ACCESS TO BANKING SERVICES
Report of the Independent Review

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FOREWORD

Access to banking is essential for people to manage their money effectively, securely, and confidently. But how this gets done has been transformed.

Since the 1980s around 15,000 bank branches have closed and most banking transactions are now conducted through mobile banking. This is not unique to the UK; accelerated by the global financial crisis, the COVID pandemic and long-term social and economic changes, branch closures have been seen around the world.

The Government commissioned this Independent Review to understand the impact of this change, assess whether it has caused unintended harm, and recommend action if the evidence shows that it is needed.

In reaching our conclusions the Review has been mindful that the cost of physical banking provision is ultimately met by bank customers. There are multiple ways in which consumer detriment can be avoided by improving access to banking, whether in-person, online or by telephone.

It is clear, however, that there are significant numbers of people who require in-person services, and that existing banking provision falls short of meeting that need. Urgent action is necessary to prevent further harm.

I am grateful to everyone who took the time to contribute to the Review. They can be sure that their experiences and views have been heard and their evidence weighed with great care.

Thousands of consumers, small business owners, advice agencies, charities, community groups, local authorities, regulators, national governments, and parliamentarians contributed helpful evidence. We received thoughtful input from banks, building societies, credit unions and firms providing cash facilities.

We heard directly from customer groups about their experiences of accessing the banking services they need. These included people with mental health problems, older people, partially sighted and blind people, and small business owners from different regions. We also observed bank staff providing sensitive, expert support in branches and hubs.

In chairing the Review I was supported by an expert and diligent secretariat, and I would like to record my thanks to the team for their excellent work.

The findings and recommendations set out in this report present an opportunity to tackle an issue that is central to financial inclusion and access to wider financial services. For consumers and communities across the UK, I hope that our banks will act without waiting for legislation.

RICHARD LLOYD, INDEPENDENT CHAIR - ACCESS TO BANKING REVIEW

October 2026

1 EXECUTIVE SUMMARY

1.1 Drawing on expert insight and research provided to the Review, we have defined essential banking services as falling into two categories: day-to-day banking and more complex services.

1.2 For individuals, day-to-day banking is centred on opening and managing personal current accounts. For small businesses (SMEs), charities and clubs, the available evidence suggests day-to-day banking needs centre primarily on cash services, including cash deposits and withdrawals and the provision of cash and coin change. They also include administrative changes to mandates and signatories for current accounts.

1.3 Significant or complex banking activities are those essential tasks that customers may need to undertake less frequently in response to unplanned life events or circumstances requiring tailored support.

1.4 Consumers' ability to access essential banking services through physical and remote channels is shaped by a range of external socio-economic and infrastructure factors. Evidence provided to the Review suggests that more than three million adults in the UK are regularly relying on these services being provided to them in-person, rising to more than four million if those who use in-person services less frequently are included. While the scale of unmet need is difficult to quantify, some estimates suggest that around 40% of consumers have been unable to access a local in-person banking service following reductions in banking infrastructure, and that nearly one in five of those affected could not carry out the banking activities they needed to do.

1.5 Poor consumer outcomes attributable to an inability to access banking services include:

- a range of financial costs (or positive financial gains foregone)
- stress, disempowerment and risk-taking
- reduced confidence
- lost time.

1.6 Quantifying this detriment is difficult, not least when the reported extent of need among consumers is masked by the informal assistance given by friends, family and carers to customers who are unable to use digital or telephone services. Vulnerable people may also be reluctant to disclose their needs or circumstance to a bank.

1.7 Nevertheless, it is clear from the evidence provided to this Review that there are widespread poor customer outcomes that can be directly attributed to the decline in access to in-person services. These can be personal to an individual consumer or structural. Cumulatively across the banking sector, the evidence shows that harm is material and recurring.

1.8 Taking into account the volume of consumers reporting their propensity to abandon banking tasks where they are unable to access services, a changing population of vulnerable people, and the growing impact of scams and fraud,

it is reasonable to conclude that this need for in-person banking by a significant minority of customers will remain for the foreseeable future.

1.9 At the same time, improvements to the accessibility, quality and consistency of digital and telephone banking could reduce the scale of that need.

1.10 This report therefore proposes a proportionate future framework to ensure that in-person banking is within reasonable reach of everyone who needs it.

1.11 Having considered voluntary measures and the existing regulatory framework, the Review has concluded that a new statutory framework is the best way forward, with an obligation on designated larger providers of personal current accounts to ensure reasonable access to essential in-person banking services.

1.12 With the support of Government and Parliament, and prompt action by the banking industry and regulator, the legislative, policy and regulatory measures necessary to achieve a future framework could be put in place and implemented during this Parliament. Learning from the access to cash regime and more recent developments, it is entirely feasible for the industry to take action in 2027 so that new approaches can be piloted and communities begin to see a material difference well ahead of any regulatory implementation period in 2028.

Recommendations

1. The Government should introduce legislation as soon as possible to create an access to banking services obligation on designated banks. This should extend the remit and powers of the Financial Conduct Authority (FCA) for the purpose of ensuring reasonable provision of essential in-person banking services.
2. The Treasury should set out the Government's policy concerning access to banking services for consumers and small businesses. This should inform the development of an appropriate policy and regulatory framework for reasonable provision of essential banking services across the UK focused on delivering consistent positive outcomes for customers.
3. Designated banks should be required to assess and fill gaps, or potential gaps, in in-person banking provision that significantly impact their customers in appropriate community catchment areas. In doing so, designated firms should be required to establish credible mechanisms for consulting local authorities, charities, advice bodies, credit unions and other relevant community groups to ensure their assessments are grounded in local knowledge.
4. The required standards of provision for day-to-day banking and complex banking services should be established and supervised by the regulator, with different levels of reasonable access for each based on flexible commonsense measures. The ways in which designated banks can discharge their obligation, including through the provision of their existing physical infrastructure or shared hubs, should be flexible but

measurable against those standards and subject to the FCA's Consumer Duty.

5. Where there is disagreement with the outcome of an assessment for provision of services there should be a right to an independent review, as with the present access to cash arrangements. The regime itself, including the designation of firms, should be subject to reporting requirements and regular review to ensure relevant market developments and changing consumer needs are taken into account.
6. In addition, the banking industry, Government and regulator should redouble their efforts to promote accessible banking across every channel, including digital and telephone services.

2 INTRODUCTION

2.1 The Government's aim is that everyone should be able to access the banking services they need. Access to banking is the foundation of the UK's Financial Inclusion Strategy, supporting people's economic participation, financial wellbeing, and independence. Access to a transactional bank account is key to enabling people to manage their money on a day-to-day basis effectively, securely and confidently.

2.2 Most retail banking transactions are today carried out through mobile banking, and this trend is accelerating with the introduction of AI-enabled services. The Government has recognised that, while this offers convenience and functionality for many, there is a risk of deepening exclusion for those who rely on in-person support and who may struggle to access online or telephone services.

2.3 Beyond the economy-wide shift towards online retail services, major long-term trends in society shape the environment within which all banking services users and providers are operating. These include an ageing population, different patterns of employment, and fear of crime such as scams and fraud.

2.4 Limited public transport, gaps in good quality digital connectivity, and the cost of broadband and mobile services can also negatively impact access to banking services.

2.5 The Review heard numerous expressions of anxiety, frustration and a sense of disconnection among consumers because of these trends, heightened by poor customer journeys or misperceptions as to what is available through different channels. There is a perceived lack of local understanding and responsiveness to the needs of small businesses (SMEs) where these are assessed and delivered through remote call centres or online processes; for those needing to deposit cash, security and safety is essential but can be felt to be lacking.

2.6 At the same time, a range of authoritative sources report high levels of customer satisfaction among users of most banks. Some banks and building societies have recently recognised that a renewed commitment to a physical presence on the high street can be an important element of their commercial strategies, while others have committed to voluntary arrangements for shared services. Within and alongside the statutory access to cash framework, there is now an extensive network of cash facilities and some basic banking services through banking hubs, the Post Office and in shops.

2.7 There are also important initiatives underway aimed at improving the accessibility of digital and telephone banking, for example to improve the useability of payments services by people with dementia and learning difficulties. Inclusive design initiatives such as the Digital Inclusion Action Plan, UK Finance's Inclusive Design Challenge, a financial services industry digital ID verification pilot, and emerging efforts to improve the accessibility of telephony services should also combine to reduce the population of

consumers and small business owners that remain in need of in-person services.

2.8 It is in this rapidly changing context that this Review was tasked with answering three key questions. First, which of the many services available should be treated as essential; second, which of these need to be provided in-person to avoid detriment to consumers and small businesses; and third, how best to secure a reasonable level of sustainable access to essential in-person services for the future.

The evidence base

This report draws together the key themes from responses to the Review's Call for Evidence and other sources. The Review considered all responses alongside commissioned research, stakeholder engagement and published data to develop a comprehensive and balanced evidence base.

A total of 18,197 responses were submitted to the Call for Evidence. The vast majority were submitted by individuals, and the additional sources available also focused predominantly on consumers. As a result, the Review had a richer evidence base on consumer experiences than on those of SMEs. Some respondents provided detailed evidence addressing specific questions, while others provided higher-level observations or comments on particular aspects of the Review.

Although the range of resources differs in purpose, methodology and coverage and are not always directly comparable, together they provide a fuller picture of the challenges and impacts associated with banking access.

3 ESSENTIAL BANKING SERVICES

3.1 There was a broad consensus among respondents to this Review's Call for Evidence and stakeholder discussions as to which banking services should be regarded as essential. Before we describe these, it is important to recognise that consumers do not always distinguish access to cash from access to wider banking services. People often combine cash withdrawals or deposits with non-cash transactions and need different combinations of services at different times, in particular when they have difficulty completing a transaction online.

3.2 Cash withdrawals and cash deposits (including change) were mentioned in 28.6% and 26.6% of responses respectively to the Call for Evidence survey question regarding which in-person banking services are essential or important to consumers.[1] More complex banking tasks were also mentioned, though more infrequently. Bereavement was referenced in 5.5% of survey responses, and Power of Attorney in 3.5%.[2]

3.3 Based on expert insight and evidence provided to this Review, essential services can be seen to fall into two following categories.

Day-to-day banking

3.4 Day-to-day banking is what customers need to carry out to manage their everyday finances, including payments, product servicing, account maintenance and support to access digital and telephone banking channels.

3.5 For individuals, non-cash day-to-day essential banking services are centred on personal current accounts:

- Account opening and closure, account information and maintenance, comprising bank balance enquiries, changes to personal details, requests for printed account statements, identity verification using non-standard forms of identification and replacement card requests.
- Payments and transfers, comprising bank transfer requests between a customer's own accounts and to third parties, the set-up, amendment and cancellation of standing orders, direct debits, recurring payment administration, and bill and card payments.
- Cheque and card services such as cheque deposits, reporting lost or stolen
- Access and support services such as identity verification and online banking registration.

3.6 For SMEs, charities and clubs, the available evidence suggests day-to-day banking needs centre primarily on cash services, including cash deposits and withdrawals and the provision of cash and coin change. They also include administrative changes to mandates and signatories for current accounts.

[1] Call for Evidence – analysis of survey data
[2] Ibid

Significant or complex banking

3.7 Significant or complex banking activities are those essential tasks that customers may need to undertake less frequently in response to unplanned life events or circumstances requiring tailored support.

3.8 For individuals, significant or complex essential banking services include support with complex queries about day-to-day banking and a wider range of products and advice including debt management, unsecured lending and mortgages. It also includes assistance with life events and legal arrangements such as the administration of a Power of Attorney for financial matters and bereavement arrangements, as well as support relating to fraud, scams and complaints.

3.9 Supporting, or registering, a vulnerability or need for additional assistance, and support in cases of economic abuse are further examples of more complex services that customers need albeit less frequently.

3.10 Beyond advice and assistance with products already held by customers, there is some indication of demand for human-led support for those applying for more complex financial products such as mortgages, loans and overdrafts. However, among the evidence gathered for the Review there was less emphasis on a widespread need for this to be provided face-to-face.

4 CURRENT PROVISION OF ESSENTIAL BANKING SERVICES

4.1 The Review examined the demand for, and supply of, channels through which essential banking services are provided, together with the factors influencing consumers' ability to access and use those channels.

4.2 Customers of traditional banks typically have direct access to both physical and remote channels, as these providers generally offer branch-based services alongside telephone, online and mobile banking.

4.3 Customers of digital-only banks may also have access to both types of channel, although their access to physical services is generally more limited and may be provided through a combination of arrangements. They may also hold an account with a traditional bank and use that provider's physical infrastructure for cash and in-person banking services;[3] access cash services[4] at Post Offices[5] or participating retailers,[6] subject to their digital bank having the necessary arrangements in place.

Physical channels

4.4 Consumers carry out banking activities through a variety of physical channels such as bank branches, Post Offices, banking hubs and other access points. At the end of 2025, 94.6% population lived within one mile of a physical cash access point.[7] However, service provision differs: some facilities offer cash services only, while others also provide wider banking services. Among these, opening times vary and support can be available only on designated days. The delivery of in-person services may begin at a physical location and, with the support of staff, may move across and or between channels as the service progresses.

Bank branches

4.5 Although regular use of bank branches has declined, they continue to play a role for a significant number of customers. In May 2024, 18% of day-to-day account holders (9.7 million) had visited a specific branch at least once a month over the previous year, compared with 40% (19.8 million) in 2017.[8] Reliance on branches was greatest among digitally excluded adults, followed by heavy users of cash (those who paid for everything or most things in cash in the previous 12 months) and adults aged 75 and over.[9] Industry estimates provided to this Review suggest that 5% of customers regularly use branches.

[3] FCA Financial Lives 2024 Survey – Retail banking, 2025. Most UK adults (97%) hold a current account with a bank, building society or credit union, while some (14%) also hold a digital-bank account. However, relatively few (4.2%) use a digital bank as their main account.
[4] Fees and limits may apply.
[5] See more detail below on Post Offices.
[6] See more detail below on alternative access points.
[7] FCA Access to cash coverage in the UK 2025 H2
[8] FCA Financial Lives 2024 Survey - Retail Banking, 2025
[9] FCA Financial Lives 2024 Survey - Retail Banking, 2025

4.6 This continued demand is driven primarily by cash-related activities,[10] undertaken by 41% of the 9.7 million regular branch users.[11] However, branches also remain important for wider banking needs: 34% of regular users had undertaken non-cash or wider banking activities in the last 12 months, with opening accounts and resolving problems the most common, each reported by 10% of customers.[12] At present, there also remain requirements for customers of larger banks in certain circumstances to carry out activities in the remaining branches, for example larger payments, identity verification or Power of Attorney registration.

4.7 This demand must be considered against the continuing contraction of the branch network. Since January 2021, banks and building societies have closed 2,382 branches, equivalent to approximately 45% of the network.[13]

Table - Larger banks and building societies providing personal current accounts and offering brick and mortar branches, 2025

Area	Within 1 mile	Within 2 miles	Within 3 miles	Within 5 miles	Within 10 miles
England overall	37.6%	67.9%	81.2%	92.5%	99.5%
England rural	5.3%	13%	29.2%	64.5%	97.9%
England urban	44.5%	79.6%	92.3%	98.5%	99.9%
Northern Ireland overall	34.6%	54.5%	63.1%	77.5%	95.8%
Northern Ireland rural	1.6%	7%	18.6%	45.5%	89.8%
Northern Ireland urban	54.4%	82.9%	89.7%	96.6%	99.4%
Scotland overall	37.7%	64.6%	74.6%	85.5%	96.5%
Scotland rural	6.5%	14.1%	26.6%	51.5%	87.2%
Scotland urban	45%	76.4%	85.9%	93.5%	98.7%
Wales overall	29.3%	53.6%	69.5%	86.1%	96.8%
Wales rural	10.2%	19.6%	33.6%	63%	90.3%
Wales urban	38.5%	70%	86.8%	97.3%	100%
UK overall	37.1%	66.6%	79.6%	91.2%	99.1%
UK rural	5.6%	13.3%	28.7%	62.3%	96%
UK urban	44.5%	79.1%	91.5%	98%	99.8%

Source: FCA Access to Cash Coverage in the UK 2025 H2 – Group 1, 2026

[10] Depositing or withdrawing cash
[11] Analysis from the FCA Financial Lives 2024 Survey
[12] FCA Financial Lives Survey 2024 – Retail Banking, 2025
[13] LINK - HM Treasury information request, 2026

4.8 The table above shows that, in 2025, 79.6% of the UK's population overall were living within three miles of a physical bank branch provided by one of the larger banks and building societies offering personal current accounts (compared to 87% in 2022). Rural coverage was much patchier than urban, and overall distances varied greatly between nations. Northern Ireland had the lowest proportion of its population within three miles of a branch (63.1% in 2025, 70.4% in 2022), followed by Wales (69.5% in 2025, 78.1% in 2022), and Scotland (74.6% in 2025, 82.3% in 2022).[14] [15]

4.9 The branches that remain provide cash deposits and withdrawals, cheque deposits, payments and account management, while also offering face-to-face support where customers' needs are more complex. This can include assistance with fraud and scams, account-access issues, bereavement, Power of Attorney arrangements, financial difficulties and product applications. Branches can also provide tailored support to customers in vulnerable circumstances and help those who need assistance to use digital banking services, although the services available and associated requirements differ between providers.[16]

Post Offices

4.10 Post Offices are an important access point for cash and basic banking services for both households and SMEs. In the Call for Evidence, 8.9% of consumer responses mention the Post Office, increasing to 51.4% of SMEs' responses.17 Around 24% of households use a Post Office for these services, including bill payments and financing, at least once every two months. Use is higher among SMEs, 37% of which access Post Office banking services at least once a month.[18]

4.11 This demand is supported by an extensive national network. The Post Office is required to maintain a minimum of 11,500 branches[19] and currently operates around 11,800, more than 10,000 of which provide access to cash.[20] Through Banking Framework 4, a commercial agreement that extends to 2030 between the Post Office and a number of bank and building society brands,[21] access to basic banking services is offered to customers of providers that are signatories to the Framework.[22]

4.12 Customers can generally withdraw and deposit cash, deposit cheques, check their balance and obtain change, although the services available depend on their bank.[23] While these vary by branch, Post Offices typically open from at

[14] FCA Access to Cash Coverage in the UK 2025 H2 – Group 1 (3 miles), 2026
[15] FCA Access to Cash Coverage in the UK 2022 Q2 – Group 1 (5 kilometres), 2026
[16] UK banks and building societies' websites, 2026
[17] Call for Evidence – Analysis of survey data
[18] Department for Business & Trade - The Value of the Post Office Network, 2025
[19] Government response: Future of the Post Office - GOV.UK
[20] Post Office - Submission to Call for Evidence
[21] Post Office – Access to Cash
[22] Signatory and partner banks/building societies: Allied Irish Bank, Bank of Ireland, Barclays; CAF Bank; Co-operative Bank; Danske Bank; Handelsbanken; HSBC; Lloyds Bank; Metro Bank; Monzo; NatWest; Reliance Bank; Santander UK; Starling Bank; TSB; Unity Trust Bank; Virgin Money; Zempler Bank; First Direct; Halifax; Royal Bank of Scotland; Ulster Bank; Coutts; Mettle; Cahoot; Smile; and Nationwide Building Society.
[23] Everyday Banking | Personal and Business Accounts | Post Office

least 9.00am to 5.30pm from Monday to Friday and for half a day on Saturdays, with some also opening on Sundays.[24]

Banking hubs

4.13 Banking hubs are shared physical facilities currently operated by Cash Access UK (CAUK) and the Post Office. They provide customers of participating banks and building societies with access to cash and a range of basic banking services and are intended to maintain access to essential banking services in areas where branch provision has reduced.

4.14 The use of banking hubs and other shared banking services has grown since banking hubs first opened in April 2021 as part of a pilot. Banking hubs were referred to in 14.1% of all responses to the Call for Evidence survey, with 11.6% of all responses showing awareness only, and 2.6% referring to use or attempted use of hubs.[25] In 2025, customers completed more than 9 million transactions, worth £1.58 billion, across CAUK's network. This included around 465,000 face-to-face interactions with Community Bankers. Customer feedback was also positive: 95% of customers reported that the banking hub had met their cash and banking needs, based on around 14,000 responses collected through hub feedback tablets in 2025.[26] Awareness of banking hubs has also increased, reaching 70% of consumers by April 2026.[27] However, awareness remained lower among those most likely to need hub services, while understanding of the services available was limited among both users and non-users.[28] [29]

4.15 As of September 2026, 250 banking hubs were open across the UK. Access to their cash and banking services is limited to customers of CAUK member and subscriber banks.[30] Opening hours vary by location, although hubs are typically open from at least 9.00am to 5.00pm, Monday to Friday.[31] Each banking hub combines a shared counter service with access to Community Bankers. Community Bankers attend on a rotating basis, with a different participating bank represented on each weekday, and provide face-to-face support in a private setting. This can include support with payments and transfers, account management and the use of online banking. The availability of Community Bankers varies between hubs and reflects local demand.

4.16 The services available through banking hubs can include cash withdrawals and deposits; balance enquiries; cheque deposits; bill payments; gas and electricity top-ups; change-giving services for registered businesses; and account servicing, including changes to personal details. Hubs can also provide support relating to fraud, scams, bereavement and powers of attorney, as well as

[24] All branch locations | Post Office®
[25] Call for Evidence – Analysis of survey data
[26] Cash Access UK - 2025 Annual Report and Accounts, 2026
[27] Cash Access UK - Celebrating five years since opening of the first banking hubs, 2026
[28] CACI, Understanding CAUK Reach & Awareness, 2025
[29] The Monday Project, Cash Access UK: The future of face-to-face banking, 2026
[30] Member and subscriber banks: AIB, Bank of Ireland, Barclays UK, Danske Bank, HSBC UK, Lloyds Banking Group, NatWest Group, Santander UK, TSB, Virgin Money. Cash Access UK - 2025 Annual Report and Accounts, 2026
[31] Cash Access UK – Banking Hubs

assistance with telephone and online banking, card-related issues and debt management.[32] The precise range of services and opening hours varies between participating banks.

Alternative access points

4.17 This category groups those physical channels outside traditional bank branches, banking hubs and Post Offices, that enable consumers and businesses to access cash, make payments, or undertake basic banking transactions.[33] However, the range of services available through these channels is substantially more limited than that offered in bank branches.

4.18 Some banks also provide points of access through initiatives such as temporary community pop-up services in libraries and community centres, video banking, home visits, or mobile banking vans serving remote areas.

4.19 Payment services company PayPoint provides card and PIN-enabled cash and banking services through a network of more than over 30,000 retail locations across the UK.[34] Services are available only to customers of participating banking partners.[35] Opening hours vary by retailer, but stores are typically open early until late and operate seven days a week.[36] Services available through PayPoint include cash withdrawal, cash deposit, bill payment, balance enquiry, prepayment energy top-ups and collection of energy credit payments.

4.20 Fintech OneBanx operates a network of open banking-enabled kiosks that do not require a payment card. Lloyds Banking Group, Metro Bank and six building societies currently host OneBanx multi-bank kiosks across 11 sites.[37] OneBanx services are available to customers of participating banking partners and can be accessed during branch opening hours. OneBanx access points provide cash deposits and withdrawals services.

Remote channels

4.21 The shift towards digital and mobile banking has resulted in a multi-channel banking model, with customers using remote channels as alternative ways to access banking services.[38] Telephone and digital can complement in-person banking offered by traditional banks or serve as the primary channel for the customers of digital banks.[39] Remote channels can also represent the most accessible option for consumers with certain types of vulnerability, including people with physical impairments and those whose mental health conditions, and make it easier to engage in a less pressured way through written communication. The Review therefore considered it important to assess these channels alongside physical provision.

[32] Cash Access UK – Cash Services and Cash Access UK – Community Banker Services
[33] ATM, deposit and assisted cash solutions have not been included as they exclusively offer cash services.
[34] PayPoint – Retailer Solutions, 2026
[35] Lloyds, Halifax, Bank of Scotland, Nationwide Building Society or Monzo. PayPoint – Deposit cash into your bank account, 2026
[36] Ibid
[37] Building Societies Association – Submission to Call for Evidence
[38] UK Finance – Budget 2026 - Submission to HM Treasury, 2026
[39] Chase, Monzo, Revolut, Starling

4.22 Banking services can be accessed remotely either independently through online and mobile banking or with staff support by telephone, video or chat. Service provision and ease of access vary significantly across firms.

Telephone banking

4.23 Telephone banking remains an important channel for accessing banking services. Twelve per cent of UK adults who are day-to-day account holders undertook banking activities by phone in the 12 months to May 2024.[40] Telephone was the most used channel over the 12 months to May 2024 for contacting or attempting to contact current account providers, accounting for 55% of contacts or attempted contacts.[41] The Call for Evidence survey saw 19.4% of consumers and 23% of SMEs refer to telephone banking.[42]

4.24 All traditional banks, branch-based challenger banks[43] and building societies that provide a current account[44] also offer telephone customer support and telephone banking. Digital banks offer telephone customer support; however, some firms may not disclose their contact number on their website, and they may not offer telephone banking.[45]

4.25 Telephone banking is typically delivered through an interactive voice response (IVR) system, enabling customers to undertake routine banking activities such as balance enquiries, transaction history checks, payments and transfers via an automated service, with the option to be transferred to a customer adviser where necessary.[46]

4.26 The services available by telephone can include balance enquiries, payments and transfers, account maintenance, card services, fraud reporting, and assistance with more complex issues such as fraud, account access problems, bereavement and vulnerability-related needs. Available services vary across banks, and some activities are delivered through automated systems rather than directly by a human adviser.[47]

Mobile and online banking

4.27 The use by consumers of mobile banking has increased significantly in recent years. Of the responses to the Call for Evidence survey, 15% mentioned mobile banking.[48] In the 12 months to 2024, 75% of day-to-day account holders used a mobile banking app. However, use was lower among older adults, adults with a household income of less than £15,000, and adults with low capability. Over the same period, the proportion of day-to-day account holders using online banking fell from 75% to 67%. This decline was particularly pronounced among adults aged 18 to 34. By contrast, online banking use

[40] FCA Financial Lives 2024 Survey – Retail Banking, 2025
[41] FCA Financial Lives 2024 Survey – Consumers' experiences with financial services, 2025
[42] Call for Evidence – Analysis of survey data
[43] Barclays UK, HSBC UK, Lloyds Banking Group, Metro Bank, NatWest, Santander UK, TSB and Virgin Money websites, 2026
[44] Nationwide, Coventry, Cumberland Building Societies websites, 2026
[45] Chase, Monzo, Revolut, Starling websites, 2026
[46] Barclays UK, HSBC UK, Lloyds Banking Group, Metro Bank, NatWest Group, Santander UK, TSB and Virgin Money websites, 2026
[47] Barclays UK, HSBC UK, Lloyds Banking Group, Metro Bank, NatWest Group, Santander UK, TSB and Virgin Money websites, 2026
[48] Call for Evidence – Analysis of survey data

increased among adults aged 65 and over. Adults with a household income of less than £15,000 were also less likely to bank online.[49] In 2026, research found that 11% of UK adults said that they were using digital banking services, but sometimes found it difficult, with this figure highest for those aged 18-24 (21%) and 25-34 (17%).[50] There has also been a decline in the proportion of day-to-day account holders banking online, including among adults aged 18-34.[51] Overall, the use of online banking has declined since 2017, while usage of a mobile banking app has increased.[52]

4.28 Traditional banks and building societies that offer current accounts generally provide both online and mobile banking, although the services available vary between firms. Some activities may still require in-person interaction; these can include certain account-opening and identity-verification processes, large cash transactions, complex bereavement cases and aspects of Power of Attorney administration.

4.29 Digital banks deliver their services primarily through mobile apps, with some also offering more limited functionality online, including current accounts, payments, savings products and card services.[53] However, some provide a narrower range of products and services, particularly in relation to cash handling, human support and certain specialist products.

[49] FCA Financial Lives 2024 Survey – Retail Banking, 2025
[50] Post Office – Submission to Call for Evidence
[51] FCA Financial Lives 2024 Survey - Retail banking: Selected findings, 2025
[52] Ibid
[53] Chase, Monzo, Revolut, Starling Bank websites, 2026

5 BARRIERS TO ACCESS

External factors

5.1 Consumers' ability to access essential banking services through physical and remote channels is shaped by a range of external socio-economic and infrastructure factors. The significance of these factors varies by locality, but we summarise here the key issues found by this Review.

- Public transport provision: infrequent public transport connections in rural areas can make physical banking facilities, including branches and banking hubs, difficult to access. Rural communities are present across the four nations, but account for a greater proportion of the population in Northern Ireland and Wales.[54]
- Mobile network coverage: limited coverage can restrict access to telephone and mobile banking services. Coverage is 90% or above across England, Wales and Northern Ireland, but falls to 79% in Scotland.[55]
- Broadband connectivity: poor connectivity can limit access to online banking (95% of premises in Northern Ireland and 71% and 78% in Scotland and Wales respectively).[56] In the Call for Evidence survey responses, 5.1% mentioned difficulties with broadband connectivity being a barrier to accessing banking services.[57]
- Affordability: low incomes can constrain people's ability to obtain and maintain the devices required to access digital and mobile banking channels. Ofcom data suggests that 2.3 million households struggle to afford their mobile contract[58] while around 7% of UK households cancelled a fixed broadband service because they could no longer afford it.[59]
- Digital capability: limited digital skills can prevent customers from accessing essential banking services through online channels. Eight million UK adults lack basic digital skills.[60]

5.2 While these factors sit outside the direct control of the banking industry, they should nevertheless be considered when assessing demand and designing interventions to improve access to banking.

5.3 Although representatives of SMEs made similar references to these factors in discussing the particular needs of small business owners, the Call for Evidence

[54] Gov.UK - Statistical Digest of Rural England - Key findings, 2026; Rural England – State of the Rural Services – The Challenges for Policy Makers, 2025; Gov.scot, Rural Scotland Key Facts 2021, 2021; Northern Ireland Statistics and Research Agency - Rural population grows three times faster than urban, 2026; Gov.Wales - Welsh Index of Multiple Deprivation 2025: deprivation in rural and urban areas, 2026
[55] Ofcom – Connected Nations, UK Report 2025, 2025
[56] Ofcom – Connected Nations update: Spring 2026, 2026
[57] Call for Evidence – Analysis of survey data
[58] Good Things Foundation - Digital Nation 2026, 2026
[59] Ofcom - Communications Affordability Tracker, 2026
[60] Good Things Foundation - Digital Nation 2026, 2026

did not identify other specific socio-economic or infrastructure factors affecting their access to banking.

Barriers across banking channels

5.4 The Review examined evidence of barriers to accessing banking services across both physical and remote channels. Overall, UK personal current account holders report high levels of satisfaction with banking services[61] across branches and banking hubs,[62] mobile apps and digital channels,[63] with digital banks consistently recording particularly strong customer satisfaction scores.[64] Industry data suggests most customers continue to access banking services effectively.[65]

5.5 However, there are sizeable cohorts which experience access barriers across all channels, with consumers finding it difficult or not possible to reach the right person to resolve their query in a quarter (26%) of recent contacts or attempted contacts with a current account provider.[66]

5.6 The Review found that this barrier to access is clearly associated with the reduction in branch networks, particularly where alternative channels – both physical and remote – do not provide the full range of essential banking services (branch equivalence), or customers are not aware of the existence of alternative channels.

Physical channels

5.7 Recent evidence indicates that a sizeable minority of consumers experience difficulty accessing in-person banking services: in 2024, 17% of all UK adults indicated they found getting to a bank, building society or credit union difficult using their normal forms of transport.[67] In the Call for Evidence survey, 34% of consumers identified physical access as a difficulty in accessing banking services.[68] The main barriers more recently identified were limited opening hours (25%); travel distance (20%); queues (18%); time required to complete the activity (10%); and inability to do what was needed (5%).[69]

5.8 Access challenges are less widespread for Post Offices with six per cent of adults reporting that in 2024 it was difficult to get to a branch.[70] Industry and consumer feedback also identified concerns about the location of some banking hubs. In some cases, hubs were considered inaccessible to people with physical access needs or located too far from the communities they are intended to serve.[71]

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[61] Institute of Customer Service – UK Customer Satisfaction Index, 2026
[62] Cash Access UK - 2025 Annual Report and Accounts, 2026
[63] IPSOS – Personal banking service quality – Great Britain, 2026
[64] Gov.UK - Latest banking satisfaction survey results revealed by CMA, 2024
[65] UK Finance – Submission to Call for Evidence
[66] FCA Financial Lives 2024 Survey – Consumers' experiences with financial services, 2025
[67] FCA Financial Lives 2024 Survey – Retail Banking, 2025
[68] Call for Evidence – Analysis of survey data
[69] UK Finance – Submission to Call for Evidence
[70] FCA Financial Lives 2024 Survey – Consumers' experiences with financial services, 2025
[71] FCA ATCS 5.4 Step 2: Assessing significance of impacts of local deficiency - When notified of an upcoming branch closure, LINK is required to carry out a cash access assessment, taking into account a number of factors

5.9 Recent research found that the consumer cohorts experiencing the greatest difficulties accessing in-person services were older people and people in poor health,[72] people with mental health conditions,[73] and people with disabilities.[74] In answer to the question on which groups need access to in-person banking services in the Call for Evidence survey, 57.9% said older people and 33.7% said disabled or vulnerable consumers.[75]

5.10 However, research showed younger consumers were also impacted, with respondents aged 18-34 who had been unable to complete an in-person banking task in the last two years more likely than older respondents to report missed payments, unresolved fraud losses and lost earnings.[76] A proportion of unbanked adults (9%) also cited the lack of nearby bank branches as a reason for not having a bank account.[77]

Remote channels

5.11 Across the range of banking service providers, a significant minority of consumers experience difficulties when using telephone banking. Seven per cent of day-to-day account holders who used telephone banking reported being dissatisfied with their experience.[78] The principal challenges identified among telephone banking users were long waiting times (13%), lengthy interactions (10%) and difficulty reaching an adviser through automated menus (9%).[79]

5.12 Digital channels also present barriers for some consumers. Of adults who did not bank digitally in the 12 months to May 2024, 37% said they were concerned digital banking is not secure and 17% reported that it seems too complicated.[80] In addition 35% of people who help someone else bank say that person finds online or mobile banking confusing or hard to use.[81]

5.13 Consumers who use online banking also reported practical difficulties. Among online banking users, the most frequently reported problems were forgotten login details (8%), navigation difficulties (7%), being unable to complete a task (6%) and device or connectivity failures (6%).[82] These can all be exacerbated by age, health, poverty and disability. Customers of digital-only banks are required to keep their phone operating system up to date, which may require them to purchase a new phone.

5.14 The impact of scams and fraud, and growing awareness of the increasingly sophisticated techniques used by criminals using AI, make it more likely that consumers will avoid remote channels. Among respondents to this Review,

[72] FCA Financial Lives 2024 Survey – Consumers' experiences with financial services, 2025
[73] Money and Mental Health Policy Institute – Submission to Call for Evidence
[74] Post Office – Submission to Call for Evidence
[75] Call for Evidence – Analysis of survey data
[76] Post Office – Submission to Call for Evidence
[77] FCA Financial Lives 2024 Survey – Retail Banking, 2025
[78] Ibid
[79] UK Finance – Submission to Call for Evidence
[80] FCA Financial Lives 2024 Survey – Retail Banking, 2025
[81] LINK/Devon Fields Consulting – Hidden Heroes, 2025
[82] UK Finance Submission to Call for Evidence

17.5% mentioned fraud in relation to needing access to in-person banking services.[83]

[83] Call for Evidence – Analysis of survey data

6 IMPACT

The Review has examined impact of reduced access to physical bank networks on consumers and businesses.

Consumer detriment

Affected consumer cohorts

6.1 The access barriers are not experienced evenly across the population. Although vulnerability among consumers has long been recognised as widespread and contextual, the consumer groups found to experience the greatest difficulties accessing mobile and online banking frequently exhibit characteristics of vulnerability, including older people, people on low incomes, and people with low capabilities and lacking qualifications.[84]

6.2 In the Call for Evidence, older people were the leading demographic mentioned as needing access to in-person banking services at 57.9%, and disabled and vulnerable consumers at 33.7%.[85] Digitally excluded groups were also mentioned by 15.7% of respondents and some form of universal or situational access was mentioned by 42.5% of respondents.[86] Those who had experienced a recent negative life event, people with mental health conditions, and adults with low resilience were among the groups most likely to experience the greatest difficulties accessing telephone banking.[87]

6.3 Evidence also shows that some digital banking journeys are not designed to effectively support customers with vulnerable characteristics,[88] including those eligible for Basic Bank Accounts.[89] [90] The main design issues include facial recognition failures, unlabelled buttons, missing alternative text and lack of audio guidance.[91]

Types of detriment

6.4 To understand detriment associated with barriers to banking access, the Review examined responses to the Call for Evidence alongside several specialised studies that provided a more detailed and systematic assessment of the different forms of detriment experienced by consumers. The evidence is clear that barriers can result in both financial and wider well-being detriment.

Financial detriment

6.5 The evidence points to several potential financial impacts on consumers:

- Losses: where scams or fraud are not addressed promptly, consumers may be unable to prevent or recover losses. In 2026, 15% of people reported that they had lost money to a scam or fraud that they were unable to resolve

[84] FCA Financial Lives 2024 Survey - Financial Inclusion
[85] Call for Evidence – Analysis of survey data
[86] Ibid
[87] Money and Mental Health Policy Institute - Submission to Call for Evidence
[88] FCA - Digital design in customers' online journeys: good practice and areas for improvement, 2025
[89] FCA – Banks told to improve access to basic accounts, 2026
[90] FCA, Basic Bank Accounts: The problems we found and how industry is committing to change, 2026
[91] Project Nemo - Submission to Call for Evidence

because of greater difficulty in accessing in-person banking services.[92] Fraud was also a concern across survey responses in the Call for Evidence, and a reason for accessing in-person banking services, mentioned by 17.9% of respondents.[93]

- Charges: seventeen per cent of consumers incurred charges because of payments being missed or delayed.[94]
- Additional travel and time costs:[95] [96] ten per cent of people incurred extra costs or charges to complete something in person when they were unable to access in person banking locally to them. This rose to 19% for people with a disability. In addition, 38% of respondents said that travelling to a local branch has become more expensive.[97] In response to the Call for Evidence, 9.1% of people mentioned travel times in their responses when accessing in-person banking services.[98]
- Loss of income: fourteen per cent have lost wages or earnings due to needing to spend more time travelling to a bank.[99]
- Loss of financial independence[100] and exposure to financial exploitation:[101] one in five UK adults help others with digital banking tasks and 54% of those providing support assist without any formal authority.[102] Among adults with a learning disability, 87% rely on informal and unsafe workarounds, sharing PINs, cards, passwords or account credentials with family members or carers to manage their everyday finances.[103]
- Reduced confidence in managing personal finances:[104] twelve per cent of consumers surveyed felt less confidence in managing their money because of reduced access to in person banking services.[105] Less frequent branch visits may reduce consumers' visibility of their finances and make day-to-day money management more difficult.[106]
- Fraud costs: consumers may also incur losses through fraud linked to online or telephone banking.[107]
- Reduced opportunities to identify financial harm: branch closures reduce opportunities for trusted staff to provide guidance and identify potential financial harm or economic abuse.[108]

[92] Post Office – Submission to Call for Evidence
[93] Call for Evidence – Analysis of survey data
[94] Post Office - Submission to Call for Evidence
[95] London Economics - Costs to consumers and SMEs of a loss of access to in-person cash and banking services, 2023
[96] FCA-commissioned qualitative consumer research, 2025
[97] Post Office - Submission to Call for Evidence
[98] Call for Evidence – Analysis of survey data
[99] Post Office - Submission to Call for Evidence
[100] UK Finance - Submission to Call for Evidence
[101] FCA-commissioned qualitative consumer research, 2025
[102] LINK/Devon Fields Consulting – Hidden Heroes, 2025
[103] Project Nemo - Submission to Call for Evidence and Safe Spending for Adults with a Learning Disability, 2025
[104] UK Finance submission to Call for Evidence
[105] Post Office and WPI Economics – Supplementary consumer insights, 2026
[106] FCA-commissioned qualitative consumer research, 2025
[107] London Economics - Costs to consumers and SMEs of a loss of access to in-person cash and banking services, 2023
[108] FCA-commissioned qualitative consumer research, 2025

- Exclusion: where their local access to in person banking is unavailable, nearly one in five people reported abandoned their banking task altogether.[109]

Wellbeing detriment

6.6 The evidence also indicates that barriers to banking access can affect consumers' wellbeing and their confidence in engaging with banking services:

- Anxiety, stress, or frustration: eighteen per cent of people reported feeling more stressed or anxious, rising to 24% among disabled people.[110] Accessibility barriers, including photosensitivity, flashing visuals and poor speech-to-text compatibility, can make banking websites difficult to use. This can cause routine tasks such as bill payments to take hours or fail if a security session times out.[111] People with mental health conditions may also experience significant anxiety when speaking by telephone. Navigating automated systems or being transferred between departments can be emotionally demanding, particularly where telephone banking is used because in-person services are unavailable.[112]

- Fear: branch closures can create feelings of fear or abandonment among regular users, reducing trust in banks and discouraging engagement.[113]

- Anger: where closures are perceived to be driven by profit, feelings of abandonment may lead to anger and make alternative banking channels feel imposed and less attractive to use.[114]

6.7 Quantifying this detriment is difficult, not least when the reported extent of need among consumers is masked by the informal assistance given by friend, family and carers to customers who are unable to use digital or telephone services. Vulnerable people may also be reluctant to disclose their needs or circumstance to a bank.

6.8 Nevertheless, it is clear from the evidence provided to this Review that there are widespread poor customer outcomes that can be directly attributed to the decline in access to in-person services. These can be personal to an individual consumer or structural. Cumulatively across the banking sector, the evidence shows that harm is material and recurring.

Business detriment

6.9 Although there is limited research assessing the detriment to SMEs arising from reduced access to in-person banking, the Call for Evidence provided useful insights on the experience of this customer cohort. The main challenges identified[115] are summarised below.

[109] Post Office – Submission to Call for Evidence
[110] Post Office and WPI Economics – Supplementary consumer insights, 2026
[111] Project Nemo - Submission to Call for Evidence
[112] Money and Mental Health Policy Institute - Submission to Call for Evidence
[113] FCA-commissioned qualitative consumer research, 2025
[114] Ibid
[115] Call for Evidence – Analysis of survey data

- Cash handling and business continuity challenges: businesses reported difficulties depositing cash and cheques, obtaining change and carrying out routine banking, with some indicating that these challenges could affect their ability to continue operating.
- Safety, security and privacy: holding more cash on business premises or carrying it over longer distances increased exposure to theft and robbery. Respondents also linked the shift of less digitally confident users towards online banking with a greater risk of scams and loss of privacy.
- Higher travel costs, longer journeys and lost productivity: respondents described longer journeys to access banking services, additional fuel and parking costs, staff time away from the business and time spent queuing. Examples included 40-mile round trips, weekly 15-mile journeys to deposit cheques and the need to take half a day off work to undertake banking.
- Wider local and economic impacts: a smaller but significant group of respondents linked branch closures to reduced high-street footfall, weaker local trade and potential harm to small towns and visitor economies.

6.10 In summary, evidence provided to the Review suggests that more than three million adults in the UK are regularly relying on banking services being provided to them in-person, rising to more than four million if those who use in-person services less frequently are included.

6.11 While the scale of unmet need is difficult to quantify, some estimates suggest that around 40% of consumers have been unable to access a local in-person banking service following reductions in banking infrastructure, and that nearly one in five of those affected could not carry out the banking activities they needed to do.

6.12 Taking into account the volume of consumers reporting their propensity to abandon banking tasks where they are unable to access services, a changing population of vulnerable people, and the growing impact of scams and fraud, it is reasonable to conclude that this need for in-person banking will remain for the foreseeable future.

7 THE EXISTING REGULATORY FRAMEWORK

7.1 As set out in this report, poor consumer outcomes attributable to an inability to access in-person banking services include:

- a range of financial costs (or positive financial gains foregone)
- stress, disempowerment and risk-taking
- reduced confidence
- lost time.

7.2 There is clear evidence of foreseeable harm to individuals or businesses, and consequently negative impacts on communities, community groups or charities, attributable to the inaccessibility of banking services. The Review therefore examined the existing legislative and regulatory framework that might address these harms.

The Equality Act 2010

7.3 The legislation establishes a legal obligation on providers of services to the public not to unlawfully discriminate against customers. This applies across the customer journey, including access to products and services, eligibility and terms, customer service, communications and the delivery of services. Firms must also make reasonable adjustments for disabled customers where required. However, the Act does not stop a firm from closing branches nor prescribe the channels which firms must offer to deliver banking services.

The access to cash regime

7.4 The Government legislated to protect access to cash services through the Financial Services and Markets Act 2023 to ensure that cash remains available for those who need it. The Act introduces a requirement for the FCA to exercise its functions in the access to cash regime for the purpose of 'seeking to ensure reasonable provision of cash access services in the United Kingdom, or a part of the United Kingdom'. This includes the ability for the FCA to set rules which designated firms must follow.

7.5 It defines cash and cash access service for the purposes of the legislation, setting the perimeter of the regulation to apply to cash withdrawal and cash deposit services.

7.6 The Act gives the Treasury the power to designate the banks and building societies, as well as the operators of cash access coordination arrangements, which must follow the FCA's rules. The legislation sets out several factors which the Treasury must have regard to when considering designation, including the distribution of cash access services operated, the distribution of persons holding current accounts provided, the share of the current account market, and the total value of the deposits held in current accounts.

7.7 The legislation also places a requirement on the Treasury to publish a statement of policy concerning cash deposit and withdrawal services, to which the FCA must 'have regard' when making rules, including in determining what constitutes 'reasonable provision' of cash access services in the UK. The policy statement sets an expectation that reasonable provision of access to cash for business and personal users should be maintained in line with a 95% distribution across the UK and notes that only free cash access services should contribute towards reasonable provision of cash access services. Finally, the policy statement sets out several factors that the FCA might wish to consider regarding local deficiencies that have significant impacts on reasonable provision of access to cash, including the hours of availability, travel and geographic factors and demographic factors in a local area.

7.8 Designated firms must assess and fill gaps in cash access. The regime is supervised closely, bringing more rigour to the previous voluntary industry scheme. While this appears to work well for filling gaps in access to cash, there is continued debate around the suitability of the assessment criteria as they apply to banking hubs. The FCA will formally evaluate the impact of the regime after the Access to Banking Services Review has concluded.

Branch closure guidance

7.9 In place since 2020, and updated in 2022, the FCA's guidance FG22/6 (with accompanying good and poor practice examples) sets expectations that firms which are closing branches should analyse the impact on customers, consider alternative services that could be put in place, and clearly communicate information about the closures and alternative provision.

7.10 Banks that are closing branches often leave behind community banker support to maintain some level of in person access to essential banking services. However, there is no requirement for firms to maintain this provision in the longer term. Some firms only offer it as a temporary measure and others are withdrawing or reducing this provision in areas where there is low footfall.

7.11 The FCA's supervisory work focuses on improving firms' communications surrounding closures, ensuring there is at least 12 weeks' notice, for those who use the branch provided through a variety of channels, with specific plans in place to contact and support customers in vulnerable circumstances who may rely on the branch. It is recognised by banks that there is still limited awareness of alternative ways to access banking services.

The Consumer Duty

7.12 The FCA's Consumer Duty requires firms to act with reasonable care to avoid foreseeable harm to consumers. They must act where they identify that any group of retail customers are receiving worse outcomes than another group for the same product, responding flexibly to circumstances where poor outcomes are identified. The FCA has been clear that detriment is varied and can be worsened or made more complex when consumers are vulnerable.

7.13 The Duty does not prescribe the channels which firms must offer to deliver good outcomes. For example, firms with digital-only support offerings are not required to offer additional, non-digital channels to meet the needs of customers outside of their target market.

7.14 But whichever channels firms do offer, these must meet their customers' needs and banks must ensure the support they offer through their chosen channels is working effectively. This includes how they deal with non-standard issues, which will likely need a real-time human interface, and support customers with changing needs.

7.15 The Duty does not stop a firm from withdrawing or altering a product or service and cannot be used to stop branch closures.

7.16 Except for access to cash services, the current regulatory framework is not equipped to effectively tackle detriment where it arises from the inaccessibility of banking, or give the relevant authorities the means to ensure a strategic, national approach to ensuring reasonable provision of in-person services beyond cash services.

7.17 There is much to be learned from the existing access to cash regime, in particular the scope for collective provision of services such as hubs and other community banking outlets where this can be shown to meet local needs cost-effectively. But it is intended to protect provision and to respond to trigger events, such as the withdrawal of services, rather than to underpin a positive, strategic approach to meeting the need for essential banking services.

7.18 At the same time, it is important to recognise that the multiple ways in which many retail banking services can be provided are evolving fast and that all the available services are ultimately paid for by their customers.

A voluntary approach

7.19 This Review has considered carefully whether improvements can be achieved through a voluntary approach that relies on goodwill and collaboration between major providers of banking services within the guardrails of competition law.

7.20 Voluntary schemes presently underway, including the development of banking hubs and more inclusive digital products, are welcome and it is important to build on these and avoid disincentivising other positive initiatives including the retention or extension of physical bank branches that improve the accessibility of services for all.

7.21 But a voluntary approach will not achieve a level playing field for all large providers of essential banking services with a consistent standard of essential service provision. It would risk slow and uncertain progress through lengthy cycles of negotiation, and continuing consumer confusion as to the availability of services caused by variations in service provision. And it would not bring

about the necessary sustainable, proportionate and planned investment in infrastructure and staff.

7.22 The Review has therefore concluded that a new statutory framework is the best way forward, with an obligation on designated larger providers of personal current accounts to ensure reasonable access to essential in-person banking services.

8 A FUTURE FRAMEWORK

8.1 It is, of course, for the Government and Parliament to decide on any future statutory framework. During the course of this Review, expert views were gathered as to the design principles on which this might be based, and a synthesis of these is presented below.

8.2 At its core, the intended outcome would be **reasonable access to essential in-person banking services for everyone that needs it.** In line with the Consumer Duty, an obligation on banks to achieve that outcome should serve to recognise the range of different ways in which it might be delivered. But a future framework will also need to be capable of credibly assessing need and delivering consistent and inclusive services to reasonable catchment areas.

8.3 This will require legislation to equip the FCA with the necessary powers to impose requirements on designated firms as the regulator for access to banking.

Design principles for the regulatory framework

8.4 Based on evidence provided to the Review, the five main design principles that the regulatory framework should meet are:

- The inclusion of the Financial Conduct Authority (FCA) as the appropriate regulator to oversee the regime
- The avoidance of duplication with the existing access to cash regime to reduce potential overlap between sets of services and participants providing those services
- The tiering of the provision of essential banking services, in line with the definitions in this report, to appropriately group services and require different levels of access
- An assessment process (which could be provided collectively) for gaps or potential gaps in cash and in-person banking provision, with a requirement to consult local knowledge, with solutions to these gaps remaining flexible
- The inclusion of an independent appeals route and a mechanism for reviewing the regime itself and the flexibility to make changes, to ensure that market developments are taken into account.

8.5 To ensure that these principles are met, a potential regulatory framework for access to banking services could build upon elements of the existing access to cash regime. Building on the access to cash regime would help to avoid duplication and could meet several of the other principles set out above, such as having the FCA as the regulator and providing flexibility for reviewing the regime. As described above, the access to cash regime consists of a statutory framework for ensuring reasonable access to cash, with the Treasury setting the legislative framework, the FCA regulating delivery and industry determining how obligations are met.

Building on the access to cash regime

8.6 There are several ways in which elements of the access to cash regime could be used as a basis for a future access to banking services regulatory regime. However, to meet the principle of removing duplication, a preferred approach might be to create a combined access to cash and banking services regime.

8.7 Legislation would be required to amend the access to cash regime and include 'access to banking services' as part of the existing legislation. This would then require that the Treasury publishes a policy statement relating to access to cash and access to banking services, enable the Treasury to designate persons involved in the provision of both access to cash and access to banking services, and give the FCA the ability to make rules for designated persons.

8.8 As set out in this report, there are two additional broad categories into which services fall (day-to-day and complex), and these should be reflected in the design of the regulatory regime, by the inclusion of three categories of services provided – cash access services, day-to-day banking services and complex banking services.

Designation

8.9 The Treasury should consider designating banks and building societies according to the categories of services that they provide – for example, some banks and building societies may need to be designated for cash alone, cash and day-to-day banking services, cash and complex banking services, or all three.

8.10 The factors the Treasury should have regard to when designating a firm should also reflect this categorisation and there may be different factors required for the different categories of designation. Some of the factors currently contained in the legislation may still remain appropriate, for example, the share of the current account market, or this might be more appropriately based on share of transactions. However, there may be further factors to be considered as part of access to banking services designation, such as whether there is supervisory evidence of firms meeting their customers' needs. The Treasury should consult the FCA in considering whether firms should be designated as they will hold some of this evidence, particularly where it is derived from their supervision of firms.

8.11 It may well be the case that the number of firms designated for each element of essential service would need to change as circumstances change. Poor outcomes are not necessarily confined to the customers of traditional banks, and consumers often 'multi-bank' so as to access different service provision. Evidence provided to the Review shows that large numbers of customers of digital-only banks frequently rely on physical cash services. There is also recognition that vulnerable consumers of all banks may struggle to have their more complex needs met, and this can be expected to become more significant

as the profile of customers changes, for example through ageing or vulnerabilities.

8.12 LINK is currently the sole designated operator of cash access coordination arrangements. A similar arrangement could be introduced, along with new criteria, with a designated operator to assess access to banking services. There is also an appeals process for access to cash assessments, including an independent assessor. A similar process should apply for access to banking services assessments.

Policy statement

8.13 It would be preferable for the Treasury to set out a single policy statement setting out the approach to both access to cash and access to banking services. This would help to reduce duplication and build on the synergies between the two areas.

8.14 Separate definitions of reasonable provision of access to cash and reasonable access to banking services will be required, as the geographical distribution of these services is different at the present time and the need for banking services will likely be different to access to cash going forward. The policy statement should delineate the services into the three categories set out above, as there may be different considerations for each.

8.15 The factors that the FCA might wish to consider may also differ between the three categories.

8.16 Whilst the access to cash regime defines the specific cash services in legislation, it would be preferable for the exact definition of banking services to be included in the policy statement. This would allow more flexibility for the banking services to be updated as part of any Treasury revisions to the statement, as the nature of the banking services required by customers is likely to change more frequently than cash services.

FCA rules

8.17 Following the publication of the Treasury's new policy statement on access to cash and access to banking services, the FCA would need to have regard to the policy statement in setting new rules to apply across both access to cash and access to banking services, building on their existing rules and guidance. The FCA would follow its usual practice in consulting on these rules.

8.18 As is currently the case for the access to cash regime, any assessments for access to banking services should also remain solution agnostic. For example, if a firm can prove that it is able to meet its obligations to provide reasonable access to cash through other means than joint industry solutions such as banking hubs, this would be acceptable. Where banking services are provided collectively, for example through hubs, the FCA should supervise the relevant designated firms to ensure that provision meets an acceptable standard,

including practical arrangements (such as opening hours and the availability of printers) and controls.

Additional features

8.19 Whilst the previous section set out how the access to cash regime might evolve to include access to banking services, there are further changes to the regime that the Treasury and FCA could make in order to strengthen the regime's responsiveness to external factors and to make it work better for local communities.

Review period

8.20 The regime should include a review period to ensure that it remains up to date with the latest developments in services and the needs of customers.

8.21 The access to cash regime already provides for the Treasury to keep the cash access policy statement under review and this should also be applied to the new policy statement. The Treasury may want to consider whether it would be appropriate for a regular review period to be set for the policy statement, either set out in legislation or in the policy statement itself. The FCA should periodically review its rules, to make sure they reflect any developments, in line with its current statutory requirements. It should publish its conclusions and relevant supporting evidence and establish a consumer challenge mechanism, or require the industry to do so, to keep consumer and small business representatives engaged.

Have regard to local communities

8.22 Consumer confidence in a future framework will in part depend on the extent to which it is demonstrably taking into account the views of local communities. A requirement to have regard to the needs local communities should be built into the FCA's rules for the operator of access coordination arrangements, to ensure that local people and relevant organisations are properly consulted when decisions are made regarding the location of cash and banking facilities. Decision-making should be founded in good practice for assessing community catchment areas for services, informed by the expertise and knowledge of local authorities, advice bodies, credit unions and other community development finance institutions. These assessments should identify the places that function as natural centres of economic and community activity, going beyond residential patterns, administrative boundaries or proximity to the nearest town.

8.23 The views of communities and small businesses would also need to be heard through effective post-implementation engagement.

8.24 A co-ordinated banking industry communications campaign would raise awareness of existing in-person services in local communities and could better promote the current account switching service.

Timeframes

8.25 With the support of Government and Parliament, and with prompt action by the regulator and industry, the legislative, policy and regulatory measures necessary to achieve a future framework could be put in place and implemented during this Parliament. Learning from the access to cash regime and more recent developments, it is entirely feasible for the industry to take action in 2027 so that new approaches can be piloted and communities begin to see a material difference well ahead of any implementation period in 2028.

Wider considerations

8.26 The Government will have an ongoing role to play beyond legislation. As part of its commitment to financial inclusion, the Treasury should regularly review progress with stakeholders to ensure that the broad aim of this action – the sustainable provision of reasonable access to banking services – continues to be met as the market evolves.

8.27 Alongside this, the Government and industry more widely should build on existing plans to drive inclusive digital design and remove barriers to delegated or third-party access to current accounts. The Review repeatedly heard calls for action to promote the safety of banking staff and bank premises, and to ensure that local authorities can play their part in assessing the need for banking services as part of their local economic plans.

9 CONCLUSIONS AND RECOMMENDATIONS

Essential banking services

9.1 There was a broad consensus among respondents to this Review's Call for Evidence and stakeholder discussions as to which banking services should be regarded as essential. It is important to recognise that consumers do not always distinguish access to cash from access to wider banking services. People often combine cash withdrawals or deposits with non-cash transactions and need different combinations of services at different times, in particular when they have difficulty completing a transaction online.

9.2 For individuals, day-to-day banking is centred on opening and managing personal current accounts. For SMEs, charities and clubs, the available evidence suggests day-to-day banking needs centre primarily on cash services, including cash deposits and withdrawals and the provision of cash and coin change. They also include administrative changes to mandates and signatories for current accounts.

9.3 Significant or complex banking activities are those essential tasks that customers may need to undertake less frequently in response to unplanned life events or circumstances requiring tailored support.

9.4 Consumers' ability to access essential banking services through physical and remote channels is shaped by a range of external socio-economic and infrastructure factors. It is clear from the evidence provided to this Review that there are widespread poor customer outcomes that can be directly attributed to the decline in access to these essential services in-person, including financial and well-being harms. These can be personal to an individual consumer or structural. For the owners of SMEs, the evidence of detriment is largely related to cash handling, with some evidence of local economic impacts. Cumulatively across the banking sector, the evidence shows that harm is material and recurring.

9.5 Evidence provided to the Review suggests that more than three million adults in the UK are regularly relying on these services being provided to them in-person, rising to more than four million if those who use in-person services less frequently are included. While the scale of unmet need is difficult to quantify, some estimates suggest that around 40% of consumers have been unable to access a local in-person banking service following reductions in banking infrastructure, and that nearly one in five of those affected could not carry out the banking activities they needed to do.

9.6 Taking into account the volume of consumers reporting their propensity to abandon banking tasks where they are unable to access services, a changing population of vulnerable people, and the growing impact of scams and fraud, it is reasonable to conclude that this need for in-person banking will remain for the foreseeable future.

Reasonable access

9.7 It is clear that the existing statutory and regulatory frameworks are not equipped to deal with the detriment identified.

9.8 The Review has therefore concluded that a new statutory framework is the best way forward, with an obligation on designated larger providers of personal current accounts to ensure reasonable access to essential in-person banking services. This will require legislation to equip the FCA with the necessary powers to impose requirements on designated firms as the regulator for access to banking.

9.9 At its core, the intended outcome would be reasonable access to essential in-person banking services for everyone that needs it. In line with the Consumer Duty, an obligation on banks to achieve that outcome should serve to recognise the range of different ways in which it might be delivered. But a future framework will also need to be capable of credibly assessing need and delivering consistent and inclusive services to reasonable catchment areas, recognising that the multiple ways in which many retail banking services can be provided are evolving fast and that all the available services are ultimately paid for by their customers.

Recommendations

1. The Government should introduce legislation as soon as possible to create an access to banking services obligation on designated banks. This should extend the remit and powers of the FCA for the purpose of ensuring reasonable provision of essential in-person banking services.
2. The Treasury should set out the Government's policy concerning access to banking services for consumers and small businesses. This should inform the development of an appropriate policy and regulatory framework for reasonable provision of essential banking services across the UK focused on delivering consistent positive outcomes for customers.
3. Designated banks should be required to assess and fill gaps, or potential gaps, in in-person banking provision that significantly impact their customers in appropriate community catchment areas. In doing so, designated firms should be required to establish credible mechanisms for consulting local authorities, charities, advice bodies, credit unions and other relevant community groups to ensure their assessments are grounded in local knowledge.
4. The required standards of provision for day-to-day banking and complex banking services should be established and supervised by the regulator, with different levels of reasonable access for each based on flexible commonsense measures. The ways in which designated banks can

discharge their obligation, including through the provision of their existing physical infrastructure or shared hubs, should be flexible but measurable against those standards and subject to the FCA's Consumer Duty.

5. Where there is disagreement with the outcome of an assessment for provision of services there should be a right to an independent review, as with the present access to cash arrangements. The regime itself, including the designation of firms, should be subject to reporting requirements and regular review to ensure relevant market developments and changing consumer needs are taken into account.

6. The banking industry, Government and regulator should redouble their efforts to promote accessible banking across every channel, including digital and telephone services.

ANNEX 1 - TERMS OF REFERENCE

Context

The way UK citizens bank has changed significantly in recent years. Whilst many customers benefit from the ease and convenience of remote banking and the digital innovations that allow them to manage their finances more easily, other people still need or prefer access to in-person banking services.

In recent years, we have seen many retail banks reviewing how to best meet the changing needs and preferences of their customers. This has included reshaping their branch networks in response to significant shifts in consumer behaviour. This reflects some of the changes in the way people choose to bank; however, this may have also resulted in detriment caused by the changes to branch networks to those who require access to in-person banking services.

The Government recognises that it is not possible, nor reflective of customer banking behaviour, to 'turn back the clock' on the provision of banking services which has in large part become digital and less relationship based because of customer preferences. However, the Government is committed to ensuring that some customers, including those who are vulnerable or have specific needs, retain sufficient access to essential banking services in-person and remains committed to supporting the financial services industry's roll-out of 350 banking hubs by the end of this Parliament.

While access to cash is protected by legislation and the Financial Conduct Authority (FCA) has responsibility and powers to ensure reasonable provision of cash withdrawal and deposit facilities, there are currently no existing protections for the provision of access to in-person banking services.

As such, HM Treasury has commissioned an independent Review into Access to Banking Services to better understand the impact of the current trajectory of access to in-person banking services, including the scale of any detriment to consumers and the impacts it may have on vulnerable groups.

Objectives and Scope

The Access to Banking Services Review should consider whether declining access to in-person banking services is causing consumer detriment, and the scale of any detriment, including to any specific cohort or demographic.

The Review should look at this primarily through a 'customer needs' lens – customer in this context primarily means individuals using retail banking services, but will also include organisations (small businesses, non-profit and community groups) using banking services – and seek to collect evidence for Government, financial services regulators and industry.

In making recommendations, the Review will seek to answer the following questions:

1. Which in-person banking services are important or essential for customers to be able to access?

2. Are there groups of customers who need or require access to in-person banking services and if so, who are they?
3. Is the decline in access to in-person banking services causing detriment to customers, and to how many customers? What is the materiality of the detriment caused to these customers?

As part of answering these questions, the Review should consider both how in-person banking has evolved to the present day, as well as the likely trajectory in this area under current regulation. It should also cover market dynamics, including the impacts that competition between types of firms may have on the market and the implications for customer access, as well as the role of existing initiatives or emerging digital or hybrid service models to mitigate any detriment.

The evidence collected by the Review will inform future decisions on whether further action is needed.

The Review will seek input from market participants and consumer representatives, and Government and regulators may also be consulted.

Financial Services is a reserved matter for the UK Government, and as such, access to in-banking services across the UK will be considered by the Review.

Governance

The Review is being conducted on an independent basis. It will be chaired by Richard Lloyd OBE, with HM Treasury providing the secretariat.

The Chair will provide a report and recommendations to the Government in October 2026. The Government will publish the report accordingly.

ANNEX 2 - STAKEHOLDERS CONSULTED BY THE REVIEW

The Call for Evidence enabled the Review to gather written evidence from a wide range of stakeholders across the UK, including members of the public, consumer groups, businesses, charities, clubs and industry participants. While much of this evidence was gathered through an online survey, multiple respondents submitted detailed written evidence: 19 submissions from industry bodies and individual firms, 32 from charities and consumer groups, and numerous emails providing general observations.

Many stakeholders met with the Review in direct engagement sessions to support broader discussion and give stakeholders an opportunity to elaborate on the key issues.

The Review also benefitted from a series of workshops and discussions with groups of consumers and small business owners.

The stakeholders that engaged with the Review included:

Banks and banking trade bodies

AIB, Bank of Ireland, Barclays UK, Chase, Danske Bank, HSBC UK, Lloyds, Metrobank, Monzo, Nationwide Building Society, NatWest, Revolut, Santander UK, Starling, Ulster Bank, UK Finance

Building societies and credit unions

Coventry Building Society, Cumberland Building Society, Dudley Building Society, Ecology Building Society, Leeds Building Society, London Mutual Credit Union, Monmouthshire Building Society, Newcastle Building Society, Newbury Building Societies, Scotwest Credit Union, Yorkshire Building Society, Building Societies Association

Cash access providers

Post Office, LINK, Cash Access UK, OneBanx, PayPoint

Research organisations

WPI Economics

Consumer, inclusion and community organisations

Age Scotland, Age UK, All Together Money, Connection Project, Disability Equality Scotland, Fair 4 All Finance, Financial Inclusion Commission, Mencap, Money and Mental Health Policy Institute, Project Nemo, Quarriers, Royal National Institute of Blind People, Citizen Advice Scotland, Consumer Scotland, Scottish Women's Budget Group, Northern Ireland Action Council, Northern Ireland Rural and Community Network, Payment Choice Alliance

Business and industry representatives

Federation of Small Businesses, Innovate Finance, Northern Ireland Federation of Small Businesses, Northern Ireland Financial Services Union/Financial Services Union, Northern Ireland Retail, National Federation of Sub-Postmasters

Consumer and industry advisory bodies

Financial Services Consumer Panel, Access to Cash Independent Assessor, UK Finance Consumer Strategic Advisory Group

Governments, regulators and public bodies

Scottish Government, Welsh Government, Northern Ireland Executive, Bank of England, Financial Conduct Authority

Parliamentarians

Members of Parliament

ANNEX 3 – RESPONSES TO THE CALL FOR EVIDENCE

The Review received 18,197 responses from a range of stakeholders, as shown in the table below. Responses were submitted through the survey form or by letter.

Table 2 - Survey respondents

Respondent category	Responses
Individual / personal capacity	17,557
Business / sole trader	212
Representative / membership body	131
Charity / voluntary / community / faith group	107
Family / carer / proxy / attorney	102
Public sector / elected representative	8
Professional / support role	23
Multiple capacities	43
Other / unclear	14
Total respondents	**18,197**

Source: Review responses

ANNEX 4 - EXISTING LEGISLATION, REGULATION AND INITIATIVES

The following is a non-exhaustive summary of relevant statutory and voluntary measures aimed at improving access to banking.

Statutory

The Financial Services and Markets Act 2000 and the FCA's Access to Cash Sourcebook (ATCS) require the largest banks and building societies to provide access to cash free of charge and assess and fill significant gaps in cash provision. However, these requirements do not extend to banking services. The FCA framework places requirements on firms proposing to close the 'last branch in town' to carry out an assessment of the impact on cash-access services if that branch closed.

Firms in scope – 14 Treasury designated banks and building societies.

The FCA's Branch and ATM Closures or Conversions Guidance (FG22/6) sets out what banks and building societies should do before closing a branch, significantly reducing services or opening hours, or converting a free-to-use ATM to pay-to-use. This includes assessing customer impacts and ensure effective alternatives are available. However, the Guidance is not prescriptive and does not prevent firms from closing branches.

Firms in scope – Banks and building societies considering/undertaking branch closures or relevant ATM changes.

The FCA's Consumer Duty requires financial services firms to act to deliver good outcomes for retail customers. This includes designing products and services that meet customers' needs and providing appropriate support throughout the customer journey. However, the Duty does not stop a firm from withdrawing or altering a product or service and cannot be used to stop branch closures.

Firms in scope - FCA-regulated firms carrying on retail market business including banks and building societies.

Under the Payment Accounts Regulations 2015 (PARs), the UK's nine largest current account providers are required to offer a basic bank account to consumers who are legally resident in the UK and either do not have a bank account or are not eligible for a standard current account. However, these requirements do not prescribe the specific channels through which those services must be provided.

Firms in scope - 9 Treasury designated banks and building societies.

The Equality Act 2010 establishes a legal obligation on providers of services to the public not to unlawfully discriminate against customers. This applies across the customer journey, including access to products and services, eligibility and terms, customer service, communications and the delivery of services. Firms must also make reasonable adjustments for disabled customers where required. However, the Act does not stop a firm from closing branches nor prescribe the channels which firms must offer to deliver banking services.

Firms in scope – Banks and building societies.

Non statutory

The Post Office Banking Framework**:** an industry agreement that enables customers of participating banks and building societies to access basic banking services at Post Office branches. Banking Framework 4, which runs from 2026 to 2030, supports access to cash across the UK by providing cash withdrawals, cash deposits, cheque deposits and balance enquiries through the Post Office network.

Firms in scope – Signatory banks and building societies.

The UK Government Digital Inclusion Action Plan is a cross-government strategy to reduce digital exclusion through improved digital skills, connectivity, device access, accessible services and local support.

National Payments Vision sets out the Government's ambitions for a trusted, world-leading payments ecosystem delivered on next generation technology, where consumers and businesses have a choice of payment methods to meet their needs.

UK Finance Inclusive Design Working Group is an industry collaboration and focused on ensuring banking services and access solutions are designed to be accessible and inclusive for all customers.

UK Finance Digital ID verification is an industry initiative to enable customers to securely verify their identity and personal details through their banking app, reducing reliance on physical documents and simplifying access to online services with customer consent.

Automated banking hubs are Cash Access UK's pilots where a single Customer Liaison Officer provide support to customers of all participating banks and connect them to their bank by phone when specialist assistance is required.

Project Nemo is a financial services industry initiative promoting disability inclusion and the design of more accessible products and services.

Connection Project is an initiative supported by banks aimed at improving digital participation by increasing access to connectivity, devices and digital support.

The Access to Banking programme is an initiative launched by the North Yorkshire Council to support alternative community-based banking provision and improve local access to in-person banking services.

Telephony innovations such as AI-enabled multilingual support are being explored by banks to improve telephone banking.

ANNEX 5 – GLOSSARY

Branch-based challenger banks	Newer or smaller banks that compete with established high street banks while operating some physical branches alongside digital and other remote banking channels.
Cash Access UK	A not-for-profit company owned by major UK banks, designated under the Access to Cash regime, that provides shared cash and banking services, including banking hubs and deposit services, in communities across the UK.
Digital banks	Banks that deliver services primarily through mobile apps or online platforms and generally do not operate a traditional branch network.
Digital channels	Online (in internet browser) and mobile banking.
High street banks	Retail banks with an established network of physical branches, typically offering personal and business banking services through both in-person and remote channels.
LINK	The UK's cash access and ATM network operator, designated under the Access to Cash regime as the coordinating body responsible for assessing local access-to-cash needs and coordinating the provision of new cash services.
Traditional banks	Banks that provide services through a combination of physical branches and remote channels, such as telephone, online and mobile banking. This category includes high street banks and branch-based challenger banks.
Vulnerable customers	Customers who, due to their personal circumstances, are especially susceptible to harm. Anyone can become vulnerable at any time, and vulnerability may be temporary or permanent.