October 2025

### Commentary

The Panel's review of LINK's Coordinating Body activity in September 2025 marked a year of their work under the regulated scheme. In that year, and of note, LINK had received 1,365 community requests for 758 locations – a 180% increase on the requests made from the voluntary scheme before regulation. Again, the panel noted customer demand for banking services beyond cash in 184 requests (24%) of those made.

LINK reported two developments in the criteria – the introduction of Assisted Counter Services provided by CAUK in existing retail premises, to provide cash services where there is no Post Office and a hub may not be warranted. Also, the use of a wider catchment area in rural communities to recognise the additional distances travelled. The Panel will receive more information about that and consider it in more detail at its December meeting.

CAUK responded to the Panel's request to discuss sustainability of hubs and their work to learn from the utilisation of hubs across the country in developing solution beyond a 'one-size fits all' hub model. The Panel were keen to support hub options that could meet customer need efficiently, while maintaining user-friendly experience and meeting accessibility needs. The Panel recognised that maintaining a service for small business and vulnerable customers as long as they need it, is the key aim, and supported efforts to secure long-term sustainability of hubs as a core part of the community and a service for everyone, by avoiding over-large facilities.

Finally, the Panel discussed the change of context for its work since the introduction of the Access to Cash regulatory framework in August 2024 which have now overtaken the Panel's Terms of Reference. Discussion with stakeholders was underway but the Panel noted a direction of travel towards holding its final meeting in December 2025.

#### **Opinions**

## 1. In regard to hub sustainability and meeting the needs of vulnerable customers and small business

The Panel supported learning from utilization of hubs across the communities of the UK to right-size new facilities as they are set up. The Panel were keen to ensure that the design of smaller hubs still provide a user-friendly experience and full accessibility, but recognized that over-large facilities in lower demand communities have no advantage if future sustainability is compromised.

### 2. In regard to the application of the Criteria

The Panel is satisfied from the assurances it has received that LINK is applying the Criteria correctly as they change. and taking the right steps to review where challenge is raised.

# 3. In regard to whether LINK's instructions for hub or deposit solutions have been followed

CAUK reported they are on track to deliver 200 hubs by the end of the year and in addition have delivered 41 other deposit solutions for notes and coins, enhanced Post Offices and cash pods in the first half of 2025.

Joanna Wallace

CCAP Chair October 2025