

Commentary

This was the final meeting of the Panel. The Panel was started during the voluntary phase of the work by the participating banks on establishing bank hubs, but as Access to Cash now falls under FCA Regulation the consumer scrutiny of that work will fall, as with the FCA's other regulated activity, to their Consumer Panel.

The Panel discussed emergent issues regarding Equality of Access, which whilst not covered directly by FCA PS24/8, underpin the FCA's broader Consumer Duty and are central to the Equality Act 2010. The existing assessment criteria reflect that in a number of ways, including in requiring step-free access to a location's Full Service Access to Cash Facility (Post Office). A facility is 'red flagged' if that can't be delivered and consideration then given to whether there is an alternative accessible provision within 30 minutes (urban) or 15 minutes (rural) and in either case within a single fare cap bus ride. If that is the case no additional services will be triggered, all other things being equal. It is anticipated that in the majority of cases support to secure disabled access will be effective in removing that 'red flag', but the Panel noted that if for whatever reason that was not the case, there was risk of a net effect that disabled customers had to travel further and potentially at cost to access services that an able-bodied person could access at no cost and close proximity, with an inadvertent discriminatory consequence.

CAUK updated the Panel on the latest position in regard to hub and deposit developments. Of particular note a pilot of the use of printers is underway. Whilst this is positive progress it is at present being trialed by community bankers from particular banks, who attend hubs on a once-a-week basis. The Panel reiterated their view from a previous opinion that vulnerable customers in particular need to be able to get a printed mini statement, to show if recent transactions and direct debits have hit their account and their exact balance, and to be able to take that away in printed form and look at it with a trusted 3rd party. This will require printing at the banking counter, available daily.

The Panel also wished to restate the two other non-cash services they considered essential, the opening an account with any provider (and with the provider of choice within a week) if in possession of proper ID documents and being able to stop or amend a direct debit or other recurring payment – to avoid going overdrawn and incurring costs.

Finally, the Panel reviewed the achievements since its formation in 2023 – the Chair agreed to write to both the PNMs and the FCA's Consumer Panel to ensure the current issues of concern were picked up in future work.

Opinions

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

The Panel was concerned that the application of the criteria could create a discriminatory position for disabled customers under certain circumstances if disabled access can't be secured. An answer that ensures equal access should be found in any community where this risk arises.

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 191 hubs open (120 Permanent and 71 temporary) and an additional 55 in development. The 200th hub is expected to be delivered before the end of 2025

Joanna Wallace

CCAP Chair

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