through an agent or procure them through a third party acting as *principal*, it may want to consider entering into appropriate arrangements with regard



to consistency of service in order to evidence compliance with *ATCS* 8.1.3R.

#### Use of cashback

- 8.1.5 R A *cash withdrawal service* of the type falling within paragraph 2(e) of Schedule 1 to the *Payment Services Regulations* (cashback with a purchase) must not be relied on to deliver any *required cash access services* under *ATCS* 8.1.1R.
- 8.1.6 G (1) A *cashback facility* providing a *cash withdrawal service* of the type falling within paragraph 3 of Schedule 1 to the *Payment Services Regulations* (cashback without a purchase) can be a useful source of *cash*. However, it will not enable compliance with *ATCS* 8.1.1R(5) if a balance enquiry service is not also available.
- (2) Consistency of service may be an issue for cashback without a purchase if, for example, provision is up to the discretion of the retailer. It may also be dependent on the availability of *cash* in the retailer's till, which in turn may be reliant on other business of the retailer and subject to particular stress if the service is relied on as the sole *cash withdrawal service* in an area.
- (3) Cashback without a purchase should therefore generally be regarded as contributing a *cash withdrawal service* which is supplementary to other *cash withdrawal services*, unless it can be demonstrated that it will provide consistency of service during stated opening hours.

#### Timing

- 8.1.7 R Where the requirement for a *cash access assessment* was triggered under *ATCS* 4.1.1R(1) (concerning closures of *designated firms*) or *ATCS* 4.1.1R(2) (concerning closures of *persons* other than *designated firms*) as a result of a decision of a *designated firm* to close a *cash access facility* or to cease, reduce or change provision of a *cash access service* (including a service procured through a third party), the *designated firm* must not implement the closure, cessation, reduction or change until the following conditions are satisfied:
- (1) a *cash access assessment* has been completed by the *designated firm*, or by a *designated coordination body* where *ATCS* 4.2.1R is relied on, in accordance with *ATCS* 5;
- (2) the information in respect of the relevant *cash access assessment* has been published under *ATCS* 6.1.1R;
- (3) any review under *ATCS* 9 in respect of the relevant *cash access assessment* has been completed and any requirements in *ATCS* 9.2.3R satisfied; and
- (4) the requirements in *ATCS* 8.1.1R(1) are being met by each *participating designated firm* or the requirements in *ATCS* 8.1.1R(2)

are being met by the *designated firm* (as appropriate) in respect of any *required cash access services* resulting from the relevant *cash access assessment*.

- 8.1.8 R Where the requirement for a *cash access assessment* was triggered under *ATCS 4.1.1R(1)* (concerning closures of *designated firms*) or *ATCS 4.1.1R(2)* (concerning closures of *persons* other than *designated firms*), the requirements of *ATCS 8.1.1R* must be met by each *designated firm* without unreasonable delay, and in any event (save in exceptional circumstances):
- (1) within 3 *months* of the later of:
    - (a) publication of the information under *ATCS 6.1.1R* in respect of the relevant *cash access assessment*; or
    - (b) completion of any review under *ATCS 9* in respect of the relevant *cash access assessment* and satisfaction of any requirements in *ATCS 9.2.3R*; or
  - (2) if later, by the time the *relevant closure* takes place.
- 8.1.9 R Where the requirement for a *cash access assessment* was triggered under *ATCS 4.1.1R(3)* (concerning *cash access requests*), the requirements of *ATCS 8.1.1R* must be met by each *designated firm* without unreasonable delay, and in any event (save in exceptional circumstances) within 3 *months* of the later of:
- (1) publication of the information under *ATCS 6.1.1R* in respect of the relevant *cash access assessment*; or
  - (2) completion of any review under *ATCS 9* in respect of the relevant *cash access assessment* and satisfaction of any requirements in *ATCS 9.2.3R*.
- 8.1.10 G The review process in *ATCS 9* will be taken into account in considering what constitutes a reasonable delay under *ATCS 8.1.8R* and *ATCS 8.1.9R*.

Closures: change of circumstances

- 8.1.11 R The requirements in *ATCS 8.1.1R* do not have to be met:
- (1) in the case of a *cash access assessment* triggered under *ATCS 4.1.1R(1)* (concerning closures of *designated firms*), where any notification has been given under *ATCS 2.1.4R* that the *relevant closure* will no longer happen; or
  - (2) in the case of a *cash access assessment* triggered under *ATCS 4.1.1R(2)* (concerning closures of *persons* other than *designated firms*), where any notification has been given under *ATCS 2.2.4R* that the *relevant closure* will no longer happen.

## Trials

- 8.1.12 R Where *cash access services* are provided for a trial period in accordance with a *cash access assessment*, the *designated person* who undertook it must, as soon as reasonably practicable following completion of the trial period, update it in a manner that is compliant with *ATCS 5* in light of the lessons learnt from the trial.
- 8.1.13 R Where a *cash access assessment* is updated under *ATCS 8.1.12R*:
- (1) *ATCS 8.1.1R* applies as if references to a *cash access assessment* are to the updated *cash access assessment*;
  - (2) the requirements of *ATCS 8.1.1R* must be met without unreasonable delay and in any event (save in exceptional circumstances) within 3 months of the later of:
    - (a) publication of the updated information under *ATCS 6.1.5R* in respect of the relevant *cash access assessment*; or
    - (b) completion of any review under *ATCS 9* in respect of the updated *cash access assessment* and satisfaction of any requirements in *ATCS 9.2.3R*.
- 8.1.14 R Where *cash access services* are provided for a trial period in accordance with a *cash access assessment*, the requirements of *ATCS 8.1.1R* must continue to be met with respect to the *required cash access services* being trialled until:
- (1) the *designated person* who undertook the *cash access assessment* has complied with *ATCS 8.1.12R* and *ATCS 6.1.5R* following completion of the trial;
  - (2) any review under *ATCS 9* in respect of the updated *cash access assessment* has been completed and any requirements in *ATCS 9.2.3R* satisfied; and
  - (3) the requirements of *ATCS 8.1.1R* are being met in respect of any *required cash access services* resulting from the updated *cash access assessment*, whether they are the same *cash access services* as those being trialled or different.
- 8.1.15 G
- (1) The effect of *ATCS 8.1.13R(1)* is that the minimum period for provision under *ATCS 8.1.1R(1)* or *ATCS 8.1.1R(2)* will apply to the *required cash access services* resulting from the updated *cash access assessment*, even if some of them were provided as part of the trial.
  - (2) The effect of *ATCS 8.1.14R* is that if, following completion of a trial, an updated *cash access assessment* compliant with *ATCS 5* does not identify any additional *cash access services* under *ATCS*

5.5.1R, the trialled *cash access services* may cease to be provided at the time indicated in *ATCS* 8.1.14R(1) and *ATCS* 8.1.14R(2) without being replaced, subject to any need to undertake a further *cash access assessment* and the consequent application of *ATCS* 8.1.7R (see (4) and (5) below).

- (3) *ATCS* 5.5.5G states that it should only be concluded in very exceptional cases where a *cash access assessment* has reached step 3 that it is not reasonable for any additional *cash access services* to be provided.
- (4) Cessation, reduction or change in provision of trialled *cash access services* in the circumstances referred to in (2), or otherwise under *ATCS* 8.1.14R, is not a *relevant closure* in relation to additional *cash access services* that were put in place for the trial, as long as the condition as to timing in paragraph (f) of the *Glossary* definition of *relevant closure* is met (ie, the cessation, reduction or change takes place within 2 years of the services being put in place).
- (5) Cessation, reduction or change in provision of trialled *cash access services* could however be a *relevant closure* if it relates to an existing *cash access service* relied on to meet the requirements of *ATCS* 8.1.1R for the trial (see further *ATCS* 8.1.2G(3)). If it would be a *relevant closure* and none of the exceptions in *ATCS* 4.1 apply, a further *cash access assessment* would need to be undertaken and *ATCS* 8.1.7R would apply.

## 8.2 Publication of information about cash access facilities

- 8.2.1 R Each *designated firm* required to provide or procure the provision of *required cash access services* under *ATCS* 8.1.1R must, as soon as reasonably practicable, publish in writing the information set out in *ATCS* 8.2.2R in an easily accessible place on its website.

Information to be published

- 8.2.2 R The information referred to in *ATCS* 8.2.1R comprises the following details about any existing or new *cash access facility* that will be used to provide the *required cash access services*:
- (1) the address or location of any existing *cash access facility*, and the expected address or location of any new *cash access facility*;
  - (2) opening hours;
  - (3) accessibility information, including availability of wheelchair access, hearing loop and audio assistance;
  - (4) details of which *specified cash access services* will be available;

- (5) whether each *specified cash access service* will allow for a reasonable mix of both coins and banknotes to be deposited or withdrawn (as appropriate);
- (6) what (if any) *assisted cash access services* will be available;
- (7) whether a balance enquiry service will be available;
- (8) the expected date from which the *required cash access services* will be provided (or, where applicable, that they are already being provided); and
- (9) whether the *required cash access services* are to be provided on a permanent or trial basis and, if the latter, details of the trial period.

8.2.3 R *Designated firms* must keep the information they publish under ATCS 8.2.1R up to date.

- 8.2.4 G
- (1) A *designated firm* may not be in a position to give a definitive date under ATCS 8.2.2R(8). For example, it may still be negotiating a lease of premises. In such circumstances, the *designated firm* should provide its best estimate of the date or range of dates, explaining why it is unable at that point to be more definitive.
  - (2) Examples of where the published information should be updated are where there has been a review under ATCS 9, where no additional *cash access services* will be provided as a result of ATCS 8.1.11R or where the *cash access assessment* has been updated under ATCS 8.1.12R.

### 8.3 Notification and signage where facility of designated firm closing

#### Notification

- 8.3.1 R
- (1) Where the requirement for a *cash access assessment* was triggered under ATCS 4.1.1R(1) (concerning closures of *designated firms*), the *designated firm* whose *cash access facility* is the subject of the *relevant closure* must notify the following in writing of the information set out in ATCS 8.3.2R:
    - (a) the Member of Parliament and any Member of the Senedd, Scottish Parliament or Northern Ireland Assembly for the local area; and
    - (b) the *local authorities* for the local area.
  - (2) The notification in (1) must take place as soon as reasonably practicable after a *cash access assessment* has been completed by the *designated firm*, or by a *designated coordination body* where ATCS 4.2.1R is relied on.

- 8.3.2 R The information that must be notified under *ATCS* 8.3.1R is as follows:
- (1) the reason why a *cash access assessment* was undertaken;
  - (2) its outcome in terms of the provision of additional *cash access services*; and
  - (3) any information required to be published under *ATCS* 8.2.1R.
- 8.3.3 R If any of the information notified under *ATCS* 8.3.1R changes as a result of *ATCS* 9, *ATCS* 8.1.11R or otherwise, the *designated firm* must, as soon as reasonably practicable, notify the relevant Member of Parliament, any relevant Member of the Senedd, Scottish Parliament or Northern Ireland Assembly, and the relevant *local authorities* of the change.

#### Role of designated coordination body

- 8.3.4 R (1) A *designated coordination body* may make any notifications required under *ATCS* 8.3.1R or *ATCS* 8.3.3R for its *participating designated firms*.
- (2) Compliance by the *designated coordination body* with the notification requirements in *ATCS* 8.3.1R and *ATCS* 8.3.3R will also be treated as compliance by the *participating designated firms* with those *rules*.

#### Signage

- 8.3.5 R (1) Where the requirement for a *cash access assessment* was triggered under *ATCS* 4.1.1R(1) (concerning closures of *designated firms*), the *designated firm* whose *cash access facility* is the subject of the *relevant closure* must deploy accessible signage at that facility:
- (a) setting out any information required to be published under *ATCS* 8.2.1R; and
  - (b) signposting where to find information published under *ATCS* 10 about the availability of *cash access services* with respect to its *relevant current accounts*.
- (2) The signage must be deployed according to the timeframe set out in *ATCS* 8.3.1R(2) and remain in place at least until the *relevant closure* takes place.
- 8.3.6 R A *designated firm* must keep the information in the signage deployed under *ATCS* 8.3.5R up to date.

## 8.4 Power of direction

- 8.4.1 G (1) If the *FCA* is not satisfied that *designated persons* have complied with their obligations in this sourcebook, it may exercise its power

to direct them under section 131W of the *Act* or take other appropriate measures for the purpose referred to in *ATCS* 1.1.1G.

- (2) By way of example, where the *FCA* considers that a *cash access assessment* has not been conducted in accordance with *ATCS* 5, the power of direction may be used to direct:
  - (a) a *designated person* to undertake a new *cash access assessment*; or
  - (b) *designated firms* to provide or procure the provision of additional *cash access services* of the type and in the manner described in the direction.

## 8.5 Relationship with the Principles for Businesses

- 8.5.1 G *Designated firms* are reminded that the following will continue to apply to their relationships with their *customers*, as appropriate, including throughout the process of planning or dealing with any *relevant closures* of their *cash access facilities* and in the delivery of any *cash access services*:
  - (1) *Principle 12* (Consumer Duty) and *PRIN 2A* (The Consumer Duty); or
  - (2) *Principle 6* (Customers' interests) and *Principle 7* (Communications with clients), where *Principle 12* and *PRIN 2A* do not apply (for example, because of the type of *customer*).
- 8.5.2 G (1) FG22/6 (Branch and ATM closures or conversions), as updated on 11 October 2022, contains guidance on *Principle 6* and *Principle 7* in the context of full or partial closures of branches or automatic teller machines, and conversions of such machines from free-to-use to pay-to-use. *PRIN 2A.1.17G* explains the relevance of such guidance to consideration of *firms*' obligations under *Principle 12* and *PRIN 2A*.
  - (2) Some notification or publication requirements in this sourcebook may overlap to an extent with expectations in FG22/6. Such requirements are independent of FG22/6, but where appropriate *designated firms* may be able to comply with a requirement in this sourcebook and meet a potentially overlapping expectation in FG22/6 in the same communication.
- 8.5.3 G (1) FG21/1 (Guidance for firms on the fair treatment of vulnerable customers) is relevant to *designated firms*' relationships with their *customers*, including in the delivery of *cash access services* to them.
  - (2) For *customers* with protected characteristics such as physical or mental health disabilities, *designated firms* should also be mindful of their duty to make reasonable adjustments for people with disabilities under the Equality Act 2010. In Northern Ireland, where the Equality Act 2010 is not enacted but other anti-discrimination

legislation applies, *designated firms* should ensure that they comply with any applicable legislation.

- (3) *Principle 12* and *PRIN 2A* support existing legal requirements, such as those in the Equality Act 2010 and anti-discrimination legislation in Northern Ireland, by requiring *firms* to monitor whether any group of *retail customers* is experiencing different outcomes than other *customers* and take appropriate action where they do. As set out in FG22/5 (Final non-Handbook Guidance for firms on the Consumer Duty), *firms* should be able to identify when *customers* with characteristics of vulnerability or *customers* who share specific protected characteristics, under the Equality Act 2010 or equivalent legislation, receive systematically poorer outcomes. This may indicate that the *firm* is not meeting the Consumer Duty for those groups or is breaching its responsibilities under legislation.

## 9 Cash access requests: reviews

### 9.1 Reviews

- 9.1.1 R A *designated person* must carry out a review of whether a *cash access assessment* it has undertaken should be revised where a request is made in the circumstances set out in *ATCS 9.1.2R*.
- 9.1.2 R The circumstances referred to in *ATCS 9.1.1R* are where a request is made to review the outcome of a *cash access assessment*, including one that has been updated under *ATCS 8.1.12R*:
- (1) by a *person* with sufficient interest in whether there is reasonable provision of *cash access services* in the local area which is the subject of the *cash access assessment*;
  - (2) in writing;
  - (3) within 28 *days* of the publication of information required by *ATCS 6.1.1R* or *ATCS 6.1.5R*; and
  - (4) which refers to information that:
    - (a) the *designated person* was not aware of when it undertook or (in the case of *ATCS 8.1.12R*) updated the *cash access assessment*, and which could have an impact on its outcome; or
    - (b) highlights factual inaccuracies in the original or updated *cash access assessment* which could have an impact on its outcome.
- 9.1.3 G *ATCS 4.1.13R* to *ATCS 4.1.15G* apply for the purpose of establishing whether a *person* has sufficient interest under *ATCS 9.1.2R(1)*.



- 9.1.4 R The *designated person* must:
- (1) undertake the review required by *ATCS* 9.1.1R reasonably, diligently and fairly;
  - (2) obtain any additional information necessary to complete the review;
  - (3) complete it within 12 weeks of receipt of the request to review;
  - (4) record in writing the reason for undertaking the review and its conclusion, together with its rationale for reaching that conclusion; and
  - (5) where appropriate, produce a revised *cash access assessment*.

## 9.2 Action after review

- 9.2.1 R Following completion of its review, the *designated person* must confirm its conclusion promptly in writing to the *person* who requested the review, setting out its rationale.
- 9.2.2 G The requirement in *ATCS* 9.2.1R can be met by giving the *person* who requested the review a copy of the record referred to in *ATCS* 9.1.4R(4).
- 9.2.3 R Where the review results in a revised *cash access assessment*, the *designated person* must, as soon as reasonably practicable, update the information published under *ATCS* 6.1.1R or *ATCS* 6.1.5R to explain:
- (1) that the *cash access assessment* has been reviewed;
  - (2) why it has been reviewed; and
  - (3) any resulting changes to the published information.
- 9.2.4 R Where the review results in a revised *cash access assessment* compliant with *ATCS* 5, *ATCS* 8.1.1R applies as if references to a *cash access assessment* are to the revised *cash access assessment*.

## 9.3 Closures: change of circumstances

- 9.3.1 R
- (1) A review does not have to be undertaken under *ATCS* 9.1.1 (or completed, if already begun) where *ATCS* 8.1.11R applies because a *relevant closure* is no longer happening.
  - (2) Where (1) applies, the *designated person* who would otherwise undertake or complete the review must promptly give notification in writing of the following to the *person* who requested it:
    - (a) the change in circumstances; and
    - (b) that the review no longer has to be undertaken (or completed, if already begun).

## 10 Raising awareness of cash access services

### 10.1 Publication of information

- 10.1.1 R (1) *A designated firm* must publish information about the availability of *cash access services* with respect to its *relevant current accounts*.
- (2) The information referred to in (1) must be:
- (a) published in writing in an easily accessible place on the *designated firm's* website; and
- (b) reviewed regularly and kept up to date.
- 10.1.2 G The requirements in *ATCS* 10.1.1R(2)(a):
- (1) may be met through publication of an appropriate online locator tool; and
- (2) do not preclude additional forms of publication.

#### Exclusions

- 10.1.3 R The following information is excluded from *ATCS* 10.1.1R:
- (1) information that is not reasonably accessible to or obtainable by the *designated firm*; and
- (2) information about *cash withdrawal services* of the type falling within paragraph 2(e) of Schedule 1 to the *Payment Services Regulations* (cashback with a purchase).

### 10.2 Categories of information

- 10.2.1 G Subject to *ATCS* 10.1.3R, the information that should be published under *ATCS* 10.1.1R(1) includes details of the following for each *cash access facility* where any *cash access services* are provided, insofar as relevant to the particular type of facility:
- (1) the type of *cash access facility*;
- (2) its address or location;
- (3) which of the *specified cash access services* are available;
- (4) opening hours;
- (5) accessibility information, including availability of wheelchair access, hearing loop and audio assistance;
- (6) what (if any) *assisted cash access services* are available;

- (7) whether each *cash access service* allows for a reasonable mix of both coins and banknotes to be deposited or withdrawn (as appropriate);
- (8) whether a balance enquiry service is available;
- (9) whether personal identification number (PIN) management services are available; and
- (10) whether any *cash access services* provided in relation to *relevant personal current accounts* are provided free of charge and, if not, what the charges are.

10.2.2 G The details in *ATCS* 10.2.1G are not intended to be exhaustive. Additional details should be published where these would be helpful to *customers*.

### 10.3 Role of designated coordination body

10.3.1 R A *designated coordination body* may publish the information referred to in *ATCS* 10.1.1R on its website for its *participating designated firms*.

10.3.2 R Where a *designated coordination body* publishes the information referred to in *ATCS* 10.1.1R(1), it must:

- (1) publish it in writing in an easily accessible place on its website; and
- (2) review it regularly and keep it up to date.

10.3.3 R Compliance by the *designated coordination body* with *ATCS* 10.3.2R will be treated as compliance by the *participating designated firm* with *ATCS* 10.1.1R.

10.3.4 R Where a *participating designated firm* relies on *ATCS* 10.3.1R, it must:

- (1) publish in writing in an easily accessible place on its website, details of how the information published by the *designated coordination body* under *ATCS* 10.3.2R can be accessed; and
- (2) provide sufficient information to the *designated coordination body* to enable it to meet the requirement in *ATCS* 10.3.2R(2) to keep the published information up to date.

### TP 1 Transitional Provisions

(1)	(2)	(3)	(4)	(5)	(6)
	<b>Material to which the transitional</b>		<b>Transitional provision</b>	<b>Transitional provision: date in force</b>	<b>Handbook provision coming into force</b>

	provision applies				
1.1	ATCS 2.1.1R and ATCS 2.2.1R	R	ATCS 2.1.1R and ATCS 2.2.1R do not apply to a <i>relevant closure</i> that was implemented prior to 10 September 2024	10 September 2024	10 September 2024

## Sch 1 Record-keeping requirements

**Sch 1.1** G The aim of the *guidance* in the following table is to give the reader a quick overall view of the relevant record-keeping requirements.

**Sch 1.2** G It is not a complete statement of those requirements and should not be relied on as if it were.

Handbook reference	Subject of record	When record must be made	Contents of record	Retention period
ATCS 9.1.4R(4)	Review required by ATCS 9.1.1R	Completion of review	Reason for undertaking review, conclusion and rationale for conclusion	Not specified

## Sch 2 Notification and reporting requirements

**Sch 2.1** G The aim of the *guidance* in the following table is to give the reader a quick overall view of the relevant notification and reporting requirements.

**Sch 2.2** G It is not a complete statement of those requirements and should not be relied on as if it were.

**Sch 2.3** G The relevant *Handbook* references should be consulted to see who is subject to each notification or reporting requirement, and who the notification or report must be made to.

<b>Handbook reference</b>	<b>Matter to be notified</b>	<b>Contents of notification</b>	<b>Trigger event</b>	<b>Time allowed</b>
<i>ATCS 2.1.1R and ATCS 2.1.2R</i>	<i>Relevant closure of designated firm's cash access facility</i>	Details of <i>relevant closure</i> including those set out in <i>ATCS 2.1.2R(3)</i>	<i>Designated firm</i> decision, or being satisfied a <i>relevant closure</i> will happen	As soon as reasonably practicable
<i>ATCS 2.1.4R</i>	Where notification given under <i>ATCS 2.1.1R</i> but <i>relevant closure</i> will no longer happen	<i>Relevant closure</i> will no longer happen	<i>Designated firm</i> whose <i>cash access facility</i> was the subject of the <i>relevant closure</i> decides or is satisfied that <i>relevant closure</i> will no longer happen	Promptly
<i>ATCS 2.2.1R, ATCS 2.2.2R and ATCS 2.2.3R</i>	<i>Relevant closure of cash access facility of person other than designated firm</i>	Information set out in <i>ATCS 2.2.2R(2)</i>	<i>Designated person</i> aware of <i>relevant closure</i> as a result of publicly available information	As soon as reasonably practicable
<i>ATCS 2.2.4R</i>	Where notification given under <i>ATCS 2.2.1R</i> but <i>relevant closure</i> will no longer happen	<i>Relevant closure</i> will no longer happen	<i>Designated person</i> undertaking <i>cash access assessment</i> satisfied on the basis of publicly available information that <i>relevant closure</i> will no longer happen	Promptly

ATCS 3.2.1R	The matters set out in ATCS 3.1.2R	Information set out in ATCS 3.1.2R	Not specified	Not specified
ATCS 3.3.6R	Receipt of <i>cash access request</i> by <i>designated person</i> who undertakes <i>cash access assessments</i> under ATCS 4.1.1R(3)	Copy of <i>cash access request</i>	Receipt of <i>cash access request</i>	Promptly
ATCS 3.3.9R	Withdrawal of <i>cash access request</i>	<i>Cash access request</i> has been withdrawn	Clear indication in writing by <i>cash access requester</i> to relevant <i>designated person</i>	Promptly
ATCS 4.2.5R	Ceasing to be <i>participating designated firm</i>	Cessation of participation, including when due to take place and reason for it	<i>Participating designated firm</i> aware of cessation of participation	As soon as reasonably practicable in advance
ATCS 7.2.2R	Substantial changes to policies and procedures in ATCS 7.1.1R	Description of substantial changes	<i>Designated person</i> proposes to update policies and procedures	When the update is proposed
ATCS 8.3.1R	Information from <i>designated firm</i> whose <i>cash access facility</i> is the subject of the <i>relevant closure</i>	Reason why <i>cash access assessment</i> undertaken, outcome regarding additional <i>cash access services</i> , and information set out in ATCS 8.2.2R	Completion of relevant <i>cash access assessment</i>	As soon as reasonably practicable

ATCS 8.3.3R	Changes to information notified under ATCS 8.3.1R	Changes to the information	Changes to the information	As soon as reasonably practicable
ATCS 9.3.1R(2)	Effect of ATCS 9.3.1R(1)	Change in circumstances and review no longer has to be undertaken (or completed, if already begun)	When ATCS 8.1.11R applies	Promptly

### Sch 3 Fees and other required payments

Not used

### Sch 4 Rights of action for damages

**Sch 4.1** G The table below sets out the *rules* in ATCS contravention of which by an *authorised person* may be actionable under section 138D of the *Act* (Actions for damages) by a *person* who suffers loss as a result of the contravention.

**Sch 4.2** G If a ‘Yes’ appears in the column headed ‘For private person?’, the *rule* may be actionable by a *private person* under section 138D (or, in certain circumstances, their fiduciary or representative; see article 6(2) and 3(c) of the Financial Services and Markets Act 2000 (Rights of Action) Regulations 2001 (SI 2001/2256)). A ‘Yes’ in the column headed ‘Removed’ indicates that the *FCA* has removed the right of action under section 138D(3) of the *Act*. If so, a reference to the *rule* in which it is removed is also given.

**Sch 4.3** G The column headed ‘For other person?’ indicates whether the *rule* may be actionable by a *person* other than a *private person* (or their fiduciary or representative) under article 6(2) and (3) of those regulations. If so, an indication of the type of *person* by whom the *rule* may be actionable is given.

Rule	Right of action under section 138D		
	For private person?	Removed?	For other person?
All <i>rules</i> in ATCS	No	Yes ATCS 1.6.1R	No

**Sch 5**      **Rules that can be waived**

- Sch 5.1**    G    As a result of section 138A of the *Act* (Modification or waiver of rules) the *FCA* has power to waive all its *rules*, other than *rules* made under section 64A (Rules of conduct), section 137O (Threshold condition code), section 247 (Trust scheme rules), section 248 (Scheme particulars rules), section 261I (Contractual scheme rules) or section 261J (Contractual scheme particulars rules) of the *Act*.



## Appendix 2

# Amendment to commencement date (legal instrument)

## ACCESS TO CASH SOURCEBOOK (AMENDMENT) INSTRUMENT 2024

### Powers exercised

- A. The Financial Conduct Authority (“the FCA”) makes this instrument in the exercise of the following powers and related provisions in the Financial Services and Markets Act 2000 (“the Act”):
- (1) section 131V (FCA rules);
  - (2) section 137T (General supplementary powers);
  - (3) section 137T (General supplementary powers) as applied by section 131V;
  - (4) section 138D (Actions for damages);
  - (5) section 139A (Power of the FCA to give guidance); and
  - (6) paragraph 23 (Fees) of Schedule 1ZA.
- B. The rule-making powers listed above are specified for the purpose of section 138G(2) (Rule-making instruments) of the Act.

### Commencement

- C. This instrument comes into force as follows:
- (1) Annex A comes into force on the making of this instrument; and
  - (2) Annex B comes into force on 18 September 2024, immediately after the Access to Cash Sourcebook Instrument 2024 (FCA 2024/26), as amended by Annex A, comes into force.

### Amendment to instrument commencement date

- D. The Access to Cash Sourcebook Instrument 2024 (FCA 2024/26) is amended in accordance with Annex A to this instrument.

### Amendments to the Handbook

- E. The Access to Cash sourcebook (ATCS) is amended in accordance with Annex B to this instrument.

### Citation

- F. This instrument may be cited as the Access to Cash Sourcebook (Amendment) Instrument 2024.

By order of the Board  
23 July 2024

## **Annex A**

### **Instrument coversheet**

This Annex comes into force on the making of this instrument.

The coversheet of the Handbook instrument “Access to Cash Sourcebook Instrument 2024 (FCA 2024/26)” is amended as shown below. Underlining indicates new text and striking through indicates deleted text.

#### **Commencement**

C. This instrument comes into force on ~~10~~ 18 September 2024.

## Annex B

### Amendments to the Access to Cash sourcebook (ATCS)

This Annex comes into force on 18 September 2024, immediately after the Access to Cash Sourcebook Instrument 2024 (FCA 2024/26), as amended by Annex A, comes into force.

In this Annex, underlining indicates new text and striking through indicates deleted text.

#### TP 1 Transitional Provisions

(1)	(2)	(3)	(4)	(5)	(6)
	<b>Material to which the transitional provision applies</b>		<b>Transitional provision</b>	<b>Transitional provision: date in force</b>	<b>Handbook provision coming into force</b>
1.1	<i>ATCS 2.1.1R and ATCS 2.2.1R</i>	R	<i>ATCS 2.1.1R and ATCS 2.2.1R do not apply to a <i>relevant closure</i> that was implemented prior to <del>10</del> <u>18</u> September 2024</i>	<del>10</del> <u>18</u> September 2024	<del>10</del> <u>18</u> September 2024

## Appendix 3

# Data collection from Post Office and LINK

1. The tables in this annex outline the data items we will collect from the Post Office and ATM network (LINK). This data will be used to support our supervision, as outlined in chapter 7. As with the branch monitoring and proposed closures data we will collect from designated firms, we will be requesting this information is submitted as an XML file.

## Post Office

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2. This table sets out the data we will be collecting from the Post Office.

### Notes:

- By 'ATM IDs' we mean the IDs used by the LINK Scheme Ltd., which they normally obtain from you. ATM ID formats vary. The most common case is an 8-symbol ID containing both letters and numbers (it can also be prepended by a 6-digit firm ID). Please contact us directly if in doubt or if the proposed format is not suitable.
- Please endeavour to submit as much information as you can. It is important that you list all branches but excluding branches that have already been permanently closed. If a permanent closure of a branch has been announced or decided upon, but has not yet eventuated, the branch should still be included even if it is temporarily closed.
- In all cases, empty cells should only be used to indicate unknown, unavailable, or not applicable. Zeroes in numeric cells should only denote known zero values, etc.
- Please let us know of any data quality concerns or where data has not been cleaned/checked, etc.

Data reporting field identifier	Data reporting field definition	Type	Notes
<b>Identifying information</b>			
6-FAD	The 6-digit unique branch identifier for this branch, without the postcode appended.	6-digit code	
<b>Branch Information</b>			
Branch Name	Branch Name.	text	

Data reporting field identifier	Data reporting field definition	Type	Notes
<b>Location Information</b>			
Postcode	Postcode.	text	<p>Preferred format: &lt;outcode&gt;&lt;single space&gt;&lt;incode&gt;, where:</p> <ul style="list-style-type: none"> <li>• outcode contains 2, 3, or 4 alphanumeric characters and is of the form AN, ANN, AAN, ANA, AANN, or AANA, with A denoting a letter and N denoting a digit, and</li> <li>• the incode is 1 digit and two letters (NAA).</li> </ul> <p>For example, "E20 1JN".</p> <p>If possible, please ensure any terminated postcodes are replaced with their correct live versions</p>
Address	Branch address, excluding postcode.	text	<p>Please include building name/number(s), where applicable.</p> <p>Please avoid abbreviations as much as possible.</p> <p>For example, "Financial Conduct Authority, 12 Endeavour Square, London".</p> <p>A single line address is preferred, but it is acceptable to include separate columns for Address_1, Address_2, etc.</p>
Easting	Branch location: British National Grid (BNG) coordinates (OSGB 1936/ EPSG: 27700), easting and northing.	numeric	<p>Note that BNG is used for all of the UK, including Northern Ireland. Various databases for Northern Ireland will commonly use versions of the Irish National Grid instead (typically either IRENET95, EPSG: 2157 or TM75, EPSG: 29903).</p>
Northing		numeric	
Latitude	Branch location: World Geodetic System 1984 (WGS) coordinates (WGS 84, EPSG: 4326), latitude and longitude.	numeric	<p>Note that these are reprojected BNG coordinates.</p>
Longitude		numeric	
<b>Opening Hours</b>			
Trading Status	This should be input as Open or Temp Closed depending on status of the branch.	text	

Data reporting field identifier	Data reporting field definition	Type	Notes
Trading Sub Status	This should be input as Open, Short term temp closed or Long term temp closed depending on the status of the branch.	text	
Closed Duration	This should be input as Open, Short term temp closed or Long term temp closed depending on the status of the branch.	numeric	
Approximate Closed Date	The date that this branch was closed on if labelled Temp Closed in column 'Trading status'.	date	The date should be in DD-MM-YYYY format.
Temporary Closed Days	How many days has this branch been closed for in the the reporting period the data relates to?	numeric	Please approximate if precise count is not available. Enter 0 if no such closures; leave empty if unknown.
Temporary Closed Reason	Reason(s) for temporary closure(s), e.g., 'maintenance'.	text	<p>If more than one reason, please enter a semicolon-separated list (preferably in order of importance).</p> <p>If one of the reasons is clearly more important, you do not need to list all of them. For example, if a branch has been closed for 5 days due to maintenance and for 1 day due to, say, weather conditions, please include maintenance as the main reason.</p>

Data reporting field identifier	Data reporting field definition	Type	Notes
Monday	Current branch opening hours.	text	<p>Here 'current' should be taken to mean typical in the most recent period. Generally, these will be the opening hours at the end of the reporting period. However, please do not report any very short-term temporary changes, e.g., when a branch happened to be closed on a particular day during the last week of the reporting period, but such a change was a one-off.</p> <p>For the purposes of this definition, 'short-term' should be taken to mean a period of time less than 2 weeks. Changes 'until further notice' are generally not short-term.</p> <p>Examples:</p> <ul style="list-style-type: none"> <li>'09:00-16:00' denotes a branch open from 9am to 4pm without a break,</li> <li>'08:45-12:30; 13:30-15:00' denotes a branch open from 8:45am to 12:30pm, closing (e.g., for lunch) from 12:30pm to 1:30pm, and then open from 1:30pm to 3pm.</li> </ul> <p>If a branch is closed on a given day, this should be recorded using a single keyword 'closed'. Note that this is not the same as an empty cell, with the latter denoting 'unknown' (i.e., you do not know the opening hours for this branch).</p> <p>Please adhere to the formatting guidelines as much as possible:</p> <ul style="list-style-type: none"> <li>A single time should be recorded as HH:MM where HH is a zero-padded hour between 00 and 23 (24-hour clock) and MM is a zero-padded minute between 00 and 59. (This is the reduced precision extended ISO 8601 format without seconds and with the qualifier 'T' omitted as there's no risk of ambiguity.)</li> <li>A range should be recorded as &lt;from&gt;-&lt;to&gt; (separated by a single dash), with both from and to in the HH:MM format, and from time earlier than to time.</li> <li>Multiple ranges should be separated by a semicolon.</li> </ul>
Tuesday			
Wednesday			
Thursday			
Friday			
Saturday			
Sunday			



Data reporting field identifier	Data reporting field definition	Type	Notes
Reduced	These opening hours have been reduced relative to pre-Covid-19 levels, i.e., relative to February 2020.	Yes/No/NA	This should be 'Yes' if any opening hours have been reduced.
Other Hours	Any other information on opening hours, if applicable.	any	

### Branch Characteristics and Internal Facilities

Branch Type	The type of contract that this branch is under.	text	It would be helpful if this field could include proposed banking hubs in addition to the currently open banking hubs which are already provided and labelled as such in this field. If the facilities for proposed banking hubs are currently unknown, these fields would be left empty.
Capacity RAG Rating	Red, Amber or Green rating of capacity to take on new customers.	text	Based on internally developed models or definitions of capacity.
Counter Face to Face	This branch has assisted services, i.e. either a counter or face-to-face services or both.	Yes/No/NA	
Counter All	Please provide an estimate of the total number of counters within the branch which serve either personal and/or SME customers.	numeric	A counter is classified as a staffed unit which provides cash deposit facilities for customers. Please include any counter which is staffed. Do not include counters which are never staffed or which do not allow for cash deposit and withdrawal.
Counter Personal	Please provide an estimate of the total number of counters within the branch which serve personal customers.	numeric	A counter is classified as a staffed unit which provides cash deposit facilities for customers. Please include any counters which serve personal customers.

Data reporting field identifier	Data reporting field definition	Type	Notes
Counter SME	Please provide an estimate of the total number of counters within the branch which serve SME customers.	numeric	<p>A counter is classified as a staffed unit which provides cash deposit facilities for customers.</p> <p>Please include any counters which serve SME customers.</p>
Consumer Deposits	This branch has internal free-to-use facilities for personal banking customers to make cash deposits.	Yes/No/NA	<p>Any facilities qualify, including counter-based, 'Smart ATMs' with deposit function, etc.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>• a branch will be considered 'business only' if it has no free-to-use internal facilities for cash deposits or withdrawals available to personal banking customers.</li> <li>• a branch will be considered 'cashless' if all 4 statements regarding business and consumer deposits and withdrawals are false (i.e., there are no free-to-use internal facilities for cash deposits or withdrawals available to either business or personal banking customers).</li> </ul> <p>If a branch does not deal with current accounts and has no ATMs or other such facilities for cash withdrawals or deposits, but still deals with savings accounts (so that customers can, at least in principle, withdraw cash from or deposit it into their savings accounts), please answer Yes to the relevant question(s) and make a note in 'Other Type' = "Savings only".</p>

Data reporting field identifier	Data reporting field definition	Type	Notes
Business Deposits	This branch has internal free-to-use facilities for business banking customers to make cash deposits.	Yes/No/NA	<p>ny facilities qualify, including counter-based, 'Smart ATMs' with deposit function, etc.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>• a branch will be considered 'business only' if it has no free-to-use internal facilities for cash deposits or withdrawals available to personal banking customers.</li> <li>• a branch will be considered 'cashless' if all 4 statements regarding business and consumer deposits and withdrawals are false (i.e., there are no free-to-use internal facilities for cash deposits or withdrawals available to either business or personal banking customers).</li> </ul> <p>If a branch does not deal with current accounts and has no ATMs or other such facilities for cash withdrawals or deposits, but still deals with savings accounts (so that customers can, at least in principle, withdraw cash from or deposit it into their savings accounts), please answer Yes to the relevant question(s) and make a note in 'Other Type' = "Savings only".</p>
Consumer Withdrawals	This branch has internal free-to-use facilities for personal banking customers to make cash withdrawals.	Yes/No/NA	<p>Any facilities qualify, including counter-based, 'Smart ATMs' with deposit function, etc.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>• a branch will be considered 'business only' if it has no free-to-use internal facilities for cash deposits or withdrawals available to personal banking customers.</li> <li>• a branch will be considered 'cashless' if all 4 statements regarding business and consumer deposits and withdrawals are false (i.e., there are no free-to-use internal facilities for cash deposits or withdrawals available to either business or personal banking customers).</li> </ul> <p>If a branch does not deal with current accounts and has no ATMs or other such facilities for cash withdrawals or deposits, but still deals with savings accounts (so that customers can, at least in principle, withdraw cash from or deposit it into their savings accounts), please answer Yes to the relevant question(s) and make a note in 'Other Type' = "Savings only".</p>

Data reporting field identifier	Data reporting field definition	Type	Notes
Business Withdrawals	This branch has internal free-to-use facilities for business banking customers to make cash withdrawals.	Yes/No/NA	<p>Any facilities qualify, including counter-based, 'Smart ATMs' with deposit function, etc.</p> <p>Please note that:</p> <ul style="list-style-type: none"> <li>• a branch will be considered 'business only' if it has no free-to-use internal facilities for cash deposits or withdrawals available to personal banking customers.</li> <li>• a branch will be considered 'cashless' if all 4 statements regarding business and consumer deposits and withdrawals are false (i.e., there are no free-to-use internal facilities for cash deposits or withdrawals available to either business or personal banking customers).</li> </ul> <p>If a branch does not deal with current accounts and has no ATMs or other such facilities for cash withdrawals or deposits, but still deals with savings accounts (so that customers can, at least in principle, withdraw cash from or deposit it into their savings accounts), please answer Yes to the relevant question(s) and make a note in 'Other Type' = "Savings only".</p>
Business Balance Enquiries	This branch offers balance enquiry services for business accounts.	Yes/No/NA	
Internal Free to Use ATM IDs	IDs of all internal free-to-use withdrawal ATMs.	text	<p>Enter a semicolon-separated list (if more than one).</p> <p>Enter 'none' if no internal withdrawal FTU ATMs present.</p> <p>Leave empty only if unknown (alternatively, indicate this by a single keyword 'unknown').</p> <p>In the unlikely event these IDs are unknown to you, please provide information about the number of such withdrawal ATMs – enter an integer (0,1,2,...).</p>

Data reporting field identifier	Data reporting field definition	Type	Notes
Internal Pay to Use ATM IDs	IDs of all internal pay-to-use withdrawal ATMs.	text	<p>Enter a semicolon-separated list (if more than one).</p> <p>Enter 'none' if no internal withdrawal PTU ATMs present.</p> <p>Leave empty only if unknown (alternatively, indicate this by a single keyword 'unknown').</p> <p>In the unlikely event these IDs are unknown to you, please provide information about the number of such withdrawal ATMs – enter an integer (0,1,2,...).</p>

### Branch Accessibility

Wheelchair	This branch is wheelchair accessible.	Yes/No/NA	
Step-Free	This branch has step-free access.	Yes/No/NA	
Hearing	This branch has hearing/induction loop available.	Yes/No/NA	
Visual Impairment	This branch has a speaking ATM or counter service available.	Yes/No/NA	
Other Access	Any other branch accessibility information, if applicable.	any	

### External Facilities

External Deposit	This branch has external machines or safes that allow customers to deposit cash into their accounts.	Yes/No/NA	Examples may include, but are not limited to: envelope deposit machines, smart deposit machines, ATMs that accept cash deposits. This should be Yes if any such machines are available.
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Data reporting field identifier	Data reporting field definition	Type	Notes
External Free to Use ATM IDs	IDs of all external free-to-use withdrawal ATMs.	text	<p>Enter a semicolon-separated list (if more than one).</p> <p>Enter 'none' if no external FTU withdrawal ATMs present.</p> <p>Leave empty only if unknown (alternatively, indicate this by a single keyword 'unknown').</p> <p>In the unlikely event these IDs are unknown to you, please provide information about the number of such withdrawal ATMs – enter an integer (0,1,2,...).</p>
External Pay to Use ATM IDs	IDs of all external pay-to-use withdrawal ATMs.	text	<p>Enter a semicolon-separated list (if more than one).</p> <p>Enter 'none' if no external PTU withdrawal ATMs present.</p> <p>Leave empty only if unknown (alternatively, indicate this by a single keyword 'unknown').</p> <p>In the unlikely event these IDs are unknown to you, please provide information about the number of such withdrawal ATMs – enter an integer (0,1,2,...).</p>
External 24/7	The external facilities at this branch are accessible 24/7.	Yes/No/NA	
Other External	Any other external facilities (covering cash access services), if applicable, or any additional notes.	any	
<b>Usage Level</b>			
Footfall Total	Your best estimate of the number of customers served at this branch in the reporting period the data relates to for any service, including both banking and non-banking visits.	numeric	The total footfall would include all customers who made use of any internal facilities regardless of the service. This does not include personal customers who only used external facilities (e.g., external ATMs). This is the sum of every visit by customers.

Data reporting field identifier	Data reporting field definition	Type	Notes
Consumer Footfall Banking	Your best estimate of the number of personal customers served at this branch in the reporting period the data relates to for banking services only.	numeric	The total footfall would include all personal customers who made use of any internal facilities regardless of the service. This does not include personal customers who only used external facilities (e.g., external ATMs). This is the sum of every visit by customers.
Business Footfall Banking	Your best estimate of the number of business customers served at this branch in the reporting period the data relates to for banking services only.	numeric	The total footfall would include all business customers who made use of any internal facilities regardless of the service. This does not include business customers who only used external facilities (e.g., external ATMs). This is the sum of every visit by customers.
Consumer Volume Withdrawal	Your best estimate of the total volume, in pounds (i.e., the total value, or the sum of all the transaction amounts), of in-branch personal cash withdrawals in the reporting period the data relates to.	numeric	Note that this is the total pound value of withdrawals from accounts, not the total amount of transactions. This figure should include withdrawals made from accounts that thereafter closed during the quarter. Please do not include the currency symbol (all values should be in pounds) or any thousands' separators (commas). Use dot as a decimal separator if the number includes pence (but this is unnecessary).
Business Volume Withdrawal	Your best estimate of the total volume, in pounds (i.e., the total value, or the sum of all the transaction amounts), of in-branch business cash withdrawals in the reporting period the data relates to.	numeric	Note that this is the total pound value of withdrawals from accounts, not the total amount of transactions. This figure should include withdrawals made from accounts that thereafter closed during the reporting period. Please do not include the currency symbol (all values should be in pounds) or any thousands' separators (commas). Use dot as a decimal separator if the number includes pence (but this is unnecessary).

Data reporting field identifier	Data reporting field definition	Type	Notes
Consumer Volume Deposit	Your best estimate of the total volume, in pounds (i.e., the total value, or the sum of all the transaction amounts), of in-branch personal cash deposits in the reporting period the data relates to.	numeric	<p>Note that this is the total pound value of deposits into accounts, not the total amount of transactions. This figure should include deposits made into accounts that thereafter closed during the reporting period</p> <p>Please do not include the currency symbol (all values should be in pounds) or any thousands' separators (commas). Use dot as a decimal separator if the number includes pence (but this is unnecessary).</p>
Business Volume Deposit	Your best estimate of the total volume, in pounds (i.e., the total value, or the sum of all the transaction amounts), of in-branch business cash deposits in the reporting period the data relates to.	numeric	<p>Note that this is the total pound value of deposits into accounts, not the total amount of transactions. This figure should include deposits made into accounts that thereafter closed during the reporting period.</p> <p>Please do not include the currency symbol (all values should be in pounds) or any thousands' separators (commas). Use dot as a decimal separator if the number includes pence (but this is unnecessary).</p>
Consumer Withdrawal Transactions	Your best estimate of the total number of in-branch personal withdrawal transactions in the reporting period the data relates to. This is inclusive of internal withdrawal ATM transactions.	numeric	
Business Withdrawal Transactions	Your best estimate of the total number of in-branch business withdrawal transactions in the reporting period the data relates to. This is inclusive of internal deposit ATM transactions.	numeric	



Data reporting field identifier	Data reporting field definition	Type	Notes
Consumer Deposit Transactions	Your best estimate of the total number of in-branch personal deposit transactions in the reporting period the data relates to. This is inclusive of internal deposit ATM transactions.	numeric	
Business Deposit Transactions	Your best estimate of the total number of in-branch business deposit transactions in the reporting period the data relates to. This is inclusive of internal deposit ATM transactions.	numeric	
Consumer Balance Enquiries	Your best estimate of the total number of in-branch personal balance enquiries in the reporting period the data relates to. This is inclusive of internal ATM transactions.	numeric	
Business Balance Enquiries	Estimated total number of in-branch business balance enquiries. This is inclusive of internal ATM transactions.	numeric	
Definition of Regular Personal Customer	Your definition of a regular personal customer.	any	

Data reporting field identifier	Data reporting field definition	Type	Notes
Number of Regular Personal Customers	The number of personal customers regularly using this branch based on above definition of regular customer.	numeric	
Definition of Regular SME Customer	Your definition of a regular SME customer.	any	
Number of Regular SME Customers	The number of SME customers regularly using this branch based on the above definition of regular customer.	numeric	
Number of SME Deposit Customers	Your best estimate of the total number of regular SME customers using this branch for cash deposits as at the end of the reporting period the data relates to, based on the above definition of regular customer.	any	
Number of SME Withdrawal Customers	Your best estimate of the total number of regular SME customers using this branch for cash withdrawals as at the end of the reporting period the data relates to, based on the above definition of regular customer.	numeric	

## ATM network (LINK)

3. This table contains the data we will gather from the main UK ATM network (LINK).

### Notes:

- By 'ATM IDs' we mean the IDs used by the LINK Scheme Ltd., which they normally obtain from you. ATM ID formats vary. The most common case is an 8-symbol ID containing both letters and numbers (it can also be prepended by a 6-digit firm ID). Please contact us directly if in doubt or if the proposed format is not suitable.
- Please endeavour to submit as much information as you can. It is important that you list all ATMs, but excluding ATMs that have already been permanently closed. If a permanent closure of an ATM has been announced or decided upon, but has not yet eventuated, the ATM should still be included even if it is temporarily closed.
- In all cases, empty cells should only be used to indicate unknown, unavailable, or not applicable. Zeroes in numeric cells should only denote known zero values, etc.
- Please let us know of any data quality concerns or where data has not been cleaned/checked, etc.

Data reporting field identifier	Data reporting field definition	Type	Notes
<b>Identifying Information</b>			
Unique ID	Unique ATM ID.	text	
ATM Operator Name	ATM Operator Name.	text	
<b>Location Information</b>			
Location	Type of business in which ATM is located. For instance bank, convenience store, supermarket, etc	text	Based on internal definitions. Where this does not fall into a common grouping, flag as other.
Premises	Name of the business in which the ATM is located.	text	
Postcode	Postcode.	text	Preferred format: <outcode><single space><incode>, where: <ul style="list-style-type: none"> <li>• outcode contains 2, 3, or 4 alphanumeric characters and is of the form AN, ANN, AAN, ANA, AANN, or AANA, with A denoting a letter and N denoting a digit, and</li> <li>• the incode is 1 digit and two letters (NAA).</li> </ul> For example, "E20 1JN". If possible, please ensure any terminated postcodes are replaced with their correct live versions

Data reporting field identifier	Data reporting field definition	Type	Notes
Address	ATM address, excluding postcode.	text	Please include building name/number(s), where applicable. Please avoid abbreviations as much as possible. For example, "Financial Conduct Authority, 12 Endeavour Square, London". A single line address is preferred, but it is acceptable to include separate columns for Address_1, Address_2, etc
External	This ATM is external.	Yes/No/NA	
Branch	This ATM is at a branch.	Yes/No/NA	
Rural	This ATM is in a rural area.	Yes/No/NA	
Easting	Branch location: British National Grid (BNG) coordinates (OSGB 1936/ EPSG: 27700), easting and northing.	numeric	Note that BNG is used for all of the UK, including Northern Ireland. Various databases for Northern Ireland will commonly use versions of the Irish National Grid instead (typically either IRENET95, EPSG: 2157 or TM75, EPSG: 29903).
Northing		numeric	
Latitude	ATM location: World Geodetic System 1984 (WGS) coordinates (WGS 84, EPSG: 4326), latitude and longitude.	numeric	Note that these are reprojected BNG coordinates.
Longitude		numeric	

### Deprivation

Highly Deprived Area	This ATM is located in a highly deprived area. Highly deprived area based on internal firm definitions. <ul style="list-style-type: none"> <li>• 'NA' values indicate unknown.</li> <li>• 'No' indicates not a deprived area.</li> <li>• 'Yes' indicates is a deprived area</li> </ul>	Yes/No/NA	
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Data reporting field identifier	Data reporting field definition	Type	Notes
Financial Inclusion	This ATM is identified as serving one of the areas falling under LINK's financial inclusion programme	Yes/No/NA	
<b>Protected ATMs</b>			
Protected ATM	This ATM is a protected ATM.	Yes/No/NA	
Date ATM Became Protected	The date this ATM became protected in DD-MM-YYYY format.	date	
<b>Charges</b>			
Pay to Use	This ATM is PTU.	Yes/No/NA	
ATM Charge per Withdrawal	If the ATM is PTU, the cost per withdrawal at this ATM without the £ symbol, rounded to two decimal places.	numeric	
Date of PTU/FTU Conversion	If applicable, the date of PTU/FTU conversion in DD-MM-YYYY format. If not applicable, please leave empty.	date	
<b>Accessibility</b>			
Speaking ATM	This ATM is a speaking ATM.	Yes/No/NA	
<b>Usage Level</b>			
Consumer Volume Withdrawal	Your best estimate of the total volume, in pounds (i.e., the total value, or the sum of all the transaction amounts), of personal cash withdrawals in the reporting period the data relates to.	numeric	Note that this is the total pound value, not the total amount of transactions. Please do not include the currency symbol (all values should be in pounds) or any thousands' separators (commas). Use dot as a decimal separator if the number includes pence (but this is unnecessary).

Data reporting field identifier	Data reporting field definition	Type	Notes
Business Volume Withdrawal	Your best estimate of the total volume, in pounds (i.e., the total value, or the sum of all the transaction amounts), of business cash withdrawals in the reporting period the data relates to.	numeric	Note that this is the total pound value, not the total amount of transactions. Please do not include the currency symbol (all values should be in pounds) or any thousands' separators (commas). Use dot as a decimal separator if the number includes pence (but this is unnecessary).
Consumer Volume Deposit	Your best estimate of the total volume, in pounds (i.e., the total value, or the sum of all the transaction amounts), of personal cash deposits in the reporting period the data relates to.	numeric	Note that this is the total pound value, not the total amount of transactions. Please do not include the currency symbol (all values should be in pounds) or any thousands' separators (commas). Use dot as a decimal separator if the number includes pence (but this is unnecessary).
Business Volume Deposit	Your best estimate of the total volume, in pounds (i.e., the total value, or the sum of all the transaction amounts), of business cash deposits in the reporting period the data relates to.	numeric	Note that this is the total pound value, not the total amount of transactions. Please do not include the currency symbol (all values should be in pounds) or any thousands' separators (commas). Use dot as a decimal separator if the number includes pence (but this is unnecessary).
Consumer Withdrawal Transactions	Your best estimate of the total number of personal withdrawal transactions in the reporting period the data relates to.	numeric	
Business Withdrawal Transactions	Your best estimate of the total number of business withdrawal transactions in the reporting period the data relates to.	numeric	

Data reporting field identifier	Data reporting field definition	Type	Notes
Consumer Deposit Transactions	Your best estimate of the total number of personal deposit transactions in the reporting period the data relates to.	numeric	
Business Deposit Transactions	Your best estimate of the total number of business deposit transactions in the reporting period the data relates to.	numeric	
Consumer Balance Enquiries	Your best estimate of the total number of personal balance enquiries in the reporting period the data relates to.	numeric	
Business Balance Enquiries	Your best estimate of the total number of business balance enquiries in the reporting period the data relates to.	numeric	

