ACCA

# Access to Banking Services Review: Call for Evidence.

A public consultation issued by HM Treasury

Comments from ACCA to HM Treasury

20 July 2026

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## About ACCA:

We are ACCA (the Association of Chartered Certified Accountants), a globally recognised professional accountancy body providing qualifications and advancing standards in accountancy worldwide.

Founded in 1904 to widen access to the accountancy profession, we have long championed inclusion and today proudly support a diverse community of over 257,900 members and 530,100 future members in 180 countries.

Our forward-looking qualifications, continuous learning and insights are respected and valued by employers in every sector. They equip individuals with the business and finance expertise and ethical judgment to create, protect, and report the sustainable value delivered by organisations and economies.

Guided by our purpose and values, our vision is to develop the accountancy profession the world needs. Partnering with policymakers, standard setters, the donor community, educators, and other accountancy bodies, we are strengthening and building a profession that drives a sustainable future for all. Find out more at: www.accaglobal.com.

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## General Comments

ACCA welcomes the opportunity to respond to the Access to Banking Services Review, which has been commissioned by the government to enable the chair to understand whether there should be protections for in-person banking services. While the Review scope reflects that, it could better connect to the insights already gathered by different departments. This includes work undertaken by the Financial Conduct Authority (FCA), HM Treasury, and the Department for Business and Trade. While outside the scope, their work should be called upon in assessing which in-person banking services are essential, relevant customer groups, and the materiality of the detriment caused.

ACCA recognise the positive intent behind the government's broader Financial Inclusion Strategy, likewise the roll out of banking hubs across the UK. We also acknowledge broader efforts to unlock finance for small business, an issue that ACCA has consistently drawn attention to. This includes the recent expansion of the British Business Bank's Growth Guarantee Scheme. Taken together, we view such initiatives as promoting the concept of ensuring financial services work for everyone. Alongside responses to specific questions, ACCA supplies the following recommendations.

- **Clearer expectations on in-person service provisions:** Given the FCA has established guidance on branch and ATM closures or conversions, we support consideration of extending these to in-person banking services.

- **Improving customer information:** We call on the government to encourage financial institutions to enhance their SME focused support and education. This is particularly relevant to the wide range of financing opportunities; likewise, the importance of business credit scores.

- **Inclusive access for all customers:** With digital exclusion still a problem in parts of the UK, ACCA has reservations about a digital only approach. We support the overarching principle of ensuring that non-digital alternatives remain.

- **Utilise evidence collected across government:** To avoid unnecessary duplication, ACCA encourages the government to utilise evidence already gathered and focus on tangible measures that promote inclusive access.

- **Transparency-focused measures:** With banks already providing the FCA with substantial information on branch closures and treatment of vulnerable customers, ACCA sees value in exploring the efficacy of assessments that underpin closure decisions. We also see merit in elevating the transparency of those.

## Consultation Questions

### Customer Needs and Use of In-Person Banking Services

**1.19 What are the benefits of being able to access banking services in person?**

The shift to digital banking has brought about widespread advantages. A greater mix of lenders, products and businesses has reshaped competition, supporting both innovation and expanding choice. The trend of SME finance moving away from the 'Big Four' UK banks is one such example. This is reflected in recent research of the British Business Bank, which found that challenger and specialist banks accounted for 60% of gross SME bank lending in 2025.[1] Yet many of the innovations entering the market stem from 'disruptor firms' and remain online focussed. This creates barriers for those who lack access to devices, reliable broadband, or do not possess adequate digital skills.

The benefits of in-person banking services cannot be understated. In our experience, the reason for considering alternatives often stems from in-built barriers. Those include a lack of dedicated account manager, unclear information, and fixed procedures that fail to account for different business types. In many cases, in-person support is simply replaced by impersonal chatbot services, leaving those with limited staff and expertise struggling to navigate complex application processes. The by-product is SMEs and individuals not getting the product most suitable for their needs.

**1.20 Are there any differences between personal and business in person banking service needs?**

While most larger businesses adopt digital banking solutions, ACCA notes that many micro-businesses operate using non-business accounts. Absent dedicated finance teams or digital systems, they can require in-person banking for lending, overdrafts, and financing options. Most will have customers that use a range of payment methods, meaning it is important such options remain. With closure assessments often distinguishing between business and personal bank accounts, there is the potential for pre-closure assessments to understate the wider impacts on smaller businesses and sole traders.

[1] British Business Bank (2026), *Small Business Finance Markets 2025/26 report,* available here.

## Groups Requiring In-Person Access

**1.21 Which customer groups most require in-person banking and why?**

ACCA notes the substantial body of publicly available research examining the issue of digital of exclusion. The customer groups most at risk include the elderly, disadvantaged, and those in rural areas. ACCA recently raised these matters with Revenue Scotland on proposals to introduce a digital-by-default approach to its communications. A key element of that response was emphasising the importance of ensuring that reliable, non-digital alternatives exist.[2] We provided the example of crofters in Shetland, their handwriting of livestock movement sheets, and difficulty accessing reliable digital infrastructure.

ACCA highlights the presence of FCA guidance setting out expectations for how banks manage branch closures.[3] This includes the impact on customers' everyday banking, alongside alternative provisions to address any loss of service. It also requires consideration of wider factors, such as characteristics of affected customers, quality of internet, transport availability, and opening times. We believe there is room for greater clarity on both the suitability and longevity of such arrangements. This includes the application of guidance to banking hubs and shared delivery models.

## Consumer Detriment

**1.24 What evidence is there of detriment arising from reduced access to in-person banking services?**

ACCA notes the impact of increased digitalisation of credit provision by the finance industry. In our experience, it can limit lenders' ability to fully understand the requirements of certain industries. The consequences can be seen in the problems many SMEs encounter, as demonstrated by insights from our quarterly Global Economic Conditions Survey (GECS) survey of accountants.

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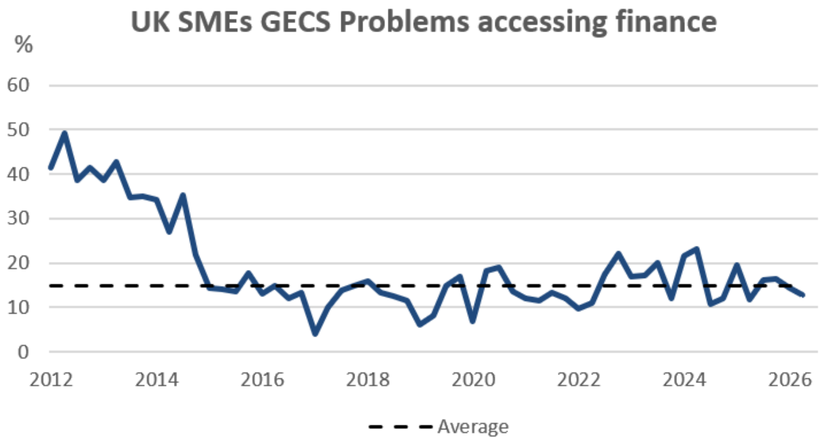
[2] ACCA to Revenue Scotland (2026), *Modernising Revenue Scotland's tax administration framework,* available here.
[3] FCA (2022), *FG22/6: Branch and ATM closures or conversions*, available here.




Source: ACCA/IMA (2012-2026)

It is also reflected in the FCA's recent mystery shopping exercise, which tested consumers' interactions with the UK's nine largest standard personal current account providers.[4] The exercise revealed that providers were not consistently offering these accounts to customers who could benefit from them. The FCA also noted inconsistent treatment of people facing financial hardship, lacking standard identification, and without a fixed address. We encourage the government to build on such work.

A frequent area of complaint from ACCA members and the businesses they represent is a lack of communication about changes to the provision of core services and other account related offers.[5] Common examples include new finance opportunities, overdraft facilities, and opening of new accounts. Members have also provided anecdotal feedback on the withdrawal of banking services with limited notice. The byproduct is creating difficulties for SMEs to find alternative arrangements and ensure business continuity.

**1.26 Are there any particular impacts on: Financial inclusion; Ability to manage finances; Business operations?**

The value of the Bank Referral Scheme lies in it raising awareness of alternative finance options. Yet greater choice and competition can also increase complexity, especially when SMEs may use different providers. Double security is one such area, where businesses may manage multiple security protocols and authentications. Education on the impact of different financing arrangements, such as fixed charges, floating charges, and personal guarantees is another. It ties back to the wider issue of accessible materials that support informed customer choice.

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[4] FCA (7 July 2026), *Banks told to improve access to basic accounts*, available here.

[5] ACCA to Treasury Committee for SME Finance (2023), *Call for Evidence on issues relating to access to finance,* available here.

## Current provision and Market Trends

**1.29 What have been the trends of branch closures and service reduction up to this point?**

The declining number of bank branches in the UK is a well-traversed issue. ACCA notes data from the British Banking Association and Office for National Statistics, which shows that there were 21,643 in 1986, compared to 6,870 in 2024.[6] There is also an established evidence base examining the downward trend, which can largely be attributed to technological changes and customer preferences.

**1.30 How have service providers made their decisions regarding closures and service reductions? What have been the driving factors?**

Given the nature of FCA guidance, thought should be given to it extending to in-person services. When considering a full branch closure or service reduction, the decision is for the firm to take. However, the FCA has clear guidelines for how firms should act in customers' best interests.[7] Central to that is informing the FCA of key proposals and decisions as soon as possible. This includes analysis of customer impact (especially those in vulnerable circumstances), stakeholder engagement plans, and alternatives that ensure a smooth transition. An extension could help promote greater transparency, likewise, understanding of approaches to at-risk customers.

In conversations with members, a reoccurring theme is that financial support via challenger firms opens growth opportunities that would have otherwise been unavailable. The value of these institutions is that they fill gaps where banks show a reluctance to support SMEs.[8] While in relation to the broader issue of SME access to finance, ACCA has raised the value of banks publishing statistics that shed light on lending practices. In the context of in-person banking, we see merit in more detailed guidance on the treatment of SMEs.

[6] House of Commons briefing (2025), *Closure of bank branches: Impact on rural communities*, available here.

[7] FCA (2022), *FG22/6: Branch and ATM closures or conversions*.

[8] ACCA response to DBT and HMT (2025), *Open call for evidence: Small business access to finance*, available here.

**1.32 What role do alternative channels play in providing services? How effective have they been, including: • Banking hubs • Post Office branches • Mobile branches**

Banking Hubs and Post Office branches can play an important role in maintaining in-person access. As it stands, the hubs are primarily focused on access-to-cash and provision of basic banking. With Post Office branches essential components to the social fabric of communities across the UK, ACCA believes consideration should be given to better leveraging their position.

## Future Trajectory and Innovation

**1.33 What is the likely future (including 5-10 years and 10+ years in the future) of in-person banking services provision under current regulation?**

ACCA reiterates its support for measures that ensure alternative options remain to access everyday banking services. For that reason, we support the government's commitment to roll out 350 banking hubs across the UK by the end of the current parliament. With respect to potential solutions and further reductions, the groundwork is in place for government action. ACCA encourages the government to build on strategies in place, likewise, scrutinising the efficacy of data that banks already supply and whether it can be improved.

**1.36 How can or should competition be maintained between different business models in offering banking services?**

Measures to improve competition should be accompanied by appropriate customer information and awareness. While the Bank Referral Scheme has proven beneficial for some businesses, there remains a degree of scepticism. Unless prospective lenders hold different risk appetites, rejected applicants may be better served by strengthening their applications and business cases. As outlined in December 2025 comments on expanding the Scheme's scope of designated lenders, it lends further weight to business support hubs that promote informed decision-making.[9]

[9] ACCA to HMT (2025), *Bank Referral Scheme: Consultation and call for evidence*, available here.