



Financial Services Union submission to the banking roundtable Northern Ireland

November 2025

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1: What are your views on how the FCA's Access to Cash rules have been working in Northern Ireland since they came into effect in September 2024?

It is widely accepted that all data and research indicates that Northern Ireland has a larger reliance on cash usage than any other part of the United Kingdom. The recent published report by the Finance Committee of the NI Assembly stated that "living in Northern Ireland makes an individual more than twice as likely to rely on cash than a similar individual in England. Additionally, not being in employment, being permanently sick/disabled or being retired makes an individual 83% more likely to rely on cash than average."

That same report showed that in an analysis of bank closures from 2020 to 2023, 21% of consumers had seen their local bank close within this period.

It is clear that the provision of cash is important to the economy of Northern Ireland, to the survival of small and medium business and to consumers, particularly older and vulnerable consumers who rely heavily on cash as their chosen method of payment.

Closing bank branches is not in the interests of consumers or increasing or protecting cash usage. The Financial Conduct Authority (FCA) need to pause any further branch closures for a minimum of three years. This is not an outlandish ask as only recently Nationwide Bank has announced they will not consider closing a branch until 2030 at the earliest. It is not acceptable for very profitable banks to acknowledge a branch closure will affect vulnerable people in a negative way but still proceed to close the branch.

The new powers given to the FCA does not include preventing the closure of bank branches. This need to be reflected on and new stronger powers introduced given the FCA additional influence over bank branch closures and the power to stop branches closing if it is going to have a detrimental effect on consumers and business.

There is a lack of transparency in the work of Cash Access UK, and more work is required to advertise the consultation period and the right to appeal a decision.

The need to access cash has no time limitations. ATMS based in the local Spar which closes at 7pm is not an adequate replacement for an ATM which is accessible 24/7.

Local community consultation prior to the decision is vital so communities feel they have been engaged with and their concerns are heard.

2: Do you believe that the current banking regulations and legislation are working well, and that the existing guidance is keeping pace with the rapid changes in the sector? What aspects are working well, what areas could benefit from improvement, and are there any notable gaps?

The retail banking sector is everchanging and regulation and legislation need to be constantly updated to ensure adequate protections are in place for consumer and business while not stymieing potential growth in the sector.

The emergence and rapid expansion of the use of artificial Intelligence has many potential gains for employers and staff but if managed poorly can lead to bad outcomes, with little oversight and real displacement of staff. The FSU has researched this issue in conjunction with TASC. You can find results of our Island of Ireland research here:

<https://www.fsunion.org/latest/accounting-forworkersin-the-age-of-ai/>

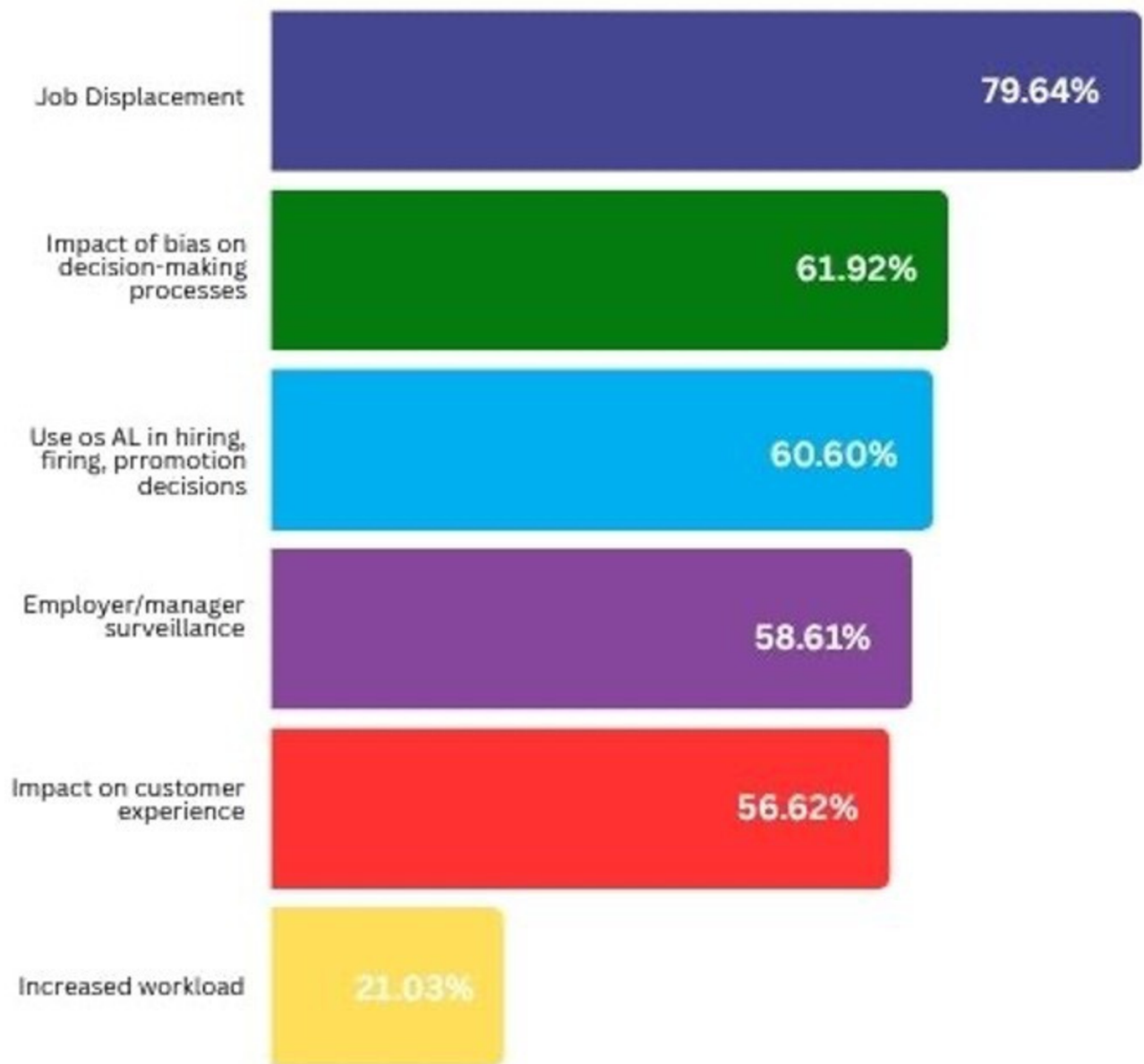
Some of the key findings include:

88% of respondents believe AI will lead to job displacement and 60% report feeling less secure in their roles than they did five years ago.

Over 61% of respondents expressed unease about AI being used in hiring, firing, and promotion decisions.

58% of workers are concerned about increased managerial oversight and surveillance through AI systems, fearing a loss of privacy and greater performance monitoring.

FSU members' concerns regarding artificial intelligence



There is a clear need to new regulation and legislation to be enacted in this area and for all relevant stakeholders to work together in a transparent manner to provide a managed introduction of AI into the workplace.

The Financial Inclusion strategy (FIS) will also need require new legislation and regulation to ensure a full and proper implement of any recommendation take place. The lack of a Union representation on the FIS is an error that should be rectified immediately.

3: Over the past 12 months, has awareness improved around how communities or individuals can request cash access assessments under the new rules? What more could be done to raise awareness?

A full marketing campaign is required to highlight the role of LINK and Cash UK in the provision of cash.

There is little transparency in the decision making and all consultation is done after a decision is already taken to close a branch.

As a union representing employees in Northern Ireland and as a stakeholder who has a considered view around consumers and business needs, we have never been approached or consulted by either LINK or Cash UK on the closure of a branch, the provision of cash in an area and the possible consequences to the economy and local community.

The FSU have consistently requested more consultation, and we would be happy to engage in a positive and productive manner on the issues involved.

The powers that both LINK and Cash UK process should be reviewed and additional powers given to them if necessary to allow better consultation and implementation.

The appeal process need a separate marketing campaign as this is a vital component to allow local communities have their say on any given decision.

4: What are your views on how change can be managed in the sector going forward in light of the shift towards digital banking?

While there is an obvious shift towards digital banking, we should not accept that this is a suitable method of banking for all. Research points to the importance of branch banking for young and old alike and in particular vulnerable people and people living in rural areas.

When we are looking at the future of banking we should ensure there is a hybrid system where people and business have the choice of online banking or in person banking through a branch network which is accessible and provides a full suite of banking facilities.

Access to an in-person meeting with a financial advisor is a prime example of how online and digital banking will not cater for all banking requirements.

The FSU acknowledge that change is inevitable and are not standing in the way of change. We strongly argue that change need to be managed in a manner that has the customer at the core and not just profit margins.

Change in banking is best managed through collective bargaining and a real stakeholder involvement. We should not allow banks and financial institution to manage the change alone. That is why we feel stakeholder forums are vital to managing change and we would urge the Department of Finance in NI to hold quarterly banking roundtable discussions so the rapid change in the sector can be managed in real time. We would also request that a banking forum involving stakeholders from NI and the Republic of Ireland is convened to allow learnings from each jurisdiction to be shared.

5: In light of recent bank branch closures, what steps could be taken to improve digital and financial literacy among the local population?

Stop any further branch closures. The acceptance that the preference of consumers and business is to move from an in-person service to online banking needs to be challenged. If a bank closes a local branch, removes local banking services consumers and businesses are forced to use an online banking model that was not their preferred choice. Research indicates that two of the main reasons people like to use their local branch is for cash transaction and to access financial advice.

It is also clear from research commissioned by Bank of Ireland that financial and digital literacy issues are high in NI. A financial literacy score index, commissioned by BOI and conducted by Red C. has revealed that NI has an average financial literacy score of 53% with just over half of the text questions answered correctly.

A new financial literacy strategy is required for NI. This requires new research to be undertaken to ascertain a baseline for financial and digital literacy in Northern Ireland.

A stakeholder forum should then be established to provide feedback and recommendations.

6: Are there any specific Northern Ireland issues that the UK Government's Financial Inclusion Committee should be examining?

The membership of the Committee needs to include a trade union representative who can be a voice for employees throughout the sector. The Committee should study the financial literacy plan recently developed by the Government in the Republic of Ireland. The development of this plan involved and continues to involve all stakeholders throughout in the sector.

The reliance on cash access in Northern Ireland is higher than other areas of the UK and this needs to be acknowledged in the plan and in-depth research carried out to ascertain the reasons.

Helping and supporting vulnerable customers' needs to be central to any plan and relevant NGOs should be part of any discussions.

7: Do you have any other concerns in relation to banking you would like discussed at the Minister of Finance's roundtable event?

Some of the agenda items we would like discussed:

- We would like the emergence of AI, and the regulation and legislation required to manage the integration of AI into the workplace to be an agenda item.
- Remote and hybrid working and the benefits accrued should form part of the discussion,
- Banking hubs and the transparency around decision making by LINK and CASH UK.
- Forced digitalisation and level of service in retail banking.
- A joint banking forum involving stakeholders from NI and ROI.

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