



MONEY AND
MENTAL HEALTH
POLICY INSTITUTE



IF I NEEDED SOMEONE

Improving access to third party financial tools
for people with mental health problems

Chris Lees

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Executive summary

The need for third party access

Our 2019 report *A little help from my friends* found that common symptoms of mental health problems can mean we need to rely on support from friends and family with our finances when unwell.

However, many people with mental health problems are resorting to risky workarounds like sharing their card or online banking details in order to get the support they need.

- Updated research shows over one in five (22%) people with mental health problems had shared their PIN or online account log-in with someone else.
- This exposes people with mental health problems to significant risk of harm, such as fraud or financial abuse.

Progress to improve third party access since 2019 has been slow and barriers such as concerns around fraud and financial abuse, technical challenges and regulatory burdens have been cited as reasons for this.

The current third party access landscape

The formal means to allow a trusted person to access financial services on your behalf is through tools such as Powers of Attorney (PoA) and deputyship orders, which are overseen by the government and courts.

Bank account providers may also offer informal Third Party Mandates that authorise trusted third parties to have more limited access to their services.

However, these mechanisms do not meet all the needs of people with mental health problems:

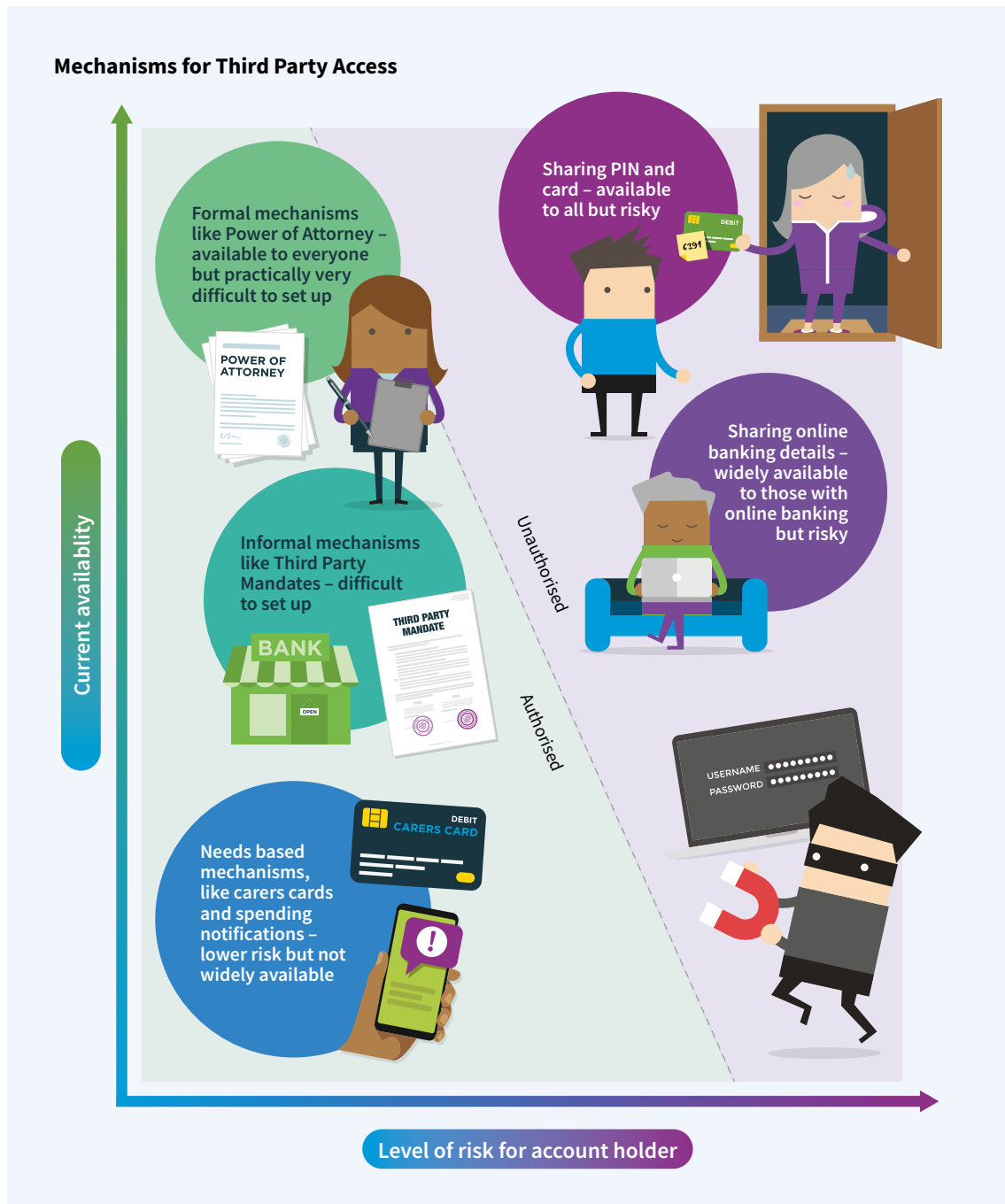
- Formal mechanisms cede too much control over to a trusted person and do not give the flexibility that matches someone's fluctuating requirements.
- People with mental health problems and those that support them can face challenges to setting up third party access mechanisms, including long and complicated processes, inaccessible (e.g. in-person only) channels and staff who are unaware of the processes or insensitive to the situation.
- Four in ten (39%) people who have conducted financial matters on behalf of someone else through one of these routes have had a negative experience while doing so.

There are some alternative needs based tools offered by providers. These include carers cards that a trusted person can spend with or notifications of activity that are sent to a trusted person. However, these are not consistently offered:

- We looked at the websites of eighteen banks and building societies, of those: seven offer a carers card, three offer notifications to a trusted person and one offers greater carer access to an account.

This leaves people with mental health problems and those that support them facing a labyrinth to get the support they need or having to resort to unauthorised workarounds and accept the associated risks in order to get the vital support they need.

Diagram 1: Mechanisms for Third Party Access



Recommendations for change

Third party access offering

Banks and building societies can improve the process of registering or setting up both formal and informal authorised mechanisms with by:

- Providing and clearly promoting accessible information on the different types of third party access support available and how to obtain them.
- Utilising a range of channels for customers and those that support them to register and provide support.
- Allowing trusted persons to provide more support through informal authorised mechanisms, such as Third Party Mandates, e.g. being able to make changes to payments or having their own card.
- Having a clear process for staff to follow and ensuring frontline staff are skilled and confident on third party access.

Banks and building societies should offer a needs based toolbox of third party access options that reflect the requirements of people with mental health problems. In order to achieve this they should:

- Work to introduce alternative third party access tools, such as notifications and the ability to permit third parties to take specific, limited actions in relation to an account.
- Jointly agree a minimum suite of Third Party Access tools, offered by all relevant banks and building societies, prescribing certain features including carers cards and transaction monitoring functionality. To achieve this the government and providers should make a voluntary agreement following the precedent of basic bank accounts.
- Consider partnering with fintechs that provide alternative third party access tools to offer a version to their customer base.
- Explore how appropriate safeguards that are relative to the risk posed and mechanisms that allow for the tool functionality to be switched on when needed can be introduced.
- Involve people with lived experience in the design of future alternative third party access tools and ensure they can be used through non-digital means.

Wider reforms to third party access processes

To ensure the change that is needed in third party access happens, the Financial Conduct Authority, the regulator for financial services, should convene a range of interested parties, such as UK Finance, the Information Commissioner's Office, the OPG and consumer groups, into a working group.

Steps should be taken by relevant stakeholders to improve the process of setting up support with a financial service provider and with the Office of the Public Guardian (OPG):

- The FCA should monitor what steps the firms involved in its recent multi-firm review of the PoA process take and publish an update within the next year.
- Building on its existing work in this space, UK Finance, the trade body for financial services, should look at how to bring more consistency in the process of registering support, such as the channels that customers and those that support them can use.

The OPG should:

- Work with the UK Regulators Network to update the guidance to essential service firms on PoA and collaborate with UK Finance to ensure consistency across the financial services sector.
- Help individuals state what support they want from their trusted person when applying for a PoA by working with UK Finance to provide examples of what financial service providers can facilitate. The OPG should also aim to introduce a drop down menu of support options provided by financial service providers into the online application process.
- Explore ways that individuals and those supporting them can register their PoA with all their relevant providers in one way through data sharing.

Additionally, we think that there is a need to rethink the PoA system to take into account the views and experiences of people with mental health problems. Therefore, the OPG should:

- Launch a review of the PoA system with the Ministry of Justice to consider how it could be changed to better meet the needs of people with mental health problems and beyond.

Addressing mental capacity

We have also identified some challenges that financial services providers face when they are concerned that a customer lacks mental capacity or doesn't have a trusted person to support them. In order to address these:

- Advance Choice Documents and care and treatment plans used in mental health services should include detail on whether someone has a trusted person and an arrangement with their financial service provider in place.
- Where possible, financial service providers and local organisations should build partnerships to reach out to when they have concerns about a customer but there is no trusted person in place.



Introduction

Mental health problems can impact us in a range of different ways. That includes, as Table 1 shows, making it difficult to manage our finances. During these periods of poor mental health, we can often rely on the support of family and friends. Our past research found that four in ten (42%) people who have experienced a mental health problem have wanted help with money management from a friend or family member.¹

What we need from these trusted people can depend on how unwell we are and what we are able to do financially. Sometimes we're too unwell to leave the house and need someone to do our shopping. Other times we can forget about bills that are due, or the thought of sorting that out can be too much. Some people with mental health problems might have to receive mental health crisis care, meaning financial matters are impossible to attend to.

"I am not good at managing my money so having someone help me is vital. I get very stressed about making phone calls when I'm unwell and my ability to understand things that are more complicated really drops."

Expert by experience

"My experience has been that I live with bipolar, and that has meant that during manic episodes, there have been quite a lot of regrettable financial decisions made by myself. So it's so important to have somebody that you trust."

Expert by experience

Table 1: Common symptoms can impact how we manage our finances and lead us to seeking support from a trusted person

| Symptom | Impact on finances |
|--|--|
| Low mood and anxiety around leaving the home | Unable to go to the shops to pick up essentials |
| Finding it difficult to use communication channels | Unable to get in touch with your bank to sort out an issue |
| Struggling to manage spending due to increased impulsivity | Spending significantly more than normal |
| Reduced memory | Forgetting about bills that need to be paid |
| Finding it harder to look over and manage finances | Paying more than needed on subscriptions or direct debits |

¹ Bond N, Evans K and Holkar M. *A little help from my friends*. Money and Mental Health Policy Institute. 2019.

This is not a new area for us. In 2016 and 2019 we published reports looking at the need for support from friends and family members, and people's experiences of accessing such support.² That last report, *A little help from my friends*, is now six years old. In that time, there have been some significant changes in the economy, society and the way services are provided:

- The covid pandemic highlighted the need to support others who were unable to leave their home. It also led to a rapid increase in the digitalisation of services as traditional face to face delivery stopped.
- The cost of living crisis that followed the pandemic put a strain on many people's financial circumstances and saw some return to more traditional ways of managing money, like cash.³
- In recent years, the prevalence of mental health problems continues to increase, with the Adult Psychiatric Morbidity Survey showing the number of adults identified with a Common Mental Health Condition increasing from 17.6% in 2007 and 18.9% in 2014, to 22.6% in 2023/4⁴ and mental health services have struggled to meet the demand.⁵
- Additionally, the number of people providing unpaid care is expected to rise with an ageing and increasingly unwell population, with the Joseph Rowntree foundation analysis predicting an additional 400,000 carers in the UK by 2035.⁶
- The number of people registering Lasting Power of Attorneys (LPAs) has increased significantly, growing from approximately 225,000 in the last quarter of 2019 to 400,000 in the third quarter of 2024, although this has decreased to approximately 300,000 in the first quarter of 2025. Family court statistics show that 51% of those registering LPAs are aged 75 or older and the average age of a donor creating an LPA is 71-75.

There have also been changes in regulation and government policy during this period. This included from the Office of the Public Guardian (OPG) that oversees the Power of Attorney system, one of the main mechanisms for third party access. The OPG launched plans for the modernisation of Lasting Power of Attorney in 2022 following a public consultation. This included making the service more digitally accessible.⁷ The amended Powers of Attorney Act was given Royal Assent in 2023.⁸ Meanwhile, the regulator for financial services, the Financial Conduct Authority (FCA), introduced new guidance and rules that put more impetus on firms to provide support for customers, including those with mental health problems.

2 Murray N. *Strength in numbers*. Money and Mental Health Policy Institute. 2016; Bond N, Evans K and Holkar M. *A little help from my friends*. Money and Mental Health Policy Institute. 2019.

3 Peachey K. *Cash-only spending in surprise jump as people budget*. BBC News. 2024. Accessed 13/06/2025 – <https://www.bbc.co.uk/news/articles/crg51e9dv8go#:~:text=The%20number%20of%20people%20mainly,2019%2C%20according%20to%20UK%20Finance;Nationwide.Cash%20usage%20rises%20for%20third%20year%20as%20Brits%20continue%20to%20value%20money%20in%20their%20pockets>

4 NHS Digital. *Adult Psychiatric Morbidity Survey: Survey of Mental Health and Wellbeing*, England, 2023/4.

5 Barker C and Kirk-Wade E. *Mental health statistics: prevalence, services and funding in England*. House of Commons Library. 2024. Accessed 13/06/2025 – <https://commonslibrary.parliament.uk/research-briefings/sn06988/#:~:text=In%20surveys%20taken%20between%20July,proportion%20had%20fallen%20to%2016%25>.

6 Jitendra A and Bokhari R. *The future of care needs: a whole systems approach*. Joseph Rowntree Foundation. 2024.

7 Ministry of Justice and Office of the Public Guardian. *Consultation outcome Modernising Lasting Powers of Attorney*. 2022. Accessed 14/05/25 – gov.uk/government/consultations/modernising-lasting-powers-of-attorney

8 Ministry of Justice and Office of the Public Guardian. *Step forward to online lasting powers of attorney*. 2023. Accessed 14/05/25 – gov.uk/government/news/step-forward-to-online-lasting-powers-of-attorneys

The first, *Guidance on the Fair Treatment of Customers in Vulnerable Circumstances*, set out the steps firms should take to support vulnerable customers.⁹ This included two key elements relevant to third party access:

“Where appropriate, firms should provide straightforward options to enable legitimate and legal delegated access or support, while maintaining robust safeguards to reduce the risk of abuse.”

“Firms should also consider how to meet the needs of consumers who need a third party to access their account or to support them on a short or medium-term basis. Flexibility that doesn’t undermine important safeguards may be appropriate in the case of an emergency or short-term need.”

The second, the Consumer Duty, a significant new piece of regulation which requires firms to deliver good customer outcomes also includes a focus on those who support customers:¹⁰

“Where a person is authorised by a customer, or by law, to assist in the conduct of the customer’s affairs (such as where power of attorney applies), firms should provide the same level of support to that person as they would have provided to the customer... It means they should also receive an appropriate standard of support and not face unreasonable barriers when acting on behalf of the customer.”

With these contextual changes, it is an opportune moment to return to this topic to explore what, if anything, has changed in third party access. In 2019, we found that the people with mental health problems felt that the authorised mechanisms to receive support from a trusted person were not designed for their, often fluctuating, needs and ceded too much power to their trusted person. Instead, many people were relying on risky unauthorised workarounds to gain support from friends and family, such as giving someone a card, PIN or login details for online banking. We called for changes to the authorised routes to support and set out what support people with mental health problems felt better met their needs. Following the report we had positive engagement with the financial services sector but did not see strong commitment to act.¹¹

This new report considers where the financial services sector now is when it comes to the mechanisms and tools firms offer, what barriers to further progress are in place and what needs to happen to ensure those of us with mental health problems can get the support we want in an accessible and safe way.

9 Financial Conduct Authority. *FG21/1 Guidance for firms on the fair treatment of vulnerable customers*. 2021. [fca.org.uk/publication/finalised-guidance/fg21-1.pdf](https://www.fca.org.uk/publication/finalised-guidance/fg21-1.pdf)

10 Financial Conduct Authority. *FG22/5 Final non-Handbook Guidance for firms on the Consumer Duty*. 2022. [fca.org.uk/publication/finalised-guidance/fg22-5.pdf](https://www.fca.org.uk/publication/finalised-guidance/fg22-5.pdf)

11 We also had engagement with the sector following the 2016 report and saw changes such as Barclays introducing a carers card and principles from the predecessor to UK Finance. See: moneyandmentalhealth.org/carers-cards

This report

In this report we examine the experiences of people with mental health problems when trying to get support from a trusted person in financial services. In particular we focus on their experiences with everyday banking and what support providers can offer. While we do not look at the wider ecosystem, such as the Power of Attorney process itself, in great detail, we have considered how it impacts the support firms can provide. We also consider the experiences of friends and family members who support people with mental health problems. When it comes to these experiences, we draw on our Research Community, a group of over 5,000 people with personal experience of having a mental health problem or of caring for someone who does.

In this report:

- **Section One** examines people with mental health problems' experiences of authorised third party mechanisms and the level of provision of alternative tools.
- **Section Two** sets out the prevalence of unauthorised third party access workarounds, the associated risks and why people with mental health problems are still using them.
- **Section Three** outlines what changes are needed from financial service providers, the FCA, OPG and others to improve third party access in financial services so it better meets people with mental health problems' needs.
- In **Sections One** and **Two** we provide a breakout box to compare our new research to what we found in 2019.

There is a range of terminology we use in this report:

- **Third party access mechanisms:** Ways that one person can access someone else's finances in order to provide support. These break down as follows:
 - » **Authorised arrangements:** Third party access mechanisms authorised by the government or financial services providers, whether formal or informal.
 - + **Formal:** Mechanisms such as Powers of Attorney that require authorisation from a government organisation or court.
 - + **Informal:** Mechanisms such as Third Party Mandates that can be authorised by the bank or financial service provider themselves.
 - » **Unauthorised workarounds:** Actions people take to offer someone support without a legal document or informal agreement with the financial service provider, such as sharing a bank card.
 - » **Needs based tools:** Alternative, authorised support options that have a specific and limited role that sits outside the current formal and informal framework. This can include cards, transaction monitoring and some control over an account. We outline the current offering from providers in the next section.

- + **Carers cards:** Also called trusted person cards, a carers card is a debit card given to a trusted third party to allow them to make purchases on behalf of the account holder. Payments may be made directly from the main current account (up to a time bound limit) or from a separate account that the account holder can load with funds. The account holder retains ultimate control of the card, for example being able to cancel it at any time.
 - + **Transaction monitoring:** Mechanisms that permit trusted persons to monitor the transactions on an account. This might be through an online portal or through the provision of SMS or app based notifications to a trusted person that allows real time monitoring.
 - + **Payment controls:** Mechanisms that permit trusted persons to make or block payments. These may be limited to specific types of payment (e.g. gambling) or payments above or below certain thresholds.
- **Trusted persons:** Friends and family members who have been trusted by an individual to access their finances in order to support them.
 - **Fintech:** Firms that specialise in financial technology.
 - **Power of Attorney:** A legal document that allows an individual, 'the donor', to appoint someone, 'the attorney' to support them to make decisions, or make a decision on their behalf. There are two categories of decisions: property and financial affairs; and health and welfare.
 - » The main form is **Lasting Power of Attorney (LPA)** which allows 'the attorney' to provide support on an ongoing basis or from when 'the donor' loses mental capacity.
 - » There is also an **Ordinary Power of Attorney** which allows the 'donor' to share decision-making with a 'delegate', possibly for a limited period of time.

There are also differences to how the system works in Scotland and Northern Ireland. Throughout we mainly refer to Power of Attorney (PoA) as a term to include the different types. This is because we did not ask Research Community members to specify what type of Power of Attorney they had and the general term PoA was often used during our expert conversations. However, we will sometimes specify LPA where necessary.

- **Third Party Mandates:** An informal third party mechanism that is set up with a specific bank or building society, which authorises a trusted person to do some things with an account but not others. Also known as Third Party Authority, we refer to them as Mandates throughout.
- **Mental Capacity:** Whether someone can understand and make a decision, including understanding, retaining and weighing up the information to make the decision and being able to communicate their decision. This is legally set out in the Mental Capacity Act 2005.

This report draws on and analyses a number of different data sources, with more information available in our methodological annex:

- Two surveys with Money and Mental Health's Research Community. A survey of 158 people with lived experience of mental health problems and a survey of 36 people who have supported someone with mental health problems, both between 7 February and 20 February 2025.
- An online focus group with eight of those respondents, both those with lived experience of mental health problems and experience of supporting someone with mental health problems, which took place in March 2025.
- New analysis of the FCA's Financial Lives 2022 Survey.
- A review of relevant support available on the public websites of 18 banks and building societies.
- A roundtable attended by experts in this area, including individual firms and consumer organisations, as well as wider discussions with relevant stakeholders.

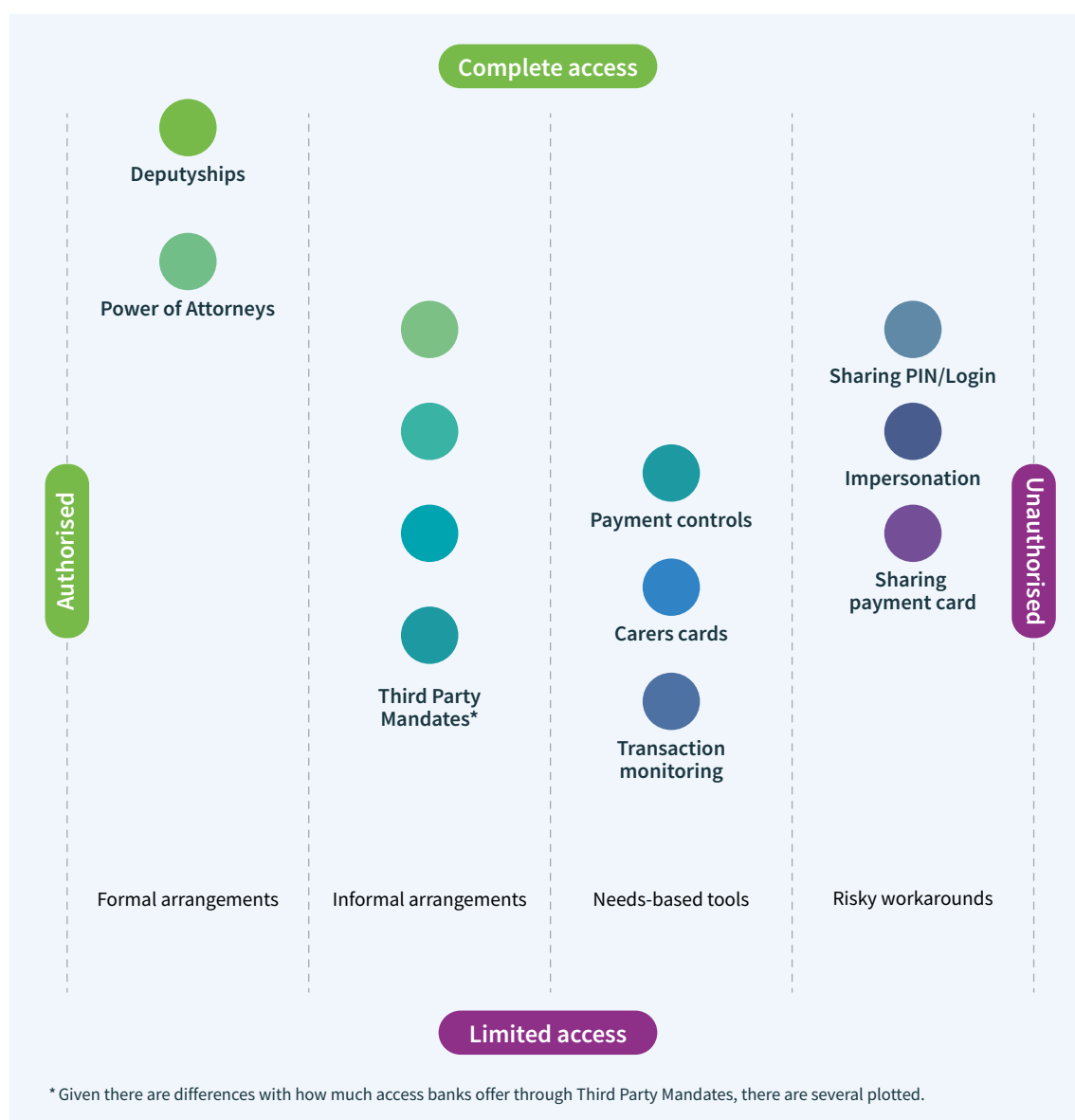


Section one – the current processes for receiving third party support

To understand how the current third party access system is working for people with mental health problems, we have examined their experiences with the current support available, as well as looking at what financial services providers say they offer publicly.

As shown by Diagram 2, this includes the formal support mechanisms, such as Power of Attorney (PoA), that sit at one end of the third party access scale, along with informal but authorised Third Party Mandates. We have also explored whether there are any alternative needs based third party support tools that sit between these mechanisms and unauthorised workarounds.

Diagram 2: Illustration of the approximate characteristics of Third Party Access mechanisms, by formality of authorisation and level of access granted to the third party.



There is low take up of existing authorised mechanisms

In order to get support from a trusted person for their everyday banking, someone can register an existing financial PoA, rather than the health version, with their bank or building society. A PoA can allow the customer to set out what specific support they would like from their trusted person and set limits around this, for example they are only allowed to withdraw up to £1,000 a month. But in many cases, online banking or payment card systems are unable to enforce more granular specifications meaning the attorney is only able to act in the branch.

Alternatively, or in addition, someone can set up an informal Third Party Mandate with their provider, which allows a trusted person to do some things with the account but not others. This might be appropriate for day to day needs where a complete level of control is unnecessary. However, this service is often quite limited, if it is offered at all. Our analysis of what 18 banks and building societies say they provide publicly suggests that only 13 offer a Third Party Mandate.¹²

Beyond these options, someone could set up a joint bank account with a trusted person, which would give the trusted person joint control over the account, including the ability to track spending and apply certain limits. However this could also incur additional risks, as both money and debts are jointly owned, as well as giving the second account holder just as much power as the first.

In our analysis of the nationally representative Financial Lives Survey, we found that:

- 4% had conducted financial transactions for someone else through a PoA,
- 8% had done so through a joint account and
- 1% through a Third Party Mandate.¹³

In 2019, just 3% of people with mental health problems had used a PoA.¹⁴ Although our recent figures are not specific to supporting someone with a mental health problem, they suggest that there has not been a significant change in the number of people using a PoA.

Additionally, recent research from Phoenix Insights found that just 8% of the population have a PoA in place.¹⁵ This research also highlighted public awareness of PoA is low across all groups, but especially amongst young people, strongly suggesting that PoAs are mostly seen as being useful for addressing a decline in capacity due to age, rather than events that can strike at any time of life such as mental health problems.

12 Money and Mental Health review of the websites of 18 banks and building societies. More detail can be found in the methodological annex. This does not mean that the other firms do not offer one to customers, but it may not be publicly spoken about by the firm. Our conversations with experts in the sector suggested that some third party access support is only available 'behind the scenes'.

13 We have taken the answer option 'third party account – where someone has the authority to run the account' to mean a Third Party Mandate. Money and Mental Health analysis of the Financial Conduct Authority's Financial Lives 2022 survey.

14 Bond N, Evans K and Holkar M. *A little help from my friends*. Money and Mental Health Policy Institute. 2019.

15 The question asked didn't specify whether this was a financial or health version or both. So it is not directly comparable to what we have previously found. Phoenix Insights. *Power of Attorney: Why public engagement is so low, and why that matters*. 2025.

While not nationally representative, our Research Community survey gives us more specific insights into the experiences of people with mental health problems. In this survey:

- 86% of lived experience respondents were aware of PoA
- Over one in five (22%) were aware of Third Party Mandates and
- One in ten (10%) had heard of another way to give permission for someone to access their account.¹⁶

Among respondents who supported someone with a mental health problem, there was a similar picture.¹⁷

However, when it came to whether respondents had used any of the arrangements, there was a considerable drop. Just 14% of respondents who had allowed someone else to access their banking services had done so through a PoA and one in ten (9%) had used another kind of arrangement, such as a Third Party Mandate.¹⁸ This was again similar for respondents who supported someone, although another kind of arrangement, like a Third Party Mandate, was more common.¹⁹ Although our Research Community can be a more engaged group than the wider population, the difference between awareness and takeup suggests that there are still some issues with both formal mechanisms and informal Third Party Mandates for people with mental health problems.

Negative experiences of setting up third party access mechanisms are relatively common

Our analysis of the Financial Lives Survey reveals that negative experiences with third party access mechanisms, like PoA, are quite common. Four in ten (39%) of those who have conducted financial matters on behalf of someone else through an authorised route have had a negative experience while doing so.²⁰

As Figure 1 shows, the most common experiences were poorly trained staff (19%), finding it difficult to register the mechanism (16%) and poor customer service (15%). These experiences suggest that providers are struggling to implement the part of the Consumer Duty that sets out that people supporting a customer should “also receive an appropriate standard of support and not face unreasonable barriers.”

16 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 155 people with mental health problems.

17 Money and Mental Health survey of 36 people with experience of supporting someone with mental health problems. Base for this question: 36 people with experience of supporting someone with mental health problems.

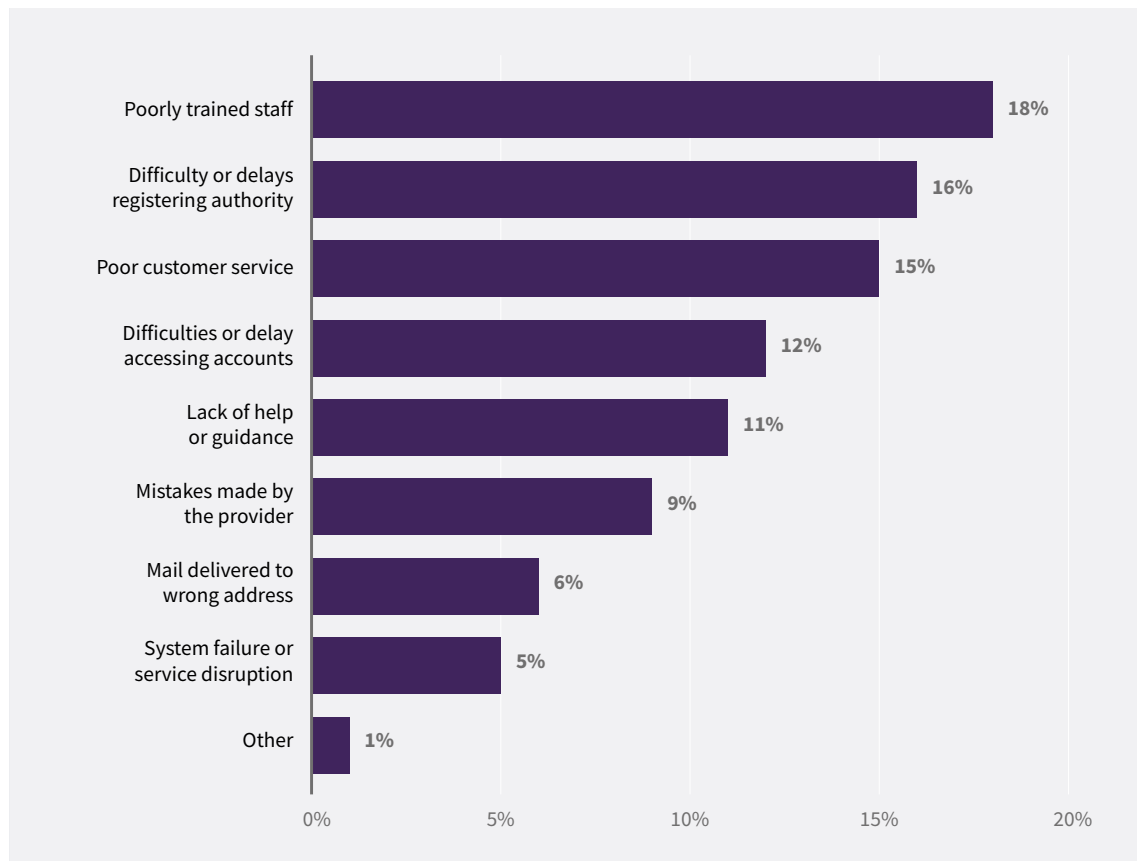
18 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 92 people who had, or considered having, someone else access their banking services on their behalf.

19 Money and Mental Health survey of 36 people with experience of supporting someone with mental health problems. Base for this question: 30 people who had, or considered getting, access to someone else's banking services on their behalf.

20 Money and Mental Health analysis of the Financial Conduct Authority's Financial Lives 2022 survey.

Figure 1 – Poorly trained staff, difficulty registering third party access mechanisms and poor customer service are the most commonly experienced problems when providing authorised third party support

The percentage of people who have experienced the following problems while conducting financial matters on behalf of someone else



Source: Money and Mental Health analysis of the Financial Conduct Authority's Financial Lives 2022 survey

Discussing this with the Research Community, members focused on the challenge of trying to set the support up with their bank or building society. The process was often found to be long and frustrating. In particular, there were frustrations around having to provide multiple documents, even when banks had already seen a copy but required the original instead. Common symptoms of mental health problems, like difficulty processing information and short attention spans, can mean that long and complicated processes can be very hard to navigate when unwell.²¹

Additionally, the person who is supporting someone with mental health problems is often not an expert in the process and can experience difficulties with understanding or completing forms. In our analysis of the Financial Lives Survey, a quarter (24%) of people who have supported someone else also have a mental health problem themselves.²² The bank will often require the trusted person to be a customer of the bank before being able to provide the support, which can be an additional process to complete in order to provide support.

21 Holkar M. *Seeing through the fog*. Money and Mental Health Policy Institute. 2017.

22 Money and Mental Health analysis of the Financial Conduct Authority's Financial Lives 2022 survey.

"I was ill in hospital and needed access to pay accounts and access to cash... When you are ill, the last thing on your mind is filling out an application form to allow power of attorney access, especially when [the bank] had seen the original legal POA document stating very clearly what access I give my POA for managing my financial and welfare affairs. Whole process was stressful not only to myself but my [attorney] who had 3 trips to the branch to sort out."

Expert by experience

Given that this process can be difficult and emotional, it is very important that customers are supported through it by staff. However, several Research Community members found that staff weren't adequately aware of the process or were not empathetic and supportive.

"The branch was not aware of the processes to follow [for PoA], which made the initial setting up difficult and frustrating."

Carer

Beyond the process itself, several members found that the communication channel the bank required them to use to set up the mechanism or use it moving forward did not meet their needs. For example, banks can often require the customer and the person who supports them to come into the branch. This can cause several problems. Someone might need support from a trusted person because they are too unwell to leave the house and find being in public too anxiety inducing. Additionally, the person being supported and the person supporting them might not live in the same home or even the same part of the country and needing to visit a branch can be a big task. A further issue is that the number of branches have been reducing drastically over the last few years and people are now required to travel further and further.²³ Beyond branches, our past research has found that half of people with mental health problems face serious difficulties with using at least one common communication channel.²⁴

"Only one person is allowed internet access to an account so I can only see his statement if I go into the branch, for which I have a PoA debit card for his account."

Carer

While poor experiences are relatively common, we did hear about good experiences from our Research Community. For example, members talked about their bank making the process simpler and allowing them to do it through a channel that worked better for them. Others mentioned that the staff they interacted with were knowledgeable and supportive, while some were able to access more specific support that better met their needs.

"The set up process with [bank] was very straightforward and was able to be completed online via their website. Once the PoA had been accepted by them, the accounts for the person that I care for were visible to me via my own personal online banking app and I was also offered the opportunity to have a debit card in my name on the person that I care for's account when the PoA was set up with [bank]."

Carer

23 Winchester N. *Closure of bank branches: Impact on rural communities*. House of Lords Library. 2025. Accessed 13/06/25 – lordslibrary.parliament.uk/closure-of-bank-branches-impact-on-rural-communities

24 Holkar M, Evans K and Langston K. *Access essentials*. Money and Mental Health Policy Institute. 2018.

This varying experience was also highlighted in the FCA's recent multi-firm review of retail banks approaches to bereavement and PoA. This included the level of staff capability and variability in the channels that could be used to provide the support.²⁵ The FCA also found that some firms don't allow the trusted person to use app-based banking, even though this is likely what they would use for their own banking. The challenges of people with mental health problems and those that support them identified in this report are not too dissimilar from those we found in our past research, suggesting that there has not been significant progress from financial service providers.

Our analysis of what banks and building societies provide through a Third Party Mandate revealed a mixed picture. For example, only some allow the trusted person to make changes to the account, such as standing orders and Direct Debits, while only a few allow the trusted person to have a card. There can also be differences across these mechanisms in what documents firms require from customers and their trusted person, what channels they can use to set up and provide the support, and whether the trusted person needs to be a customer or not. This leaves people with mental health problems and those that support them with a varied landscape to navigate.

Putting the emphasis on people who experience symptoms that make any process more difficult and those that support them, who are often put into this situation without much preparation, is far from ideal. It also raises questions around barriers to switching accounts and competition in the sector.

"I found it easy because it could all be done online. I have tried to register my power of attorney with another bank account I have and this bank makes it very difficult as my nominated persons do not bank there."

Expert by experience

Being able to get the support from a trusted person through authorised mechanisms can make a substantial difference to someone when they are struggling with their mental health, allowing them to focus on recovering and safeguarding their finances.

"My POA managed all my financial affairs when I had 3 months in hospital. Without their support my credit accounts would have defaulted with charges and would have caused me more distress at the time."

Expert by experience

However, not being able to get the support from a trusted person through these means can have a significant impact on people's mental health and finances. Additionally, as the next section explores, it can lead to them using alternatives that expose them to significant risk.

25 Financial Conduct Authority. *Retail banks' treatment of customers in vulnerable circumstances* Multi-Firm Review: good practice and areas for improvement. 2025. Accessed 12/04/2025 – [fca.org.uk/publications/multi-firm-reviews/retail-banks-treatment-customers-vulnerable-circumstances-multi-firm-review](https://www.fca.org.uk/publications/multi-firm-reviews/retail-banks-treatment-customers-vulnerable-circumstances-multi-firm-review)

There is some limited, provision of alternative needs based tools

In our 2019 report we outlined the type of third party access support options people with mental health problems would like, ranging from providing more visibility to delegating total control. Our analysis of the websites of 18 banks and building societies suggests there has been some progress on support options that do not require a PoA or other type of bespoke agreement.

As Table 2 shows, seven firms offer a carers card, three offer ways for a trusted person to receive notifications and one allows a trusted person to have greater access to someone else's account. Table 2 highlights how these tools can be beneficial for people with mental health problems.

Table 2: Alternative third party access tools introduced by banks and building societies and their benefit to people with mental health problems

| Tool | No. of banks and building societies providing it | Why it's helpful for people with mental health problems |
|--|--|---|
| Carers cards (also known as trusted person cards) | Seven ²⁶ | Allows a trusted person to still buy essential items when the individual is too unwell to leave the house or sort out their essential spending. |
| Notifications to a trusted person | Three | Gives the trusted person an early warning sign that someone might be struggling with their mental health and/or finances, and support the individual. |
| Enabling trusted persons to have partial access and control over someone's account | One | Allows an individual and their trusted person to put more guardrails around their finances to avoid financial harm when unwell. |

Source: Money and Mental Health review of the websites of 18 banks and building societies. More detail can be found in the methodological annex.

While these tools are being offered by providers with some of the largest customer bases, we are unable to put a number on how many people have actually taken them up. There were only a few Research Community members who had either heard of these tools or used them. For those who had used the tools, the ability to get or provide limited needs based support rather than go through the rigorous process for more bespoke support was appreciated. This suggests that there is more to be done to raise awareness of the tools, especially given they can be so beneficial.

"My husband's bank both allow us to have a separate card, but on this person's account. So you can have a different withdrawal limit etc. So that provides another option."

Expert by experience

²⁶ Two of the firms included in the review had introduced a carers card during the pandemic but have since withdrawn it from the market.

Box 1 – Carers Cards

For people with mental health problems, being able to authorise someone else to make payments on our behalf is of high importance. This could be a long term arrangement such as regular shopping, or one off instances based upon individual needs. As a result, one of the most common unauthorised workarounds identified in the course of this research is sharing a debit or credit card and PIN with a third party.

Carers cards offer a direct and practical solution to this issue, and one that is already offered by several prominent financial service providers and fintechs. These can be implemented in different ways depending on the type of customer. They include payment cards that can be loaded with funds by the account holder, as well as cards that allow payment directly from the current account.

Critically, carers cards can be subject to a range of controls and limits for security, such as allowing the account holder to block usage or to set spending limits. The financial service provider themselves may also set their own limits.

“Give a supported person their own card and PIN to access my account that way transactions etc could still be monitored and we would know who is spending.”

Expert by experience

Beyond the mainstream providers, there are also several fintech companies that have created third party access support solutions. These include ways for a trusted person to have view-only access to someone's account, carers cards and apps to help manage someone else's account. Fintechs are typically small companies which can limit their reach, however conversations with sector experts have highlighted opportunities for growth.

“I have a care account on a prepaid debit card which I have authorised a friend and paid carer to access fully and manage completely my care account package and credit card.”

Expert by experience

While there are alternative tools available, these are not consistently offered across the sector. For example, rather than the tools being spread across different firms, three of the banks offering two types of tools belong to one business group. Experts in financial services and third party access provided a range of reasons for why more firms were not providing such tools. For example:

- Firms being concerned that allowing a third party more access to an account without a bespoke agreement could increase the risk of fraud and abuse.
- Regulatory rules, such as for money laundering, were seen to make support that sat outside of formal agreements or bespoke authorisation more complicated to deliver.
- The technical changes that would be required to introduce these tools was also seen as a barrier as providers can often be using old and clunky systems that can be hard to change.

However, the firms that had introduced these tools to their customers had taken on these concerns and risks. The provision from fintechs highlights the potential that can come from innovation and some financial service providers have begun to partner with fintech firms.²⁷

In the case of one banking group, carers cards were introduced across their range of current account products during the pandemic in response to the needs of customers who couldn't leave their homes. This suggests that providers can introduce new third party access tools in a shorter time period if needed. However, these were removed once the pandemic restrictions ended, leaving customers without this support.²⁸

"I like the sound of the [carers card] companion card, but I never heard of it."

Expert by experience

Additionally, our conversations with experts have suggested that more alternative support is available to customers but not made public. We have found in our past research that people with mental health problems can be unaware of the support that is available from their banks and other essential service providers.²⁹ This means that there could be significant numbers of customers missing out on valuable support.

What has changed since 2019?

Formal mechanisms

In 2019 we found that the ways to set up formal mechanisms were complicated and difficult to do for people with mental health problems. These experiences mixed with a feeling that the mechanisms didn't meet their needs meant that only a very small minority of people with mental health problems (3%) had used a PoA to get support with money management. As a result we called for changes to the way that people can be supported by a trusted person in essential services through formal routes such as PoA.

Since then, there has been work by the Office of the Public Guardian (OPG) to modernise the process of setting up a Lasting Power of Attorney.³⁰ This has included allowing people to apply, track and register a LPA online. Powers of Attorney still, however, follow the framework established by the Enduring Powers of Attorney Act 1985, at a time when consumer banking was predominantly face to face.

Additionally, the FCA introduced new requirements for firms and some providers have taken steps to make the process of registering support simpler, quicker and more supportive.

Continues...

27 For example Lloyds Banking Group working with Hope Macy. *Lloyds Banking Group. A blueprint for disability and neuro-inclusion.* 2025. Accessed 13/06/2025 – lloydsbankinggroup.com/insights/a-blueprint-for-disability-and-neuro-inclusion.html

28 The Natwest Group which includes Natwest, Royal Bank of Scotland and Ulster Bank. Natwest Group. NatWest, Royal Bank of Scotland and Ulster Bank launch card for carers to support vulnerable customers and those in isolation. 2020. Accessed 13/06/2025 – natwestgroup.com/news-and-insights/feature-content/our-updates/2011-2020/natwest--royal-bank-of-scotland-and-ulster-bank-launch-card-for-.html

29 Holkar M. *Time to act.* Money and Mental Health Policy Institute. 2022.

30 gov.uk/government/news/step-forward-to-online-lasting-power-of-attorneys

However, this isn't always the case and both the Research Community and FCA have flagged that there is still inconsistency in experience. While there has been some progress with the PoA system, it fundamentally remains very similar and has not significantly become more appealing for people with mental health problems. Only 4% of people have conducted financial transactions for someone else through a PoA.

Alternative support

In *A little help from my friends* we outlined the ways that people with mental health problems would want to be supported by a trusted person and how this didn't have to come through formal mechanisms like PoA. Since then we have seen progress on alternative ways that banks can allow someone to provide support without having to have a PoA or bespoke Third Party Mandate in place. These include seven banks offering a carers card, three offering ways for a carer to receive notification and one allowing more access for a carer. Beyond these banks, a range of fintechs offer alternative tools for people with mental health problems and those that support them. However, these have not become widespread and only some Research Community members have used them.

The barriers to further changes

In 2019, we outlined several barriers to the further development of third party support options that better met the needs of people with mental health problems. These included technical challenges with implementation, the risks of fraud and abuse, and rules around data protection and Anti-Money Laundering.

Our new research, including conversations with experts, has found that these barriers are still seen to be there. However, there has been progress with expectations from the FCA regarding how firms treat customers in vulnerable circumstances, from more guidance to new rules. Against this background, several providers have chosen to accept the regulatory risk inherent in innovation, in favour of leading the way pursuing more positive outcomes for customers.

Section one summary:

- There is some awareness and take up of formal processes like PoA but this does not significantly differ from our past research.
- People with mental health problems and their trusted persons can often face challenges when trying to set up authorised mechanisms for support.
- There have been steps to provide more alternative third party access tools from both banks and fintechs but these are not widespread due to a combination of the investment required to solve the technical challenges and perceived risks both at a regulatory level and to the customer.



Section two – The use of unauthorised third party access workarounds

Our research in 2016 and 2019 exposed the high number of people with mental health problems who are receiving support from a trusted person through an unauthorised route.³¹ This can include giving someone your card and PIN, or letting them log into your online banking. However, these can come with risks. For this report, we explored whether these workarounds were still being used, to what extent and why, and whether people were aware of the risks.

Unauthorised workarounds are still common

Of our Research Community, nearly two thirds (65%) of lived experience respondents who had allowed someone to access their banking services had done so without formal authorisation.³² Among carers, nearly half who had been given access by the person they support had been through an unauthorised route.³³ This ranged from giving someone a card to buy their shopping when they were too unwell to leave the home to giving them access to their account to move money around as they found it too hard to manage due to their mental health.

"I have agoraphobia and can't leave the house. When my brother visits every three months – he lives 100s of miles away- he gets money from the cashpoint for me to have in the house so that I am able to have some cash."

Expert by experience

"I was in hospital for suicidal ideation. But I still needed money for bills etc. I gave my mum my card and she sorted it all out. I didn't even know my own name. I would not have been able to do it without her and would have ended up in a financial mess which would have 100% made me feel worse."

Expert by experience

As figure 2 highlights the two most common types of unauthorised workaround among lived experience respondents were giving someone else a PIN or letting them use a debit card.

Our analysis of the Financial Lives Survey also suggests that these workarounds are still common. Over one in five (22%) people with mental health problems had shared their PIN or online account log-in with someone else.³⁴ The most common person that this was shared with was a partner or spouse (17% had shared with them) and friends or other family members (7% had done so).³⁵

31 Murray N. *Strength in numbers*. Money and Mental Health Policy Institute. 2016; Bond N, Evans K and Holkar M. *A little help from my friends*. Money and Mental Health Policy Institute. 2019.

32 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 92 people who had, or considered having, someone else access their banking services on their behalf.

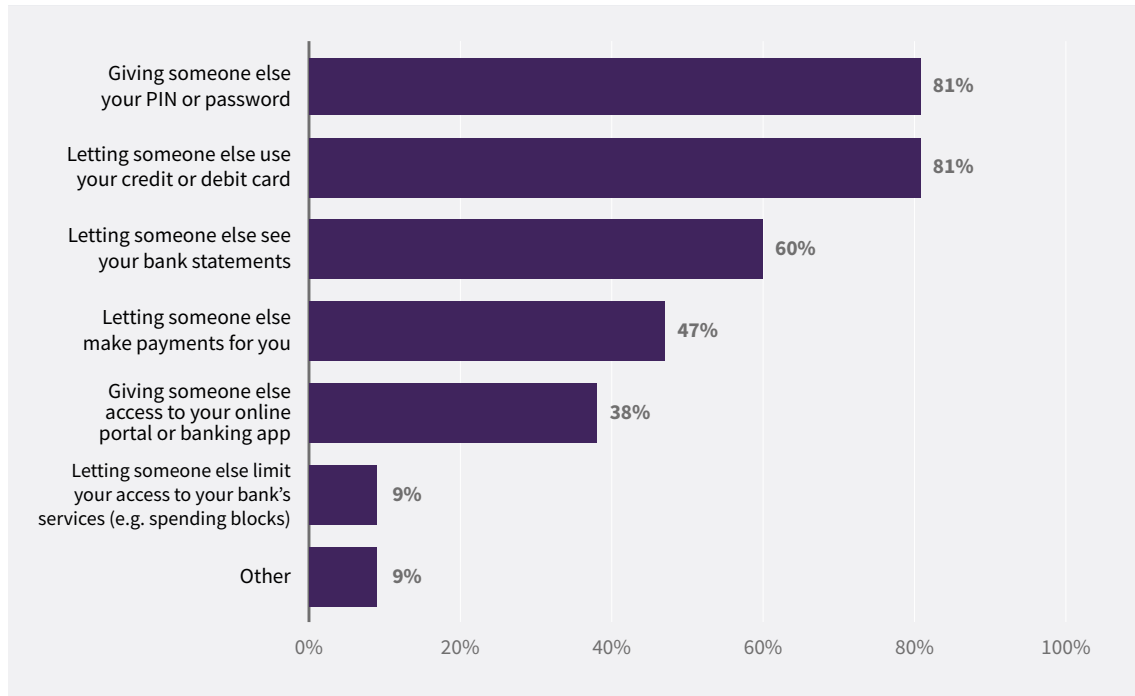
33 Money and Mental Health survey of 36 people with experience of supporting someone with mental health problems. Base for this question: 30 people who had, or considered getting, access to someone else's banking services on their behalf.

34 Money and Mental Health analysis of the Financial Conduct Authority's Financial Lives 2022 survey.

35 Money and Mental Health analysis of the Financial Conduct Authority's Financial Lives 2022 survey.

Figure 2 Giving someone else a PIN or letting them use a card were the most common types of unauthorised workarounds used by our Research Community

The number of Research Community members who had used a particular unauthorised workaround as a percentage of the total who had used a workaround



Source: Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 53 people who had used an unauthorised workaround to allow someone to access services on their behalf.

The inflexibility and difficulty with existing mechanisms mean that unauthorised workarounds are easier

Research Community members explained that receiving support from a trusted person can have a significant positive impact on their finances and mental health. Having someone step in to provide support can help pause the vicious cycle at such a crucial moment. For example, it can mean that a bill is paid and someone avoids debt collection which can worsen people's mental health.³⁶

"[I felt] supported, comforted, like I have someone on my side fighting my corner when I am not in a position to."

Expert by experience

"It makes life easier at times when life is not easy."

Expert by experience

However, people with mental health problems are using unauthorised workarounds to get this support. There were predominantly two reasons Research Community members gave for why unauthorised workarounds were used instead of approved mechanisms offered by banks.

³⁶ See our work on the psychological impact of debt collection, such as: Murray T and Bond N. *Debts and despair*. Money and Mental Health Policy Institute. 2023

Firstly, that those mechanisms are too difficult to set up; and secondly, that the agreements don't meet their needs.

The challenges of setting up existing mechanisms can be a barrier to take up

The belief that existing mechanisms are too difficult to set up was often based on past experience, as highlighted in section one. In some cases, Research Community members had gone through the long process and in others, members had tried and not succeeded at doing so.

For example, one focus group participant explained that they had tried to set up a Third Party Mandate but the process had broken down and so they had to rely on unauthorised support instead.

"I'm in the process of applying for that [third party mandate] now. And, for me, the process was, initially quite simple, filling out an online form, and then you had to send in your copies of your ID. But then everything kind of fell down from there, so we were sent consent forms, but no return envelope. So that had to be faxed by the branch, and then we haven't heard a thing since then. So currently my husband is continuing to look after all of my finances, the non-legal way."

Expert by experience

Additionally, the process of setting up a formal or informal authorised arrangement seemed too complicated for some Research Community members and not something they could do while unwell.

"I've got a lot of experience with all that [PoA] and it's an unpleasant business that has to be dealt with in the same way as organizing a funeral or whatever... I'm in this trap of not wanting to go through the rigmarole, so it's easier just to give somebody one of my bank accounts a card and not keep too much money in it."

Expert by experience

The cost of applying for a LPA was also flagged by some respondents. Our past research has shown that people with mental health problems are more likely to be on lower incomes and be in financial difficulty.³⁷ Setting up a LPA costs £82 and is expected to rise to £92 from November 2025.³⁸ This cost can be prohibitive in itself, even before fees from certificate providers are considered, which can potentially add hundreds of pounds to the cost. Additionally, while there are reduced rates for those on benefits, people might not be aware of these.

"We are both reliant on state benefits and it costs money, money that we don't actually have available. So where are you standing then? There is nowhere to go unless you can afford to pay financially for these power of attorneys."

Expert by experience

37 Bond N and D'Arcy C. *Mind the income gap*. Money and Mental Health Policy Institute. 2020; Holkar M. *Debt and mental health: A statistical update*. Money and Mental Health Policy Institute. 2019.

38 Gov.UK. *Changes to lasting power of attorney fees: 2025*. Accessed 08/09/2025 – [gov.uk/government/news/changes-to-lasting-power-of-attorney-fees-2025](https://www.gov.uk/government/news/changes-to-lasting-power-of-attorney-fees-2025)

People with mental health problems can often feel that formal and informal authorised mechanisms offered by banks and building societies don't meet their needs

For some Research Community members, neither PoAs nor the various forms of Third Party Access offered by their bank account providers were something they had considered using. Many members felt the way banks currently facilitate support from a trusted person did not work for them and didn't give them what they needed at that moment. The feeling that a PoA or other arrangement is not something relevant to your current situation has been highlighted by other organisations.³⁹

"[The person supporting] was a person I trusted and they did it with me present however it was not a formal legal arrangement so if anything had gone wrong it could have been a risk. I had not foreseen that I would become so unwell therefore had not put any arrangements in place beforehand."

Expert by experience

Many Research Community members explained that the authorised mechanisms like PoA or joint accounts seemed to give away too much power to their trusted person and didn't work for their fluctuating needs. This echoed the findings from our 2019 report, showing that how people with mental health problems view authorised mechanisms had not changed considerably during the interim period.

"I've never made a formal agreement, it feels like handing someone control. The sensitivity of being someone's third party authority is a difficult line to walk and I've never trusted anyone enough with it."

Expert by experience

In some cases, Research Community members believed that the excessive caution from banks around third party access placed restrictions on what members felt were basic ways of supporting someone. This included speaking to staff about an issue or paying in small amounts of money on their behalf. The FCA's recent review highlighted that financial service providers can be obstructive even when someone has been legally authorised to act on someone's behalf.⁴⁰

"Actually, I needed some cash deposited into my account so I gave my husband the cash and my card, plus a letter of authorisation... The bank refused the transaction (due to Money Laundering regs, I think). I had no other option at the time and didn't think it would be an issue."

Expert by experience

"I spoke on the helpline first and I said who I was, my sister was with me, etc. She went on the phone and answered the security questions and then they said, because she hadn't spoken first, we'd failed security. And therefore we're going to block the account and they said you'll have to go into the branch to unblock the account."

Carer

39 Carers UK. *Carer Friendly Company Managing someone else's affairs*. 2021; Phoenix Insights. *Power of Attorney: Why public engagement is so low, and why that matters*. 2025.

40 Financial Conduct Authority. *Retail banks' treatment of customers in vulnerable circumstances Multi-Firm Review: good practice and areas for improvement*. 2025. Accessed 12/04/2025 – [fca.org.uk/publications/multi-firm-reviews/retail-banks-treatment-customers-vulnerable-circumstances-multi-firm-review](https://www.fca.org.uk/publications/multi-firm-reviews/retail-banks-treatment-customers-vulnerable-circumstances-multi-firm-review)

Unauthorised workarounds can often be seen as the easier option

Regardless of the reason why they hadn't set up an authorised arrangement with their bank or building society, respondents highlighted how it can just be easier to get unauthorised support from someone. Giving a trusted person your card or asking them to pretend to be you on the phone can meet your immediate needs without having to go through the complicated maze of an authorisation process.

"I don't like leaving the house unless I've got a really important reason and I get overwhelmed when I go shopping, apart from that I also overspend, panic buy, and manic buy! Therefore allowing somebody else to go and get things for me became the simplest of all the options and although I know it is forbidden by the banks I have given my pin and my card to more than one person and allowed people to buy things using my card saved in their own home."

Expert by experience

People with mental health problems can be aware of the risks with unauthorised workarounds but see them as necessary to get support

There are a range of risks that can come with unauthorised third party support. This can go from being debanked as a result of breaking the terms of agreement for an account to being the victim of financial abuse or fraud.

Those who were aware of the risk of breaching the bank's terms and conditions felt that was just something they had to do to get support. Some believed that the banks were unfairly putting this on to their customers by not providing the right support options for a trusted person.

"But I think what worries me is that my husband, he has my online banking details, he has my card, but technically he could get into trouble for helping me and that doesn't seem right."

Expert by experience

When it came to fraud and financial abuse, some people were aware that this could happen but trusted their third party not to do so. Others had themselves been defrauded as a result of trusting someone with their finances.

"I was mentally unwell. Had someone I thought I trusted try to help. Instead I was coerced into giving them £1000s of pounds thinking they were helping me."

Expert by experience

However, these risks were also felt to exist, and in fact were amplified, when someone entered into a formal arrangement such as a PoA. For example, there were concerns that there were few safeguards given the amount of power granted to 'attorneys' to prevent them from acting against the individual's interests. While there is recourse to the Office of the Public Guardian (OPG),⁴¹ who can investigate suspected cases of abuse, this itself requires the abuse to be identified and reported. For people with mental health problems, engaging with formal processes such as this can be very onerous.

41 Gov.uk. [OPG annual report and accounts 2023 to 2024](#). Office of the Public Guardian.

Experts we spoke to also raised concerns about the increased risks with formal arrangements but felt that providers had their hands tied more given the formal arrangement being in place. This increased risk can also be the case when someone sets up a joint account with a trusted person.

"I'm echoing the point, actually, in that you have to take a chance with whoever you trust, be it formal or informal. You know, my appointed power of attorney, I don't know what they're actually like with money. They're friends of mine. You know, I could have made a huge mistake. I don't know. I'm never gonna know until that moment."

Expert by experience

Overall, the Research Community recognised the risks that come with third party access. Over half of lived experience respondents who had given, or considered giving, banking access to someone else (57%) agreed that they are "worried that someone could take advantage of me if they had access to my bank's services on my behalf."⁴² However, a similar percentage (58%) agreed that "the benefits of being able to nominate someone to access my bank's services on my behalf outweigh any risks."⁴³ While the risks might exist, being able to get the support you need is ultimately the most important factor.

Trust was a crucial element in third party access. Some respondents didn't feel there was any risk because they trusted the person they were getting unauthorised support from completely. However, there were others who explained that their mental health problem made it harder for them to trust someone with that amount of power. Ultimately for people with mental health problems they have to take the risk that the person they trust will not let them down. Otherwise they wouldn't be able to get the support they need and would see their mental health and finances worsen as a result. However, the main ways of doing so at the moment give full control over to someone else, either with authorisation or without. We explore the potential of more graduated levels of third party access later in the report.

There are additional challenges providers can face in third party access

Our research highlighted additional challenges in this area. One of these was when someone with mental health problems does want support from a third party but does not have anyone they can trust. This was flagged by both experts in financial services and experts by experience who found the current third party access system inaccessible for this reason.

"I know rationally for very practical and quite strong reasons, I have to do this power of attorney stuff because things would be very difficult if I didn't. And for no good reason and with no evidence, I cannot trust anybody, not even a lawyer, and to me that's a powerful reality, even though the system is set up to say, you know, pick a trusted person."

Expert by experience

42 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 77 people who had, or considered having, someone else access their banking services on their behalf.

43 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 76 people who had, or considered having, someone else access their banking services on their behalf.

Our conversations with experts in financial services also flagged the challenge of mental capacity, whether someone is able to understand and make decisions.⁴⁴ Mental capacity is at the heart of third party access as some mechanisms, such as PoA, require the individual to have mental capacity when setting it up. There are also other mechanisms, such as Court of Protection, that are the only way a trusted person can provide support when someone who has no existing mechanism in place has lost mental capacity. We have previously highlighted how the way that formal mechanisms like PoA are implemented can provide full decision-making abilities to a trusted person which can be out of step with the Mental Capacity Act.⁴⁵

People with mental health problems can often need the support of a trusted person because they are concerned that they will get into financial difficulty when unwell. Additionally, those who support someone with a mental health problem can feel the need to step in to avoid financial harm when the person is struggling with their mental health. The Consumer Duty puts a requirement on firms to avoid foreseeable harm. For people with mental health problems and those that support them, a bank seeing someone change their spending pattern as a result of being unwell,⁴⁶ or being told that someone has mental health problems which could impact their financial behaviour could be seen to foreseeable harm.

However, the Mental Capacity Act (MCA) says that someone should be allowed to make an 'unwise decision' if they have mental capacity. This can often lead to tension with people with mental health problems and their carers feeling that the bank should have done more to stop them from making such decisions. Research Community members have a pragmatic view on what banks should be doing in this situation. While over a third (37%) of those who had given, or considered giving, banking access to someone else felt that they should always be able to spend money how they want even if they make unwise decisions,⁴⁷ a majority (68%) agree that their bank should protect them from financial harm if they are concerned about their ability to make a decision.⁴⁸

Our conversations with experts in the industry suggested that banks can struggle with knowing what would be appropriate in certain situations. Particularly, what actions would meet both the MCA's and Consumer Duty's requirements. For example, when a trusted person is concerned that the customer they support lacks mental capacity, or when staff are concerned that a customer who has a trusted person lacks mental capacity.

A further challenge in these situations is that mental health problems can fluctuate and impact how we make decisions, but that doesn't mean that someone doesn't have formal 'mental capacity'. Additionally, providers can find it challenging when they have concerns that a customer lacks mental capacity but does not have a trusted person to support them.

44 Department for Constitutional Affairs. *Mental Capacity Act 2005 Code of Practice*. 2007.

45 Bond N, Evans K and Holkar M. *A little help from my friends*. Money and Mental Health Policy Institute. 2019.

46 We previously explored the potential use of transactional data and found support from people with mental health problems. Alpin K and Holkar M. *Data protecting*. Money and Mental Health Policy Institute. 2019.

47 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 78 people who had, or considered having, someone else access their banking services on their behalf.

48 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 79 people who had, or considered having, someone else access their banking services on their behalf.

What has changed since 2019?

In both 2016 and 2019, we highlighted how commonly people with mental health problems were using workarounds to get the support they need from someone they trust. For example, four in ten (43%) people who had experienced a mental health problem had let someone else use their credit or debit card, and one in five (20%) had let someone log in to their online banking.

In this report, we have found that people with mental health problems are still using unauthorised workarounds. This is due to:

- the difficulties with setting up authorised mechanisms;
- a feeling that authorised mechanisms do not work for people with mental health problems;
- and a lack of progress on alternative needs based tools.

While we do not have directly comparable figures to 2019, there are similarities in the level of prevalence of the workarounds. Over one in five (22%) people with mental health problems have shared their PIN or online account log-in with someone else.

Section two summary

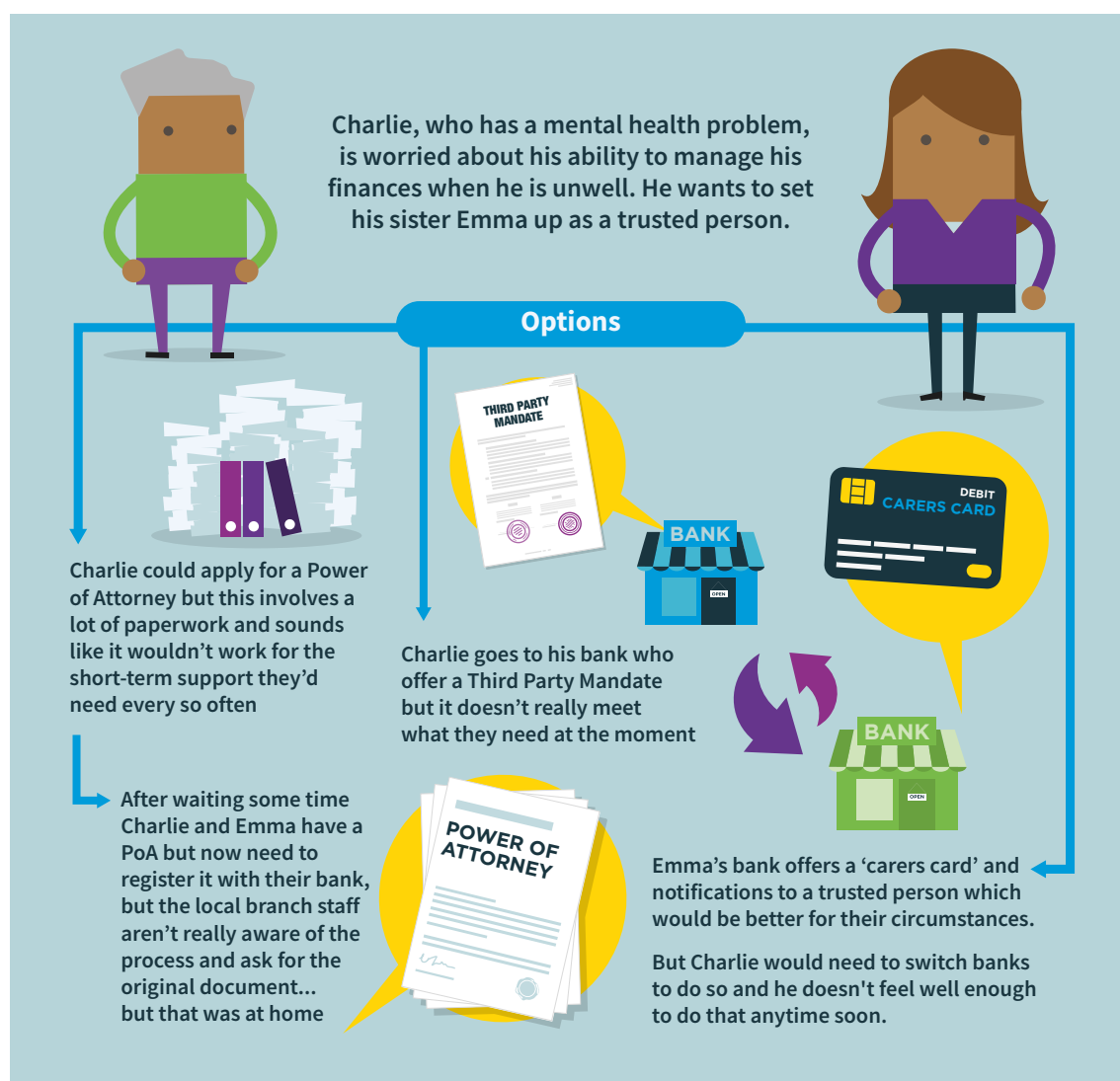
- The difficulties with setting up both formal arrangements such as PoAs and many informal authorised arrangements with banks such as Third Party Mandates, along with the inflexibility they provide can mean that many people with mental health problems still rely on risky, unauthorised workarounds like giving someone their card or PIN
- This can expose them to risks like financial abuse and fraud, but people with mental health problems accept these risks and hope the person supporting them can be trusted in order to get the help they need when unwell.
- Mental capacity can cause challenges for financial service providers, especially when it comes into tension with other requirements set out by the Consumer Duty.



Section three – what should change?

This research has found that there have been some positive changes in third party access in financial services but many of the issues we found in 2019 still persist. As Diagram 3 shows, we have ended up with a complicated system for people with mental health problems and those that support them to navigate. There are a range of different mechanisms and tools available but who offers what and what you can do with them varies greatly.

Diagram 3 – the complicated process people with mental health problems have to currently navigate to receive support from a trusted person



PoA is currently the main mechanism, beyond unauthorised workarounds, that people can use to get the support they need from a trusted person. It remains a useful tool for some people with mental health problems and we make recommendations below for how it can be improved.

However, PoA is an imperfect system that doesn't always meet the needs of people with mental health problems. It should be seen as one tool in a toolbox of third party access support options that people with mental health problems can use at the right time. In this section, we also explore how we can introduce more needs based tools to that box. As Diagram 4 shows, we want to get to a place where people with mental health problems and those that support them can utilise the tool that is most appropriate to their needs at that time. As their needs change, other tools can be used. This approach would also benefit those with other conditions or experiences given the challenges that other organisations have flagged with the current system.⁴⁹

Diagram 4 – moving to a needs based approach to third party access



49 Alzheimer's Society. *Short changed: Protecting people with dementia from financial abuse*. 2011; Carers UK. *Carer Friendly Company Managing someone else's affairs*. 2021; Project Nemo. *Safe Spending for Adults with a Learning Disability: A Call to Action for Financial Services*. 2025.

Improving the current authorised third party access mechanisms

While PoA and Third Party Mandates can allow someone to get the support they need from a trusted person, our research has highlighted that people with mental health problems can feel they don't meet their needs. A holistic approach is required to ensure that people are able to safeguard their long term interests and guard against diminishing or loss of mental capacity through obtaining PoAs, but are also able to get more granular day to day help from third parties, without needing to risk giving up more control of their finances than necessary.

People with mental health problems and those that support them can also face challenges when trying to set the mechanisms up with their bank or building society. This is despite the aims of the FCA's guidance on vulnerable customers and the Consumer Duty. In this subsection we outline ways that financial service providers, like banks and building societies, can improve this process. Furthermore, while this research has focused on the role of financial services, it has highlighted challenges related to the overall PoA system, so we also consider how that could also be improved.

Improving the process and experience with financial service providers

Our research found that people with mental health problems and those that support them can face the following challenges:

- The third party access system in financial services is complicated and difficult to navigate. This can be exacerbated by common symptoms of mental health problems, like difficulty processing information or weighing up information to make a decision.
- The process for setting up authorised mechanisms, whether formal or informal can vary from provider to provider, including:
 - » what documents someone needs to provide and how
 - » what channel the process can be completed through
 - » what channel they can use to provide the support
 - » and whether the trusted person needs to be a customer.
- What a trusted person can do through an authorised mechanism can be different depending on which provider they are a customer of.
- The channel that a customer and their trusted person need to use to set up and then utilise the mechanism can be restrictive and not meet people with mental health problems' needs.
- Staff that are unaware of the third party access processes that the provider has or lack the training to engage with customers and their trusted person in the sensitive manner that the situation requires.

Providers, like banks and building societies, should take the following steps to improve the process of registering, setting up and using an authorised mechanism, like a PoA or Third Party Mandates.

Provide and promote accessible information on the different types of support

Research Community members felt that if firms provided them with information on the different support mechanisms, including what they involve and how to set them up, it would make a big difference to their experience.

"It would be wonderful if banks let you know that there was any help. Just plain and simple, you know. I'm sort of in a position where I couldn't pluck up the courage to go in and ask my bank. So why can't they just send a letter out if there is help? And just say, look, if you need any help, let us know. And this is how you do it."

Expert by experience

Providers should therefore provide information on the different types of third party support to their customers. This should be done through a variety of channels and formats and communicated in accessible language. Firms should use a range of case studies to illustrate how the support can be used, including people with mental health problems. This information could include:

- How the different options compare to each other
- How the mechanisms can be set up and when they start
- What the third party will be able to do
- How much control the customer will have
- How long the mechanism will last
- What a customer can do if they have concerns over their third party.

In order to raise awareness of the alternative types of support, any customer-facing information should also include any alternative tools that the provider offers, such as carers cards. From speaking to experts, it seemed like some firms offered support options but did not advertise these publicly.

Providers should ensure any third party access tools available are communicated to customers where appropriate.

Utilising a range of channels

As Figure 3 shows, our lived experience Research Community survey respondents expressed an interest in a range of channels for how they would like someone else to access their bank account on their behalf. While branch and telephone were the most common, online and app banking were also relatively popular.⁵⁰ This was reflected in the carer survey.⁵¹

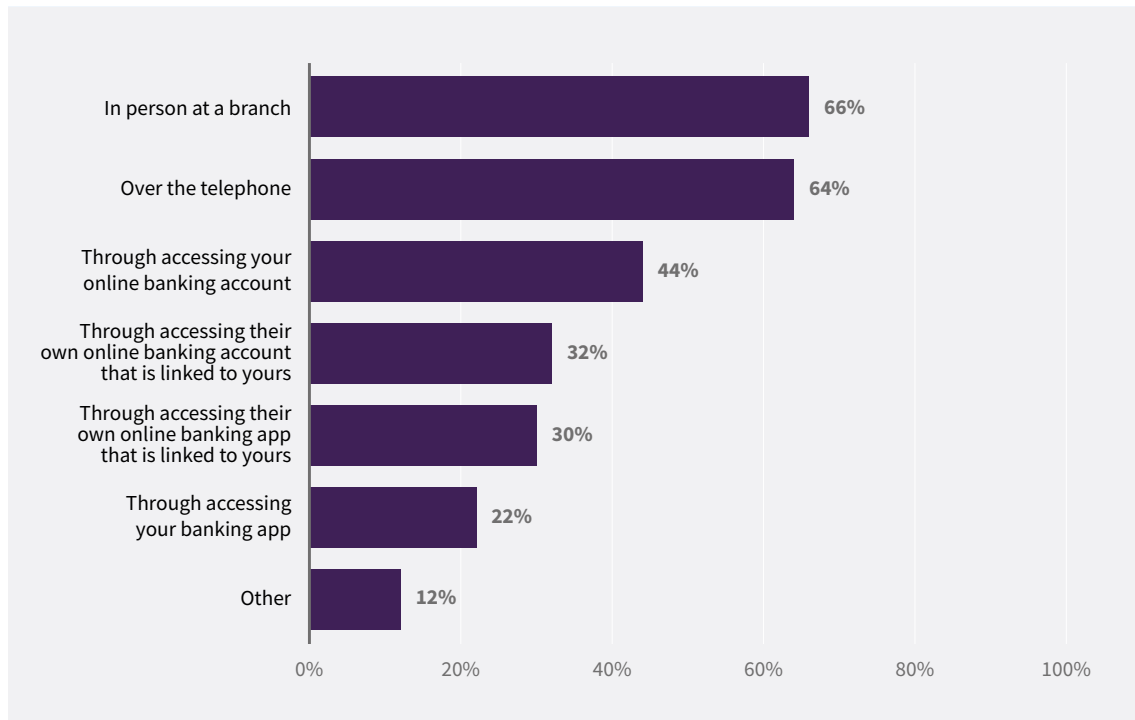
Financial service providers should therefore provide a range of channels for customers and those that support them to register for third party access and provide the support.

50 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 73 people who had, or considered having, someone else access their banking services on their behalf.

51 Money and Mental Health survey of 36 people with experience of supporting someone with mental health problems. Base for this question: 27 people who had, or considered getting, access to someone else's banking services on their behalf.

Figure 3 – While at a branch and over the phone were the most popular channels for having someone else access their account, having a range would be helpful

The percentage of Research Community respondents who had given, or considered giving, banking access to someone else and said they would like a trusted person to access their bank's services through the following channels



Source: Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 73 people who had, or considered having, someone else access their banking services on their behalf.

Allowing trusted persons to provide more support through authorised mechanisms

The variation and limitation in what support a trusted person can provide through an authorised mechanism can be due to risk aversion from firms. However, this can lead to the customer having no options other than unauthorised workarounds which may be prohibited by the bank's own terms and conditions while also placing them at greater risk of harm. This is despite customers and their trusted person having already gone through a legal or the bank's own process to set the support up.

Providers should allow trusted persons to do more through the authorised mechanisms, for example being able to make changes to payments or having their own card. This should also include any alternative tools they offer. This should still give choice and control to the customer, allowing them to decide whether the third party can view payments, block payments, or make payments or other changes themselves. Providers should review their systems in order to facilitate this, for example utilising developments in transaction monitoring to offer additional security while maintaining flexibility.

Having well trained staff and clear processes

Banks should ensure there is a clear process for staff to follow if they are made aware that a customer would like support from a trusted person.

While a process is important, ensuring staff know about it is also essential. **Providers should ensure that frontline staff are skilled and confident on third party access, through training.** This training should include how third party access relates to mental health problems and a focus on mental capacity. This should allow staff to know what to look and listen out for and how to respond, including what support options might be most appropriate. They should also consider whether it is necessary to have a specialist team that supports customers and trusted people through the process and beyond.

"Specialist help teams would be a good thing, But it's not only for the individual, I also think it's also for the person who's supporting. So how can they actually get to that specialist team to say I need help to support somebody else when they're in a mental crisis. And as with every organisation, you have the people at the top who say we do XYZ, but the people who are lower down in the organization actually don't know that XYZ exists. So you know, they say that all these processes are in place, but in reality it's not actually delivered specifically lower down the organization in every instance."

Expert by experience

Having a consistent approach across the sector

We are aware that consistency on the minimum required documentation to register a formal mechanism with a provider is part of a work plan for UK Finance, the trade body for financial services, and we support these steps. **UK Finance should also look at how to bring more consistency in the other aspects of the process outlined above, such as the channels to set up and provide the support.** It should also consider how there could be more consistency in what is offered through authorised mechanisms. Additionally, UK Finance should monitor whether these steps lead to better consistency and if not, the FCA should intervene to consider whether formal guidance is necessary.

"If their process has less paperwork this would reduce stressful situations when you are ill. Accept we need strict protection against fraud but they need to have common sense when they are provided with all legal documents relating to POA and appropriate ID."

Expert by experience

In 2019, the OPG worked with the UK Regulators Network (UKRN) to provide guidance to regulated firms on the process to follow when a customer wanted to register a PoA.⁵² However, this guidance has not been updated even though the OPG has made changes to the PoA process through its LPA modernisation work, such as enabling firms to verify an LPA online without needing a paper copy. **The OPG and UKRN should update the guidance in light of these changes and work with UK Finance to ensure greater consistency in firms' processes.**

52 Office of the Public Guardian and UK Regulators Network. *Supporting customers who do not make their own decisions*. 2019.

Monitoring improvements

As part of the multi-firm review, the FCA said it had written to the firms included and highlighted the expected next steps. **The FCA should monitor what steps the firms take and publish an update within the next year. If the firms have not taken adequate steps, the FCA should consider whether enforcement action is required.**

Improving the PoA process

While there is more that could be done to improve the third party access process within banks and other financial institutions as outlined above, there are some fundamental issues with the PoA system that those providers are bound by. There are some steps that the OPG, Ministry of Justice (MoJ) and others should take in both the short and long term to improve the PoA system.

Facilitating a smoother process

Although the financial PoA application process allows the individual to write down what support they'd like from their trusted person, it can be really difficult for someone to work out what would be most appropriate. This might be because they are setting it up before they need the support and wouldn't know what they'd need at that time, or they are doing it when the support is actually needed and are therefore struggling with their mental health. Additionally as highlighted above, people might not know what third party support a bank can facilitate. To make this process easier, **the OPG should work with UK Finance to provide examples of what support could be provided. As part of its LPA modernisation work, the OPG should introduce a drop down menu in the online PoA application with the most common options both for circumstances where the donor retains mental capacity and where they do not. There should also be provision for and allow for an open text response for alternative options.**

Once someone has set up a PoA, they and their trusted person have to go through the process of registering the mechanism with each of the financial service providers they are a customer of. Given that registering with one provider can be very difficult, doing so with all the providers, each with their own unique system, can be especially so. The 'donor' and 'attorney' are also likely to do this with other essential service providers like energy and water companies. **The OPG should explore ways that individuals and those supporting them can register their PoA with all the relevant providers in one way through data sharing.** We are currently working on a multi-year project looking at data sharing,⁵³ and will publish a set of principles co-produced with people with lived experience that the OPG could use.

Bringing PoA into the 21st century

Like many many areas of our everyday lives,⁵⁴ the legislation and rules around PoA have been slow to keep up with changes in society and technology. It took over 50 years for there to be a new Powers of Attorney Act, which mainly made changes to other pieces of legislation.⁵⁵ In that time one development was the introduction of LPAs in 2007 through the Mental Capacity Act 2005.⁵⁶

53 Lees C. *Can sharing lead to caring? Our new project on data sharing.* Money and Mental Health Policy Institute. 2024. moneyandmentalhealth.org/can-sharing-lead-to-caring

54 Holkar M, Lees C and D'Arcy C. *Safety Net.* Money and Mental Health Policy Institute. 2021.

55 Powers of Attorney Act 1971 – legislation.gov.uk/ukpga/1971/27; Powers of Attorney Act 2023 – legislation.gov.uk/ukpga/2023/42

56 Mental Capacity Act 2005 – legislation.gov.uk/ukpga/2005/9

As set out in the introduction, the way we live our lives now has changed considerably since 2019, let alone 2007 or even 1971. The work from the OPG through the LPA modernisation project has introduced welcome changes such as being able to track and register a LPA online. The OPG should continue with this work and pay particular consideration to how the process works for people with mental health problems.

Beyond this, there are more changes that could be made to how PoA functions to make it work better for people with mental health problems. In 2019, we gave the example of Ireland's Assisted Decision Making (Capacity) Act. Showing that significant changes to third party access mechanisms are not quick, this only came into effect in 2023. The Act set out three legal tools:

- A decision-making agreement – where the third party has no decision-making powers and is simply available to help the person manage the choices in front of them
- Co-decision making agreement – where the person appoints a third party to jointly make decisions with them
- Decision-making representative – Where a court appoints someone to make decisions on behalf of someone who lacks the capacity to do so.

In 2019, we recommended that the OPG consider introducing similar structures to the PoA system. However, this has not happened.⁵⁷ **The OPG and MoJ should launch a review of the PoA system to consider how it could be changed to better meet the needs of people with mental health problems and beyond.** This could include conducting research on how people view PoA and what support they would like.

Introducing more alternative needs based third party access support tools

While PoAs can be helpful for people with mental health problems, they aren't suited to every circumstance when someone needs support, which could be short-term or light touch. What people with mental health problems need can fluctuate and who is viewed as a trusted person can change over time, which PoAs can't easily account for.

Many financial service providers already recognise that there is a need for other third party access tools, beyond bespoke authorisations, that people can use as and when they need them, with appropriate safeguards in place. However, providers have also expressed concerns that such tools could increase the risk of fraud and financial abuse and this has led to slow and inconsistent development of options for third party access.

As a result, the current system is leading to people to use unauthorised workarounds which ultimately exposes them to the same risks banks are worried about. The recommendations we make in this subsection instead transfer some of the risk from the individual to the financial services providers, who are much better placed to mitigate them. With careful design and working with those with lived experience and charities, financial service providers can help bring about a transformation in third party support.

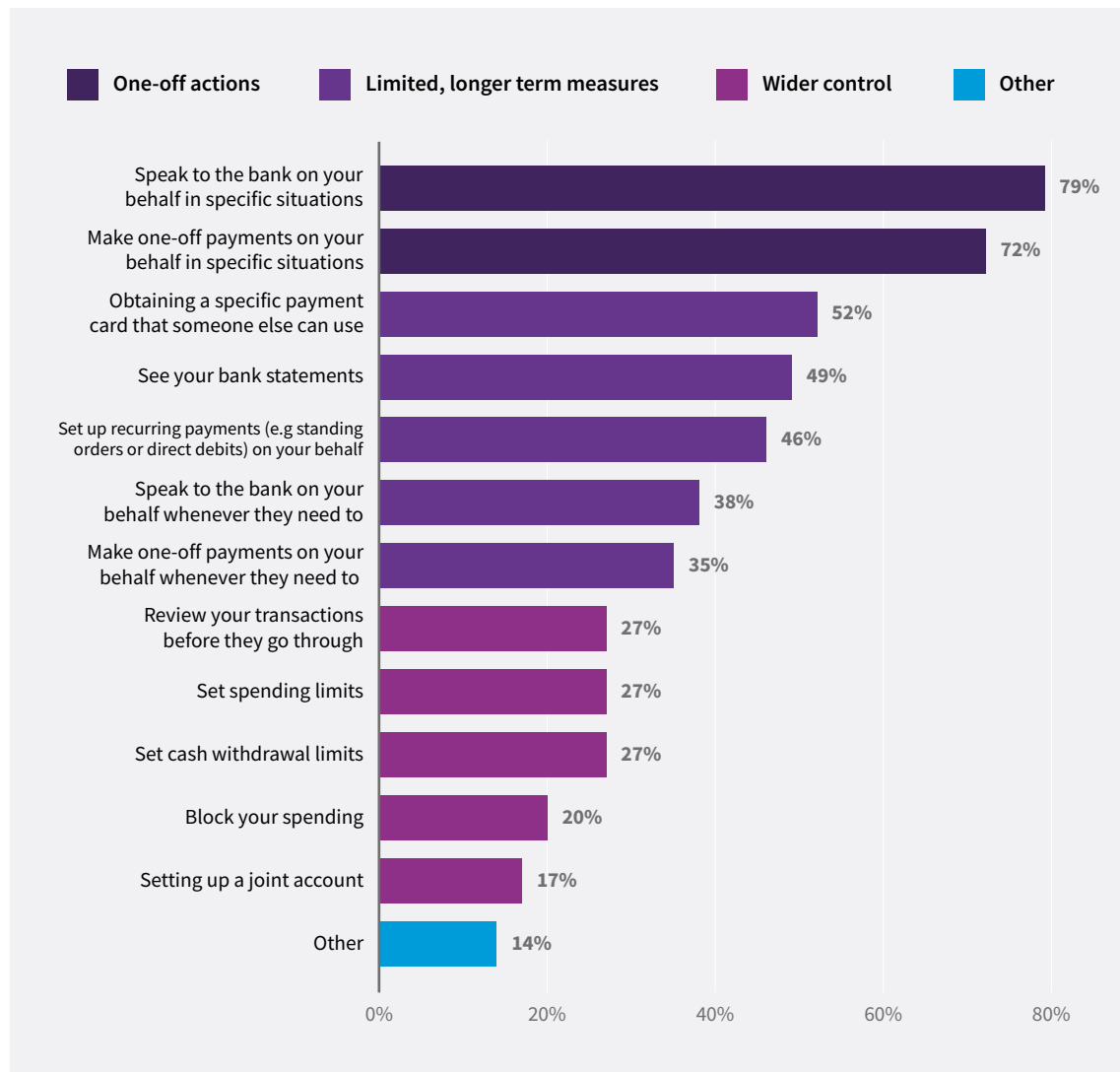
⁵⁷ The OPG had launched a transformation programme in 2019 called OPG 2025 but this focused more on how the services were provided. Office of the Public Guardian. Our business plan for 2019 to 2020. 2019.

The alternative needs based tools that firms should introduce

Our Research Community survey, see Figure 4, found that being able to have support from someone else for a limited and specific reason had the highest levels of interest among lived experience members who had given, or considered giving, banking access to someone else.. This included a trusted person speaking on their behalf or making a one-off payment. Additionally, around half of respondents were interested in longer-term support with limited parameters, such as a carers card or allowing someone to access bank statements. A smaller group was interested in tools that gave more control over to the trusted person.

Figure 4 – receiving one-off support from a trusted person had the highest levels of interest from Research Community respondents

Percentage of Research Community respondents who had given, or considered giving, banking access to someone else and said they were interested in receiving support from a trusted person in the following ways



Source: Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 71 people who had, or considered having, someone else access their banking services on their behalf.

Figure 4 highlights that what people with mental health problems need isn't homogenous and what might work for one person might not work for the other, or what works at one time might not work at another. However, the current third party access system doesn't allow for this and at the moment, only some of what people would like is available from banks or fintech firms.

Financial service providers should work to introduce alternative third party access tools, such as those included in Figure 4.⁵⁸ Providers could consider how they could make the tools personalisable beyond an initial 'basic' version. This is another area of focus from UK Finance which we welcome and we see industry groups as being a potential vehicle for making change.

In order to achieve this cross-firm core offering, the industry should collaborate with the government on the creation of a voluntary agreement setting out the minimum third party access services that all bank account providers should offer. Banks have committed to providing a common offering before – basic bank accounts, which allow customers to use some functions of a current account but not others.⁵⁹ Although nine firms are legally required to offer basic bank accounts through the Payment Accounts Regulations, this requirement was preceded by a voluntary agreement with the government.⁶⁰ As part of that agreement, the firms involved committed to reporting back to the government on areas like takeup. A similar agreement between the industry and government would help both in the aim of achieving financial inclusion without creating new rules.

The minimum offer should result in a broad range of services, including carers cards, transaction monitoring and payment controls that are already offered by some providers, allowing for increased control in line with customers needs while safeguarding against abuse. If the firms do not make the progress needed, the government could consider legislating for this change or working with the FCA to introduce a new rule.

How firms could introduce these tools

While some banks have already introduced tools such as carers cards or payment notifications for third parties, in order to move towards a sector wide offer, it will be important that providers are able to share their knowledge and experience, while also ensuring they can meet the needs of their individual customer base. In the box below we show how gambling blocks can provide a precedent for how new tools can be developed and implemented.

58 The list included in Figure 4 is non-exhaustive, for example we didn't include notifications to a trusted person which we know people with mental health problems would welcome.

59 Money Helper. *Fee-free basic bank accounts*. Accessed 16/06/2025 – moneyhelper.org.uk/en/everyday-money/banking/basic-bank-accounts

60 HM Treasury. *UK compliance with the EU Payment Accounts Directive*. 2016. Accessed 16/06/2025 – gov.uk/government/publications/uk-compliance-with-the-eu-payment-accounts-directive/uk-compliance-with-the-eu-payment-accounts-directive; HM Treasury. *New basic fee-free bank accounts to help millions manage their money*. 2014. Accessed 16/06/2025 – gov.uk/government/news/new-basic-fee-free-bank-accounts-to-help-millions-manage-their-money#full-publication-update-history

How progress on gambling blocks can be a precedent for needs based third party tools

After Research Community members told us they would like to block certain spending like gambling, we set out how financial service providers could use merchant category codes to introduce such restrictions.⁶¹ Shortly after in 2018, two challenger banks and a mainstream bank introduced versions of a gambling block.⁶² At the time it seemed like it would be difficult to implement the blocks more widely across the sector, given similar concerns that innovation can be difficult in larger, more established firms. However, now around 18 banks and building societies offer a gambling block.⁶³

Given the technological challenges with some of the tools, **financial service providers should consider whether partnering with fintechs that provide alternative third party access tools could enable them to offer a version to their customer base.** To help build the scope for what tools are possible and how to get there, **the FCA should develop a tech sprint for third party access.** This would enable firms to pool knowledge in the development of an inclusive core standard, while also bringing collective expertise to overcoming potential blockers.

It is essential that these tools are developed with appropriate safeguards in place, but we think that these should be proportional to the support being offered and the risks that this poses. For example, providing a trusted person with essentially an identical debit card could lead to that person spending all of the customer's money. However, introducing a spending limit to the card reduces the risk and therefore the checks that would be needed for the trusted person to have the card. Firms could also allow customers to say how often they would want the firm to check if they still wanted the trusted person to have permission.⁶⁴

Several of the alternative support options can be used as part of a 'co-pilot' approach where the trusted person steps in when the individual is too unwell to manage their finances and steps out again when they have recovered. These can better meet the fluctuating needs of people with mental health problems than full, ongoing delegation through formal mechanisms or Third Party Access. The support could also be time limited, with options to increase the length, to reduce the risks that firms are worried about. Firms would need to consider ways to allow controls to be switched to a trusted person when the customer is too unwell to do so.

Financial service providers should explore how the following can be built into alternative needs based tools:

- **Appropriate safeguards that are relative to the risk posed**
- **A way for the tools to be switched on when needed.**

⁶¹ Evans K and Acton R. *Fintech for good*. Money and Mental Health Policy Institute. 2017.

⁶² Semple B. *A campaign victory: Barclays introduces spending controls for customers*. Money and Mental Health Policy Institute. 2018. moneyandmentalhealth.org/barclays-spending-block

⁶³ GamCare. *Everything You Need to Know About Bank Gambling Blocks*. 2025. Accessed 18/06/2025 – gamcare.org.uk/news-and-blog/blog/everything-you-need-to-know-about-bank-gambling-blocks

⁶⁴ Some members of the Research Community were happy for the bank to never check (13%) or to check annually (21%), while some wanted it monthly (16%) or every time they needed access (30%). Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 77 people who had, or considered having, someone else access their banking services on their behalf.

"[Support] when I am unable to do it myself (e.g. in hospital)... but only via a specific nominated person(s) and for specific tasks, i.e. paying the usual bills and allowing money transfer to enable those bills to be paid."

Expert by experience

When providers begin to design these tools it is important that they consider the needs of their customers.⁶⁵ **Providers should involve people with lived experience in the design of future alternative third party access tools.** We are also aware that other organisations, such as Project Nemo, have explored or are exploring similar tools for other groups of people.⁶⁶ Any new tools introduced by firms should aim to meet the needs of a wide range of customers. Additionally, while many people are now digital first in their banking, this does not work for everyone, including many people with mental health problems. **Providers should ensure that alternative third party access tools can also be used through non-digital means.** This could be through telephone or branch banking, or for firms with less of a physical presence, through Banking Hubs.

Addressing the gaps with third party access and minimising harm

This research has identified two additional challenges in third party access in financial services – mental capacity and when someone doesn't have a trusted person.

Addressing mental capacity

Financial service providers can find it difficult to know when to involve a trusted person when there are concerns that a customer lacks mental capacity. The role of a trusted person could come in the form of the 'co-pilot' support mentioned above. This is something that Research Community members who had given, or considered giving, banking access to someone else supported but they see the need for safeguards. While two thirds (66%) agreed that a nominated person should be able to access their banking if they have significant concerns about their wellbeing,⁶⁷ only four in ten (40%) felt that this could be anyone who could prove they are next of kin or a carer (with 32% disagreeing).⁶⁸

"I would like the bank to identify irresponsible spending or activity on my account and contact my nominated representative first to check my wellbeing. I would allow this person access to my bank statements on all of my accounts, perhaps to make payments if it's looking like I'm falling behind with payments but I would draw the line at being able to enter into any new credit agreements."

Expert by experience

65 Providers should consider how to embed the four principles we set out in our 2019 report: *Minimising the risks of fraud and abuse; balancing autonomy and support; preserving privacy; and ensuring accessibility*. Bond N, Evans K and Holkar M. *A little help from my friends*. Money and Mental Health Policy Institute. 2019.

66 Project Nemo. *Safe Spending for Adults with a Learning Disability: A Call to Action for Financial Services*. 2025.

67 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 72 people who had, or considered having, someone else access their banking services on their behalf.

68 Money and Mental Health survey of 158 people with lived experience of mental health problems. Base for this question: 72 people who had, or considered having, someone else access their banking services on their behalf.

The FCA does say in its guidance on vulnerable customers that providers could contact a third party or act on their instructions if appropriate, including when there aren't formal arrangements in place, as long as it complies with data protection rules.⁶⁹ Providers should ensure that they are following the guidance in such situations. Additionally providers should consider how they could use transactional data to spot signs of a change in financial behaviour and alert a trusted person.⁷⁰

For people with mental health problems this support can often be needed when they are receiving mental health crisis support. However, they might not have set up an authorised mechanism such as PoA before getting this support. There is a document called an Advance Choice Document that allows people with severe and enduring mental health problems to state their wishes about their treatment when they are well. We have called for these documents to include a section on financial matters and as part of Mental Health Act reforms, the government committed to including this in the upcoming code of practice.⁷¹

The detail on advance choice documents in the Mental Health Bill code of practice should include the following: whether someone has a trusted person, whether they have an arrangement/s in place with their financial service providers or if they would need to set one up. Additionally, as part of the code of practice there will be a routine enquiry into someone's financial circumstances in care and treatment plans. **This should also include a question on whether someone has a trusted person and has an arrangement/s in place or would need one set up.**

Addressing when there is no trusted person

Many people with mental health problems will find that they need the support from someone else when they are unwell but some won't have anyone they can trust enough with their finances. This can prove a challenge when providers might be concerned about someone's mental health and/or mental capacity. While we think there is more opportunity for trusted persons to be able to support someone when they are going through a period of poor mental health, this will not benefit those who don't have a trusted person to help them. We have previously highlighted ways that banks and other financial service providers could make their services more accessible and inclusive for people with mental health problems, such as:

- Multi-channel access, including for specialist support
- Clear and accessible communications sent through a preferred channel
- Money management tools
- Multiple, accessible ways for customers to disclose their circumstances and needs.⁷²

69 Financial Conduct Authority. *FG21/1 Guidance for firms on the fair treatment of vulnerable customers*. 2021. fca.org.uk/publication/finalised-guidance/fg21-1.pdf

70 For more detail see Alpin K and Holkar M. *Data protecting*. Money and Mental Health Policy Institute. 2019.

71 Department of Health and Social Care. *Government response to the Joint Committee on the draft Mental Health Bill*. 2024. Accessed 13/06/2025 – gov.uk/government/publications/government-response-to-the-joint-committee-on-the-draft-mental-health-bill/government-response-to-the-joint-committee-on-the-draft-mental-health-bill

72 Holkar M, Evans K and Langston K. *Access essentials*. Money and Mental Health Policy Institute. 2018; Holkar M. *Time to act*. Money and Mental Health Policy Institute. 2022. For more information on how we work with essential service providers to put these into practice see – moneyandmentalhealth.org/mentalhealthaccessible

Beyond this, **financial services providers and local health services, charities and councils should build more partnerships so that they can reach out to provide support in situations where there are significant concerns about someone's mental health and/or mental capacity but there is no trusted person.** With fewer and fewer branches, this can become more difficult but the increased prevalence of banking hubs could provide an opportunity to co-locate some of these services. **Alongside this local authorities should work with relevant organisations to ensure that sufficient provision for third party assistance with finances is made available.**

Where a joined-up approach is needed

While our recommendations above have focused on what one actor or set of actors can achieve, it's clear that the change we need to see won't be achieved without a coordinated and joined up approach. While there is currently a UK Finance working group on Third Party Access and Mental Capacity, we see an opportunity and the need to have a wider reaching group – especially given the barriers identified by firms to tackling this issue. **Therefore, the FCA should launch a working group on third party access bringing together UK Finance, the Information Commissioner's Office (ICO), the Financial Ombudsman Service (FOS), the OPG, MoJ and consumer organisations.**

The working group should explore the following areas:

- How the PoA system could best work for financial services.
- How there could be consistency in approach and offering from financial service providers.
- How providers could best follow the Consumer Duty's requirement around those supporting customers. which sets out that they should *"also receive an appropriate standard of support and not face unreasonable barriers."*
- How providers could introduce alternative needs based third party access tools to ensure adherence to relevant rules.
- How providers should approach mental capacity, in particular where it fluctuates and when a trusted person might need to step in, including how this can meet the Consumer Duty, Mental Capacity Act and data protection rules.
- How people without a trusted person could be best supported.

This could take a similar approach to the FCA's credit reporting working group.⁷³ If necessary, this could lead to a FCA deep dive or multi-firm review, a best practice document or new guidance. The working group could also explore the potential of an Action Lab on third party access. Action Labs are a collaborative approach that, through a combination of expert consultancy and peer support, allows providers to work together to develop new and innovative solutions to complex and challenging problems.⁷⁴

⁷³ Financial Conduct Authority. *Credit reporting: Interim Working Group (IWG)*. 2023 (updated 2025). Accessed 13/06/2025 – fca.org.uk/firms/credit-reporting-interim-working-group

⁷⁴ For example, we have set up a Gambling Harms Action Lab, a three-year project where we are working directly with financial services providers to explore how firms can best support customers' experiencing gambling harm. moneyandmentalhealth.org/gambling-harms

Table 3 – Summary of key recommendations by stakeholder group

| Stakeholder Group | Recommendation |
|---------------------------|---|
| Current account providers | Come to a voluntary agreement implementing a consistent sector-wide approach to third party access |
| | Offer carers cards |
| | Offer third party transaction monitoring |
| | Offer payment controls |
| | Ensure third party access tools can be activated and de-activated at need |
| | Ensure third party access is available over a wide range of channels |
| | Provide and promote accessible information on the different types of third party access offered |
| | Ensure clear processes for staff to follow where a customer requires support from a trusted person |
| FCA | Monitor steps taken by firms with regard to PoA and publish an update within the next year |
| | Develop a third party access tech sprint to help overcome technological hurdles |
| | Launch a working group on third party access to bring together UK Finance the ICO, FOS, OPG, MoJ and consumer organisations |
| | Consider intervention or enforcement action if adequate steps are not taken to achieve progress. |
| OPG | Work with the UK Regulators Network to update PoA registration guidance to reflect LPA modernisation work |
| | Introduce a drop-down menu in the PoA online application of the most common options |
| | Explore the possibility of 'register PoA once' through data sharing |
| | Launch a review of PoA with MoJ to consider how it could better meet the needs of people with mental health problems |
| UK Finance | Investigate how to bring further consistency to third party access mechanisms |
| DHSC | Ensure the Mental Health Bill code of practice includes identifying and facilitating support from trusted persons |
| Community services | Build partnerships with current account providers to address situations where there is no trusted person |

Conclusion

In 2019, we set out the case for why changes to the third party access system were essential. Six years later we have seen some, but not enough of the changes that were needed then and still very much needed now. The current, outdated system is not working and is putting too much risk on people with mental health problems.

The government has committed itself to inclusive growth. Encouraging innovation in this space to make third party access fit for the 21st century can help facilitate this. People with mental health problems will be able to focus on recovering rather than worrying about their finances and those that support them, the unpaid carers whose work often goes unsung, can be freed up from long paperwork and the risks of unauthorised workarounds. Some providers have taken the plunge and shown that change is possible. The rest of the sector must be prepared to do the same.





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