



7 February 2024

Retail Banking

Financial Conduct Authority

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London

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To Whom It May Concern;

Mid Ulster District Council Response to Consultation Paper – Access to Cash

Mid Ulster District Council wishes to avail of the opportunity to respond to the current Consultation Paper – Access to Cash.

The Mid Ulster 'Local Government District' (abbreviated as LGD) has a land mass comprising of 1,826km². Our geographic position plays a significant part in our success, located in the heart of Northern Ireland whilst also sharing a 16km² stretch of border with the Republic of Ireland (see map on Appendix 1). The district has four larger towns each with population levels greater than 5,000 people. More than two-thirds of our district is classified as rural, comprising many dispersed small rural villages and settlements with populations levels much less than 5,000 people.

The district is home to some 150,293 residents and has become an increasingly popular place to live and work, demonstrated by a 12% growth in population above the NI average over the last number of years. Forecasts indicate the district will continue to grow at more than twice the pace of the NI population growth levels between 2020-2032, which in turn presents significant opportunities for future economic growth, most notably through an increasing supply of labour.

Furthermore, the Mid Ulster LGD is **the most entrepreneurial district in Northern Ireland**. We are also the **largest business base in Northern Ireland, outside of Belfast LGD**. Mid Ulster's main business sectors are concentrated in advanced manufacturing and engineering, construction, agri-food/agri-tech and retail. The innovative and collaborative nature of these businesses means our region is already a leader in competitive global markets, boasting a world-class 'High Growth Cluster'

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that manufactures over 40% of the world's mobile crushing and screening equipment.

Our dynamic business base plays host to a rich ecosystem of businesses that have made the **Mid Ulster district the 'economic engine room' of the Northern Ireland economy.**

Within the current "Community Request Scheme" a three stage process exists to initiate an assessment where a community can be considered for the establishment of a Community Banking Hub. The current criteria for stage one in this process will initially assess against the population size within a 1 mile radius of the retail centre (the expected threshold for a banking hub is around 4,000 population and over 40 local retailers that are likely to accept cash) of the village/town of bank closures.

Under the current proposals, I disagree with the Stage One criteria, as I believe it will not meet the needs of rural residents or businesses. Outlined below are some of the barriers faced by communities and businesses at Stage One;

- The Mid Ulster district is predominantly a rural economy, with two-thirds of our population living in rurally dispersed villages and settlements with population sizes ranging between 500-4,999 people.
- Limited provision/access to public transport creates further barriers for rural communities who dwell in rural areas outside our district's four 'urban' towns.
- Lack of access to adequate telecommunication services (eg, broadband/mobile phone coverage) in many rural parts of our district.
- With an aging rural population, many of our elderly community have limited digital skills to avail of online banking services, and consequently require access to cash to transact their every day business.
- A number of businesses choose to operate 'cash only' transactions, and therefore the need and access to cash is greater for those businesses and the communities for which they serve.

Based on the aforementioned barriers, I believe consideration should be given to reviewing and reassessing the criteria imposed at Stage One, to ensure equality of opportunity and inclusiveness (eg, Section 75 Equality legislation and Rural Proofing) for communities located in Northern Ireland.

An example of where our District has experienced a significant downward spiral in banking services is our Clogher Valley Ward which comprises of 3 main villages (each with populations less than 5,000 people). These villages are within an 8 mile radius and the lack of banking services has had a major detrimental impact upon local residents and businesses as they have lost their face to face personal and business banking services. The area is home to many indigenous businesses and has a large rurally dispersed farming community. Presently, the communities located



in the Clogher Valley have access to a minimum of one ATM per settlement (with free cash withdrawal). In order for them to complete face to face banking services for personal or business use, they have to travel up to 45 minutes to avail of this service which is wholly unacceptable.

As the leader of the Local Authority for the area, I would request that the criteria for Stage One is reviewed to provide equality and inclusiveness for rurally dispersed communities. As the criteria stands at present, it excludes rurally based communities like the one described above to be able to have a Community Banking Hub which would provide much needed face to face personal and business banking services.

I would like to request that your consideration be given to selecting the Clogher Valley Ward in Mid Ulster District as a pilot project to demonstrate how a Community Banking Hub would work in this rural context, which your criteria currently excludes it from.

I trust you will take into consideration the need for review and reform the process before it is finalised and improve the model to better fit community and business needs in urban and rural settings.

I trust this information is helpful and I look forward to hearing from you in relation to our proposal to establish a Community Banking Hub in the Clogher Valley region in Mid Ulster. I'd be delighted to meet with your team to discuss this opportunity further.

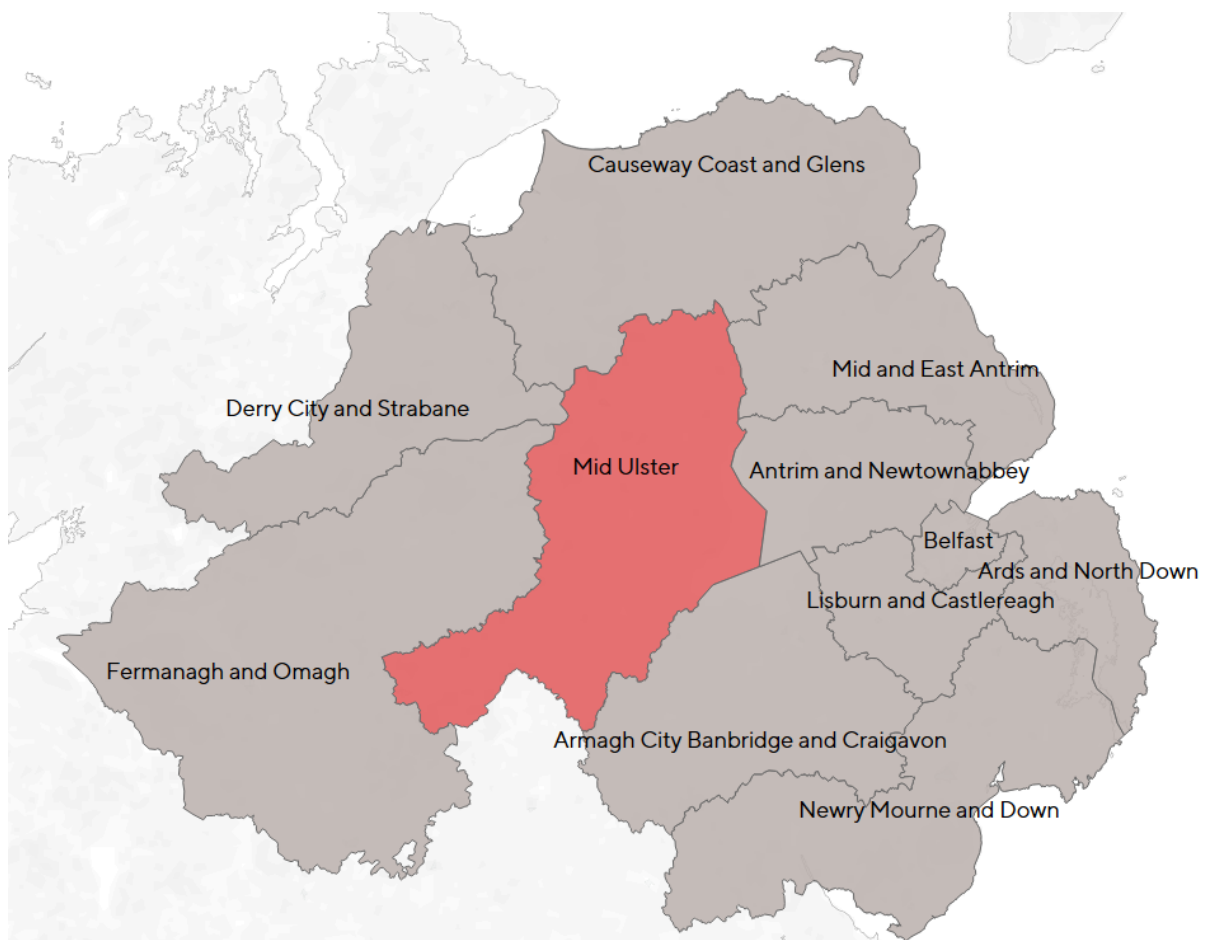
Yours sincerely

Adrian McCreesh

Chief Executive

Appendix 1 –

Map Depicting Mid Ulster District Council area within the Northern Ireland Context



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9 February 2024



Fiona Boyle Associates

Email: fboyleassociates@btinternet.com

Ref: Investigating future provision for victims of violence and those at risk/under threat of violence including victims of domestic abuse within the Northern Ireland Housing Selection Scheme.

To whom it may concern:

Mid Ulster District Council welcomes the opportunity to provide its views and opinions in relation to the development of research examining future provision for victims of violence and those at risk/under threat of violence including victims of domestic abuse within the Northern Ireland Housing Selection Scheme.

Overall, the Council feel that the proposal to remove the intimidation points from the housing selection scheme was wrong and they should be maintained to protect those who are genuinely at risk from intimidation. The Council agree that the selection criteria should include people at risk from domestic abuse. There is a need to protect those facing serious and immediate threat to themselves and their family and there should be robust verification of intimidation points by the police to ensure they are allocated appropriately to those at genuine risk and to prevent others on the housing list (including those with homeless points) being unfairly disadvantaged.

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The Council would also have concerns regarding the way in which this research is being conducted, and the failure to publicise it widely via victims support groups etc. Furthermore, Mid Ulster District Council area is vastly rural with a lack of available social housing. As such the Council would recommend examining the contrast between urban and rural considerations when searching for housing solutions in victims of violence and those at risk/under threat of violence including victims of domestic abuse. Solutions employed in urban areas may not work in rural areas and that alternatives should be considered.

In addition, the Council believes that current levels of domestic and sexual abuse in Northern Ireland are completely unacceptable and hopes that this research will examine the impact on victims of domestic abuse who cannot leave abusive situations because of the current flaws within the Northern Ireland Housing Selection Scheme. In the Council's latest conversations with our local Women's Aid Manager, she highlighted that there has been a significant increase in the duration of stay in their refuge by women and children of domestic violence, related to difficulties in accessing more permanent housing. They currently have 6 women and families on the waiting list for Cookstown refuge and 44 pending for Floating Support. Therefore, in relation to the implementation of the current and any updated scheme, the Council would advocate that NIHE Housing Officers work and communicate closely with local Women's Aid organisations to ascertain the level of threat to these families when assessing their points.

The Council would also encourage a significant increase in social housing provision. This could alleviate some of the current issues within the Northern Ireland Housing Selection Scheme and also offer victims of violence additional options and choice in relation to relocation issues. The Council has previously written to the Permanent Secretary of DfC and provided responses on the issue within the Housing Supply Strategy in order to raise the continuing issue of the lack of social housing provision within the District.

The Council is aware that Safe Lives commissioned a report in 2018 that found that approximately one third of homeless women stated that domestic abuse contributed to their homelessness. Therefore, it's clear that there's need to ensure adequate provision of emergency in refuge accommodation as well as adequate access to safe housing in the Mid Ulster area. No survivors of domestic or abuse should be prevented from leaving their abuser due to the fears of homelessness. It seems that often, only this assurance of suitable alternative housing accommodation for survivors and their families can help them to break the cycle of abuse.

The Council is also aware that the Crime Prevention Officer regularly provides citizens with locks, bolts, and other types of home safety equipment. However, the Council is worried is disappointed that very Handyman Scheme who would usually be available to fit these pieces for vulnerable households will cease on 31st March 2024 because of a lack of funding. The struggle to ensure that the scheme is future proofed has so far been unsuccessful leading to a fear that the incredible work that

this scheme provide via the Agewell Partnership will no longer be in place to increase the safety of vulnerable people in their homes.

In conclusion, the Council believe that intimidations points shouldn't be removed from the scheme and that they should be retained and indeed broadened to include those at risk from domestic abuse. There is a need to protect individuals experiencing domestic violence in order to allow them to protect themselves and their families. There is also a need for robust verification of intimidation points to ensure that these points are allocated appropriately to those a genuinely at risk and to prevent others on the housing list including those with homeless points from being unfairly disadvantaged.

Finally, the Council would recommend that additional consultation is carried out when the findings of this research paper is known.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dominic Molloy', written in a cursive style.

Cllr Dominic Molloy

Chairperson, Mid Ulster District Council