



**FINANCE MINISTER'S
BANKING
ROUNDTABLE 2025**

SUMMARY REPORT

MARCH 2026



Department of
Finance

An Roinn

Airgeadais

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1 Background

- 1.1** The Finance Minister, John O’Dowd MLA, has the lead role locally on engaging with the Treasury and the Financial Conduct Authority (FCA) as required on banking matters, where the legislative and regulatory authority lies.¹
- 1.2** A number of banking related issues were raised with the Finance Minister throughout 2025, including continued concerns around bank branch closures and their impact on vulnerable and rural communities; limited awareness of LINK’s community access request process; and lack of provision regarding access to cash facilities (including banking hubs) in some areas. A reduction in cash acceptance by traders and cross-border cash and banking transaction issues were also highlighted.
- 1.3** Over the past year, the Minister has visited Warrenpoint Banking Hub to see first-hand how it operates and serves the local community in practice and to engage with Cash Access UK, and post office and local bank representatives. He also visited the town of Crossmaglen, where a cash access assessment had not identified a need for additional services, to better understand the cash requirements of local communities, in the absence of a physical bank in the area.
- 1.4** The Finance Minister made an address at the FCA’s launch of its 5-Year Strategy in Belfast on 12 June 2025 to emphasise the need to maintain access to cash and vital banking services across all communities in the North. In addition, he agreed for LINK to host a cash access assessment drop-in event at Parliament Buildings in December, which enabled MLAs and their staff to meet directly with LINK to gain a clearer understanding of its assessment process and to obtain constituency-specific information.

¹ The responsibility for Credit Union policy and legislation rests with the Department for the Economy.

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- 1.5 At the end of 2025, (3 December), the Minister hosted a Banking Roundtable with key stakeholders, providing an opportunity for continued local engagement on banking matters.
 - 1.6 To fully understand all emerging issues, prior to the roundtable, a survey was issued to invitees, asking targeted questions about topical issues such as cash access, branch closures, digital inclusion, and regulation.
 - 1.7 The FCA, LINK, Cash Access UK and UK Finance attended, enabling direct engagement on local issues with those responsible for regulating, managing and delivering access to cash to communities. Other attendees included representatives from:
 - i. Trade Unions;
 - ii. Post Office;
 - iii. Credit Union;
 - iv. consumer organisation;
 - v. business bodies; and
 - vi. community and voluntary organisations.
 - 1.8 A full list of organisations that attended the banking roundtable event and/or responded in writing is included in the **Annex**.
 - 1.9 The event took the form of a structured discussion chaired by the Finance Minister. This report sets out the key issues identified (anonymised) by the various stakeholder submissions and discussion.

LANDSCAPE OVERVIEW

Financial Conduct Authority's (FCA) Access to Cash Regime

- The FCA's access to cash rules came into force on 18 September 2024, requiring banks and building societies to assess and fill notable gaps in cash services.
- The FCA will begin reviewing the effectiveness of its access to cash regime in Q4 2026, aiming to publish its findings in Q2 2027.

Local Financial Services Provision

- A continued trend of high street bank closures persisted into 2025. Locally, there are 105 branches following 10 closures in 2025. Ulster Bank has the most branches with 25, followed by Danske Bank with 24, Santander with 15, and Bank of Ireland with 13.
- The number of local bank branches per 100,000 population has fallen from 11.4 in 2021 to 6.4 in Q2 2024. There are currently 1,480 free-to-use ATMs, which is 7.7 per 10,000 population, down from 9.7 in 2021.
- The Post Office Network currently stands at 483 locally¹ as of December 2025.
- Seven Banking Hubs have opened to date, in Kilkeel, Comber, Ballynahinch, Newcastle, Portrush, Warrenpoint and Larne.
- The North has the lowest number of Banking Hubs per person at around 3.6 per million population compared to 3.7 in England, 5.3 in Wales, and 5.9 in Scotland.
- There are around 119 Credit Unions in the North, a much higher number per person than all other UK regions.

Digital and Financial Inclusion Strategy

- In December 2025, Treasury launched a **Financial Inclusion Strategy**, the British Government's approach to improving financial inclusion for underserved groups.
- **The Strategy outlines Britain-wide actions on reserved financial services, such as Digital Inclusion and Access to Banking; Support for Savings; and Financial Resilience through Insurance.**
- The North is referenced through existing activities around financial education in the NI curriculum; Credit Union reform consultation; and engagement with Treasury on Breathing Space (DfC Debt Respite Scheme).

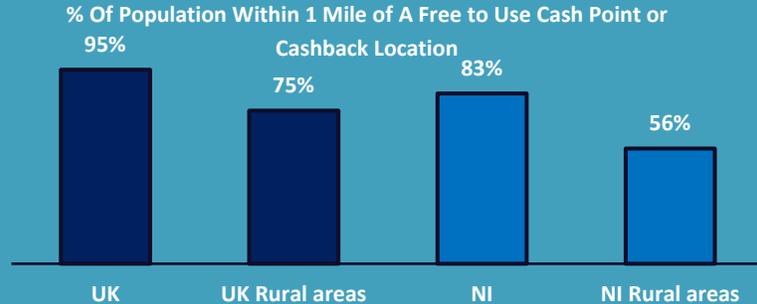
Cash Access

The North's use of cash is higher compared with Britain...
... and local access to facilities is poorer for some, particularly in rural areas.

Average Value per Cash Withdrawal (Q2 2024)



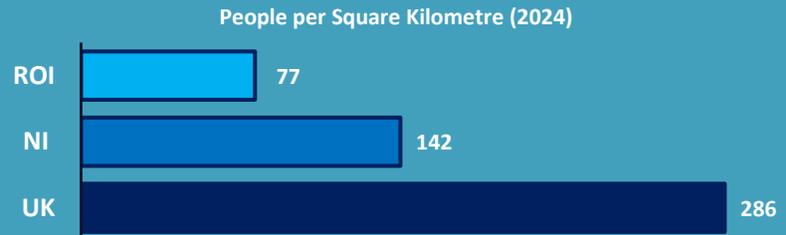
People in the North are further away from cash points and cashback locations, particularly in Rural areas...



Average Number of Cash Acquisitions per UK Adult per year (Q2 2024)



NI/ROI have sparser populations and higher percentages of people living in rural areas than UK...



No. of Bank Branches per 100,000 of the Population (Q2 2024)

6.4 in NI



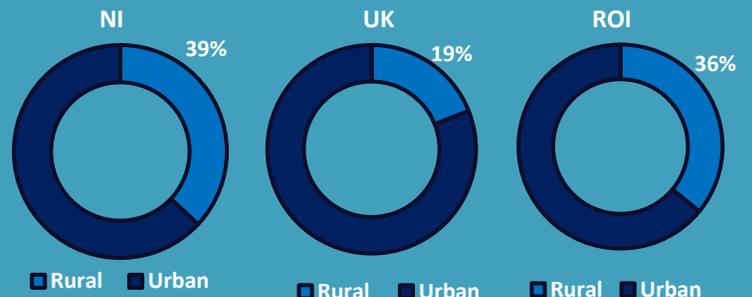
5.2 in the UK



9.3 in ROI



% of population living in Rural or Urban areas (2024)



No. of ATMs per 10,000 of the Population (Jan 2026)

8.9 in NI



6.4 in the UK

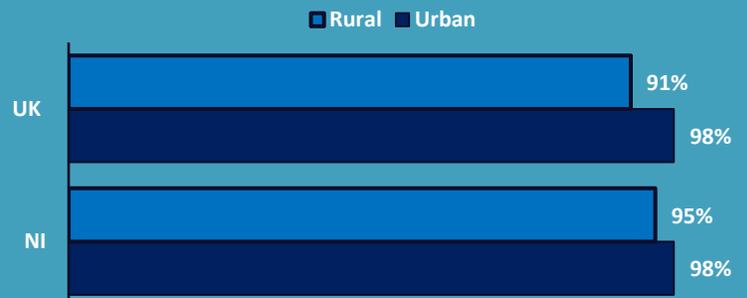


7.5 in ROI



NI rural Superfast Broadband coverage has vastly improved over recent years, from 66% in 2020 to 95% (2025)

% of residential properties with Superfast Broadband (>=30 Mbit/s)



2 Output from Discussion

- 2.1** The issues raised by stakeholders through the pre-event survey shaped the agenda for the event, which broadly fell under three categories:
- i. Banking Regulation and Legislation;
 - ii. Awareness and Managing Change; and
 - iii. Financial and Digital Inclusion.
- 2.2** Taking each theme in turn, the Director for Strategic Policy Division in DoF presented, at a high level, the issues highlighted by invitees. The Minister then invited a designated speaker to respond before there was an open discussion.
- 2.3** The key messages under each of these themes have been summarised within this report, based on the issues raised by stakeholders at the banking roundtable event as well as through their pre-event submissions.
- 2.4** The issues set out are being formally presented to the Treasury and British regulatory authorities for consideration given their legislative authority in relation to banking. The paper is also being shared with the Irish Government given the likely commonality of issues, and the linkages in financial services across the island of Ireland.
- 2.5** The Department and Finance Minister would like to thank all stakeholders for their pre-event survey submissions and participation in the roundtable event, and in helping to set out the key issues facing the local banking sector.

3 Roundtable Actions

3.1 Following the discussion with stakeholders at the Banking Roundtable, the following actions are now being requested:

3.2 Treasury (*legislative authority*)

- i. Provide update on what plans are in place to ensure access to banking services, including in-person financial advice, will receive the same statutory protection and policy priority as access to cash;
- ii. Ensure proper representation from the North on any future groups or committees involved in the development of policies or strategies that may impact locally, including those relating to financial inclusion;
- iii. Address challenges facing charities and community groups in navigating digital banking processes, including mandate changes, multi-signatory requirements, account freezes and inconsistent eligibility criteria, and ensure clearer processes, accessible guidance and a reliable escalation route;
- iv. Ensure clear communication and transparency on Post Office banking services, including deposit limits; and
- v. Outline a plan to protect the use of cash in line with developments in other countries.

3.3 FCA (*regulatory authority*)

- i. Put in place mechanisms to ensure full transparency in cash access assessment decisions, including those relating to Banking Hub roll-out, and provide clarity on how LINK's criteria are applied and what is required for a positive assessment;
- ii. Review the access to cash assessment criteria to ensure they are fit for purpose for the North, with specific consideration given to the following issues:
 - The current regional distribution of Banking Hubs where predominately rural areas have none;
 - The appropriateness of the 3-mile radius in rural areas;

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- The definition of a rural area being used by LINK and discrepancy with Scotland;
 - That cross-border consumer and business cash usage between the North and the South of Ireland is fully taken into account during assessments;
 - That the data being used in assessments is robust and fit for purpose.

3.4 Finance Minister / Department of Finance (*devolved actions*)

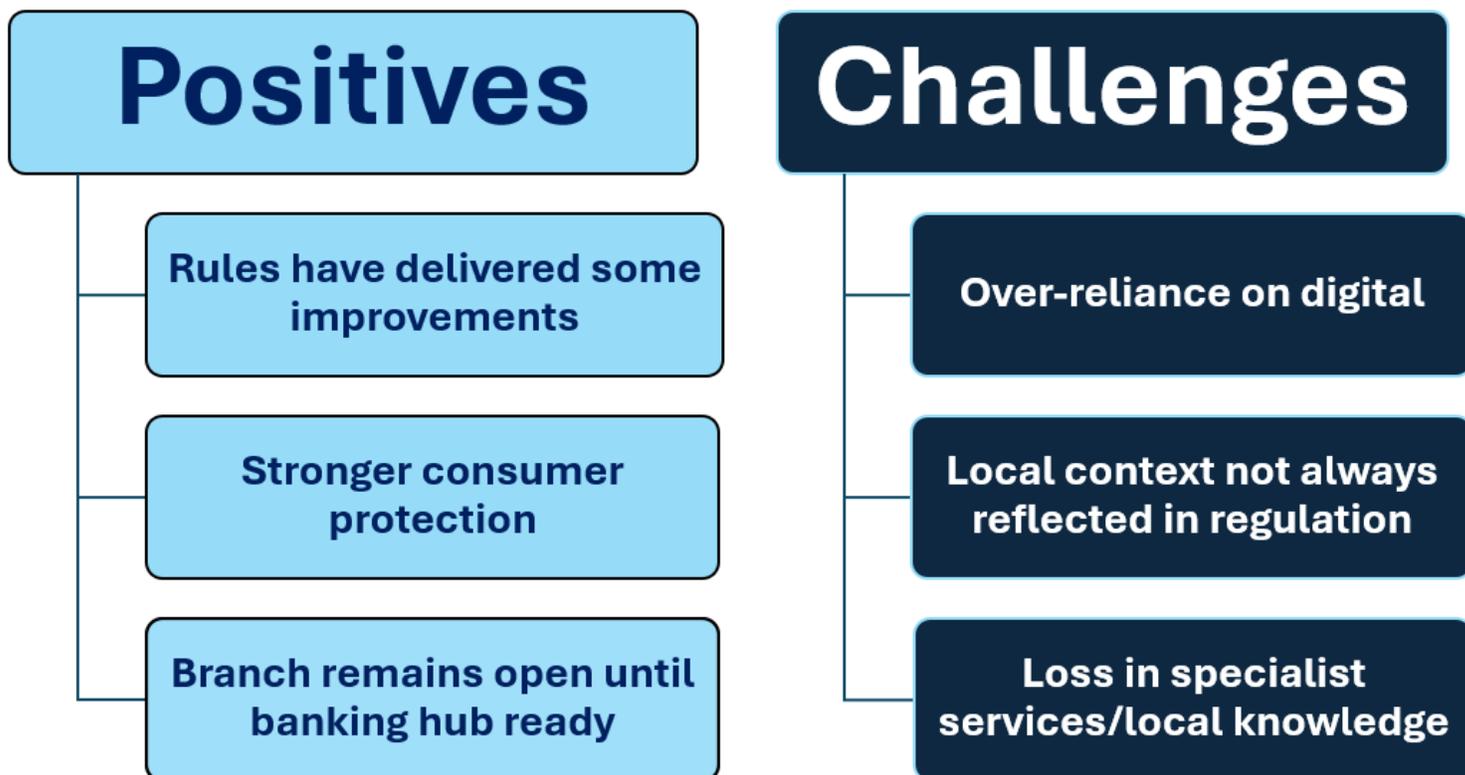
- i. Finance Minister to share report with Treasury and FCA, seeking appropriate action on issues identified above;
- ii. Minister to share report with the Finance Minister in the South of Ireland and request that officials meet to discuss developments on access to cash;
- iii. Minister to write to UK Finance asking for ongoing issues faced by the Community and Voluntary sector to be addressed;
- iv. Minister to engage with relevant Executive colleagues on need for local Financial Inclusion Strategy;
- v. Minister to continue to press on ensuring the North is properly represented in British access to cash and broader financial inclusion policies and strategies;
- vi. Officials to better understand access to cash and cash acceptance developments across Ireland, Europe and worldwide;
- vii. Officials to better understand what financial education is taking place across communities to help those who need support with online banking; and
- viii. Minister to continue to host an annual Banking Roundtable, with the next planned for late 2026.

4 Banking Regulation and Legislation

Introduction

4.1 This theme explores stakeholders' views of how the FCA's access to cash rules have embedded locally since coming into effect in September 2024, and whether accompanying guidance is keeping pace with ongoing changes in the sector. Results from the survey issued prior to the Roundtable highlighted a number of positives but also a number of challenges, as summarised in Figure 3.1 below.

Figure 3.1: Positives and Challenges in Cash Access Regulation



Access to cash remains vital

- 4.2** It was noted that the banking and finance sector plays a critical role in supporting the growth, prosperity and well-being of every aspect of the North's economy and society. The main banks operating locally support SMEs to start up and scale up, with gross lending of c£7 billion and new lending of c£1.3 billion per year². Around £2 billion of new lending is also provided each year to home-movers and those making it onto the housing ladder for the first time.
- 4.3** At the same time, between 2012 and 2022, cash payment volumes declined by 69%, debit card payments increased by 201%, while credit card payments also saw significant growth (85%)². Stakeholders view that the behavioural shift to increased digital (mobile) banking will continue to evolve and accelerate. Within this wider context of declining cash usage, the FCA's access to cash rules and LINK's cash access assessment process were largely welcomed for maintaining coverage and delaying some branch closures until banking hubs or other facilities were operational.
- 4.4** However, stakeholders emphasised that access to cash remained vital for local communities, even as the wider system transforms towards digital channels. According to the 2024 FCA's Financial Lives survey³, one-in-four (26%) adults here regularly use branches, much higher than when compared with Britain (18%). Adults living in the North (8%) were also more likely to be 'heavy' cash users (compared with 5% for Britain).
- 4.5** Stakeholders felt access to cash was particularly important to the North's economy, to the survival of small and medium-sized business and to consumers, especially older and vulnerable consumers who rely heavily on cash as their preferred method of payment. It was also highlighted that individuals permanently sick or disabled, or who are retired, are 83% more likely than average to rely on cash⁴.

² Data from UK Finance

³ [Financial Lives 2024 Survey | Financial Conduct Authority](#)

⁴ [An Empirical Analysis of Characteristics Associated with Cash Reliance in the UK | Financial Conduct Authority](#)

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- 4.6** Stakeholders highlighted the need for banks to communicate more locally, clearly, and at an earlier stage on service changes and available alternatives. In some cases, changes such as branch closures, were not known about until too late for meaningful local engagement. It was noted that local community consultation prior to the decision is vital so communities feel they have been engaged with and their concerns are heard.
- 4.7** The powers to keep bank branches open if closures are going to have a detrimental effect on consumers and business was raised. It was reported that the FCA cannot compel banks to keep branches open indefinitely with powers limited to pausing closures under defined conditions, such as instances where closing the branch would create or worsen a significant gap in cash access and alternative services are not yet in place.
- 4.8** While discussion praised the Post Office's central role in many communities, there were calls for clearer communication of which services are available, and greater transparency around deposit limits, especially as this differs depending on the bank. It was suggested that non-digital communications (e.g. leaflets for vulnerable customers) to clarify the Post Office capabilities and deposit thresholds could be useful. However, others cautioned that easing deposit constraints without safeguards could heighten anti-money laundering exposure. It was therefore noted that any policy solutions should balance convenience, feasibility, and crime-prevention.
- 4.9** The role of Credit Unions locally was also praised with stakeholders mentioning that they often remain the last accessible, financial institutions in many areas. According to the FCA's Financial Lives Survey¹, the use of Credit Unions was far higher in the North (7%) compared with England (1%), Scotland (1%) or Wales (1%).

Access to Cash: What Should I Know?



Banking Hubs

There are currently 7 Banking Hubs open in Northern Ireland, located in:

- Ballynahinch (County Down)
- Comber (County Down)
- Kilkeel (County Down)
- Larne (County Antrim)
- Newcastle (County Down)
- Portrush (County Antrim)
- Warrenpoint (County Down)



Cash Locator

To find out exactly where ATMs, Bank branches, Post Offices and Banking Hubs are located, use the link below:

<https://www.link.co.uk/cash-locator>

Cash Access Requests

To find out if you are eligible to request access to cash from LINK, use the link below:

<https://www.link.co.uk/helping-you-access-cash/request-access-to-cash>

Anyone who finds it difficult to access cash locally, whether an individual, group, or organisation, can make a cash access request. Requests must be in writing, but LINK can assist with this.

Key Aspects of the Cash Access Rules

Assess and Fill Gaps:

Designated firms must assess local cash access needs and promptly fill significant gaps.



Trigger Events:

Assessments are triggered by changes to services (e.g., branch or ATM closures, reduced hours) or by requests from local residents, businesses, or representatives.



Service Continuity:

Firms must keep existing facilities open until necessary alternative cash services are available.

Communication:

Designated firms must clearly inform consumers and businesses about changes to services, how to request reviews, and where to access cash.

Monitoring:

The FCA monitors compliance, and firms must report to them to maintain transparency.

Coverage Standards:

While not rigid, the rules aim to align with government policy requiring reasonable access, generally within 1 mile in urban areas or 3 miles in rural areas.

Rural and cross-border considerations

- 4.10** Several contributors queried whether local context was fully captured in LINK's cash access assessments. Stakeholders noted that the North is more rural than any other part of Britain, with 39% of the population living in non-urban areas⁵.
- 4.11** It was raised that during its assessment process, LINK use a 3-mile radius for rural locations with the number of retailers and population in that 3-mile radius as key metrics for cash demand. However, it was noted that in more rural locations, there are often businesses and consumers who travel into a location from much larger distances to access cash. This could result in assessments not factoring in all cash demand for that area. It has also been highlighted that LINK classifies a rural area in the North as having fewer than 5,000 people, a threshold that is significantly higher than the 3,000-person definition applied in Scotland.
- 4.12** Contributors also highlighted the need to better account for cross-border consumer and business cash usage and transactions between the north and South of Ireland. LINK has confirmed that during the cash assessment process, the adult population count for border towns does not factor those who live over the border in Ireland.
- 4.13** Stakeholders further reported that assessments did not always sufficiently reflect local road networks and travel constraints (e.g. routes around lakes), meaning actual travel distances could exceed those quoted. In practice, some rural and border communities were reported to travel distances of over 10 miles to access cash services. It was also raised that it wasn't clear how the border with the South of Ireland is considered in assessments and how LINK defines a border town. Discrepancies in the Lisnaskea assessment were highlighted⁶, particularly around the quoted

⁵ [NISRA Census 2021](#). Urban status is derived by assigning Data Zones as either urban or non-urban. Data Zones with 90% or more of their usual resident population inside the boundary of an urban settlement (i.e. those settlements with population 5,000+ usual residents) are classed as urban. All remaining Data Zones are classed as non-urban.

⁶ [Lisnaskea 28-Day Appeal Outcome Report | LINK](#)

number of relevant retailers from its initial assessment to the number after a site visit was carried out.

- 4.14** Some stakeholders expressed concern that, given the North's geographic context, many areas would not meet the criteria for the establishment of Banking Hubs. In contrast, others suggested that Banking Hubs in certain locations were under-utilised and questioned whether alternative interventions, such as multi-function ATMs, might have been more appropriate.
- 4.15** Reassurance was provided that the assessments take account of real-world travel routes and terrain, with coverage rules applied to actual travel patterns rather than straight line distance. The availability of public tools such as the [LINK Cash Locator](#) were also highlighted.
- 4.16** It was also noted by stakeholders that in rural locations, especially during holiday periods, ATM machines ran out of cash, leaving residents with no choice but to use ATMs that charged for their cash.

Access to Banking Services

- 4.17** Some stakeholders raised concerns about barriers to accessing wider banking services, noting that the FCA's current regulatory approach focuses primarily on access to cash and does not extend to broader in-person banking provision. It was noted that a formal review of the access to cash rules is scheduled to commence at the end of 2026.
- 4.18** Stakeholders highlighted concerns about the increasing automation of banking services and the perceived loss of personalised support. It was noted that financial decision-making can be intimidating for some customers, with stakeholders reporting difficulties in accessing face-to-face assistance without significant effort or travel. Challenges were also raised in relation to lodging cash, accessing advice and support, and managing accounts for clubs and societies. In some cases, this was reported to have led well-intentioned individuals to operate outside

accepted good-governance practices, as existing banking processes were viewed as making the management of group accounts increasingly difficult.

4.19 Ongoing and systemic problems faced by charities in accessing banking services were highlighted, particularly in relation to bank account freezes, unclear eligibility criteria, and poor communication when banks update mandates or digital processes. It was raised that, despite the Consumer Duty's⁷ requirement for firms to deliver good outcomes for all customers, challenges remain around monitoring banks' compliance. These challenges have been furthered following the FCA's removal of the requirement for firms to appoint a Consumer Duty Board Champion, without presenting evidence of firms' readiness.

4.20 Concerns were also raised about inconsistent charity account eligibility criteria, pressures for trustees to be existing personal customers, and the risk of smaller charities being disadvantaged as the North moves to a £20,000 registration threshold⁸. Wider issues were also raised, such as rising fees, branch closures, and trustees resorting to personal accounts, contrary to good governance, underscoring the need for better systems that reflect the structures and needs of the voluntary and community sector.

Cash Acceptance

4.21 The issue of some traders no longer accepting cash was also raised. Bank of England⁹ data from March 2025 showed that, where consumers encountered a cash free store, 8% had to go to a different store to purchase the item, while 6% did not purchase the item at all. It was clarified that enforcing cash acceptance does not fall within the FCA's remit, and there are currently no known plans by the Treasury to extend

⁷ [Consumer Duty | Financial Conduct Authority](#)

⁸ [Registration threshold for charities in Northern Ireland | Department for Communities](#)

⁹ [Treasury Committee: Acceptance of Cash: Government Response | House of Commons](#)

the FCA's access to cash powers under the Financial Services and Markets Act 2023 to require businesses or organisations to accept cash.

4.22 Countries across the world have introduced measures to protect the use of cash, with several requiring that retail businesses accept it. France¹⁰, Denmark¹¹ and Norway¹² mandate cash acceptance in most retail settings, supported by legal-tender guarantees from their central banks, while Hungary¹³ and Slovakia¹⁴ go further by embedding the right to pay in cash in their constitutions. Sweden¹⁵ has reversed its earlier cashless trajectory by obliging supermarkets, pharmacies and fuel stations to accept cash, and cash-acceptance laws are enforced in several US states enforce with Congress considering enacting the Payment Choice Act¹⁶ to ensure nationwide acceptance for transactions up to \$500. China¹⁷ also legally require businesses to accept cash, imposing fines for non-compliance, and the Netherlands¹⁸ is preparing legislation that will mandate cash acceptance across all consumer-facing businesses. In parallel with these international approaches, the European Central Bank¹⁹ is preparing legislation to ensure that cash is accepted in every retail outlet across the euro area.

4.23 In addition, the recent Access to Cash Act (2024)²⁰ legislation in the South now requires essential businesses such as supermarkets and pharmacies to accept cash. Other businesses (like hairdressers) can still refuse cash, but they must display this clearly.

¹⁰ [The Banque de France Guarantees Cash Acceptability | Banque de France](#)

¹¹ [Payment Services and Electronic Money Act | Forbrugerombudsmanden](#)

¹² [The Right to Pay Cash | Norges Bank](#)

¹³ [The Fifteenth Amendment to the Fundamental Law of Hungary | Parliament of Hungary](#)

¹⁴ [Constitutional Act No. 460/1992 | Slov-Lex.sk](#)

¹⁵ [Introduce Obligation to Accept Cash and Strengthen Banks' Responsibility for Cash | Sveriges Riksbank](#)

¹⁶ [Payment Choice Act of 2025 | Library of Congress](#)

¹⁷ [Announcement of the People's Bank of China | Gov.cn](#)

¹⁸ [Law guarantees future of cash | Rijksoverheid.nl](#)

¹⁹ [Making Euro Cash Fit for the Future | European Central Bank](#)

²⁰ [Finance \(Provision of Access to Cash Infrastructure\) Bill 2024 | Gov.ie](#)

5 Awareness and Managing Change

Introduction

5.1 This theme summarises stakeholders' views on whether awareness has improved regarding how communities or individuals can request cash access assessments under the new rules, and what more could be done to further improve awareness. It also considers how change can be managed across the sector going forward, considering the ongoing shift towards digital banking. A summary of the survey results issued prior to the Roundtable is shown in Figure 4.1 below.

Figure 4.1: Summary of Stakeholder Views on Cash Access Awareness



Stormont drop-in event for MLAs & attendees raising awareness.



Public awareness remains very low; only 9 community requests since rules began (4 prior to that).



Stronger promotion needed including details on other services/options available.



Cash acceptance an emerging issue.



Support/services for non-digital/vulnerable users through change.

Public awareness and requests for cash access assessments

- 5.2** In December 2024, the Chancellor announced a commitment to deliver 350 Banking Hubs across Britain by 2029²¹. At the Roundtable event, it was noted that Banking Hubs are being established at pace by the sector, with high levels of satisfaction reported where they are operational. In the North, seven are now operational.
- 5.3** While awareness of Banking Hubs is increasing nationally, participants felt that awareness remains comparatively lower locally. Since regulations came into effect, it was reported that there have only been 14 community requests in the North (five of which resulted in a Banking Hub), three Branch Closure Reassessments, and one 28-Day Appeal Request. By contrast, there have been 704 community requests, 230 Branch Closure Reassessments, and 24 28-Day Appeal Request across Britain.
- 5.4** It was reported that local community groups, elected representatives, and Councils here are only beginning to become familiar with the request process, and that ordinary consumers are generally unaware that such a mechanism even exists. Awareness was considered likely to be lower among older people, minority ethnic communities and those who are offline.
- 5.5** A range of outreach activities, including broadcast media, local events, and engagement through community partners, were noted as ongoing to increase visibility and understanding of available services. It was also reported that the Post Office also signposts the opportunity to request an assessment through its website. However, others indicated this has only had limited impact on wider awareness.
- 5.6** Stakeholders suggested that outreach activity should include multi-channel communication (not solely digital), engaging through independent advice providers and community groups, and the provision of interpreting

²¹ [UK Government Commitment to Roll-Out 350 Banking Hubs by 2029 | Gov.uk](#)

or language support. It was also suggested that the appeals process would benefit from a dedicated awareness campaign, given its role in enabling local communities to influence decisions.

Assessment process and communication

- 5.7** The assessment process is predominantly guided by the FCA's Cash Access Rules²² which lay out conditions in which assessments need to be carried out, ie trigger events such as branch closures. They also include regulations on service continuity, monitoring, and coverage standards whilst also ensuring communication between designated firms, consumers and businesses on how to request reviews and where to access cash.
- 5.8** It was reported that access to cash assessments typically follow a staged process, including site visits where appropriate. In the North, discretionary visits were also noted to take place, even where formal criteria²³ are not fully met. Participants highlighted that appeals have, in some instances, reversed initial decisions against establishing a Banking Hub in a particular area, e.g. York – Acomb.²⁴
- 5.9** Nevertheless, stakeholders identified several gaps, including businesses in an area becoming aware of branch closures late in the process, catchment area definitions not always reflecting rural realities, and inconsistent messaging around deposit services. It was noted that rules are being refined to incorporate a cash demand index, intended to improve how changes in local demand are reflected in assessments.
- 5.10** Concerns were raised about limited transparency in decision making, with consultation often occurring after a decision to close a branch has already been taken. Stakeholders expressed interest in directly engaging with

²² [FCA- Cash Access Rules](#)

²³ See criteria here: [LINK assessment process](#)

²⁴ [LINK / Our Assessments](#)

LINK and Cash Access UK on issues including branch closures, local cash provision, or potential economic and community impacts.

Managing Change

- 5.11** Some stakeholders argued for a hybrid banking model, allowing people and businesses to choose between online banking or in-person services delivered through an accessible branch network offering a full suite of facilities. Access to in-person meetings with financial advisers was cited as an example of services that digital banking cannot fully replace.
- 5.12** Stakeholders also felt that change should not be managed by banks and financial institutions alone, stressing the importance of ongoing stakeholder forums. Participants stressed the importance of maintaining an annual Banking Roundtable as a key forum for managing sectoral change, ensuring ongoing collaboration, and supporting shared learning across jurisdictions, including through across-border banking forum involving stakeholders from both the North and South of Ireland.
- 5.13** In managing change, stakeholders stressed that service environments must protect privacy, noting that some Banking Hubs were perceived to be overly open-plan. Trust was also highlighted as a critical asset for community-based provision. Contributors called for positive and proactive engagement that recognises citizens are time-poor, alongside an appropriate balance between digital innovation and personal service - particularly for vulnerable users.
- 5.14** The shift to digital banking was regarded as being inevitable and as offering greater convenience, efficiency, and choice. However, stakeholders emphasised it must be managed in a way that avoids deepening financial exclusion, especially in the North where digital adoption varies significantly across age, income, and geography.
- 5.15** Where automation is introduced as a cash solution within a community, stakeholders stressed the importance of building awareness and user

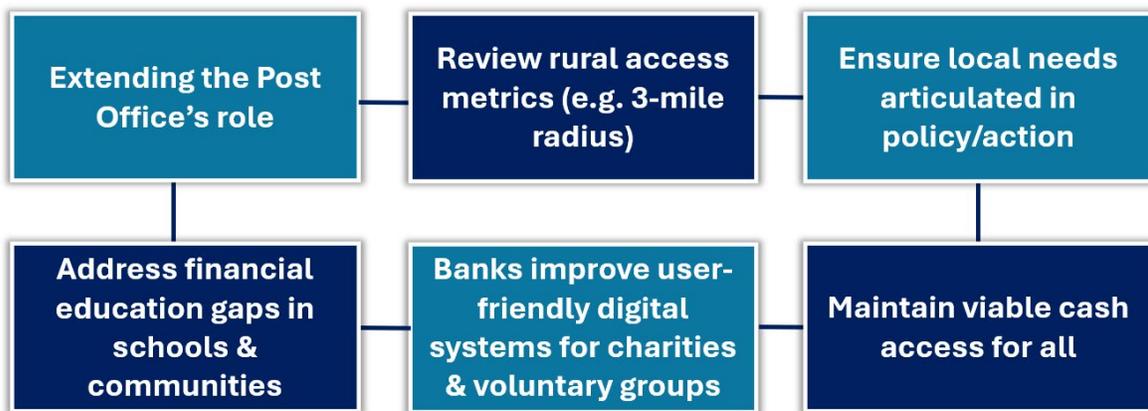
confidence. Industry collaboration between the banks, Cash Access UK and the Post Office was stated to be needed to support uptake and build trust.

- 5.16** It was reported that, within Banking Hubs, Community Bankers can provide face-to-face support to help customers to access online banking services. In some locations in Britain, a new customer liaison service has also been piloted, enabling Cash Access UK staff to help customers connect with the appropriate team within their own banks, with pilots planned in the North too.
- 5.17** Stakeholders also raised the importance of prioritising rural infrastructure and maintaining a dual-running period, during which branches and alternative services operate alongside one another while communities' transition.
- 5.18** Concerns were raised about the usability of banks' digital systems, particularly for voluntary and community organisations. Stakeholders noted that banks do not consistently log or address common digital issues, citing difficulties updating digital bank mandates and business profiles. Language used within digital processes was described as unfamiliar or inappropriate for charities, with limited explanations provided when uploaded documentation is rejected. Overall, participants felt that many systems are designed primarily for commercial businesses, creating significant challenges for voluntary and community organisations.
- 5.19** Finally, stakeholders emphasised the need for a holistic approach that combines regulation, market development, communications, community involvement, and practical support for adoption. While future planning was urged over reactive measures alone, participants stressed that the pace of change must be carefully managed to avoid unintended harm to underserved groups.

6 Financial and Digital Inclusion

6.1 This theme summarises stakeholders' views on the steps that could be taken to improve digital and financial literacy among the local population. A summary of the survey results issued prior to the Roundtable is shown in Figure 5.1 below.

Figure 5.1: Summary of Stakeholder Views on Improving Financial and Digital Inclusion



Financial Inclusion Strategy

6.2 Contributors highlighted the North's distinctive socio-economic profile, characterised by relatively lower average wages; higher cash usage; greater rurality; a larger share of households receiving benefits; and higher overall levels of disadvantage. According to statistics from NISRA's Continuous Household Survey, almost one-in-four people (23%) locally also have limited digital skills²⁵.

6.3 Some stakeholders felt that the British Government's Financial Inclusion Strategy²⁶ does not sufficiently reflect these nuances and called for parity

²⁵ [Continuous Household Survey 2023/24, Digital Skills | NISRA](#)

²⁶ [UK Government's Financial Inclusion Strategy | HM Treasury](#)

and more tailored interventions to reflect local needs, alongside consideration of a local Financial Inclusion Strategy.

- 6.4** Concerns were also raised about harmful informal lending and the need for safe, affordable credit options locally.
- 6.5** Some participants suggested that future branch closures should be stopped and that the acceptance that the preference of consumers and business is to move from an in-person service to online banking needs to be challenged.

Education and capability building

- 6.6** Stakeholders noted that there needs to be direct engagement with consumers of all ages in areas impacted by bank branch closures to deliver awareness raising and education training to support them to feel comfortable and confident to engage with financial services and transition to digital solutions.
- 6.7** Stakeholders also stated that there needs to be education support provided through schools and the informal education sector to develop awareness amongst younger consumers. This could be in the form of educational materials, a dedicated campaign or accredited/non-accredited courses and qualifications.
- 6.8** There was support for embedding financial education within community access points, including Banking Hubs. Some stakeholders suggested extending the role of Post Offices to increase financial literacy across communities.
- 6.9** Stakeholders called for practical help that meets people where they are, recognising that some young people are outside formal education pathways and that many trustees and volunteers in civil society organisations need support with mandates, governance, and digital processes.

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- 6.10** Participants highlighted the need for clear, non-digital communications (letters, leaflets, local radio) when service changes are proposed, to reach offline households.
 - 6.11** Participants proposed assisted-digital drop-ins delivered by trusted local providers (e.g. Banking Hubs, Post Office, Credit Unions) with follow-up signposting to ongoing support.
 - 6.12** There was support for multi-channel awareness campaigns (not digital-only) using plain-English materials and introductory fraud-awareness modules tailored to different audiences.
 - 6.13** Stakeholders recommended targeted training for volunteers, trustees and club officers on mandates, multi-signatory accounts and secure document upload processes.

SMEs, sole traders, and charities

- 6.14** Participants emphasised the importance of sole traders and micro-businesses to the local economy who are not fully considered in access assessments or service design.
- 6.15** Charities reported practical difficulties with remote customer service and multi-signature requirements, sometimes leading to poor workarounds that undermine governance, underscoring the need for clearer processes and reliable support channels (e.g. a 24/7 helpline).
- 6.16** Operational pain points included repeated automated letters sending redundant and incorrect information to customers, account freezes, and delays when updating mandates, occasionally prompting trustees to use personal accounts, a governance risk that warrants targeted fixes and a clear single point of contact.

6.17 Stakeholders asked for simpler, charity-appropriate digital journeys (plain language, clear reasons when uploads are rejected, accessible formats) and named escalation routes for complex cases.

Digital skills, confidence and inclusion

6.18 Stakeholders highlighted that limited digital skills and confidence remain key barriers for older people, disabled consumers, those on low incomes and people in rural areas.

6.19 Many users need hands-on, in-person support to get started (device setup, security basics, using apps), rather than online guidance alone.

6.20 Fear of making a mistake, fear of scams, and low trust in automated systems continue to limit digital take-up for some cohorts.

6.21 Participants supported targeted outreach through community organisations, with interpreting/language support where appropriate. Some also suggested that the banking sector could work with local community groups and run sessions on banking and finance with them to get messages out about online banking, safety and security issues.

Financial Literacy

6.22 They noted that financial literacy is relatively low in the North, with a Financial Literacy Score Index, commissioned by Bank of Ireland and conducted by Red C²⁷, revealing an average financial literacy score of 53%. They suggested that a new financial literacy strategy is required locally and a stakeholder forum should be established to provide feedback and recommendations.

²⁷ [Bank of Ireland Financial Literacy Score Index | Bank of Ireland](#)

Access to cash, fraud awareness and inclusive service design

- 6.23** Affordability of broadband and mobile data was cited as a constraint for some households. Rural areas reported slower or unreliable connectivity and limited transport, making digital-only banking impractical. Stakeholders asked that service withdrawals be “rural-proofed” before changes take effect.
- 6.24** The strengthened Authorised Push Payment (APP)²⁸ fraud reimbursement framework was welcomed. Stakeholders called for sustained education on scams and safe usage, delivered through trusted local channels and tailored to different needs, and emphasised the importance of accessible service design (paper, phone and face-to-face options alongside digital, plain-English materials, early/clear notices of changes and clear appeals/feedback routes).

²⁸ [PSR information for consumers- Fraud reimbursement protections](#)

Annex – Attendees

Attendee	Organisation
David Geale	Financial Conduct Authority
John O'Connell	Financial Services Union
Brian McDowell	Financial Services Union
Paul Leonard	UK Finance
Eric Leenders	UK Finance
Noyona Chundur	The Consumer Council of Northern Ireland
Denise Copeland	Northern Ireland Council for Voluntary Action
Sarah Evans	Cash Access UK
Chris Ashton	LINK
Mark Gibson	Post Office
Martin Fisher	Irish League of Credit Unions
John Moore	Federation of Small Businesses
Glyn Roberts	Retail NI
Samantha Gallagher	Rural Community Network
Jim McCafferty	National Federation of Sub-Postmasters
Louise Henshaw	Disability Action