

Cynulliad Cenedlaethol Cymru / National Assembly for Wales
Pwyllgor yr Economi, Seilwaith a Sgiliau / Economy, Infrastructure and Skills Committee
Mynediad at Fancio / Access to Banking
EIS(5)AB13
Ymateb gan / Evidence from Which?

Which? is the largest consumer organisation in the UK with more than 1.3 million members and supporters, 57,000 of whom live in Wales. Our mission is to make individuals as powerful as the organisations they have to deal with in their daily lives, by empowering them to make informed decisions and by campaigning to make people's lives fairer, simpler and safer.

Summary

1. Which? is concerned that, without further action from the UK Government, regulators and businesses, we risk drifting towards a no cash society before we are ready, where millions of consumers still reliant on cash could be left behind. Without free access to cash many people in Wales may find it harder to manage their money, make payments, and may feel vulnerable in a society where technology cannot always be relied on.
2. Action is needed now if we are to ensure that people have the freedom to pay for goods and services their own way across Wales. Which? welcomes the recent UK Government commitment to protect access to cash and is pleased that the Treasury has recognised the need to bring together the relevant regulators to ensure there is a joined up approach. The newly formed Joint Authorities Cash Strategy (JACS) group is a welcome step and it is essential that they work quickly to protect people's access to cash and to build a sustainable cash infrastructure for Wales and the rest of the UK. We believe that the JACS group should act now to stop the closure of protected ATMs and commit to review ATM provision; review the current Financial Inclusion Programme (FIP), consider what protections need to be in place to maintain cash access for consumers across the UK and publish a clear strategy and timeline for the next steps the government, regulators and Bank of England.
3. Ultimately we believe that further steps must be taken by the UK Government and the members of the JACS group to ensure that access to cash is maintained and consumers are supported in the transition to an increasingly digital society. Our campaign is calling for:

A statutory duty to protect access to cash, free of charge. While we welcome the commitment and leadership on this issue from the Treasury, consumers cannot be confident that their access to cash will be protected going forward if there is no legal requirement for this to happen.

Banks and building societies do more to ensure customers are adequately supported as we move towards an increasingly digital society. Governments and regulators will have a key role in working with banks to make sure they are taking into account the needs of all consumers.

4. The Welsh Government must engage with stakeholders and consider what solutions could be put in place across Wales to ensure that local communities are able to access the banking and payments services that are essential to their day-to-day lives. Ensuring consumers have the freedom to pay for goods and services in the way that best meets their needs means protecting access to cash for those who rely on it. This is especially important as cash provides a vital backup when digital infrastructure fails. It also means supporting those who use card and digital payments for their day to day spending, supporting consumers who want to move to digital, and ensuring good connectivity across Wales.

Consumer demand for cash

5. We are concerned that the rate at which access to cash is declining is at odds with consumer attitudes and demand, and is being driven by industry. Welsh communities could be stripped of their choice to use cash before they are ready and if cash disappears, re-introducing can be complex. For example Sweden moved towards a cashless society but now the government has demanded action from parliament, and contingency planning from their central bank. This is because as the networks in place to support cash circulation became unsustainable, there was no central oversight, and costs have now been incurred to ensure that there is a minimum provision in terms of access to cashpoints and re-introducing some core banking facilities into areas that had lost them. The central government has also leafleted the public to reassure consumers they will still be able to access cash.
6. The issue of poor access to cash is not just a problem for older people or those living in rural communities, people across all aspects of society use cash, including small business owners, people who live to tight budgets and some people with disabilities. Cash is one of the most widely used payment methods in the UK; 25 million people would face 'real challenges' without it, and 2.2 million people are reliant on it. Which? research conducted in 2018 found that nearly four in five (78%) Welsh people use cash frequently (one to two times a week or more). This is broadly reflective of the UK average (73%). Only 2% of those in Wales say they rarely use cash (about every three months or less) and fewer people in Wales (59%) use a contactless debit or credit card frequently compared to the UK average (63%).

Which? UK wide research found that:

- 79% of those over 40 years old use cash at least once or twice a week.
 - 63% of 18 - 39 years use cash at least once or twice a week.
 - four in five retirees (80%) frequently use cash at least one or two times a week.
 - the use of cash is high across the income groups, showing that it's not just people on low incomes who use cash frequently.
7. Six in ten (61%) Welsh people say it is important for them to be able to use cash to pay for something costing under £5. Around three in five people (61%) think it is important that they can use cash when paying for occasional professional services such as babysitting, house cleaning/ window cleaning, and 2 in 3 (66%) think cash is important for lending or gifting money to family/ friends.

Our research also found that almost half (48%) of Welsh consumers experienced a time in the last three months when they could only pay for something by cash. Among

those, the majority (80%) said this was because cash was the only payment method accepted by the vendor.

Due to the role cash plays in their lives, 60% of those in Wales reported that they would feel negatively about cash being removed from society and notes and coins not existing in their lifetime. However, access to cash is disappearing, and it's having a huge impact on individuals across Wales.

Dawn, Carmarthen East and Dinefwr: "I rely on cash a lot. We live in a rural area and have a disabled son. It isn't always possible for us to go and get cash or deposit money. If we miss the mobile banking van, we sometimes have to travel up to 22 miles to get to another one. We then have to queue to access the van. All this puts greater strain on us all, especially as our son has issues with having to be stationary for a long time."

Katie, Dwyfor Meirionnydd: "We have a mobile bank which comes for 40 minutes a week. Otherwise it's then a 2 and a half hour round trip to get to the closest bank. There are no free to use cash points or other banks nearby and the Post Office is very busy. I might take out larger amounts of cash if I have the money available in my account. I try to get cashback in shops, and use less cash when possible. I avoid using charging cashpoints and when using a free one. I do use the internet but miss help and contact."

Lisette, Carmarthen East and Dinefwr: "There used to be four banks in our small town. Now there are none. To access a bank, it is a 30 mile round trip. The small local traders find it very hard, as they can no longer deposit cash, or get change easily. The Post Office has also moved over the county border, away from the shops, so this makes it harder too. Because the banks have gone, fewer people come into the town, meaning shops are having to close too. This means longer car journeys to shops, instead of just being able to walk."

Rhian, Alyn and Deeside: "Where I live it is now impossible to access any bank, ATM, post office etc without access to a car."

Better regulation and oversight of cash

8. The sustainability of the UK's cash infrastructure is at risk. No single organisation has overall responsibility for, and oversight of, cash. Different parts of the cash system are split across multiple regulators, UK Government departments and commercial organisations. As a result, the Government and financial regulators have not been tackling the complex issues threatening access to cash. We believe, as a result, people across Wales may have restricted payment options from which to choose.
9. Action is needed now if we are to ensure that people have the freedom to pay for goods and services their own way. Which? welcomes the recent UK Government commitment to protect access to cash and is pleased that the Treasury has recognised the need to bring together the relevant regulators to form the JACS group. However, if access to cash is to be protected the members of the JACS group must:

- **Act now to stop the closure of protected ATMs** and commit to review ATM provision. Any review should seriously consider the sustainability of the current funding model and whether it supports a geographical spread of ATMs. The JACS group should also consider the possibility of the Payment Systems Regulator directly regulating ATM interchange fees.
 - **Review the current Financial Inclusion Programme (FIP)** and consider what protections are needed to maintain cash access for consumers across the UK for as long as they need it. A review should look at LINK's Financial Inclusion Programme and commitment to protected ATMs, and should take account of the post office's commitments on financial service provisions.
 - **Publish a clear strategy and timeline for the next steps of the Government, regulators and Bank of England** to ensure that cash is protected. Next steps should include actions to encourage innovation in the provision and circulation of cash, to ensure the infrastructure remains sustainable and affordable for consumers and businesses that need it. The review must consider the potential in increasing ATM functionality, introducing joint banking hubs, and introducing new cash depositing technology.
10. Taking these steps would prevent financial exclusion, ensure access to a secure non-digital form of payment is retained, make sure people are given options on how they pay for goods and services, and promote effective competition across all payments.
11. Ultimately we believe that further steps must be taken by the UK Government and the members of the JACS group to ensure that access to cash is maintained and consumers are supported in the transition to an increasingly digital society. Our campaign is calling for:

A statutory duty to protect access to cash, free of charge. While we welcome the commitment and leadership on this issue from the Treasury, consumers cannot be confident that their access to cash will be protected going forward if there is no legal requirement for this to happen.

Banks and building societies do more to ensure customers are adequately supported as we move towards an increasingly digital society. Governments and regulators will have a key role in working with banks to make sure they are taking into account the needs of all consumers.

What is the current position regarding access to banking services in Wales, including issues relating to financial inclusion and digital inclusion?

12. Welsh consumers access financial services in a range of ways including at bank branches, cash points, Post Office branches and by using digital technologies. People need to have the option to pay for goods and services in a way that suits their needs, rather than being forced to rely on one payment method. In a Which? survey of over 1,200 people in the UK, half said they're concerned about the banking and payment industry increasingly offering products or services that can only be used online or with an app. Two fifths said these concerns related to a lack of digital capability (their own, or that of relatives) - and the unreliability of the digital infrastructure.

13. Connectivity and mobile issues

The fast movement towards relying solely on digital and electronic payments is happening without the proper assessment and scrutiny. It risks leaving some people excluded, less independent and struggling to pay for basic services. Large numbers of Welsh people are either not online or do not have a strong enough broadband connection to make use of digital forms of payment and banking. Data from people who have used the Which? speed checker found that Ceredigion was one of the worst affected local authority areas in the UK with a speed of 7.5Mbps.

As well as supporting work to protect access to cash, the Welsh government must ensure that it is supporting good broadband and mobile coverage across Wales to make sure that consumers have the choice to use digital payments and banking services.

Though the UK Government has proposed 10Mbps as the minimum download speed that anyone in the UK could request under its Universal Service Obligation (USO), according to an Ofcom report on digital connectivity in 2018, around 3% of premises in Wales cannot access a decent fixed broadband service. In addition, 10% of Wales' landmass has no good 4G coverage from any operator. This has improved from 22% a year ago but rural areas are still badly affected. 31% of homes and businesses in Wales do not have good indoor 4G coverage from all operators. This unreliable broadband and 4G connection will leave many people across Wales excluded from making digital payments, or using online banking.

Lack of good phone signal can also cause problems. Using Ofcom data collected from EE, O2, Three and Vodafone, Which? looked at the percentage of residential and commercial premises in UK parliamentary constituencies with no reliable 2G signal indoors (the minimum for voice calls and sending or receiving texts). We estimate that around 1.6 million people live in a mobile blackspot, and are likely to struggle to receive any texts. In Wales 5% of the population has no 2G. People with low phone signal risk being excluded as banks start to ask customers to validate online card payments using their mobile phone, under strong customer authentication (SCA) requirements. Banks will send a one-time passcode (OTP) – typically by text – which must be entered at the online checkout to authorise the payment. However, we know that some people will struggle to receive these texts and be unable to continue making their payment.

Kathy, Pembrokeshire "I am a wheelchair user and live in a very rural part of Wales where there is absolutely no mobile phone reception. I use the internet for shopping, paying bills and banking – it's a two-hour round trip by car to visit the nearest branch. Halifax recently contacted me with a questionnaire as they are also thinking of changing security for setting up new payments to a mobile phone system (they currently use my landline for this). I explained that I would have to close my account with them, which I have had for 30 years, if they introduce this."

Trevor, Aberconwy: "All banks have been closed for over a year I think. I know

that banks want us to switch to online banking but some of them are making it very difficult for people living in rural areas. Santander send OTP (one time passwords) by text message, when you want to pay a bill online. We don't have a mobile signal, yet they refuse to send it by e-mail or landline phone."

RG, Clwyd West: "It's very difficult now that the nearest branch is over 30 miles away. An extra difficulty is that I cannot use bank apps; there is no mobile signal in the area. I have to remember to use the cash machine when I go shopping, because the nearest ATM is 16 miles away. My nearest bank branch is 30.1 miles away. I am 73 and do not enjoy driving so far."

14. Financial inclusion

Despite LINK running a Financial Inclusion Programme to protect ATMs, more than 155 ATMs with 'protected' status have since stopped transacting, including 13 in Wales. This means that people in deprived areas of Wales, or those who have limited cashpoint options in their community, cannot always rely on the Financial Inclusion Programme to protect their local ATMs. LINK says that it will publicly monitor the whole country; report on free ATM availability; and highlight any areas where free ATM availability is lost. However, simply monitoring lost ATMs is not enough - people cannot wait for their access to be removed before they see action.

It is vital that communities in Wales are not under-served by their local cashpoints and left struggling to access cash when they need it.

Which? is calling on the Payment Systems Regulator (PSR) to conduct a review of LINK's Financial Inclusion Programme and its wider commitment to financial inclusion, including the current ATM replacement process, to ensure that it is fit-for-purpose and adequately protects access in the areas that need it most.

The Financial Inclusion Programme was established in 2006. The programme operates by providing interchange fee premiums for ATMs that are deemed to be protected. Under the Financial Inclusion Programme the last free-to-use ATM in a deprived area is eligible for a premium of 30p, with some being eligible for a super-premium of up to £2.75 per withdrawal to maintain profitability of the machine. In addition to that, LINK has committed to maintaining the geographical spread of ATMs and to ensure there remains a free ATM within 1km of the next free AT. When an ATM becomes the last ATM within a 1km radius, LINK will designate it 'protected' and act in line with its protected ATM policy¹.

In addition, as a result of ATM closures, LINK announced that it will introduce a 'super-premium' to machines in both schemes; those that have protected status and those which are in the Financial Inclusion Programme. This premium will be up to £2.75 on selected machines with the aim of incentivising operators to keep them open.

While we agree with the intention behind LINK's measures, we are concerned that due to commercial pressures from members, LINK cannot guarantee that the protections

¹ https://www.link.co.uk/media/1437/v-96-link-scheme-ltd-change-control-method4-change-2019-1030_19-protected-atm-policy-effective-1st-april-2019.pdf

offered by the Financial Inclusion Programme will work in practice and benefit people across Welsh communities.

The Protected ATMs currently represent less than 3% of the total LINK network, and the number of ATMs is expected to decline as changes to the interchange fee model between operators no longer ensures that the fees paid will cover the costs for ATMs across the UK. The impact of this is already evident in Which? research that showed over 1,700 ATMs converted from free-to-use to charging between January 2019 and March 2019. This activity means people across Wales will have less opportunity to access their own cash free of charge when using ATMs in their local area.

15. Resilience of IT systems

Unlike cash, digital payment systems are at risk of systematic failure as a result of technical issues or malicious attack. Which? analysis found British banks are being hit by more than one major IT or security failure every day, which stop customers from making payments. When digital payment systems fail, access to online banking and card systems is restricted, leaving people vulnerable if they do not have a non-digital payment alternative.

Cash is currently the main alternative to card-based payments and is the only widely used non-digital form of payment. If people are unable to access their cash easily, it is likely to result in a movement towards relying on digital payment systems – if people are indeed able to use these. This trend could leave those who can't use these digital systems excluded, and mean they are unable to access their financial services online.

Sweden is one of the most advanced nations for digital payments, but in 2019 the Government urged its citizens to stockpile coins and banknotes in case a cyber crisis leaves people without access to their money.

In the future, if digital payments are to be considered as the only option, the transition needs to be well supported by banks and building societies so that people who feel they lack the skills or confidence can use these payment options.

Which? research showed that three in five consumers in Wales use a contactless debit or credit card frequently (59%), which is reflective of the UK average (63%). Our research also highlighted that two in three of those in Wales (67%) say they have never used a mobile phone payment system, such as Apple Pay.

John, Clwyd West: "I use cash most days which I get from cashback in a shop. My biggest worry is a big prolonged network failure."

What are the variety of ways in which branch closures and access to free ATMs can affect local communities?

16. Bank branches

People in Wales now have more difficulties accessing their cash from a local bank. At least 235 banks and building societies have closed in Wales between January 2015 and January 2019, with NatWest closing the most branches (70), followed by HSBC (46), Barclays (46) and Lloyds (32). These closures reduce the banking options available to people in Wales.

Branch closures disproportionately impact vulnerable consumers, including people who don't have access to online banking, who struggle to travel, who cannot use digital forms of payment, those with poor broadband connection, and those living in rural areas. Banks should maintain access to these vital banking services for all, particularly the most vulnerable consumers who often rely on face-to-face contact in branches.

Which? data analysis in 2018, using all current account providers in the UK, found that between them, these banks only have 7,586 branches left in the UK. While not completely like-for-like, UK Government figures put the number of banks at 20,583 thirty years ago. Wholesale bank closures have left one in five (19%) of the UK population more than three kilometres from their nearest branch, and almost one in 10 people (8%) have to travel more than five kilometres to access their nearest branch.

Elisabeth, Brecon and Radnorshire: "There is now only one bank left in the town. Two banks have closed in the past year and we have also recently lost our Post Office. It is extremely inconvenient. The nearest branch of our bank is over 50 miles away. If we need to hand in a cheque it requires a day out! The one remaining bank has an ATM, but if that is non-operational, then it requires a journey to the nearest town approximately 9 miles away and banks have closed there as well. This is a rural area and organising a return journey can be problematic. There are many elderly and retired people here who rely on local banking services as they are unable to drive."

Gareth, Gower: "Banks have closed within the last year in my area so I no longer have the option to use those. I now use a bank 7 miles away in Llanelli or 9 miles away in Swansea. I also have to travel further to a cashpoint to access my money. I suffer with a bad back and it restricts the amount I can walk, so sometimes I cannot get to a cash point which is 1 mile away one way and 2 miles away return trip."

Dave, Meirionnydd "We are in Barmouth a seaside town in the Snowdonia park region. We now have no banks left in Barmouth after initially Lloyds closing down and then last year Barclays shut as well. This makes life unnecessarily more troublesome especially for disabled people like myself. I now sometimes have to drive 20 miles just to withdraw cash in Porthmadog or Dolgellau during the holiday season as far too many people are trying to access the limited funds that are available."

17. Cashpoints /ATMs

Published figures show that 4,692 cashpoints across the UK disappeared between Jan 2018 and December 2018. This equates to more than 400 free machines closing per month on average.

In addition to closures, free-to-use cashpoints are at risk of converting to charging. From the start of January 2019 to the end of March 2019 almost 1,700 free-to-use cashpoints converted to charging in the UK, with over 1,200 converting in the month of March 2019 alone. Though these cashpoints are not lost, they no longer provide a means for people to access their cash free of charge. The loss of free-to-use cashpoints will negatively impact people in Wales who have no other option nearby, or those who can't travel further to access another free cashpoint. It could also result in the remaining free-to-use cashpoints running out of money more quickly.

Which? is concerned that the reduction of free-to-use ATMs is being driven by business interests without sufficient consideration being given to the needs of consumers and local communities. Free-to-use ATMs provide vital banking functions and access to cash for people from all walks of life, particularly those who choose not to, or are unable to use, digital payment alternatives. An online UK wide survey conducted for Which? in August 2018 of over 4,000 adults found that half (51%) withdrew cash from an ATM at least weekly and eight in ten (78%) did this at least monthly.

In 2018, 1,200 Which? members across the UK shared their views in a survey about the impact of a potential reduction in free-to-use ATMs. Key findings include:

- Removing free-to-use access would leave one in ten (9%) struggling to make payments, shutting many consumers out from local shops and services.
- A reduction would also lead to one in seven (16%) being deterred from using outlets that accept cash only, placing a strain on consumers and retailers alike.
- Our survey found that one in ten (11%) have to walk more than 30 minutes to access their nearest cashpoint, while a further one in ten (9%) said the nearest machine was too far away to reach on foot.
- Which? research also found more machines were lost proportionally in rural communities than urban areas across the UK.

Eben, Carmarthen East and Dinefwr: "There's only one cash point left within a 25 minute drive and it is stated to close soon. Soon we will be unable to get cash without driving for 25 minutes."

18. The Post Office

Currently, the Post Office does not fill the gap a local bank leaves when it is removed from a location, and it cannot be considered a like for like alternative which will meet the needs of everyone in the community.

Though customers can withdraw cash, check their balance and pay in cash and cheques, they need to use a paying-in slip from their bank, and often an extra day or two is needed for deposits and cheques to appear on their balance. People also cannot transfer money from their account, or seek advice or make enquiries about savings, current accounts, credit cards, mortgages, and personal loans or investments.

Which? research found that

- only 55% of adults were aware that they could use Post Offices for banking.
- almost half (47%) of adults said they were unlikely to use the Post Office for this in the future.

When we asked them to explain their reluctance:

- 59% said they prefer to deal directly with their bank.
- 28% were worried about a lack of staff expertise in financial services.
- 42% voiced concerns that Post Offices have long queues which they didn't feel are private enough to deal with personal finances.

While a limited service is better than nothing - and 77% of those who had previously used a Post Office for banking said they would likely do so again - Post Offices are not yet a robust alternative for people to do their banking and manage their everyday finances.

Jim, Ceredigion: "My nearest bank is 20 miles away. All the local banks, and even those not so local, closed in quick succession. I have to rely on cashback in shops. It's very awkward to pay in cheques. Paying through the Post Office takes a very long time for cheques to clear into my account."

Sue, Dwyfor Meirionnydd: "I have to queue at the post office which is now always busy and for access to other banking services I have to travel a further 30 miles on from my previous 17 mile journey to my now closed bank. I can only access cash locally when the post office is open."

Appendix 1a: The number of bank and building society branch closures in Wales as collected by Which?

This number includes information from 20 major brands and does not account for new branches that may have been opened.

Parliamentary constituency	2015	2016	2017	2018	2019	Grand Total
Grand Total	49	53	64	50	19	235
Aberavon		1				1
Aberconwy	2	2	2	2		8
Alyn and Deeside	2	4		1	1	8
Arfon	1	1	1			3
Blaenau Gwent		3	2	1	1	7

Brecon and Radnorshire	2	2	5	5		14
Bridgend	1	2	1	2		6
Caerphilly		1	1			2
Cardiff Central	2		1	1	2	6
Cardiff North	1	1	1	2		5
Cardiff South and Penarth		1		3	2	6
Cardiff West			2	1		3
Carmarthen East and Dinefwr	3		2	4	2	11
Carmarthen West and South Pembrokeshire	4	4	2	2	1	13
Ceredigion	2	1	2	2		7
Clwyd South	2	2				4
Clwyd West	4		4	2		10
Cynon Valley		1	2	1		4
Delyn		2	2			4
Dwyfor Meirionnydd	6	3	1	3		13
Gower	1		3	1		5
Islwyn	1	2				3
Llanelli		1	1			2
Merthyr Tydfil and Rhymney					1	1
Monmouth	1	1	2	2	1	7
Montgomeryshire	2	2	3	1		8
Neath	1			1		2
Newport East	1	1	1		1	4
Newport West	1			1		2
Ogmore			1	2		3
Pontypridd	1	2	1	2		6
Preseli Pembrokeshire			4	3		7
Rhondda	1	3	1		3	8

Swansea East		2				2
Swansea West	3	1	3	1	1	9
Torfaen		1	2			3
Vale of Clwyd	2	1	3	1	1	8
Vale of Glamorgan	1	1	2	2		6
Wrexham	1	1		1		3
Ynys Môn		3	6		2	11

Appendix 1b: The number of bank and building society branch closures in Wales as collected by Which?. Last updated Jan 2019.

This number includes information from 20 major brands and does not account for new branches that may have been opened. Many brands closed 0. Last updated Jan 2019

Bank	2015	2016	2017	2018	2019	Grand Total
Barclays	7	8	10	16	5	46
Co-Op		5	1	2		8
Halifax			1	1		2
HSBC	7	26	13			46
Lloyds		12	13	2	5	32
NatWest	29	2	19	20		70
RBS				6	3	9
Santander	3		2	3	6	14
TSB	3					3
Yorkshire Building Society			5			5
Grand Total	49	53	64	50	19	235

Appendix 1c: The number of bank and building society branch closures in Wales by Assembly region as collected by Which?. Last updated Jan 2019.

Assembly region	2015	2016	2017	2018	2019	Grand Total
Grand Total	49	53	64	50	19	235
North Wales	14	16	18	7	4	59
Mid Wales	19	13	20	20	3	75
South Wales East	4	9	8	4	4	29
South Wales West	6	6	8	7	1	28

South Wales Central	6	9	10	12	7	44
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Appendix 2a: The number of free ATMs in each Welsh constituency

*Data taken from LINK reports

Parliamentary Constituency	JULY 2018	FEB 2019	LOSSES/GAINS	%CHANGE	Extra information
Aberavon	48	47	-1	-2.1	
Aberconwy	51	50	-1	-2.0	
Alyn and Deeside	46	44	-2	-4.3	
Arfon	62	62	0	0.0	
Blaenau Gwent	42	41	-1	-2.4	
Brecon and Radnorshire	62	45	-17	-27.4	* anomaly -- maybe an event, such as a summer festival, meant more ATMSs were temporarily installed in July
Bridgend	78	80	2	2.6	
Caerphilly	62	61	-1	-1.6	
Cardiff Central	174	165	-9	-5.2	
Cardiff North	59	58	-1	-1.7	
Cardiff South and Penarth	83	76	-7	-8.4	
Cardiff West	52	53	1	1.9	
Carmarthen East and Dinefwr	36	34	-2	-5.6	
Carmarthen West and South Pembrokeshire	71	69	-2	-2.8	
Ceredigion	62	57	-5	-8.1	
Clwyd South	28	27	-1	-3.6	
Clwyd West	52	48	-4	-7.7	
Cynon Valley	48	45	-3	-6.3	
Delyn	39	41	2	5.1	
Dwyfor Meirionnydd	54	50	-4	-7.4	
Gower	38	37	-1	-2.6	
Islwyn	43	42	-1	-2.3	
Llanelli	59	53	-6	-10.2	
Merthyr Tydfil and Rhymney	62	59	-3	-4.8	
Monmouth	60	60	0	0.0	
Montgomeryshire	39	38	-1	-2.6	
Neath	58	59	1	1.7	
Newport East	52	50	-2	-3.8	
Newport West	112	101	-11	-9.8	

Ogmore	38	40	2	5.3
Pontypridd	71	70	-1	-1.4
Preseli Pembrokeshire	54	53	-1	-1.9
Rhondda	46	41	-5	-10.9
Swansea East	63	58	-5	-7.9
Swansea West	103	98	-5	-4.9
Torfaen	74	71	-3	-4.1
Vale of Clwyd	77	76	-1	-1.3
Vale of Glamorgan	87	85	-2	-2.3
Wrexham	74	76	2	2.7
Ynys Môn	49	46	-3	-6.1
TOTAL	2468	2366	-102	-4.1

Appendix 2b: The number of free ATMs per head in Welsh constituency

*Data taken from LINK reports and ONS population estimates

Constituency	Feb 2019	Population	per 10,000 people
Aberavon	47	68203	6.9
Aberconwy	50	58941	8.5
Alyn and Deeside	44	85354	5.2
Arfon	62	62304	10.0
Blaenau Gwent	41	69609	5.9
Brecon and Radnorshire	45	69244	6.5
Bridgend	80	83796	9.5
Caerphilly	61	88129	6.9
Cardiff Central	165	93276	17.7
Cardiff North	58	90507	6.4
Cardiff South and Penarth	76	115406	6.6
Cardiff West	53	93312	5.7
Carmarthen East and Dinefwr	34	71891	4.7
Carmarthen West and South Pembrokeshire	69	77544	8.9
Ceredigion	57	73076	7.8
Clwyd South	27	72600	3.7
Clwyd West	48	73371	6.5
Cynon Valley	45	70673	6.4
Delyn	41	69801	5.9
Dwyfor Meirionnydd	50	61438	8.1
Gower	37	79176	4.7
Islwyn	42	76451	5.5
Llanelli	53	82826	6.4
Merthyr Tydfil and Rhymney	59	76168	7.7
Monmouth	60	85613	7.0
Montgomeryshire	38	63271	6.0
Neath	59	73887	8.0
Newport East	50	81090	6.2
Newport West	101	88258	11.4
Ogmore	40	77515	5.2

Pontypridd	70	82153	8.5
Preseli Pembrokeshire	53	78902	6.7
Rhondda	41	69278	5.9
Swansea East	58	82731	7.0
Swansea West	98	83573	11.7
Torfaen	71	82378	8.6
Vale of Clwyd	76	72026	10.6
Vale of Glamorgan	85	100945	8.4
Wrexham	76	70655	10.8
Ynys Môn	46	69794	6.6