Consultation Paper 163 – Access to Cash Local Deficiency Guidelines

Q1. Do you agree with the information to be provided when making a notification to the Central Bank? Is there other information that should be provided?

Consensus is Yes. Members agree with the information to be provided when making a notification to the Central Bank, as it allows the customer to provide relevant information on their ability to avail of cash and the perceived local deficiency. However, in respect of the sample prompts for 'Context about the cash service needed' it would be useful if an additional prompt is included to capture the frequency of when the cash service is needed. This would provide additional information on the required usage of the cash service for example, if the customer needed the ability to lodge bank notes weekly, monthly etc. This will assist the Central Bank in understanding the proportionality of the potential local deficiency.

Q2: Do you agree with the proposed manner of assessing local deficiency notifications to the Central Bank? If not, please explain why.

Consensus is Yes.
Members agree with the proposed manner of assessment, however members would welcome clarity from the Central Bank on what the proposed look-up functionality will display to the customer to assist them in reviewing the cash infrastructure in their relevant area. Members believe it would be beneficial to the customer if adjacent areas are included, so they have full view of the cash infrastructure in their area.

Q3: Do you agree with the proposal to use the national statistical boundaries as the basis for the Central Bank making a determination on local deficiencies? If not, please explain why.

Consensus is Yes. Members agree with the use of the national statistical boundaries in respect of the use of NUTS 3 regions and Electoral Divisions as the basis.
However, members would ask the Central Bank to consider excluding Small Areas given the level is too granular. This could affect the proportionality in determining a local deficiency.

While national consistency is important, the framework would also benefit from clearer articulation of how local context is considered in practice. Providing explicit guidance on how local demographic, geographic, and behavioural factors may influence assessments would improve confidence in the framework and reduce the risk of unintended outcomes. Members recommend that the Guidelines include illustrative examples demonstrating how the framework would apply across different types of localities.

The methodology places significant emphasis on structured data inputs and central assessment but does not adequately account for real world constraints, including site availability, security requirements, planning considerations, costs and dependency on third party providers. We would ask the Central Bank to take into account some of these constraints such as site availability and planning considerations when making an assessment. Without explicitly testing whether an identified deficiency can realistically be remedied, there is a risk of outcomes that are technically compliant but operationally impractical. Members would also ask the Central Bank to consider if it would be beneficial to engage with the members for input on these matters when making a determination.

Members believe the assessment methodology should include a formal deliverability test as part of the determination process, ensuring that identified deficiencies are capable of being addressed in practice.

Q4: Do you have any comments on the way the Central Bank shall make a determination in relation to potential local deficiencies?

Members would ask the Central Bank to consider if it would be beneficial to engage with the members for input on the matters being considered when making a determination. They would welcome the opportunity to work with the Central Bank and the BPFI to build out what that engagement framework would look like. While Members will provide the required data on the current infrastructure, they would hold historic data which could provide valuable insights on the reasons for previous site closures and on the estimated costs to remedy a particular deficiency.
They would also ask the Central Bank to consider excluding Small Areas as a basis when assessing a locality, given the level of granularity could increase the number of deficiencies identified.

It was also highlighted that the Guidelines do not clearly set out decision thresholds, weightings, or the relative importance of the factors considered in making a determination. In the absence of such transparency, determinations risk being perceived as discretionary rather than evidence led.
It would be beneficial if the Central Bank would consider establishing and publishing clearer decision rules, including minimum evidential thresholds and greater transparency on how competing factors are assessed and balanced.

Q5: Do you have any comments in relation to the circumstances in which the Central Bank will consider it is appropriate and proportionate that the local deficiency concerned be remedied?

Members would welcome further clarity from the Central Bank on what would be considered 'temporary' to ensure this circumstance is a reliable measure. They would also ask the Central Bank to consider if planning applications for the area where a deficiency is identified will be considered as part of the assessment, noting there could be future plans for large retailers to open in the area who would likely offer an ATM facility.

Although proportionality is referenced, the Guidelines do not require a structured assessment of long-term sustainability or forecast consumer usage before remediation is mandated. Without these assessments, remediation risks becoming a default response rather than an evidence-based intervention aligned to genuine consumer need. Members believe remediation should only be required where it is demonstrably sustainable, proportionate, and likely to deliver meaningful consumer benefit, supported by explicit analytical criteria within the Guidelines.

It is also the view that the members should have the opportunity of rebuttal using evidence such as usage statistics and any other evidence that they deem pertinent to the remediation request.