



LINK Public Annual Report on Service-User Engagement
1st October 2020 – 30th September 2021

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Foreword by John Howells (CEO, LINK Scheme)

Consumers and Network Members are LINK’s “Service Users”. LINK’s role is to ensure access to the LINK Network is provided in a safe, reliable, and inclusive manner. That means maintaining a strong focus on the needs and preferences of those Service Users. The report sets out the extensive mechanisms that LINK has in place to achieve good engagement and to make sure that it responds well to Service User requirements in a marketplace which continues to change rapidly. LINK also depends on a broad membership of card issuers and ATM deployers to deliver its objectives (LINK’s Network Members). LINK therefore also has extensive mechanisms in place to understand the requirements of its Network Members and these are also set out in this report. The report is a public document that is published on LINK’s website (<https://www.link.co.uk/>). It is updated annually.

Maintaining this public report is one of LINK’s obligations as a major payment system regulated by the Payment Systems Regulator (PSR). LINK welcomes the strong support that it receives from the PSR in developing and maintaining its effective engagement with Service Users. This is especially important during a time of great change for cash usage. While cash is in long term decline, it remains vital for many UK consumers. LINK will continue to focus on maintaining good free access to cash for as long as is needed by consumers and until digital payment methods are able to support UK consumers in a comprehensive and inclusive manner.



LINK's approach to Service-User Engagement and who LINK considers to be its Service-Users

LINK considers Service-User Engagement as the mechanism that allows it to understand the needs of consumers and Network Members and how well it is meeting those needs. It is at the centre of LINK's strategic thinking, set out in the LINK Strategic Plan which is developed and approved by the Board. The public version of the Plan can be found <https://www.link.co.uk/publications/link-three-year-strategic-plan/>. A two-way approach that allows an open and clear flow of information to and from Service User is an important feature of LINK's approach. By working with and considering the views of Service-Users, LINK believes that it can deliver meaningful and sustainable improvement to its services. Anyone needing to contact LINK, including consumers, is welcome to contact us <https://www.link.co.uk/contact-us/>.

LINK's Service Users are currently made up as follows:

- Consumers - make use of ATMs to access cash and information on their account balance. LINK's research shows that over 95% of UK consumers use its ATMs. LINK is a domestic ATM scheme so only operates in the UK, the Channel Islands and the Isle of Man for UK card holders.
- Network Members – make use of LINK to offer consumers access to cash using over 100 million LINK-enabled UK debit and ATM cards at a network of over 50,000 UK ATMs connected to LINK across the UK. LINK currently comprises 35 Network Member organisations, which include the majority of Card Issuers and ATM Operators in the UK. A full list of LINK Members is available <https://www.link.co.uk/members/members/>.

LINK's Board meets regularly and considers the interaction between LINK, its strategic plan, and service users, in support of preserving effective consumer access to cash.



A summary of how LINK engages with its Service-Users

LINK has well developed mechanisms to engage with consumers and Network Members. These are listed below and then described in more detail in the following sections. Each section briefly describes the work and achievements in that particular area over the last year and plans for the next twelve months.

LINK uses its website as a key channel to support two-way communications with its Service-Users. Helpful links to useful pages on the website are shown throughout. Alternatively, anyone is welcome to contact LINK via info@link.co.uk, through the LINK website <https://www.link.co.uk/contact-us/> page or the following postal address and can be assured of a prompt response: Link Scheme Holdings Ltd, RSM Central Square, 5th Floor, 29 Wellington Street, Leeds, LS1 4DL.

Main tools for consumer engagement:

- The LINK Consumer Council.
- LINK's Website.
- LINK's Mobile App.
- The Financial Inclusion Programme.
- Social Media Campaigns
- Periodic research and publications.
- Participation in consumer events.

Main tools for Network Member engagement:

- Network Member Governance.
- Member Compliance regime.
- LINK's Website.
- The Financial Inclusion Programme.
- Periodic research and publications.
- Participation in industry events.

In addition to the information provided below, LINK also recently published its annual report for 2021, which can be found here https://www.link.co.uk/media/1787/link_annualreport_2021_final_2.pdf.



Consumer Engagement

The LINK Consumer Council	
What is the LINK Consumer Council and how does it represent consumers?	<p>The LINK Consumer Council was established by LINK in April 2006 to provide advice on consumer issues that relate to the UK's largest cash machine network. The Council brings together independent consumer representatives and LINK Network Members including card issuing banks and cash machine operators. It is chaired by Tracey Graham who is a non-executive Director of the Link Scheme Holdings Ltd Board. The current Consumer Council has the following members:</p> <ul style="list-style-type: none">• Tracey Graham, Chairman and Non-Executive Director, Link Scheme Holdings Ltd.• Tim Allen, Barclays• Adam Bailey, NatWest• Lady Margaret Bloom CBE• Eimear Duffy, Consumer Council Northern Ireland• Kerry Fearn, Department for Work & Pensions• Iain Gibson, Sainsbury's Bank• Martin Kearsley, Post Office• Paul Maynard MP• Nick Wiles, PayPoint• Sian Williams, Toynbee Hall <p>The Council publishes an Annual Report which provides further details of the Council's objectives, members, its activities over the year and forward-looking priorities. This Report publishes the Council's independent assessment of the LINK Scheme's performance against its consumer interest objectives.</p> <p>Full details of the LINK Consumer Council and its work, including the Annual Report, can be found here https://www.link.co.uk/initiatives/consumer-council/.</p>



<p>What has been the work of the LINK Consumer Council this year?</p>	<p>The LINK Consumer Council leads the development and focus of the LINK Financial Inclusion Programme.</p> <p>This year, that work has focused heavily on the trial and subsequent implementation of a Counter Service proposition which enables consumers to access cash from retailers' tills. The Consumer Council has been involved in lobbying the Government to secure an amendment to the Financial Services Act to enable cashback without a purchase and has overseen a detailed trial of the service. Its expertise has been vital in shaping the project over many years and ensuring it delivers a good service to consumers.</p> <p>The Council has also overseen the update of elements of the Financial Inclusion Programme, including work to reflect the latest deprivation data, better mapping software, LINK's response to the COVID-19 crisis and the community request scheme.</p> <p>It has also worked with Issuing Members to conduct research on pay-to-use ATMs and understand consumer choices around those machines, particularly in deprived areas.</p>
<p>What are the plans for the next 12 months?</p>	<p>The Council will continue its oversight of the LINK Financial Inclusion Programme. In addition, it is conducting research into the provision of free and pay ATMs across the UK to ensure that consumer access to cash remains satisfactory.</p> <p>The Council will also monitor the roll-out of the Counter Service offer and consider how it can be integrated into LINK's Financial Inclusion Programme.</p>
<p>LINK's Website</p>	
<p>How does the LINK website help consumers?</p>	<p>The LINK website (https://www.link.co.uk/) provides a wide range of guidance and information for consumers. This includes an ATM locator, contact information for LINK and details about its members, fraud prevention tips, details on how to suggest a new ATM location and details of LINK's Consumer Council.</p>



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<p>How has the website developed over the last year?</p>	<p>LINK has undertaken a significant project to improve the user experience of the LINK website for consumers. This has included enhancing the frequently asked questions page, running social media campaigns to promote LINK’s work, publishing two videos featuring case studies of community request locations, an interactive map of LINK’s financial inclusion work, simplifying language across the website and, crucially, making it easier for consumers to find information to help resolve any enquiries quickly. This work has demonstrated improvements in how consumers interact with the website and secure the information they require.</p>
<p>What are the plans for the next 12 months?</p>	<p>LINK will continue to ensure that consumers have access to the information they need from the website, particularly around financial inclusion, for example being able to participate and contribute to LINK’s various initiatives on new ATM locations.</p> <p>LINK will also update the website to ensure all service users can access the right level of information about Counter Services as they are rolled out as a service across the network. This includes incorporating them onto the online Locator, which will be renamed the “Cash Locator” rather than the “ATM Locator”.</p> <p>LINK will also undertake a project to direct consumers to the website. LINK recognises that many consumers will not be aware of what services LINK provides and has commissioned a campaign on social media to engage with cash users to ensure they are aware of the work being done to protect access to cash, and how they can participate in it.</p>
<p>LINK’s Mobile App</p>	
<p>How does the LINK Mobile App help consumers?</p>	<p>The LINK Mobile App is a free app that can be downloaded from both Apple and Android app stores and installed on consumers’ mobile devices.</p> <p>It enables consumers to find ATMs and Post Offices anywhere in the UK to withdraw cash. The App shows which ATMs are free-to-use and which charge consumers including how much and which ATMs have specific accessibility features such as audio assistance or the ability to dispense £5 notes. The App also shows consumers the opening hours of Post Offices.</p>



	<p>A key feature of the App is the ability for consumers to provide feedback on their experience at individual ATMs, for example where the ATM was not where it was shown on the ATM Locator, it was out of cash, or was out of service.</p>
How has the LINK Mobile App developed over the last year?	<p>The LINK App is updated daily with the most recent ATM and Post Office Counter locations, functionality, charging information and opening hours. It is also updated periodically to ensure continued compatibility with the latest mobile device technology.</p>
What are the plans for the next 12 months?	<p>The App will continue to be updated to reflect current information on ATM and Post Office locations, features, charges and access. The App will also be updated as required to ensure continued compatibility with the latest mobile devices.</p> <p>The App will also be updated to inform users of the location of Counter Services as they are introduced to the LINK Network.</p> <p>Users of the App have the ability to leave reviews and ratings through the app store which the LINK team will use to help to inform future developments.</p>
The Financial Inclusion Programme	
What is LINK's Financial Inclusion Programme?	<p>LINK is committed to maintaining free access to cash across the UK for as long as consumers need it. This includes maintaining the coverage of free-to-use ATMs in remote and rural locations as well as improving free access in the most deprived areas of the UK.</p> <p>LINK has had a Financial Inclusion Programme since 2006, which has been focused on improving free access in the most deprived areas of the UK. The Programme was designed and set up in 2006. Today, over 1,800 communities have free-to-use ATMs that didn't have one before as a result of the work of the Programme. LINK does this through providing financial subsidies to operators who operate machines providing free access in the most deprived areas in the UK. This</p>



	<p>subsidy has increased over time and is now up to £2.75 per cash withdrawal for the ATMs that are used least and where there is no other free-to-use ATM within a kilometre.</p> <p>In addition to provision in deprived areas, LINK has committed to maintain the broad coverage of free ATMs and free access to cash within 1km of every High Street with at least 5 shops. This is achieved by LINK paying subsidies where appropriate to retain them. If any of these ATMs close or convert to pay-to-use then LINK will replace them.</p> <p>LINK has also worked closely with communities across the country to highlight issues and respond to them where necessary. The Financial Inclusion Programme continues to practically implement the recommendations of the Access to Cash Review and ensure cash access is protected across the country.</p>
<p>What changes has there been to the Programme in the last 12 months and how have consumers benefited?</p>	<p>Throughout the year, LINK has continued to review the level of subsidies provided to relevant ATMs every quarter, to reflect the excess pressure wrought by COVID-19 on the cash network. This provided a subsidy of around £2.5m a year to those strategic machines most at risk of closure because of the pandemic.</p> <p>LINK has enhanced its approach of visiting sites and understanding local circumstances where protected or deprived ATMs have closed. This includes being more proactive where there are potential security issues and seeking to accelerate the replacement process where possible.</p> <p>LINK has also made its community request scheme more robust and sought new ways to engage with communities across the country, through stakeholder engagement, discussions with elected representatives and a proactive approach to site visits.</p>
<p>What are the plans for the next 12 months?</p>	<p>LINK continually reviews the ATM footprint and will act where necessary to protect the broad spread of free-to-use ATMs as well as those in remote, rural and deprived areas. This might include financial subsidies, provision of ATMs through direct commissioning or any other action which the LINK Board deems necessary to protect consumers and communities.</p>



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	<p>The Financial Inclusion Programme is being updated to ensure that its various components continue to work effectively together as the ATM footprint changes. This includes developing LINK’s mapping capability and finding new ways to work in partnership with Members to deal with issues quickly.</p> <p>LINK will also incorporate the counter service proposition into the Financial Inclusion Programme.</p> <p>LINK will also launch a large-scale social media advertising campaign to ensure consumers in deprived areas are able to request cash access if necessary. Targeting cash users in deprived areas, the campaign will ensure more consumers are aware of how the Financial Inclusion Programme can support their community.</p>
Periodic Research and Publications	
<p>Does LINK use research and publications to help consumers?</p>	<p>LINK commissions a wide variety of research from organisations such as YouGov and CACI and from relevant experts to understand consumer behaviour in relation to payments, cash usage and accessibility. In addition, LINK works closely with industry bodies such as UK Finance and Pay.UK, consumer groups including Which?, Toynbee Hall, and Age UK, and researchers including from the University of Bristol to create wider sources of information on consumers’ ATM and cash needs.</p>



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<p>What research and publications has LINK done in the last 12 months?</p>	<p>LINK regularly publishes information to help consumers understand LINK’s role and the wider ATM industry. To this end, LINK has published a public version of its Strategy Plan, its Annual Report and monthly reports on LINK activity.</p> <p>LINK transaction and other statistical information is published at least weekly at https://www.link.co.uk/about/statistics-and-trends/ and on social media to enable consumers who are interested (and the bodies which represent them) to understand the changes in consumers’ demand for cash. LINK also publishes the locations of ATMs which it funds through its Financial Inclusion Programme via an interactive website.</p> <p>In October 2020, LINK published a report at https://www.link.co.uk/media/1651/impact-of-covid-on-cash.pdf, which focused on the impact of the crisis on communities’ access to cash. LINK has also supported external research on cash, including the House of Commons Library https://commonslibrary.parliament.uk/research-briefings/cbp-9054/ on access to cash which have been published to time with relevant debates in Parliament.</p>
<p>What are the plans for the next 12 months?</p>	<p>LINK has commissioned an extensive piece of research on cash users and the future of digital payments from the Royal Society of Arts think-tank which will feature detailed consumer research and recommendations for future policy.</p> <p>LINK will continue to use its own data and insight to research access to cash and work with partner organisations and the Consumer Council to inform public debate on the subject.</p>
<p>Participation in Consumer Events</p>	
<p>Does LINK support consumer events?</p>	<p>Yes, LINK is always seeking relevant opportunities to engage with consumers, although at present these are largely online.</p>
<p>What has LINK supported in the last 12 months?</p>	<p>LINK attended the Which? Summit on the future of access to cash in May. LINK is a sponsor of the Financial Inclusion Commission, and as well as regularly attending their meetings, has presented on its financial inclusion work this year.</p>



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What are the plans for the next 12 months?	LINK will continue to develop these opportunities and particularly face-to-face contact if and when this becomes possible.
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Network Member Engagement

Network Member Governance	
<p>How does LINK engage with Network Members?</p>	<p>To participate in LINK, Network Members sign a contractual Members Agreement (MA), which in addition to other contractual documents describes their legal obligations to LINK as the Operator of the Payment System and to each other Network Member within LINK.</p> <p>The MA defines how decisions are made within LINK, includes provisions for the management of Member joining, participation and withdrawal from LINK and responsibilities on day-to-day operations “Operating Rules”.</p> <p>In addition to the MA, Network Members also sign a Switching and Settlement Agreement (SSA), which describes the relationship and legal obligations between Network Members and Vocalink, LINK’s infrastructure provider.</p> <p>Each Network Member is represented by a Network Member Representative who acts as “Relationship Manager” and is accountable to LINK for adherence to the above agreements. A Network Member Advisory Group (NMAG) provides advice and recommendations and represents Network Member interests on operational matters. Each Network Member is entitled to be represented on NMAG.</p> <p>A full list of current network Members can be found at https://www.link.co.uk/members/members/.</p>
<p>What engagement has there been with Network Members this year?</p>	<p>NMAG meets on a regular basis to discuss operational issues, including network performance, operational projects and innovation opportunities. During the last 12 months, NMAG has provided valuable support to a number of operational and technical projects, including a technical network release and a pilot to offer cash from retail terminals.</p>



	<p>NMAG has continually reviewed UK ATM availability during the coronavirus pandemic and as necessary acted to ensure efficient operation of the network and that consumer access to cash is maintained.</p> <p>NMAG supports the need for increased collaboration between Network Members at an operational level to help focus action to mitigate the impact of fraud. Coordinated action aimed at sharing information on fraud attacks has been effective in helping combat ATM Fraud across the UK.</p>
<p>What are the plans for the next 12 months?</p>	<p>NMAG will continue its work to support LINK on operational matters into the forthcoming year to meet the demands of operational change. This includes work on ATM connectivity as the telecoms industry moves into provision of digital-only communications networks, enhancements to operational resilience and keeping Network and Member systems updated to the latest industry security standards.</p>
<p>Member Compliance Regime</p>	
<p>How does LINK ensure Network Members maintain compliance to its rules?</p>	<p>Network Members must comply on a continuous basis with all Governance and Operational obligations as defined in the MA, the SSA and the Service Mark User Agreement. An annual assurance process requires that all Network Members review their LINK specific controls and processes and provide assurance that adequate controls exist to mitigate any Risk to the LINK Network.</p>
<p>What has been done to ensure continued Network Member compliance in the last 12 months?</p>	<p>LINK maintains oversight of Network Member assurance through a continuous review programme to ensure compliance against the MA, the SSA and the Service Mark User Agreement. In line with its regulatory obligations, LINK is in the process of implementing an Operational Resilience Framework under its requirements as a Financial Market Infrastructure provider. LINK is working with its Network Members to understand their own Operational Resilience position in ensuring access to cash for consumers. compliance will underpin this initiative.</p>



<p>What are the plans for the next 12 months?</p>	<p>Focus remains on maintaining operational resilience and assessing Network Member compliance with all Governance and Operational obligations the LINK Operating Rules and ensuring minimal consumer impact. resulting from ongoing operational change.</p>
<p>LINK's Website</p>	
<p>How do Members engage with the LINK Website?</p>	<p>The LINK website (https://www.link.co.uk/) presents a broad range of information which is useful to Network Members including statistical and trend data on the ATM Network, publications on ATM related subjects including ATM security best practice and authentication of Bank Notes. In addition, the LINK Monthly ATM Footprint Report https://www.link.co.uk/initiatives/financial-inclusion-monthly-report demonstrates progress of its commitment to maintaining broad geographical UK ATM coverage.</p> <p>The https://www.link.co.uk/consumers/locator and LINK Mobile App are updated on a daily basis using information sourced directly from Network Members to ensure the latest LINK ATM Location and associated information is accessible to consumers where ever they are.</p>
<p>How has Network Member engagement with the LINK Website changed in the last 12 months?</p>	<p>LINK continually updates the LINK website to ensure that information is current. In the last 12 months, using direct consumer feedback, LINK has worked with Network Members to ensure ATM locator accurately reflects temporary closure of ATMs resulting from the closure of some premises during the coronavirus pandemic.</p>
<p>What are the plans for the next 12 months?</p>	<p>LINK will continue to ensure that consumers have access to the information they need from the website, particularly around financial inclusion, for example being able to participate in and contribute to LINK's various initiatives on new ATM locations. The website will also be updated to provide the locations of all Counter Service terminals.</p>



The Financial Inclusion Programme	
<p>How do Network Members engage with the Financial Inclusion Programme?</p>	<p>Network Members are key to LINK’s Financial Inclusion Programme as they deploy, operate and fund the ATMs that provide the access to cash required in rural, remote and deprived communities in the UK.</p> <p>LINK works closely with Network Members to monitor the ATM footprint and is in constant dialogue to understand where ATMs are opening, closing or converting to pay-to-use. Where these changes impact on financial inclusion, LINK works with Network Members to provide financial support to ensure the continued operation of free-to-use ATMs where they are needed.</p> <p>Some Network Members are also represented on LINK’s Consumer Council that provides advice on consumer issues relating to the UK cash machine network and represents consumer interests.</p> <p>LINK publishes a LINK Monthly ATM Footprint Report https://www.link.co.uk/initiatives/financial-inclusion-monthly-report/ to show progress against its commitment to maintain broad geographical coverage of the ATM network in the UK. The latest report is available on the LINK website.</p>
<p>What changes has there been to network Member engagement with the programme in the last 12 months and how have Network Members benefited?</p>	<p>LINK has continued to develop its engagement with Members around financial inclusion. As well as embedding its Direct Commissioning process and working with Members to install 100 ATMs so far, LINK regularly speaks with members to seek practical, rapid solutions to cash access issues. This has included detailed engagement around protected and deprived ATMs affected by COVID-19.</p>
<p>What is LINK’s approach to Network Member engagement on Financial Inclusion in the next 12 months?</p>	<p>Financial Inclusion will continue to be a key focus for LINK over the next 12 months and LINK will continue to work with Network Members to improve existing processes to ensure that free-to-use ATMs continue to be available in rural, remote and deprived communities across the UK.</p>



Periodic Research and Publications	
Does LINK use research and publications to support Network Members?	LINK provides Network Members with regular reporting of network statistics including breakdown of transactions volumes by Network Member and ATM transaction type. Network Members also provide data to support routine reporting to Pay.UK.
What research and publications has LINK done on the last 12 months?	LINK has maintained the schedule of structured reporting to Network Members throughout the year.
What are the plans for the next 12 months?	LINK will continue to provide Network Members with the information they need to understand the performance of LINK as a whole. As LINK evolves through innovation, reporting will be amended accordingly. LINK is in the process of developing additional reporting to help monitor the retail terminal pilot.
Participation in Industry Events	
Does LINK support industry events?	LINK regularly takes opportunities to contribute at industry events, although at present these are conducted online.
What industry events has supported any in the last 12 months?	<p>LINK has also been an active participant in the Cash Action Group, which is an industry wide group working with regulators and the Government to secure the long-term future of cash. LINK has been at the heart of these discussions and focused on the consumer impact of any proposals and changes.</p> <p>LINK has joined and participated in the Industry and Parliament Trust, with Chief Executive John Howells providing a talk to Parliamentarians and industry guests about LINK's role in access to cash.</p> <p>A number of policy focused events have taken place this year, and LINK has spoken at the Enryo Conference, "Is Cash a Dirty Word" and the European Cash Cycle seminar, as well as events organised by UK Finance and the Emerging Payments Association.</p>



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	<p>LINK has also participated in relevant regional events, including speaking at an event organised by FinTech North focusing on the role of FinTech's in supporting financial inclusion, and the Scottish Grocers' Federation Annual Conference, focusing on the role of convenience stores on Access to Cash.</p> <p>LINK also takes a leading role in regular industry events related to ATM fraud and crime, including chairing the European Physical Crime Expert Group.</p>
What are the plans for the next 12 months?	LINK will continue to engage across the industry at ATM related events in the forthcoming year and seek further opportunities engage with Network Members.