

## Chapter 5

# Process for cash access assessments

In this chapter, references to:

- (1) 'local area' means the relevant area established in accordance with ■ ATCS 5.3.1R and ■ ATCS 5.3.2R;
- (2) 'relevant distance' means the distance set out in ■ ATCS 5.3.5R or ■ ATCS 5.3.8R (as appropriate);
- (3) 'urban' means:
  - (a) for England and Wales, an area where the majority of the population live in a settlement of 10,000 people or more;
  - (b) for Scotland, an area where the majority of the population live in a settlement of 3,000 people or more; and
  - (c) for Northern Ireland, an area where the majority of the population live in a settlement of 5,000 people or more;
- (4) 'rural' means:
  - (a) for England and Wales, an area where the majority of the population live in a settlement of fewer than 10,000 people;
  - (b) for Scotland, an area where the majority of the population live in a settlement of fewer than 3,000 people; and
  - (c) for Northern Ireland, an area where the majority of the population live in a settlement of fewer than 5,000 people.



## 5.2 Overview

### The 3 steps

- R** The *cash access assessment* must be a reasonable assessment of the following:
  - (1) step 1 – whether there is, or would be after a *relevant closure*, a local deficiency in provision of *cash access services*;
  - (2) step 2 – if there is or would be such a deficiency, whether its impacts are or would be significant; and
  - (3) step 3 – if there is or would be such a deficiency with significant impacts, what additional *cash access services* it would be reasonable to provide.

**G** ■ ATCS 5.3 to ■ ATCS 5.5 contain detailed *rules* and *guidance* about the steps referred to in ■ ATCS 5.2.1R.

**R** The extent and scope of the *cash access assessment* and the work the *designated person* must do to undertake it are dependent upon, and proportionate to, the circumstances of each case.

### General qualifications

- R** ■ ATCS 5.2.5R contains restrictions on what can be taken into account in a *cash access assessment* when considering:
  - (1) what *cash access services* are or will be available following a *relevant closure*, where the requirement for the *cash access assessment* was triggered under ■ ATCS 4.1.1R(1) (concerning closures of *designated firms*) or ■ ATCS 4.1.1R(2) (concerning closures of *persons* other than *designated firms*); and
  - (2) what *cash access services* are available, where the requirement for the *cash access assessment* was triggered under ■ ATCS 4.1.1R(3) (concerning *cash access requests*).

**R** The restrictions referred to in ■ ATCS 5.2.4R are as follows:

- (1) no account is to be taken of the availability of *cash access services* at a *cash access facility* in respect of which a full closure is expected;

- (2) account may only be taken of the availability of *cash access services* at a *cash access facility* where there is expected to be a material reduction in provision of *cash access services*, or a material change in the nature of such provision, on the basis of the *cash access services* the facility will provide after such reduction or change has taken place;
- (3) no account is to be taken of the availability of *cash withdrawal services* of the type falling within paragraph 2(e) of Schedule 1 to the *Payment Services Regulations* (cashback with a purchase);
- (4) no account is to be taken of the availability of any *cash access service* in relation to *relevant personal current accounts* if it is subject to a charge; and
- (5) where more than one *cash access assessment* is undertaken as a result of the same trigger event under ■ ATCS 4.1.1R, no account is to be taken in any of those *cash access assessments* of the availability of additional *cash access services* that might be provided as a consequence of any of the other *cash access assessments*.

**R** Where any *rules* or *guidance* in ■ ATCS 5 refer to distance to, proximity of, or travel to a *cash access facility*, or where the context otherwise so requires, a *cash access facility* does not include a *cash* delivery or collection service.

**G** ■ ATCS 5.2.6R applies where *rules* and *guidance* in ■ ATCS 5 are only relevant to *cash access facilities* which users of *cash access services* can visit, as opposed to, for example, a service which delivers *cash* to or collects *cash* from people's homes.

**G** In considering the availability of *cash access services* (as described in ■ ATCS 5.2.4R(1) or ■ ATCS 5.2.4R(2)), significant weight should be given to whether it can be demonstrated that *cash access services* provided at any *cash access facility* under consideration are provided with consistency during stated opening hours. See ■ ATCS 8.1.6G for guidance in this context on cashback without a purchase.

### Sources of information

- R** (1) A *cash access assessment* must be based on sufficient information of which the *designated person* undertaking it is aware at the time it is undertaken, and obtained where appropriate from other sources, to enable it to be a reasonable assessment.
- (2) The *designated person* undertaking a *cash access assessment* must consider:
  - (a) the types of information to use;
  - (b) the content and level of detail of the information to use; and
  - (c) whether and to what extent to obtain information from other sources.

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- (1) Other sources from whom *designated persons* should consider obtaining relevant information include those that might help them to understand the demographic characteristics of the local area and the need for *cash access services*, as well the range of local matters that could impact this understanding such as transportation issues and planned housing developments. Examples of such sources could be:
  - (a) local community groups;
  - (b) *local authority* departments with responsibility for planning or for cohorts who may be particularly reliant on cash;
  - (c) *consumer* groups;
  - (d) the local office of *persons* listed in ■ ATCS 3.2.1R(1);
  - (e) groups or charities who help local *cash* users in vulnerable circumstances, such as local carers or mental health support groups or charities;
  - (f) staff of *designated firms*; and
  - (g) *customers of designated firms* (for example, through surveys).
- (2) The list of possible sources of information in (1) is not exhaustive.

## 5.3 Step 1: Identifying local deficiencies

### What is the local area?

- R** (1) In order to identify whether there is a local deficiency under **■ ATCS 5.2.1R(1)**, a *cash access assessment* must establish the local area according to the methodology referred to in **■ ATCS 5.3.2R**.
- (2) The methodology must be used consistently by a *designated person* for its *cash access assessments*.
- (3) Where a *cash access request* is submitted by the *FCA*, the *FCA* may specify the local area for the purposes of the *cash access assessment*.

- R** (1) The *cash access assessment* must use an appropriate methodology which enables it to draw a boundary for a local area that takes in the addresses of the *persons* who could be affected if there was a deficiency in the *specified cash access services* being assessed.
- (2) Where a *cash access assessment* is triggered under **■ ATCS 4.1.1R(1)** (concerning closures of designated firms) or **■ ATCS 4.1.1R(2)** (concerning closures of *persons* other than *designated firms*), the *persons* referred to in (1) are the people or businesses in the area surrounding the *cash access facility* which is the subject of the *relevant closure* who have the potential to be more than nominally affected by the *relevant closure*.
- (3) Where a *cash access assessment* is triggered under **■ ATCS 4.1.1R(3)** (concerning *cash access requests*), the *persons* referred to in (1) are the people or businesses in the area surrounding the address, street or retail area referenced in the *cash access request* who would have the potential to be more than nominally affected if:
  - (a) there was a *relevant closure* of a hypothetical *cash access facility* at the address, street or retail area referenced in the *cash access request*; and
  - (b) the *specified cash access services* being assessed were provided through it.

#### 5.3.3

- G** (1) **■ ATCS 5.3.2R** involves the need to establish who could be affected. The work undertaken to do this should be reasonable and proportionate, bearing in mind that this is not the *cash access assessment* itself. It involves looking at the potential for effects rather than reaching a conclusion on whether there are actual effects. It should not involve the need to establish whether any *persons* actually

use *cash*, nor to undertake any of the detailed steps in ■ ATCS 5.2.1R. The purpose is to establish the grouping of residents and businesses (by reference to an area) that those steps should be directed at.

- (2) In determining the people who could be affected under ■ ATCS 5.3.2R, one consideration may be where people in the relevant surrounding area who might use *cash* are likely to use it regularly, such as retail areas, and the presence (or otherwise) of *cash access facilities* there. For example, if a *relevant closure* takes place in a village, residents of a nearby town may not be regarded as people who could be affected if it is reasonable to expect that they do not make regular use of the relevant *cash access facility* in the village because of the presence of *cash access facilities* in the town.
- (3) ■ ATCS 5.3.2R(3) involves the application of a hypothetical test of who could be affected if a *relevant closure* was to take place. The methodology for determining the *persons* referred to in ■ ATCS 5.3.2R(2) and ■ ATCS 5.3.2R(3) should accordingly be consistent.
- (4) If the methodology adopts a radius measurement extending from the relevant reference point that is the same for every *cash access assessment*, that is unlikely to be regarded as an appropriate methodology as it would not take account of the potential for differing local circumstances, such as differences in geography.
- (5) Where the requirement for a *cash access assessment* is triggered under ■ ATCS 4.1.1R(1) (concerning closures of designated firms) or ■ ATCS 4.1.1R(2) (concerning closures of *persons* other than *designated firms*), the local area is unlikely to be appropriately drawn if it does not at least include the addresses of any *persons* who, as a result of the *relevant closure*, are or would no longer be within the relevant distance of one or more *cash access facilities* which, between them, provide the *specified cash access services* and *specified cash access facility features* being assessed at step 1.

Closures: scope

5.3.4

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Where the requirement for a *cash access assessment* is triggered under ■ ATCS 4.1.1R(1) (concerning closures of *designated firms*) or ■ ATCS 4.1.1R(2) (concerning closures of *persons* other than *designated firms*):

- (1) an assessment must be made of whether there is or would be, after the *relevant closure*, a local deficiency in provision of each *specified cash access service* that is or was (as the case may be) subject to closure, reduction or change at the *cash access facility* as a result of the *relevant closure*, taking into account any *specified cash access facility feature* subject to the closure, reduction or change;
- (2) where a *designated firm* undertakes a *cash access assessment*, it does not have to assess a *specified cash access service* that relates to *relevant personal current accounts* if it does not provide any such accounts, and it does not have to assess a *specified cash access service* that relates to businesses if it does not provide any *relevant current accounts* for businesses;
- (3) where a *designated coordination body* undertakes a *cash access assessment* for its *participating designated firms*, the body does not

have to assess a *specified cash access service* that relates to *relevant personal current accounts* if none of those *firms* provide any such accounts, and it does not have to assess a *specified cash access service* that relates to businesses if none of those *firms* provide any *relevant current accounts* for businesses;

- (4) an assessment may cover more *specified cash access services* or *specified cash access facility features* than those referred to in (1); and
- (5) ■ ATCS 5.3.5R applies.

**Closures: application of relevant distance**

5.3.5

R

If at least 95% of people living in the local area have access to one or more *cash access facilities* within:

- (1) 1 mile of where they live, if the local area is predominantly urban; or
- (2) 3 miles of where they live, if the local area is predominantly rural,

through which:

- (3) a *specified cash access service* is provided which is of a type that is or was subject to closure, reduction or change as a result of the *relevant closure*, along with any *specified cash access facility feature* subject to the closure, reduction or change,

the *cash access assessment* may find that there is or would be no local deficiency in provision of that *specified cash access service* after the *relevant closure*, subject to ■ ATCS 5.3.9R.

5.3.6

R

Where more *specified cash access services* or *specified cash access facility features* are assessed than those referred to in ■ ATCS 5.3.4R(1), ■ ATCS 5.3.5R applies as if ■ ATCS 5.3.5R(3) refers to:

- (1) each *specified cash access service* being assessed; and
- (2) each *specified cash access facility feature* being assessed in relation to the service.

**Cash access requests: scope**

5.3.7

R

Where the requirement for a *cash access assessment* is triggered under ■ ATCS 4.1.1R(3) (concerning *cash access requests*):

- (1) an assessment must be made of whether there is a local deficiency in provision of each *specified cash access service* indicated in the *cash access request*, taking into account any *specified cash access facility feature* indicated in relation to the service;
- (2) where a *designated firm* undertakes a *cash access assessment*, it does not have to assess a *specified cash access service* that relates to *relevant personal current accounts* if it does not provide any such accounts, and it does not have to assess a *specified cash access service* that relates to businesses if it does not provide any *relevant current accounts* for businesses;



- (3) where a *designated coordination body* undertakes a *cash access assessment* for its *participating designated firms*, the body does not have to assess a *specified cash access service* that relates to *relevant personal current accounts* if none of those *firms* provide any such accounts, and it does not have to assess a *specified cash access service* that relates to businesses if none of those *firms* provide any *relevant current accounts* for businesses;
- (4) an assessment may cover more *specified cash access services* or *specified cash access facility features* than those referred to in (1); and
- (5) ■ ATCS 5.3.8R applies.

**Cash access requests: application of relevant distance**

5.3.8

**R**

If at least 95% of people living in the local area have access to one or more *cash access facilities* within:

- (1) 1 mile of where they live, if the local area is predominantly urban; or
- (2) 3 miles of where they live, if the local area is predominantly rural,

through which:

- (3) a *specified cash access service* being assessed is provided, along with any *specified cash access facility feature* being assessed in relation to the service,

the *cash access assessment* may find that there is no local deficiency in provision of that *specified cash access service*, subject to ■ ATCS 5.3.9R.

**Step 1 qualifications**

5.3.9

**R**

■ ATCS 5.3.5R and ■ ATCS 5.3.8R cannot be relied on where:

- (1) the time or cost of travelling for those living in the local area to any *cash access facility* that would otherwise be relied on to meet the requirements in those *rules* is such that it would not be reasonable to regard the relevant distance as an appropriate determining measure; or
- (2) the *cash access facility* or *cash access facilities* which would otherwise be relied on to meet the requirements in those *rules* do not, or would not after a *relevant closure*, have sufficient capacity between them to accommodate users of the relevant *cash access service* from the local area.

5.3.10

**R**

For the purposes of establishing whether there are *cash access facilities* that meet the requirements in ■ ATCS 5.3.5R or ■ ATCS 5.3.8R, account may only be taken of the availability of a *specified cash access service* and any *specified cash access facility feature* relating to the service at a branch of a *bank* or *building society* within the relevant distance if one of the conditions in ■ ATCS 5.3.11R or ■ ATCS 5.3.12R is satisfied.

**5.3.11** **R** The first condition referred to in **■ ATCS 5.3.10R** is that the same type of *specified cash access service* and (where relevant) *specified cash access facility feature* are available to *customers* of another *relevant current account provider* besides the *bank or building society* referred to in that *rule* at a *cash access facility* within the relevant distance.

**5.3.12** **R** The second condition referred to in **■ ATCS 5.3.10R** is that:

- (1) the requirement for the *cash access assessment* was triggered under **■ ATCS 4.1.1R(1)** (concerning closures of *designated firms*) or **■ ATCS 4.1.1R(2)** (concerning closures of *persons other than designated firms*); and
- (2) the *cash access facility* which is the subject of the *relevant closure* is a branch of the *bank or building society* referred to in **■ ATCS 5.3.10R**.

**Guidance**

**5.3.13** **G**

- (1) The *cash access assessment* begins by considering whether there is a local deficiency in provision of *cash access services* by reference to what is available within the relevant distance. Exclusions from consideration of what *cash access services* are available for the purposes of **■ ATCS 5.3.5R** or **■ ATCS 5.3.8R** are set out in **■ ATCS 5.2.5R** and **■ ATCS 5.3.10R**. The effect of **■ ATCS 5.2.5R(1)** is that where a *cash access assessment* is undertaken as a result of an expected full closure of a *cash access facility*, that facility must be ignored for the purposes of **■ ATCS 5.3.5R** or **■ ATCS 5.3.8R**. Where the assessment results from a material reduction or change in provision of *cash access services* expected at a *cash access facility*, the effect of **■ ATCS 5.2.5R(2)** is that the facility can be taken into account but only to the extent of the *cash access services* it will provide after the reduction/change.
- (2) See **■ ATCS 4.1.12G(3)** on the impact of **■ ATCS 4.1.11R** on the *specified cash access services* and *specified cash access facility features* that must be assessed in accordance with **■ ATCS 5.3.7R(1)**. *Designated persons* may want to bear this in mind when considering the scope of *cash access assessments*. Unless assessments are undertaken on a holistic basis (ie, by assessing all *specified cash access services* and *specified cash access facility features*), they could in theory have to act on multiple *cash access requests* indicating different issues in respect of the same or substantially the same local area within a 12-month period.
- (3) There is no requirement in **■ ATCS 5.3.5R(3)** that the *specified cash access service* at a *cash access facility* within the relevant distance must be provided by the same provider that provided it at the *cash access facility* which is the subject of the *relevant closure*. The focus is on the availability of the type of *specified cash access service*, not on the identity of the provider.
- (4) Reliance on **■ ATCS 5.3.5R** or **■ ATCS 5.3.8R** is not dependent on all the *specified cash access services* under assessment being provided at the same *cash access facility*. They may be provided through a combination of 2 or more *cash access facilities*.

- (5) ■ ATCS 5.3.9R(1) is most likely to apply in rural areas – for example, where:
  - (a) geographical barriers mean that it takes substantially longer for people living in the local area to travel to the relevant *cash access facility* or *cash access facilities* than it does to travel to their nearest retail areas; or
  - (b) limited transport networks mean that it costs people living in the local area substantially more to travel to the relevant *cash access facility* or *cash access facilities* than it does to travel to their nearest retail areas.
- (6) An example of where ■ ATCS 5.3.9R(2) may apply is if a *cash access facility* subject to a full closure has several service counters, and the only other *cash access facility* within the relevant distance with equivalent *specified cash access services* and *specified cash access facility features* has one counter. If this means the other *cash access facility* would be unable to accommodate the additional demand from users of *cash access services* in the local area following the *relevant closure*, ■ ATCS 5.3.5R cannot be relied on.
- (7) Opening hours may be relevant to consideration of a *cash access facility's* capacity under ■ ATCS 5.3.9R(2). For example, the facility may be open for so few hours each week that this leads to unacceptable delays in service or queues.
- (8) Predictable fluctuations in demand may also be relevant to consideration of capacity. For example, where a local area receives a significant influx of visitors during the holiday season or on market days, which puts pressure on the *cash access facility*.
- (9) The effect of ■ ATCS 5.3.10R is that if the only *cash access facility* within the relevant distance is a branch of a *bank* or *building society*, and the condition in ■ ATCS 5.3.12R is not met, the only *specified cash access services* provided at the branch that it may be possible to take into account for the purposes of ■ ATCS 5.3.5R or ■ ATCS 5.3.8R are services which are also available to *customers* of at least one other *relevant current account provider*. An example of this is a *cash withdrawal service* provided through an automatic teller machine which is part of the LINK network. If *cash withdrawal services* are being assessed, it may be possible to find there is no local deficiency in them where there is such a machine, subject to any *specified cash access facility features* that also need to be assessed and the qualifications in ■ ATCS 5.3.9R. But if any *cash deposit services* are being assessed in this scenario and these are not also available to *customers* of another *relevant current account provider*, they will have to proceed to step 2.

**Background to relevant distances**

5.3.14

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- (1) Under section 131U(5) of the *Act*, a local deficiency in the provision of *cash access services* is: 'a circumstance which limits the ability of persons in any locality in a part of the United Kingdom to (a) withdraw cash from a relevant current account, or (b) place cash on a relevant current account'.

- (2) Under section 131U(6) of the *Act*, in determining whether there are local deficiencies, the *FCA* must have regard to the Treasury's Cash Access Policy Statement published under section 131P(6) of the *Act* which is currently in effect, as well as such other matters as the *FCA* considers appropriate.
- (3) The relevant distances are taken from the Treasury's Cash Access Policy Statement published on 18 August 2023. These distances are measured in a straight line.
- (4) The distances in the Cash Access Policy Statement do not include distances for business premises from *cash access facilities*. However, the statement says: 'the distance relative to the residential population is considered here to be a suitable proxy'. No separate distances are given in this chapter relative to business premises.

**Going to step 2**

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5.3.15

**R**

If ■ ATCS 5.3.5R or ■ ATCS 5.3.8R cannot be relied on, it must be found that there is, or would be after a *relevant closure*, a local deficiency in provision of the relevant *specified cash access service*.



## 5.4 Step 2: Assessing significance of impacts of local deficiency

### Scope

5.4.1

**R**

- (1) Under **ATCS 5.2.1R(2)**, an assessment must be made of the significance of the impacts of the local deficiency found in the provision of any of the *specified cash access services* that were assessed at step 1.
- (2) The assessment must consider the significance of the impacts on users of *cash access services* in general in the local area, not just *customers of designated firms*.

### Factors

5.4.2

**R**

Subject to **ATCS 5.4.1R**, the factors a *cash access assessment* must have regard to when considering whether the impacts of a local deficiency are or would be significant include the following:

- (1) the number of *persons* in the local area likely to be affected, including:
  - (a) the number of holders of *relevant personal current accounts* likely to be affected; and
  - (b) the number of businesses which accept *cash* payments likely to be affected;
- (2) the likely impact on those in the local area likely to be affected, bearing in mind in particular:
  - (a) their characteristics;
  - (b) the impact on those in vulnerable circumstances;
  - (c) the extent of the need for *assisted cash access services*;
  - (d) the extent of the need for businesses which accept *cash* payments to use *cash access services* for both coins and banknotes;
  - (e) the extent to which those likely to be affected may be outside the relevant distance when considering proximity to the nearest suitable *cash access facilities* with (between them) sufficient capacity to accommodate users of *cash access services* from the local area;
  - (f) whether the additional travel time for those likely to be affected to get to the *cash access facilities* referred to in (e) over and above the travel time to their nearest retail areas is unreasonable;

- (g) whether those likely to be affected have to incur unreasonable costs in travelling to the *cash access facilities* referred to in (e) over and above the costs of travel to their nearest retail areas; and
  - (h) the impact of any predictable fluctuations in demand for *cash access services*.
- (3) The list of factors in (1) and (2) is not exhaustive.

**Guidance on factors**

- (1) An assessment under ■ ATCS 5.2.1R(2) is only required where it has been identified that there is or would be a local deficiency under ■ ATCS 5.2.1R(1).
- (2) Subject to ■ ATCS 5.4.1R, an assessment will need to be made of the degree to which users of *cash access services* in the local area (both people and businesses) are impacted.
- (3) ■ ATCS 5.2.5R excludes consideration of the availability of certain *cash access services* at step 2.
- (4) The degree to which the nearest suitable *cash access facilities* with (between them) sufficient capacity may be outside the relevant distance is a factor. For example, if they are only just outside the relevant distance, that may indicate (leaving aside other factors) that the deficiency does not or would not have significant impacts. This factor should involve looking at issues such as:
  - (a) the *cash access services* available at, the features of and the capacity of the nearest *cash access facilities*;
  - (b) the distance to the nearest *cash access facilities* needed to reasonably meet the cumulative demand of users of *cash access services* from the local area; and
  - (c) how far outside the relevant distance these *cash access facilities* might be – in particular, the furthest such facility.
- (5) Opening hours may be relevant to a *cash access facility's* capacity. For example, the facility may be open for so few hours each week that this leads to unacceptable delays in service or queues.
- (6) The other factors set out in ■ ATCS 5.4.2R also involve the question of degree. For example, where a substantial number of people in the local area are likely to be affected, that would suggest significant impacts.
- (7) In having regard to the number of businesses likely to be affected and the impacts on them, consideration should, in particular, be given to types of businesses that might be expected to be heavily dependent on *cash*.
- (8) The impact on those with characteristics of vulnerability is a factor. This should involve identifying when users of *cash access services* with characteristics of vulnerability, including those who may have particular difficulties with accessing *cash access services* due to disabilities, are or would be significantly impacted. *Designated*

*persons* should refer to Finalised Guidance (FG) 21/1 (Guidance for firms on the fair treatment of vulnerable customers) for more information on our approach to characteristics of vulnerability.

- (9) An example of predictable fluctuations in demand for *cash access services* and their impact is where a local area receives a significant influx of visitors during the holiday season or on market days, which puts pressure on the *cash access facilities* in the area.
- (10) Regard should be had to any concerns raised by local community representatives and organisations about the adequacy of *cash access facilities*.

## 5.5 Step 3: Assessing reasonable additional provision

### Identifying additional cash access services

5.5.1 **R** The assessment under ■ ATCS 5.2.1R(3) must identify the additional *cash access services* that would:

- (1) address the significant impacts of any local deficiency identified by the assessment under ■ ATCS 5.2.1R(2); and
- (2) be reasonable to provide.

5.5.2 **R** The identification in accordance with ■ ATCS 5.5.1R must:

- (1) detail which of the *specified cash access services* are to be provided;
- (2) state that any *cash access services* to be provided in relation to *relevant personal current accounts* are to be free of charge;
- (3) specify whether each *specified cash access service* should allow for a reasonable mix of both coins and banknotes to be deposited or withdrawn (as appropriate);
- (4) identify whether any *assisted cash access services* should be provided and, if so, the type of assistance;
- (5) specify the area within which any *cash access facilities* that will provide the *cash access services* should be located;
- (6) specify the capacity needs and opening hours of any *cash access facilities* which will provide the *cash access services*; and
- (7) specify whether the *cash access services* are to be provided on a permanent or trial basis and, if the latter, the trial period.

### Guidance on identification and reasonableness

5.5.3 **G** (1) ■ ATCS 5.5.1R does not require the *cash access assessment* to identify the *cash access facilities* from which the additional *cash access services* are to be provided. The *rules* are accordingly channel-neutral in this respect, subject to the matters set out in ■ ATCS 5.5.2R.

(2) The definition of *assisted cash access service* is channel-neutral in terms of how the assistance should be provided, so this could involve the physical presence of the appropriately trained individual or the



provision of assistance by them via, for example, video link. The exact nature of any assistance needed in the circumstances must be identified in accordance with ■ ATCS 5.5.2R(4).

- (3) In delivering any *cash access services*, *designated firms* should be mindful of the duty to make reasonable adjustments for people with disabilities under the Equality Act 2010 in *Great Britain* and the need to comply with equivalent legislation in Northern Ireland. While *cash access assessments* are not expected to make judgments about compliance with such legislation, they should explain their findings on the impact on those who have particular difficulties with accessing *cash access services* due to disabilities. Those findings may assist *designated firms* in ensuring they meet any obligations under the relevant legislation.
- (4) ■ ATCS 5.2.5R excludes consideration of the availability of certain *cash access services* at step 3.

5.5.4

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- (1) The question of reasonableness in terms of the identification required under ■ ATCS 5.5.1R and ■ ATCS 5.5.2R is likely to depend on matters specific to the local area, which could include:
  - (a) whether any *cash access services* have been provided in the local area in the past and, if so, their nature and extent;
  - (b) the reasons, if known, for any *relevant closures* in the local area in the past;
  - (c) the likely cost of additional provision of a particular service;
  - (d) whether any additional *cash access services* which would wholly or partly address the significant impacts of the local deficiency identified by the *cash access assessment* are due to be provided by anyone independently of the assessment and any other *cash access assessment* undertaken as a result of the same trigger event, and the timeline for such additional provision;
  - (e) in terms of the identification of the location of any *cash access facilities* under ■ ATCS 5.5.2R(5), proximity to areas where *cash* is most likely to be used, such as retail areas; and
  - (f) in terms of the identification of capacity needs and opening hours of any *cash access facilities* under ■ ATCS 5.5.2R(6), any predictable changes in demand for *cash access services*.
- (2) The list of matters in (1) is not exhaustive.

5.5.5

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Given the number of different solutions available, it should only be concluded at step 3 in very exceptional cases that it is not reasonable for any additional *cash access services* to be provided.

**Trials**

5.5.6

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It may be appropriate in some cases for additional *cash access services* to be provided for a trial period. In such cases, ■ ATCS 6.1.2R(10), ■ ATCS 6.1.5R, ■ ATCS 6.1.6G, and ■ ATCS 8.1.12R to ■ ATCS 8.1.15G apply.

