

# LINK's response to the Lords Select Committee

## Inquiry into National Resilience

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<https://committees.parliament.uk/work/9585/national-resilience/>

- Monday 20 April 2026
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Classification: Public and available on [www.link.co.uk](http://www.link.co.uk)

By website:

### Introduction

1. LINK is a not-for-profit company governed by an independent Board. It has a public interest objective to protect access to cash across the UK.
2. LINK sustains access to cash through maintaining the coverage of free-to-use ATMs in remote and rural locations as well as improving free access in deprived areas of the UK through the operation of its well-established financial inclusion programme.
3. As part of its work, LINK manages the UK's main cash machine (ATM) network. LINK's network connects the vast majority of ATMs (both free and charging) in the country and allows customers of banks and building societies (card issuers) that are LINK Members to make cash withdrawals and balance enquiries with their payment cards at almost all ATMs. All of the UK's major card issuers and ATM operators currently choose to become Members of LINK. LINK processes around 1.3 billion transactions and dispenses £75 billion in cash each year through a network of around 42,000 ATMs.
4. LINK's access to cash role also includes acting as a Coordination Body, having been designated as such by the Treasury on 24<sup>th</sup> May 2024. In this part of its role, LINK is notified by those Designated Firms that choose to participate in LINK's coordination arrangements of their intention to close branches, and LINK then assesses the impact of the closure on the local area. LINK also receives requests from communities (individuals and groups, including elected representatives) to review cash access. Where LINK identifies a gap in cash access services that cause a significant impact on communities it recommends new cash facilities such as shared banking hubs and deposit services. Responsibility for implementing LINK's recommendations is with the bank or banks concerned, some of whom choose to use a bank-owned infrastructure company called Cash Access UK for implementation.
5. LINK is regulated by the Payment Systems Regulator (PSR), and by the Bank of England (the Bank) as a systemically important payment system and is designated as such by the Treasury. LINK is also designated by the Treasury and supervised by the Financial Conduct Authority in its role as an industry Coordination Body and is subject to the FCA's Access to Cash Sourcebook.

## General comments

6. LINK welcomes the opportunity to respond to this Consultation. In its response LINK is considering major, widespread disruption to services such as a failure of electrical power and /or telecommunications lasting into the following day.
7. Cash and ATMs have an important role in local and personal contingency, for example, when a particular merchant or retailer is unable to accept card payments or the consumer is unable to use their cards etc for whatever reason. Cash has an important role here and many people still carry or store cash for this purpose. LINK has published research on this area which is available on the LINK website<sup>1</sup>. However, this is out of scope in this response.
8. LINK's response also does not consider local emergencies such as flooding which although they can be severe and damaging in a local area, they are usually contained and consumers are able to travel outside the area affected to collect essential supplies. Consumers access to payments per-se is unlikely to be affected.
9. When considering a major widespread emergency LINK's response is based on ensuring that citizens can cope with the initial phase of the emergency, three to four days. Beyond that, it is assumed that normal service will have been resumed or at least partially restored, or that central authorities will be taking a major part in ensuring consumers get essential supplies like food and water. Catastrophic events which could lead to a national power and communication outage of more than four days are out of scope of this response.
10. Cash has a number of unique properties when considering its role in national resilience. It can be stored indefinitely and used, to at least some degree, without needing any external equipment, power, communications, or information such as PINs, passwords account numbers etc.
11. Consumers' ability to acquire cash is likely to be severely constrained in any crisis which involves the loss of electrical power as ATMs require power and telecommunications networks to function.
12. Consumers ability to use cash during a crisis will depend on the ability and willingness of whoever is supplying the product or service to accept cash payments.
13. LINK has responded to a selection of the questions below. In other cases, LINK has responded with No Comment.

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<sup>1</sup> [tapping-into-trouble.pdf](#)

## Summary

14. LINK believes that should the government consider it necessary to issue emergency guidance then cash should be included, not only to encourage people to have enough cash available to last them three to four days, but also to encourage stores and other service suppliers to have contingencies in place so that they are able to accept cash payments in the event of a power / telecommunications failure.
15. Such guidance should be issued well before a crisis is imminent and couched in such a way to avoid a rush to collect food, cash etc and the resultant strain on normal supplies.

## Consultation questions for comment

1. *How far are national and international risks inter-connected, including across different sectors and across short-term and long-term risks, and what are the implications for the national approach towards preparedness and resilience?*

There are a wide range of plausible if unlikely short-term events<sup>2</sup> which could lead to a widespread or national loss of power. The cause of such incident is out of scope for LINK, which is focussed on how to respond, rather than identify potential causes.

It is generally considered that a country like the UK has around three to four days to resolve a complete breakdown in essential services such as power. After this point households will have exhausted their own resources, even with planning and in the absence of any alternative will simply take the food and other essential supplies they need. Such a collapse of in order would inevitably lead to the uneven distribution of the remaining resources which risks leaving the most vulnerable, the elderly, infirm or those with young children with nothing. At this point the civil or military authorities are likely to be required to manage the distribution of essentials like food and water.

Contingency planning on the part of the population itself should therefore be focussed on enabling them to manage this initial three-to-four-day period, until central authorities have either resolved the problem(s) or brought in other contingencies (eg food/water distribution).

2. *What national risks could have the most severe impact in a reasonable worst-case scenario, including nuclear accidents and loss of control of satellite communications?*

As noted under (1), there are a wide range of plausible if unlikely short-term events which could lead to a widespread or national loss of power.

Cash remains an important payment instrument in the UK, accounting for 4.4 billion payments in 2024<sup>3</sup>. LINK's most recent research shows that 61% of people have used cash in the past 2 weeks, supermarkets (22%) and convenience stores (19%) being the most popular locations, ie cash is being used to access essentials, in particular food. Ignoring barter and alike, cash is a unique payment instrument in that in itself it requires no power or other external resource in order to function, either

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<sup>2</sup> ie short term catastrophic events rather than long-terms trends such as climate change, rising sea levels etc.

<sup>3</sup> UK Finance – UK Payment Markets 2025

as a medium of exchange or a store of value. This means it can be used during the initial three-to-four-day period to enable people to pay for essentials.

However, in order to accept cash many, if not most, retail locations now use payment systems which rely on electrical power, eg tills, stock management and scanning systems, plus in-store infrastructure such as lighting, air conditioning, power operated doors and security systems. In addition, ATMs themselves need power to distribute cash.

Therefore, without some element of planning and pre-emptive action cash is unlikely to function as an effective and widespread payment system in the event of any risk which resulted in a loss of power.

This was demonstrated during the Iberian power outage in 2025<sup>4</sup>. Here, as well as electrical power, telecommunications and internet services collapsed, with mobile networks generally failing within 20 minutes of the blackout starting as mobile mast base stations' UPS (Uninterrupted Power Supply) battery backups became exhausted. Shops, banks, and public services shut down. ATMs, apart from any which were in locations with backup power, all stopped working. While local bars and some smaller stores which were still willing and able to process cash payments remained open, most stores closed, either because they were unable to manage cash payments or from the wider effects of a lack of power such as no lights, air-conditioning, power operated doors etc. In some cases, where stores remained open, it was not possible to give change so payments could only be made in round values.

This incident gave some useful lessons as far as cash as a contingency is concerned. While cash is widely considered as a potential contingency in the event of another payment system's failure, with its unique characteristics noted above, in this example, of a widespread power outage, cash could not fulfil this function. This was because:

- ATMs stopped working. This was irrespective of the central switch and processor, SIBS, which continued to operate. Individual ATMs had UPS, however this only provided short term backup of around 20 minutes at most. In the UK ATMs are not fitted with UPS in any case.
- With no warning, consumers' access to cash was limited to whatever cash they had on them or stored at home.
- Stores generally had no processes or equipment to manage cash payments without power (ie point of sale, product scanning equipment and tills all stopped working).
- Store staff had no experience or training to manage cash payments.
- Stores had insufficient change.
- Stores reliance on power for other functions; lights, doors, security, refrigeration, air-conditioning etc meant they had no option but to close.

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<sup>4</sup> On 28 April 2025, a power outage struck Spain, Portugal, and parts of southwestern France and Andorra. It was one of the largest blackouts in history, affecting over 58 million people. The blackout lasted around 10 hours in most areas,

However, actions can be taken and indeed have been in other countries to address these issues and allow cash to continue to function as a means of payment in a time of crisis. See Question 13.

3. *Since the 2025 Strategic Defence Review, what changes have there been to the national resilience implications of the geopolitical environment for defence spending, development of the country's industrial base, and military recruitment?*

No comment.

4. What risks does the private sector face, including to cyber activity and supply chains, and how do these vary across key industries, such as finance, food, water, medicine, and transport?

In the UK, like all developed economies, the supply of essential goods and services is extremely interconnected, relying on electrical power and telecommunications to function plus a complex web of software and hardware systems. This interdependence means the failure in any one of a wide range of systems and processes may have unexpected and widespread impacts. For example, the CrowdStrike outage in 2024, caused by a failure in a software product many organisations were unaware they used, disrupted approximately 8.5 million Windows devices worldwide, affecting critical services across multiple industries.

Payments is the system which connects consumers to most essential services such as food, heating, medicine, and transport. These have to be paid for immediately and without a medium of payment citizens will not be able to access them. Therefore, in the event of a power/telecommunications outage cash may be the only way people can access essentials during the critical first days of a crisis. As such cash should be included in any planning and the household resources which consumers collect in advance.

5. *How can a shared vision be developed to improve preparedness and resilience across the whole of society?*

No comment

6. *How can understanding of preparedness and resilience be improved, with action encouraged at all levels of society so that these priorities are both seen as relevant and achievable in practice?*

A number of simple steps, some of which have been implemented in for example the Nordic countries, could significantly increase the UK's preparedness and resilience.

For individuals, leaflets, online messages, TV and press campaigns could encourage households to collect and maintain stocks to allow them to function independently for three to four days. These need to be nuanced in such a way as to prevent panic-buying, ie be before there is a crisis and to allow the stocks to be accumulated over time. This should include cash notes and coin. These should be repeated periodically, if only to ensure the stocks of food, water etc remained usable.

Retailers, perhaps through trade bodies like the Association of Convenience Stores and British Retail Consortium should be encouraged to have contingencies in place

to allow them to remain open in the event of a power outage. These could include backup power generators for larger stores, to simple steps like having a stock of solar powered calculators, sufficient coin and small denomination notes for change, paper ledgers and receipt systems. It should also include periodic staff training in using them.

In the Netherlands they have recommend each household should hold €70 for each adult and €30 for each child. In the UK £50 per adult and £25 per child would seem appropriate and easy values to communicate and remember. This value should include small denominations in notes and also a range of coin.

7. *How can the preparedness and resilience of civil society be strengthened, such as through funding community organisations and the inclusion of people of all ages and from all backgrounds?*

It would seem sensible to engage organisations like AgeUK, RNIB, and organisations which have links with communities which have specific requirements. In addition, those which have links to specific language or other social /cultural /national groups should also be considered. Leaflets and information in the Nordics are available in a wide range of languages and these could be distributed through local associations, church groups etc as well as the post.

8. *What does the public perceive to be the biggest risks, and how can communication help to provide information about these risks, including those that are already established or materialising, and support conversations about attitudes towards preparedness and resilience?*

A range of plausible scenarios need to be presented to the public, perhaps using examples from other countries.

9. *What are the risks of disinformation concerning preparedness and resilience, including through digital channels and around elections, and how can these be mitigated, such as through the involvement of community organisations?*

The risks of over-reaction and panic buying and indeed the risk of a run on cash come not just from deliberate misinformation but misinterpretation and exaggeration on the part of the media, and particularly social media which can amplify local issues. Messages to “not panic” and avoid stockpiling unnecessary items, including cash may have the opposite effect, if the population fears future shortages. Messages must therefore be before the incident materialises and should be nuanced, ie that that you do not need to collect your stock (including cash) now, rather over the next few weeks and months. It is important that this doesn’t take place in an atmosphere of crisis, by which time it is too late. Experience from COVID with hoarding of items like bread flour, pasta and toilet rolls suggests that not all reactions to a crisis will be rational.

To counter the risks of deliberate misinformation from hostile entities, some countries include specific warnings, for example “*Foreign powers and others outside Sweden use disinformation, misinformation and propaganda to influence us*” and include advice as to how to identify and counter it.

10. *How should communication concerning preparedness and resilience, including the national curriculum, be targeted for particular groups, including young people aged 11-17, students, and vulnerable people?*

Messages need to be targeted and timed in such a way that those who are vulnerable eg those with limited mobility etc have time to put measures in place, both to go and collect the required items but also to transport and store them effectively and safely at home. Local communities could be engaged to assist collecting items and moving and storing supplies. However cash, because of its intrinsic value may require extra care to ensure vulnerable consumers are able to access and store it without putting themselves at risk.

Young people, ie under 17 seem likely to still be living at home and therefore come under the care of the household, however students may require specific advice and support if they are away from home and this seems to be best provided through the colleges' existing social, care and support structures. In terms of cash, as noted under (6) children should be included when calculating the cash resources each household should prepare.

11. *What barriers have there been to implementing improvements to preparedness and resilience, such as inaction, inappropriate structures, inadequate funding, and short-term thinking?*

No Comment.

12. *What legislative measures should be considered to improve preparedness and resilience, such as a Defence Readiness Act and duties for organisations to incorporate resilience into their internal planning and business models?*

No Comment.

13. *What lessons concerning preparedness and resilience can the UK learn from other countries, including Nordic countries, and how can it facilitate international co-operation on these issues?*

The Nordic countries<sup>5</sup> and indeed others such as the Netherlands have contingency plans in place and have issued guidance to their citizens, in some cases for many years. This is available online and often distributed to households in leaflet form. The objective being to enable each household can remain independent during the critical first few days, although the exact time period does vary. Alongside food, water, wind-up radio etc, these include recommendations to hold a store of cash.

Seeking advice from the authorities in these countries to understand in more detail the rationale behind the recommendations and how citizens have reacted to them would seem sensible.

14. *How were preparedness and resilience achieved in the past, such as during the Second World War, and what are the implications for the current environment?*

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<sup>5</sup> <http://krisinformation.se/>  
<https://www.dsb.no/siteassets/sikkerhverdag/egenberedskap/brosjyren/dsb-egenberedskap-engelsk-web.pdf>  
<https://www.suomi.fi/guides/preparedness>

No Comment.

**Ends.**