



Cash Access Assessment Policy

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Notice

All versions of this document not labelled FINAL are subject to change without notice and should not be construed as a commitment by LINK.

LINK assumes no responsibility for errors or representations that may appear in versions of this document not labelled FINAL on the title page.

HR

Failure to comply with this Policy document by LINK staff may result in a disciplinary process.

Author

The author of this document is the Head of Commercial Change and Controls

Owner

The owner of this document is the Chief Commercial Officer.



1 Introduction

Having seen how important cash is to many people in society the UK Parliament has passed a law to ensure the reasonable provision of cash withdrawal and cash deposit services for people who have personal current accounts and for businesses across the UK.

The UK Parliament has required the Financial Conduct Authority (FCA), one of the UK's financial regulators, to keep a check on how cash is provided and ensure that everyone who needs it has local access to cash. The FCA has set out how it will do this in its Access to Cash Sourcebook (which in this Policy we call "the Rules") to ensure that, as [cash access services](#) develop over time, they continue to be provided on a reasonable basis.

The Rules apply to LINK in its work as a [Coordination Body](#) when assessing cash access needs within communities and recommending solutions if any deficiencies (gaps) are identified.

1.1 Purpose

This Policy sets out how LINK will apply the Rules in its work to assess cash access needs within local communities (a [Cash Access Assessment](#)).

There are a number of things that LINK must consider when doing this work which helps it to:

- understand how people access cash in a Local Area;
- identify where there might be gaps making it difficult to access cash; and
- decide how best to fill those gaps to make it easier for the community to deposit and withdraw cash.

By applying this Policy LINK aims to be consistent and fair in what it does and in the decisions that it makes about cash access services in communities.

1.2 Audience

This Policy will help LINK staff in their work when they undertake Cash Access Assessments to ensure the reasonable provision of cash access services for communities.

This Policy will help members of the public to understand the work LINK does as a Coordination Body including when Cash Access Assessments are done; how they are done; what new services if any are recommended at the end of the assessment; and where the results of assessments are published.

This Policy is available on the LINK website [here](#).



1.3 Review and approval

It is important that this Policy is looked at each year to see if it is up to date or if it needs updating because something has changed. For example, a change to the Rules might mean that the Policy would need to be updated.

This Policy is looked at and agreed by the most senior people in LINK, as they are accountable for making sure that LINK does a good job for consumers and communities and meets the Rules. It is the LINK Board that looks at this Policy, agrees its content and approves it for use.

If any changes to this Policy are needed and the changes are important, once they are agreed by the Board, LINK will also let the FCA know about them.

2 Scope

This Policy applies to the work LINK carries out as a Coordination Body for a group of banks and one building society (known as [Designated Firms](#)) that offer personal current accounts, and also to the work it may do for the FCA which can ask LINK to conduct a cash access assessment in a Local Area.

LINK's work as a Coordination Body includes amongst other things, undertaking Cash Access Assessments to determine whether additional cash access services are required to address local gaps in cash access; telling people and groups about the outcome of those assessments; undertaking reviews of previous assessment decisions; helping people to request a cash access assessment; and providing an online tool to help people find out where they can access cash locally.

3 The Designated Firms

There are fourteen [Designated Firms](#). These firms offer current accounts for individuals and for businesses and they have chosen to use LINK as a Coordination Body for Cash Access Assessments when they are making changes to the cash access services they provide. For example, they may be closing a branch or reducing the hours that it is open, or closing a cash machine.

To help you see if one of those is a firm you bank with, we have listed them below:

- Barclays Bank UK plc; National Westminster Bank plc & The Royal Bank of Scotland plc (NatWest Group); Lloyds Bank plc and Bank of Scotland plc (Lloyds Banking Group); Santander UK plc; HSBC UK Bank plc; Nationwide Building Society; TSB Bank plc; Clydesdale Bank plc (Virgin Money); The Co-operative Bank plc; Northern Bank Limited; Bank of Ireland (UK) plc; and AIB Group (UK) plc.



4 Policy Principles

LINK's work as a Coordination Body is governed by the principles of this Policy, as set out below. These principles are clear, simple statements of how LINK will conduct its work for those Designated Firms who use LINK as a Coordination Body.

This Policy is supported by more detailed processes including the criteria which LINK applies consistently, in its Coordination Body work. More information about LINK's work and the processes which support it can be found [here](#).

4.1 Principle 1: Local Areas

- *LINK will operate a proven robust and reliable process which fits with the requirements set out by the Rules, to pinpoint and map a Local Area that is the subject of a Cash Access Assessment, and will apply that process consistently and fairly.*

LINK knows that the use of and need to access cash is more important to people in some areas than it is in others, and that local communities are well placed to highlight if they see gaps in [cash access facilities](#).

It is important that LINK pinpoints the Local Area where it is undertaking a Cash Access Assessment and that the process it applies is a fair one and meets the Rules. LINK does this by looking at the cash access service that is closing or changing, linking this area of interest to a nearby High Street to enable the assessment to consider the wider population that relies on cash access services, and measuring the percentage of people who live within the relevant distance (1 mile in urban areas or 3 miles in rural areas) of the remaining cash access services. This includes understanding the needs of small and medium sized businesses that may want to deposit or withdraw notes and coins to support their customers. This will define the Local Area to be assessed.

LINK also finds out about any barriers locally (for example travel issues and costs), concerns raised by the local community about the adequacy of existing cash access facilities to meet the needs of a Local Area, and how financially vulnerable the community is. These are just some of the things that LINK considers to better understand the needs of a Local Area.

4.2 Principle 2: Cash Access Assessment Triggers

- *LINK will respond to the triggers that require a Cash Access Assessment to be conducted, diligently, and in a timely manner.*

A Cash Access Assessment is triggered by certain events that are listed in the Rules such as:

- The closure of a cash access facility. For instance, a branch of a bank or a building society, a free-to-use cash machine (ATM), a post office, or a banking hub. This may include a closure arising from an unexpected event such as damaged caused by a flood.
- The conversion of a free-to-use cash machine to pay-to-use.



- The closure of a pay-to-use cash machine where cash access services are provided for businesses.
- A significant change in service and/or hours of a cash access facility.
- A request for an assessment received from members of the public or from community representatives such as Members of Parliament and any member of the Senedd, the Scottish Parliament, or the Northern Ireland Assembly for the Local Area; and the local authorities for the Local Area; and community groups.
- The FCA is also able to request an assessment of cash services in a particular Local Area and set the boundaries and population that the assessment should include.

Once triggered, LINK will complete a Cash Access Assessment as soon as it reasonably can and, unless there are exceptional circumstances, within twelve weeks of being asked to conduct the assessment.

4.3 Principle 3: Restrictions and Exclusion

- *LINK will ensure that any restrictions and/or exclusions in the Rules are applied properly when it undertakes Cash Access Assessments.*

There are some things that LINK **cannot** consider when looking at a Local Area and the cash access services and facilities available for people to use in a Local Area, following a closure or a significant change in service. These are:

- Cash access services at a cash access facility which is expected to close or where there is expected to be a change such as a reduction in opening hours which would cause problems for customers.
- Cash withdrawal services through cash back with a purchase.
- The availability of any additional cash access services that might be provided because of another cash access assessment being undertaken.
- The availability of a cash access service where it is subject to a charge.

4.4 Principle 4: When a Cash Access Assessment is not needed

- *Where LINK does not have to conduct a Cash Access Assessment as stated in the Rules it will inform the person requesting it promptly, and explain the reasons why.*

Sometimes LINK will not have to conduct a Cash Access Assessment if it is asked to. The Rules say that an assessment is not required in the following situations:

- If the person (or group) that asks for an assessment to be done, does not have a sufficient interest. For example, they may request LINK to do an assessment in a location where they do not live, or visit regularly.
- If the person (or group) that asks for an assessment to be done, does not know about some of the services that are already available in the Local Area, that they can use. If LINK tells them about where they can get cash or pay cash in, they might think that



there is not a gap. If they tell LINK in writing that they do not need us to do the assessment then we will not start it or, if we have started it, we will stop.

- Where LINK is already doing an assessment or has done one within the last year, in the same or almost the same Local Area; **and** the gap in the service is the same as the one LINK is looking at or has looked at before.
- Where an assessment was triggered by a closure which LINK has been told is no longer happening. If LINK has already started the assessment, it will stop and it will tell the person (or group) that asked for the assessment why it has stopped.
- Where one or more cash machines close in a place where there are more cash machines and at least one of the machines that are left, offers the same services.

4.5 Principle 5: The Cash Access Assessment Process

- *LINK will conduct Cash Access Assessments and any subsequent review of those assessments independently, thoroughly, and in the interests of consumers and communities. This includes the fair and consistent application of its assessment criteria to inform the assessment outcome.*

LINK has an established process in place to support the Cash Access Assessment work it undertakes. This makes sure that assessments are comprehensive, fair, consistent, and impartial, regardless of which Local Area is being assessed. The process explains the criteria measures that LINK use as part of the assessment and how these are applied to help LINK understand the nature and scale of any gap in cash access services and the impact on those in the Local Area. You can read more about what LINK does and its processes [here](#). A high-level summary is provided below.

LINK's Cash Access Assessment process follows the three steps set out in the Rules:

- Step 1: To look at if there is or would be a gap in cash access services in the Local Area.
- Step 2: To decide how any gap might affect the people and businesses in the Local Area, especially people who rely heavily on cash and might be vulnerable (for example, the elderly and disabled).
- Step 3: If a gap would have a significant effect on the Local Area, to identify and make recommendations as to what additional cash access facilities would best fill the gap and be reasonable to provide.

The infographic [here](#) helps to explain the steps.

When the assessment is complete, LINK may say that new cash access services and facilities are needed. Following LINK's recommendation, some examples of the additional "minimum" service communities can expect to get are:

- A free-to-use cash machine.
- An Automated Deposit service (Notes and/or Coin).



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- An Enhanced Post Office.
 - A Banking Hub with a cash machine.
 - A Banking Hub without a cash machine.

The cash access services that LINK recommends must be provided free for personal current account customers.

LINK will also say:

- Where the additional cash access facility should be located.
- What the capacity of the facility should be as well as the opening hours.
- If the additional facility should include help for users. For example, a person at a counter to assist with cash deposits and withdrawals.
- If there is a need for cash services for small and medium sized business customers (deposit and/or withdrawals) with a mixture of notes and coins.
- Whether the additional facility and services should be provided on a trial basis, or permanently.

LINK will complete a Cash Access Assessment as soon as it reasonably can and, unless there are exceptional circumstances, within twelve weeks of being asked to conduct the assessment.

LINK will publish the outcome of a Cash Access Assessment on its website [here](#). It will provide the outcome in writing to the person or group who asked for the assessment to be done, as well as to others who may be interested in the outcome as required by the Rules.

LINK will also conduct a review of the outcome of an assessment and its original decision, if it is asked to. Anyone can ask for a review of an assessment decision to be conducted as long as they have an interest in whether there is reasonable provision of cash access services in the Local Area. They need to ask in writing, within 28 days of LINK publishing its original assessment decision and point out any mistakes in the original assessment or provide new information that LINK did not know about or consider that could change the result. It will complete the review within 12 weeks of receiving the request and where appropriate publish a revised assessment decision.

4.6 Principle 6: Communications and Information

- *LINK will ensure that its communications and the information it provides to the general public and to other stakeholders under the Rules, are clear, easy to understand, and timely.*

LINK recognises the importance of letting people know how to request a Cash Access Assessment in their Local Area. To help them to do this LINK has a page on its website to explain what a Cash Access Assessment request is and a form to help people submit a request to it, either online or by post. You can access the form [here](#).



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LINK has processes in place to ensure that as a Coordination Body, it can receive notifications about the closure of or changes to cash access facilities, gaps in cash access services and Cash Access Assessment requests. This allows LINK to inform its stakeholders about the information it receives in accordance with the Rules. This includes notifications to the FCA and to elected representatives as well as to other Designated Firms, where these are needed.

5 Outcomes and provision of new facilities

This Policy and the framework which LINK has in place to fulfil its role as a Coordination Body, (aligned to the Rules) supports the following outcomes for communities:

- Addressing the local needs of the people and businesses most affected by gaps in cash access services.
- Preventing unreasonable costs to accessing services for those who rely on cash including charges, unreasonable travel costs, or travel time.
- Maintaining assisted cash services where needed for those who need help to deposit or withdraw cash and ensuring access to both notes and coins.
- Maintaining cash deposit services for local businesses so that they can accept cash and withdraw coins to provide change to their customers.

Once a Cash Access Assessment is completed and new cash access services recommended by LINK, then the Designated Firms are responsible for putting those services in place and getting them open.

Cash Access UK Ltd (CAUK) is an industry body established by some of the Designated Firms to support them to put LINK's recommendations in place. Once LINK has made the recommendation, CAUK is then solely responsible for the funding, set up, operation and maintenance of any new shared cash access facility. More information about CAUK is available [here](#).

If one or more of the Designated Firms is not using CAUK to support them to implement the recommendations then the firm/firms are responsible for closing the gap themselves.

The required services are to be put in place without reasonable delay and within three months (or by closure date if later) except in exceptional circumstances.

6 Definitions

To help to understand some of the terms used in this Policy (which come from the Rules), these are explained with helpful examples of what this means. If you see a term in blue, you can click on the link and find out more.



Term	FCA Rules (Definition)	For example
Assisted cash access service	The provision of the support of an appropriately trained individual, whether physically present or not, to assist with a cash access service.	Someone at the counter of a bank branch to help with cash deposits and withdrawals.
Cash Access Assessment	The assessment required by ATCS 4.1.1R and which must be undertaken in accordance with ATCS 5.	Work to look at any gaps in paying in or taking out cash in a Local Area, deciding what if any new services are needed and if they are reasonable to provide. For example, a new cash machine. LINK conducts Cash Access Assessments.
Cash access facility	A branch, banking hub, mobile facility, automatic teller machine or other physical facility, or a cash delivery or collection service, in each case through which any cash access service is provided.	Somewhere to deposit or withdraw money - a bank or building society perhaps or a local cash machine.
Cash access services	Has the meaning given in section 131N of the Act, which is: (a) a service which enables cash to be placed on a relevant current account; or (b) a service which enables cash to be withdrawn from a relevant current account.	Paying money into a bank account. Withdrawing money from a bank account. Taking cash out of a cash machine.
Coordination Body	A person with responsibility for operating or managing cash access coordination arrangements designated by the Treasury pursuant to section 131R of the Act for the purposes of Part 8B of the Act.	LINK, which is a Coordination Body for cash access assessments. This means LINK looks at gaps in cash access services within communities and if appropriate recommends new services.
Designated Firm	A relevant current account provider designated by the Treasury pursuant to section 131R of the Act for the purposes of Part 8B of the Act.	A UK bank or building society that the Treasury has designated. You can find details here .
Cash Access Review	A review by the Coordinating Body of whether a cash access assessment it has undertaken should be revised in accordance with ATCS 9.1.	This is a review of LINK's initial Cash Access Assessment decision. Anyone can ask for a review of an assessment decision to be conducted as long as they have an interest in whether there is reasonable provision of cash access services in the Local Area



7 Roles and Responsibilities

Chief Commercial Officer: Is accountable for compliance with this Policy and by extension the Rules, and for reporting ongoing compliance with this Policy to the Board and Management.

Employees: Undertaking their work as it applies to LINK's role as a Coordination Body must ensure this is conducted in accordance with this Policy and with supporting processes.

8 Management Information

Management information is sourced from the records retained by LINK in relation to the activities it undertakes as a Coordination Body and will be used to support reporting to the Board.



VERSION CONTROL

Date	Author	Version	Change Reference
24 th April 2024	Lynne Foreman	Draft 0.1	Draft of new Policy
3 rd May 2024	Nick Quin	Draft 0.1	Edits and questions
18 th August 2024	Lynne Foreman	Draft 0.2	Reformatted to public facing text and incorporating RPC comment from draft v0.1 where appropriate

REVIEWERS

Name	Version	Position	Date
Tom Sleight	Draft v0.2	Chief Risk Officer	19 th August 2024

APPROVERS

Name	Version	Position	Date
LSHL Board	Final v1.0	Board	5 th September 2024

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