

# Community Cash Advisory Panel

7<sup>th</sup> Opinion

July 2025

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## Commentary

The Panel's review of LINK's Coordinating Body activity in June 2025 was the second considered under the FCA's regulatory framework effective from September 2024.

The Panel noted 452 communities affected by bank closures announced since 2024 with assessment leading to 30% of closures triggering service recommendations. The Panel were updated on recent changes to the allocation criteria, which increased the relevant retailers by 10 for a community to be considered a medium retail centre, an increase in travel threshold cost by £1 and amendment to the way in which other local ATM use and capacity is reflected in recommendations. The Panel identified hub sustainability as a topic of interest and a future meeting agenda item, specifically with regard to uptake and use.

The Panel also discussed the nature of community requests to LINK with regard to the balance between those for cash (the sole focus of the Access to Cash legislation) versus other services. Data showed that of 572 cash requests between September 2024 and April 2025, 15% referenced banking services beyond access to cash, with 33% of those mentioning face to face services and 22% services for older people. Requestors provided little extra information - it was recognised the request forms were simple and that there were many general statements such as 'elderly people need face to face help'.

The Panel also considered a paper on the complaints and appeals brought to LINK, to try to better understand sources of dissatisfaction. There had been just 16 complaints, and several hundred appeals, but as there were 30 or 40 appeals each about three or four locations those hundreds were about only 19 communities. The Panel noted that the same issues were at the heart of complaints and appeals as in the community requests above, including lack of face-to-face banking and concerns for the elderly, but also travel distances and costs. Three decisions had been changed by LINK following reassessment after complaint/appeal.

## Opinions

### 1. In regard to customer requests and expressions of dissatisfaction through appeals and complaints

The panel noted the issues of face-to-face and noncash services arising from a number of sources including cash requests, complaints and appeals and CAUK's report. The Panel noted that consumers appear to be using the access to cash mechanisms to articulate these needs in the absence of any other route to do so, and whilst the scope of the Panel's work is on deposit of,

and access to cash, we are concerned that these important needs do not otherwise go unheard and unaddressed.

**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**

The Panel received an update from CAUK, with 163 hubs in place to date and 127 deposit solutions.

Joanna Wallace

CCAP Chair

July 2025