



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Consultation Paper CP163

Access to Cash Local Deficiency Guidelines

December 2025

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Introduction

The Finance (Provision of Access to Cash Infrastructure) Act 2025 (the Act) commenced on 30 June 2025.¹ The Act aims to ensure, amongst other things, that there is sufficient and effective access to cash infrastructure in the State for individuals and micro, small or medium-sized enterprise (SMEs), and that any future changes to the cash infrastructure will be managed in a fair, orderly, transparent and equitable manner for all stakeholders.

The Act intends to preserve the level of access to cash infrastructure at December 2022 levels, adjusted to take account of changes that arose as a consequence of the exit of Ulster Bank Ireland DAC and KBC Bank Ireland plc from the market. Accordingly, we judge that the intent of the Local Deficiency provisions is not to necessarily increase the aggregate amount of access to cash infrastructure in the State, but rather to ensure that there remains sufficient and effective access to cash infrastructure for the public and SMEs throughout the State.

The Minister for Finance, with the approval of the Government, will specify Access to Cash (ATC) criteria, in respect of each NUTS 3 region², to ensure the continued provision of sufficient and effective access to cash infrastructure for individuals and SMEs.

The State's eight NUTS 3 regions are:

- **Border** (Cavan, Donegal, Leitrim, Monaghan, Sligo);
- **West** (Mayo, Roscommon, Galway);
- **Mid-West** (Clare, Tipperary, Limerick);
- **South-East** (Carlow, Kilkenny, Wexford, Waterford);
- **South-West** (Cork, Kerry);

¹ Finance (Provision of Access to Cash Infrastructure) Act 2025, available to view [here](#).

² "NUTS 3 region" means a geographical area in the State that is classified as NUTS level 3 in accordance with Regulation (EC) No. 1059/2003 of the European Parliament and of the Council of 26 May 2003 on the establishment of a common classification of territorial units for statistics (NUTS).

- **Dublin;**
- **Mid-East** (Kildare, Meath, Louth, Wicklow); and
- **Midlands** (Laois, Offaly, Longford, Westmeath).

“Cash Infrastructure” is defined in the Act as Automated Teller Machines and Cash Service Points:

- Automatic Teller Machines (ATM): An ATM means an electromechanical device that allows for the withdrawal of banknotes from an account, and
- Cash Service Points (CSPs)³ are defined as locations at which cash services are provided by or on behalf of a designated entity⁴. Cash service means any service by which cash, i.e. banknotes and coins, may be deposited and withdrawn by individuals and SMEs, to or from an account, and in-person assistance is available in connection with that service.

For the purposes of the draft Guidelines, a Cash Infrastructure Point (CIP) is to be considered an ATM, or, a CSP (i.e. a CIP is one ATM or one CSP).

The table below illustrates the minimum requirements in terms of service provision. An ATM only requires banknote withdrawal services, whereas a CSP requires that all five services be provided.

³ To be considered a cash service point, the location must provide in person assistance, lodgement and withdrawal services for both banknotes and coins. If an ATM is at the same location as a Branch/Post office, then the services for the full location are combined to determine if it is categorised as a CSP or ATM only.

⁴ In accordance with the Act, credit institutions that meet prescribed conditions will be deemed designated entities.

Services	Cash Infrastructure Point (CIP)	
	ATM	Cash Service Point (CSP)
Requires banknote withdrawal services	✓	✓
Requires banknote lodgement services	✗	✓
Requires coin withdrawal services	✗	✓
Requires coin lodgement services	✗	✓
Requires in-person assistance	✗	✓

The Act provides that the Minister for Finance, with the approval of the Government, must specify Access to Cash criteria, to include:

- I. the minimum percentage of the population of the region concerned that ought to be within a specific radius of not less than 5 kilometres and not more than 10 kilometres of an ATM,
- II. the minimum number of ATMs that ought to be available per 100,000 people in the region concerned, and
- III. the minimum percentage of the population of the region concerned that ought to be within a specific radius of not less than 5 kilometres and not more than 10 kilometres of a cash service point.

The Central Bank is responsible for monitoring compliance by designated entities with the ATC criteria. NUTS 3 regions are large areas, some incorporating multiple counties, and the Act recognises that, even where ATC criteria are met, particular difficulties may still arise in specific local areas and that a *local deficiency* in cash infrastructure may still exist.

Local deficiencies are cases where, although the ATC criteria are being met, localised difficulties with access to cash infrastructure arise. Reasons for these difficulties may vary, and may arise from, for example, difficult access to infrastructure because of a river, lake, motorway, or railway line that means increased travel times. A

deficiency could also arise from large scale increases in population due to several large housing schemes coming on stream within a short period.⁵

As the ATC criteria, set by the Minister, are numerical, the Central Bank's approach to assessment of compliance with the ATC criteria will be largely quantitative in nature, and based on mathematical calculations. However, as a local deficiency submission will also include non numerical data, the Central Bank's approach to determining whether a local deficiency exists will be based on a quantitative and qualitative assessment of all information submitted. The Central Bank's objective will be to promote consistency and objectivity in its assessments.

For example, to conduct a local deficiency assessment, the Central Bank will map the area being considered (i.e. whether it is urban or rural) as this is a key indicator of how many people and businesses would be affected by a local deficiency. The Central Bank will then check the cash facilities within the area to consider the cash services available and whether the travel time / distance to reach them is reasonable. The Central Bank will also consider how businesses will be affected in terms of being able to deposit or withdraw banknotes and coins.

Typically, and without prejudging specific circumstances, a local deficiency will be determined when there is a permanent closure, with no alternative within an acceptable distance for the population affected, of a cash infrastructure point or where upcoming population changes indicate that cash demand will not be managed effectively by the existing cash infrastructure. In some circumstances, an ATM may meet the required need and in other

⁵ <https://assets.gov.ie/static/documents/access-to-cash-bill-2024-regulatory-impact-analysis.pdf>.

situations, depending on the circumstances, in-person assistance for cash services may be the solution. However, a local deficiency would not be determined in a situation where the existing cash infrastructure and services can continue to meet the local area needs even after the closure of a specific CIP. Temporary changes, which increase travel times or inconvenience, or short seasonal fluctuations, would generally not merit a local deficiency determination.

Section 8 of the Act requires the Central Bank to prepare Guidelines that set out how the Central Bank will receive notifications, undertake assessments, and make determinations regarding local deficiencies in cash infrastructure. The proposed framework to identify local deficiencies provides a mechanism to identify and address situations where access to cash infrastructure may be inadequate despite compliance with the ATC criteria. The Act allows the Central Bank to make a determination that there is a local deficiency or that there is reasonably likely to be a deficiency that limits access to cash infrastructure for individuals or SMEs. Where a determination is made that a local deficiency exists, the Central Bank is required to make a further determination as to whether it is appropriate and proportionate that the local deficiency concerned be remedied.

The term “local” is not defined in the Act. The Central Statistics Office (CSO) use various national statistical boundaries at a range of geographical levels including NUTS 3 regions (as mentioned earlier), Electoral Divisions, and, Small Areas. The Central Bank proposes to align the interpretation of “local” (and, by extension “locality”) with these CSO classifications, meaning that it will reference established national statistical boundaries in its assessment of local deficiencies.⁶

⁶ <https://www.cso.ie/en/census/census2022/census2022smallareapopulationstatistics/>.

In accordance with the Act, credit institutions that meet prescribed conditions set out under Section (10) of the Act, will be designated entities for the purposes of the Act, and will have specific compliance obligations, both in terms of the ATC criteria and in terms of remedying local deficiencies.

The Central Bank is conducting this public consultation to seek views on our proposed Guidelines for notifying, assessing, and making determinations as to whether local deficiencies in access to cash infrastructure exist within the State and whether it is appropriate and proportionate that they are remedied. The Local Deficiency Guidelines in Annex 1 supplement the framework for local deficiencies that is provided in the Act. They detail how the Central Bank will implement its responsibilities with respect to the operation of the local deficiency framework and how individuals and SMEs that wish to rely on this framework must engage with the Central Bank. In particular, the draft Guidelines set out the Central Bank's processes in relation to notifications, assessments, and determinations in respect of local deficiencies in access to cash infrastructure in any part of a NUTS 3 region.

Separately, under Section 31 of the Act, the Central Bank is required to introduce regulations prescribing requirements in relation to *notifications* and *appropriate service standards* for ATM operators.⁷ The Central Bank is conducting a separate public consultation in relation to these requirements.

The draft Guidelines align with the requirements in the Act and are a proportionate response to the specified requirements and are not intended to impose any additional burden on the designated entities outside of what is required of them under the Act.

⁷ ATM operator is defined in the Act and includes ATM Deployers and specified Payment Service Providers.

Central Bank: Responsibilities under the Act

In order to supplement the local deficiency framework in Section 7 of the Act, the Central Bank is required to prepare, consult on, and publish Guidelines in relation to:

- the information to be provided to the Central Bank when a person makes a notification of a potential local deficiency;
- the manner in which the Central Bank shall assess a potential local deficiency notification;
- the manner in which the Central Bank shall make a local deficiency determination; and
- the circumstances in which a determination to remediate a local deficiency may be made.⁸

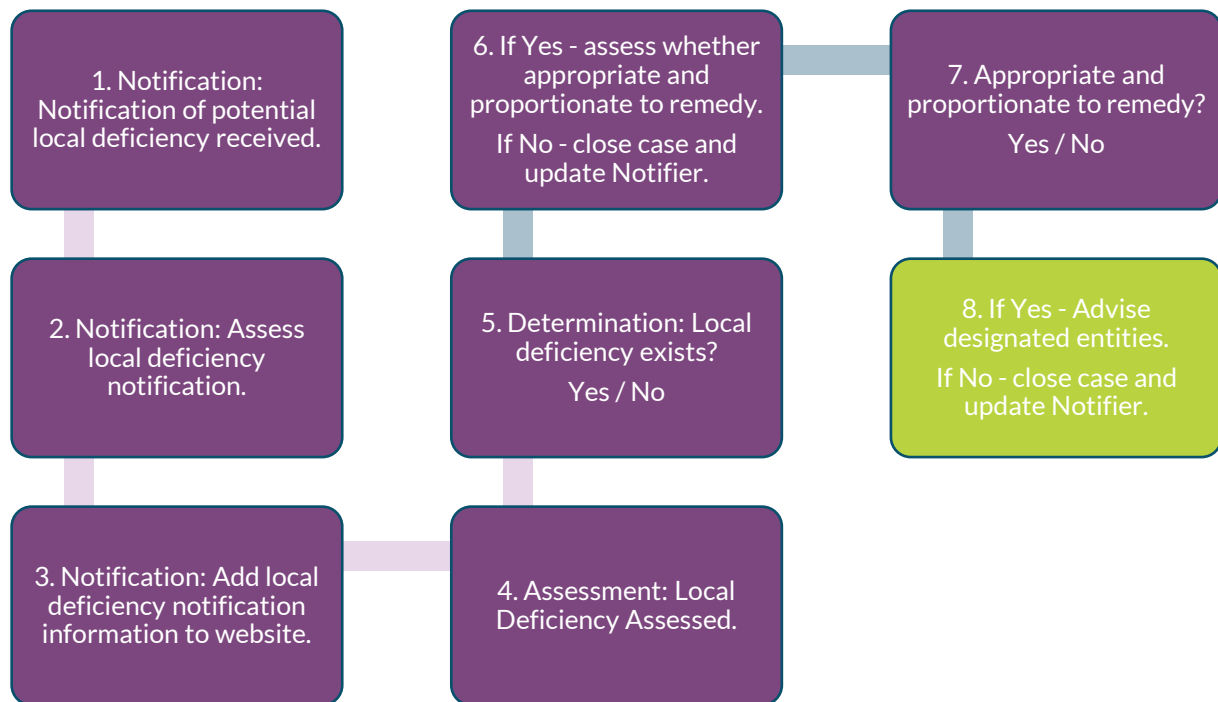
Local Deficiency Framework

The Central Bank is required to implement its functions with respect to the local deficiency framework to facilitate: (i) a person or SME reporting their concerns where they believe that there is a deficiency which limits access to cash infrastructure, (ii) a local deficiency assessment process whereby the Central Bank will determine whether or not there is deemed to be a local deficiency or the reasonable likelihood of a local deficiency arising, and, (iii) an assessment as to whether it is appropriate and proportionate for any such deficiency to be remedied.

Central Bank Process

The Central Bank aims to ensure a consistent, fair, and transparent process that enables the Central Bank to make a determination as to whether a local deficiency has been identified in the locality concerned and whether it is appropriate and proportionate for that deficiency to be remedied (where necessary).

⁸ Note: The Central Bank's Guidelines supplementing the local deficiency framework will be introduced 12 months after the initial commencement of the Act (i.e. Guidelines to commence from 30 June 2026).



Notification: Information to be provided

The Act, and the Central Bank, recognise the value of local insights and experience in identifying a potential local deficiency. Section 7 (2) of the Act facilitates notifications to the Central Bank for this purpose.

As per Section 8 (1) (b) of the Act, the Central Bank is required to prepare Guidelines in relation to the information to be provided to it when making a notification.

The Central Bank is proposing an online notification process through the Central Bank website. The Notifier will be directed to an online notification form for the collection of relevant information.

The Central Bank will also facilitate an assisted notification journey by way of a phone channel. Requests from Notifiers, who require assistance or who are unable to submit a notification through the standard online process, can telephone the Central Bank who will populate the notification form with the required information on behalf of the Notifier. The Central Bank will ensure that people who wish to submit a notification through Irish will be accommodated.

Information to be provided in the Notification Form

The Central Bank will require a minimum amount of information in order to undertake an assessment as to whether a local deficiency or a likely local deficiency exists. All fields in the notification form will be mandatory and the Central Bank will only collect data that is adequate, relevant and limited to what is necessary for the purposes of conducting an assessment. The Notifier will be required to provide limited personal data to facilitate the assessment process.

The personal data to be provided by the Notifier is as follows:

TABLE 1: PERSONAL DATA

Contact Details Required	Collection Format
Name of Notifier	Standard character entry
Email address (if available) of Notifier	Standard character entry
Contact Number of Notifier	Standard character entry
Eircode (primary)	Standard character entry
Address (secondary)	Standard character entry

The Notifier will be required to positively confirm they have reviewed the cash infrastructure in the relevant local area, which will be available on the Central Bank website. The Central Bank website will include look-up functionality to simplify this review.

The following information relating to a perceived local deficiency will be requested from the Notifier when completing the notification form:

TABLE 2: INFORMATION TO BE PROVIDED

Information Required	Collection Format
Specific location in local area with potential local deficiency	Standard character entry
Confirmation of having reviewed information on the availability of cash infrastructure in their locality	Tick-box
Notifier type – person or SME	Tick-box
Self-notification or submitting on behalf of someone else	Tick-box
Reason for potential local deficiency (see Table 3 below)	Tick-box (single) / (multiple)
Text box to provide context about the <i>locality</i> and why there is a local deficiency (see Table 4 below)	Free text entry (character limit)
Text box to provide context about the nearby <i>cash facilities</i> (see Table 4 below).	Free text entry (character limit)
Text box to provide context about the <i>cash service needed</i> (see Table 4 below).	Free text entry (character limit)

Notification Form Support

The following online supports (dropdown boxes and prompts for data collection) will be available within the form to assist with its completion:

TABLE 3: REASON FOR LOCAL DEFICIENCY (DROPDOWN BOX)

Dropdown – Reason for potential local deficiency

Closure of a cash service point (e.g. bank branch or post office)
 Removal of an ATM
 Proposed closure of cash service point (e.g. bank branch or post office)
 Proposed removal of an ATM
 Reduced opening hours of cash service point (e.g. bank branch or post office)
 Reduced hours of access to an ATM
 Population growth
 Travel and / or geographic factors
 Other (use text box for additional info)

Each of the free text information boxes will be accompanied by question prompts to guide the Notifier on the type of information required to ensure that the information provided is sufficient and relevant. Specific and detailed information will assist the local deficiency assessment. Text boxes will have a character limit to encourage the Notifier to be concise and appropriate in the information supplied e.g. 1,000 characters per text box.

This free text information is critical in order for the Central Bank to understand the nature of the potential local deficiency and to develop a profile of the locality.

TABLE 4: SAMPLE PROMPTS FOR FREE TEXT INFORMATION

Context about the locality
What is the approximate number of shops in the locality?
Has the population increased recently (e.g. due to new housing developments)?
Are there other changes directly impacting the cash infrastructure in the locality?
Context about nearby cash facilities
Where do you currently withdraw and / or lodge cash?

Have cash facilities been withdrawn recently? Please provide exact detail – address or location of the bank branch, post office or ATM.

Why do the existing cash facilities not meet your cash access needs?
--

Have there been recent changes making it more difficult to access cash?

Context about the cash service needed
--

Explain if you need the ability to lodge banknotes.

Explain if you need the ability to lodge coins.

Explain if you need the ability to withdraw banknotes.
--

Explain if you need the ability to withdraw coins.
--

The Central Bank will acknowledge receipt of the notification, look to expedite its assessment and keep the Notifier apprised on the status of the assessment at key stages in the process and at the outcome of its assessment.



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?

Notification: Manner of assessing a notification

As per Section 8 (1) (c) of the Act, the Central Bank is required to prepare Guidelines in relation to the manner in which it shall assess a notification received.

The purpose of this process is to ensure the Notifier has provided sufficient and relevant information in the local deficiency request, and, that the Notifier has a way to track progress.

Once a local deficiency notification has been received by the Central Bank, a case file will be created with a unique case reference number. A receipt confirmation will be issued to the Notifier with the unique case reference number to acknowledge receipt (in writing). For any future queries or engagement with the Central Bank, the Notifier should quote the case reference number. The Notifier will receive further updates at key stages in the process.

The Central Bank will publish certain information on its website in relation to notifications received so that Notifiers (and other stakeholders) are aware that a local deficiency notification has been submitted for a specific area. The Central Bank will also publish information relating to the status of the notification e.g. notification received and under consideration. As and when a determination is made, summary details of the outcome will also be listed for this notification. The information published will not contain any personal data and will only identify the relevant local area of the notification and the status of the notification received.

The Notifier will be able to inform themselves of the cash infrastructure information in their area via the Central Bank website and they will be facilitated in making a full and detailed notification and consequently there should not be a need for the Central Bank to

engage in further iterative exchanges with the Notifier. However, in exceptional circumstances, given the specific circumstances in the notification, the Central Bank may need to engage bilaterally with the Notifier to get further additional information for the purposes of the assessment.

All fields in the form will be mandatory. The Central Bank will review the notification to ensure that the information received is meaningful and to determine whether the notification will continue through to the local deficiency assessment process.

The Central Bank will decide that a notification does not continue through to the local deficiency assessment process where the information provided is insufficient to allow the Central Bank to make a determination as to the presence or likelihood of a local deficiency e.g. meaningful or relevant information has not been provided in respect of the locality, the cash service needed and the existing cash facilities. If the Central Bank decides that it cannot make an assessment on the basis of the notification provided, it will then close the notification case, update the notification status on the website, and inform the Notifier as to why the notification has not progressed. Notifiers may submit further notifications.

All notifications received containing sufficient information to allow the Central Bank to make a determination as to the presence or likelihood of a local deficiency will progress to be fully assessed in this regard.



Do you agree with the proposed manner of assessing local deficiency notifications to the Central Bank?

If not, please explain why

Determination: Manner of making a determination

As per Section 8 (1) (a) of the Act, the Central Bank is required to prepare Guidelines in relation to the manner in which it shall make a local deficiency determination.

To make a local deficiency determination, a local deficiency assessment is required, and in the first instance, an interpretation of locality is needed.

Concept of locality

The Central Bank proposes to align its considerations of “local” and “locality” with the CSO and to use established national statistical boundaries at a range of geographical levels including NUTS 3 regions, Electoral Divisions, and, Small Areas. These boundaries are well defined, accepted and statistically well understood. For example, Small Areas are designed as the lowest level of geography for the compilation of statistics in line with data protection guidelines and typically contain between 50 and 200 dwellings, and as previously mentioned, NUTS 3 regions are to be used for setting the ATC criteria.

These boundaries can be viewed as generally reflecting communities and as such allow for any given assessment of a locality to be considered in combination with the specific details and factors provided by the person or SME in their notification. As part of its assessment process, the Central Bank will undertake an analysis of the relevant locality using these boundaries, relevant publicly available statistical data (e.g. population & demographics) and other information available to it (e.g. CIP data received from the designated entities, An Post and ATM operators).

This approach aims to ensure a consistent, fair, and transparent approach that is easily understood and intuitive with the added benefit that the locality data will be automatically updated when new publicly available data is available e.g. following a census.

In practical terms, using the the CSO statistical boundaries means assigning the Notifier to an area based on a location they provide in their notification. There may be instances where the Notifier is on the border of a particular area and it is expected that in these cases the information provided, and the assessment of the Central Bank will ensure that appropriate consideration is given to adjacent areas.

It is important that the areas be reasonably sized but not too big as using too big a geographic footprint would mask specific local issues. This would, by definition, exclude larger areas such as NUTS 3 regions, for this purpose, on the basis of being too large.

The CSO defined Electoral Divisions and Small Areas, appear more appropriate in scale for local deficiency assessment purposes and as subsets of NUTS 3 regions will make analysis more transparent and straightforward.

The CSO describe these national area classifications as follows: ⁹

- Electoral Divisions (EDs) are the smallest legally defined administrative areas in the State. Previously known as District Electoral Divisions (DEDs), they were initially subdivisions of poor law unions, grouping one or more townlands together to elect members to a Board of Guardians. The DED boundaries were drawn by a Poor Law Boundary Commission, with the

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<https://www.cso.ie/en/methods/classifications/csodatastandardsandclassifications/csostatisticalclassifications/csogeographicalclassifications-nationallevel/>

intention of producing areas of roughly equal 'rateable value' as well as population.

- Small Areas (SAs) are designed as the lowest level of geography for the compilation of statistics in line with data protection guidelines and typically contain between 50 and 200 dwellings. A further constraint imposed when creating these new areas was that they are nested within Electoral Division boundaries. Finally, they are generally comprised either of complete townlands or neighbourhoods.

TABLE 5: THE NATURE OF ELECTORAL DIVISIONS AND SMALL AREAS

Criteria	Electoral Divisions	Small Areas
Granularity	c. 3,400 EDs in the State with a mix of urban and rural defined populations.	c. 18,900 SAs in the State which provides a granular view of a given area.
Population	Average population c. 1,500. They may not always bear much relation to natural community boundaries.	Average population of c. 270. Based on a small number of households and are generally comprised of complete townlands or neighbourhoods.

SAs can be considered as reference points, based on the location identified by the Notifier, upon which the Central Bank can initiate its assessment in a transparent and consistent manner. In undertaking a local deficiency assessment, the Central Bank will consider information available about an SA and adjacent SAs and consider the population who are likely to be affected by any change in cash infrastructure.

It should be noted that while these statistical boundaries are a useful basis for conducting assessments of various factors relevant to an area, it is not to be interpreted that a specific area such as an SA should necessarily have a CIP located in them. The purpose of interpreting locality in this way is to define the community that is

being served and to consider how well it is being served by reference to relevant publicly available information.



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

Determination: Local Deficiency Assessment

The Central Bank will undertake an assessment as to whether a local deficiency exists or is likely to exist.

The Act (Section 7 (5) (a)-(h)) sets out specific matters that may be taken into consideration in undertaking a local deficiency assessment. The Central Bank can also consider other matters that may be relevant as per Section 7 (5) (i) of the Act.

The Central Bank will determine the relevant locality by reference to the address provided in the notification submitted.

Where a Notifier submits a local deficiency request in respect of a locality and the Central Bank has already received a separate notification in respect of the same or adjacent locality, which is under consideration, these notifications will be linked to the same local deficiency assessment and assessed collectively.

If the notification can be linked to a locality of an already determined local deficiency assessment, this will be considered as part of the assessment.

Matters to be considered

The Central Bank will evaluate the locality in question for proximity, availability and population coverage of CIPs. The table below sets out each of the matters that may be considered (as per the Act) and how they will be considered in the local deficiency assessment. This information will be used to support developing a profile of the locality for assessment purposes.

The Central Bank will, for the purposes of monitoring compliance with the ATC criteria, collect quarterly information on the location, number and hours of availability of ATMs and CSPs, and cash

demand in each NUTS 3 region. The Central Bank will use the most recently available information in its local deficiency assessment.

Matters that may be considered (Section 7(5)(a)-(i))	Central Bank: Assessment approach
a) The number of people impacted or likely to be impacted by the local deficiency concerned;	<p>The Central Bank will address this by using the national statistical boundaries based on the address / Eircode provided by the Notifier.</p> <p>The size of the population in a given locality is a key factor and the Central Bank will use CSO information for this purpose.</p>
b) The number of ATMs, the number of cash service points and the cash demand, in the part of the NUTS 3 region concerned, prior to the local deficiency arising;	<p>The Central Bank is required to monitor the location, number and hours of availability of ATMs and cash service points in each NUTS 3 region. The Central Bank will require certain firms to provide this information to it in accordance with its powers under the Act.</p>
c) The current number of ATMs, the current number of cash service points and the current cash demand, in the part of the NUTS 3 region concerned ("the first mentioned part") and in any other part of the NUTS 3 region concerned or of any other NUTS 3 region, adjacent to the first-mentioned part;	
d) The hours of availability of cash infrastructure in the part of the NUTS 3 region concerned ("the first-mentioned part") and in any other part of the NUTS 3 region concerned or of any other NUTS 3 region, adjacent to the first-mentioned part;	
e) Travel and geographic factors;	<p>These will be addressed by the Central Bank considering the distance by road network of the locality in question to the nearest CIP (ATM & CSP). The Central Bank proposes to calculate distances to CIPs based on the distance from the centre of the locality to a given CIP. This approach is based on the principle that a deficiency is not assessed on the basis of the location of an individual but based on the community as a whole.</p> <p>The distance to the <i>next</i> nearest CIP will also be considered in the context of the</p>

Matters that may be considered (Section 7(5)(a)-(i))	Central Bank: Assessment approach
	additional distance a person may need to travel if the closest service is unavailable.
f) Demographic factors applicable to the persons impacted by the local deficiency;	<p>The Central Bank will consider relevant publicly available data e.g. Pobal's HP Deprivation Index of the locality where the potential local deficiency has being notified.¹⁰</p> <p>There is further demographic detail available to the Central Bank from the CSO's interactive map¹¹ that can be used as part of the assessment.</p>
g) The impact of the local deficiency on financial inclusion;	Having affordable, timely and adequate access to cash services will be considered by a combination of factors (including d) to f) above).
h) The likely cost of taking any measures to remedy the local deficiency;	The likely costs will be considered on a case by case basis.
(i) such other matters as the Bank considers appropriate for the purposes of making a determination under subsection (1) or (4), as the case may be.	The Central Bank will use any other available information at its disposal depending on the circumstances and the particular notification, e.g. there may be relevant SME information that influences the assessment (which would differ from an individual persons circumstances).

The Central Bank will consider any or all of the criteria above as it considers may be appropriate in the circumstances.

The Central Bank will make a determination that either;

- (a) Yes. Following local deficiency assessment, a deficiency in access to cash infrastructure exists or is reasonably likely to exist, or

¹⁰ Pobal works on behalf of Government to support communities and local agencies toward achieving social inclusion and development. The Pobal HP Deprivation Index (Haase and Pratschke, 2017) is the core index for the Republic of Ireland. The Pobal HP Deprivation Index shows the level of overall affluence and deprivation of areas and is updated for each census. [Pobal HP Deprivation Index Launched - Pobal](#)

¹¹ [Interactive Data Visualisations | CSO Ireland](#)

- (b) No. Following local deficiency assessment, a deficiency in access to cash infrastructure does not exist or is not reasonably likely to exist.

The Central Bank will proceed to assess whether it is appropriate and proportionate that a local deficiency that exists is remedied.



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

Determination: Circumstances in which the local deficiency concerned be remedied

As per Section 8 (1) (d) of the Act, the Central Bank is required to prepare Guidelines in relation to the circumstances in which it shall make a determination as to whether it is appropriate and proportionate that the local deficiency concerned be remedied.

Where a local deficiency in access to cash has been *determined*, the Central Bank will consider if it is *appropriate* and *proportionate* that the local deficiency concerned be remedied.

The Central Bank will consider the following in undertaking its assessment:

- If the issue is temporary, it may not be proportionate to proactively address as it will resolve itself;
- If the Central Bank has received a notification that new cash infrastructure is planned that will address the deficiency;
- Any other matters that may arise and which the Central Bank considers relevant for the purposes of making a determination.

For the purposes of this assessment, the Central Bank will consider any or all of the factors referred to in “Matters that may be considered (Section 7(5) (a)-(i))” as appropriate in the circumstances.

The Central Bank will proceed to engage with the designated entities for remediation, in accordance with the Act, where it makes a determination that it is appropriate and proportionate that the local deficiency concerned be remedied.

The Central Bank will update the notification status on its website and advise the Notifier that the case is progressing.



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?

Providing Feedback

The Central Bank welcomes feedback on this consultation paper from interested stakeholders. Stakeholder views are sought on the proposed approach to the Local Deficiency Guidelines as set out in the consultation paper. The draft Guidelines are set out in Annex 1 to the consultation paper.

How to Submit a Response

When submitting a response via email, the Central Bank asks that respondents include the following subject heading in their email 'Consultation Paper on Local Deficiency Guidelines' and address their response to: accesstocash@centralbank.ie. Submissions are also welcome in writing to Central Bank of Ireland, PO Box 559, Dublin 1.

It is the policy of the Central Bank to publish all responses to its consultations on our website. Accordingly, commercially confidential information should not be included in consultation responses.

Information deemed potentially libellous or defamatory will not be published. The Central Bank will accept no liability in respect of any information provided, which is subsequently released, or in respect of any consequential damage suffered as a result.

What Happens Next?

The consultation period will be open for 12 weeks until 4th March, 2026. We will then consider submissions received, and publish the final revised Guidelines by 30th June 2026 alongside a feedback statement.

Questions

For ease of reference, the following is a consolidation of each of the questions asked throughout this consultation paper:

Question 1: 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?

Question 2: Do you agree with the proposed manner of assessing local deficiency notifications to the Central Bank?

If not, please explain why

Question 3: 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

Question 4: Do you have any comments on the way the Central Bank shall make a determination in relation to potential local deficiencies?

Question 5: 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?

Annex 1: Local Deficiency Guidelines

Link: [Local Deficiency Guidelines](#)



T: +353 (0)1 224 5800
E: publications@centralbank.ie
www.centralbank.ie



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