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9th October 2018

Dear Mr Mowat,

### **CP18/2 - Draft Specific Direction 8 - protected ATMs**

Which? welcomes the opportunity to respond to the Payment Systems Regulator's (PSR) consultation on its draft specific direction regarding protected ATMs. It is vital that free, easy access to cash is protected for the millions of consumers who rely on it in their daily lives.

Our 'Save our cashpoints' campaign and our recent submission to the Access to Cash Review have highlighted the continued importance of cash for consumers, communities and small businesses, and has raised concerns about the future of the free-to-use ATM network. In particular, Which? has highlighted shortcomings with the measures outlined as part of the current Financial Inclusion Programme (FIP).

For the FIP to be truly effective, it must be dynamic and transparent. LINK must regularly review any changes in the ATM network and take action to ensure access to cash is maintained. LINK must also significantly increase transparency surrounding the free-to-use ATM network by publishing full details of the FIP and the areas and ATMs covered by it.

The PSR must therefore ensure that this specific direction achieves the following:

1. **A truly dynamic inclusion programme** - the FIP must take into account all new ATM closures and regularly update the status of any free-to-use ATMs that are newly vulnerable as a result.
2. **Full transparency** - LINK must publish monthly update reports. These should be made available on the LINK website and include, as a minimum, updates on the names, locations and status of protected ATMs.
3. **Minimal impact on consumers and communities** - LINK must clearly set out its ATM replacement procedure to ensure that communities are not left without free access to cash for an extended period of time.



While Which? welcomes this direction, it is a short-term solution. We continue to believe that a full review of the FIP is **needed**. This must examine the design and scope of the programme and ensure that it adequately **protects** future access to cash for consumers and communities across the UK.

Yours sincerely,

A handwritten signature in cursive script that reads 'Jenni Allen'.

Jenni Allen  
Managing Director - Money