Submission to Central Bank of Ireland on Access to Cash: Local Deficiency Guidelines

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Contact
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Overview

Irish Rural Link (IRL) is the national network of rural community groups, representing over 600 groups and thousands of individuals committed to socially, environmentally and economically sustainable rural communities.

IRL very much welcomed the writing of the ‘Access to Cash’ legislation into law at the end of 2025. For many years, IRL has consistently engaged with Government and the Central Bank to highlight the importance of maintaining cash as a viable and accessible payment option. We emphasised that people must continue to have the right and ability to access cash to pay for goods and services, particularly as digital and online payments become more widespread.

In recent years, the closure of bank branches and post offices across rural towns and villages has made it increasingly difficult for people to access ATMs and withdraw cash. Many individuals face longer journeys to reach the nearest cash point, which is even more difficult for those without access to a car or public transport.

Cash remains a crucial budgeting tool for many people, especially older residents, low-income households, and welfare payment recipients. The rise in financial scams, combined with a lack of digital and online banking skills among some groups, also reinforces the need for reliable access to cash for day-to-day transactions.

While some retail outlets currently host ATMs inside their stores, this restricts access to business opening hours. IRL stresses the importance of ensuring that ATMs are available outside of limited trading schedules and that they are sufficiently stocked to avoid running out of cash, particularly in smaller rural communities.

People still use cash and they must continue to have the right to access cash regardless of where they live in the country.

We welcome that the Central Bank of Ireland is engaging with civil society and small businesses to ensure that a process is developed and made accessible to people on the ground, enabling them to identify unmet needs in their local communities regarding access to cash.

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?

The information requested appears appropriate; however, it may be beneficial to make the provision of personal data optional where possible. Alternatively, clearly explain why personal data is required, how it will be used, and how it will be stored. A statement should clarify that the information will be used solely for processing the notification, for follow-up queries if further details are needed, and to inform the notifier of the outcome.

It may also be preferable to request the location in terms of townland rather than a full personal address or Eircode. Keeping the survey straightforward and as time efficient as possible will be important to encourage completion. The website should be accessible to everyone, and questions should be written in plain English; it may be worthwhile to have the content reviewed by National Adult Literacy Agency (NALA). There should also be a clear option to indicate whether the notifier is responding as an individual or on behalf of a business.

In addition, the process should indicate the expected timeframe for a response and specify what the notifier can expect to receive. Consideration should also be given to individuals with limited digital skills or without access to a digital device, for example by providing a telephone contact option or the ability to submit information in writing.

An awareness campaign will be needed so people and small businesses are aware that this process is available for use and where and how you can access the platform.

Q2. Do you agree with the proposed manner of assessing local deficiency notifications to the Central Bank?

In principle, IRL agrees with the proposed manner of assessing local deficiency notifications to the Central Bank. However, several matters should be considered when assessing a notification.

The assessment process should be clear, proportionate, and transparent, with defined criteria outlining how notifications will be reviewed and prioritised. The information requested should be limited to what is strictly necessary, with a clear explanation of why any personal data is required and how it will be used, stored, and protected. Where possible, the provision of personal data should be optional. Consideration should also be given to the specific barriers people face in accessing cash—for example, whether an ATM or post office is being removed or closed; how far away the next available facility is; whether public transport is available in the area; and whether cashback is available in local shops, including any minimum spend required to access this service.

The notification process should be straightforward and accessible, with questions drafted in plain English and the website designed to be usable by all. Consideration should also be given to individuals with limited digital skills or access to technology, including alternative submission methods such as telephone or written correspondence, with responses provided in the same format where requested.

Clear timelines should be outlined so that notifiers understand how long the assessment is likely to take and the type of response they can expect to receive. Where a response is considered inadequate or does not address the notifier’s concerns, there should be an opportunity for further dialogue or for the notifier to provide additional information to support their case.

We also recognise that this will be a learning process for the Central Bank, and the notification system should remain flexible and capable of adapting to feedback and improvements over time.

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?

The proposed use of Central Statistics Office (CSO) Census and population data, along with electoral and small area statistics, is appropriate and should form the foundation for data collection and the identification of local service gaps. Although the Census is conducted every five years, annual population estimates should also be analysed to inform timely responses and support engagement with the notifier.

Population figures alone should not be relied upon. Demographic factors, particularly age profile, must also be considered to ensure services are aligned with community needs. The Pobal HP Deprivation Index is another valuable data source, providing insight into income levels at small area level and helping to ensure that lower-income communities retain adequate access to cash services.

Engagement with the National Transport Authority (NTA) regarding public transport timetables and connectivity to towns and villages should also be explored. In addition, analysis of cash usage patterns across different areas, particularly in remote and island communities, should be undertaken to assess existing cash point services and identify unmet needs. The Department of Social Protection, together with the An Post network, may be in a position to provide further data and insights on cash usage.

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

IRL agrees with the proposed matters to be considered, and the assessment approach outlined by the Central Bank in the consultation paper. These factors are important and should form part of any determination process.

While the use of NUTS3 regions may be appropriate for identifying broad areas of potential need—particularly in relation to the availability and operating hours of cash infrastructure—it may be necessary to assess needs at a more localised level. This is especially relevant when geographic and demographic factors are considered.

In assessing access, consideration should also be given to the practical distance to the nearest cash service point or ATM for individuals and businesses. This should include potential travel barriers such as mobility challenges, access to public or private transport, and the physical surroundings of cash service points and ATMs. For example, are facilities easily accessible for wheelchair users (including counter and ATM height), is there adequate nearby parking for elderly persons or those with limited mobility, and are the machines straightforward to use?

Other potential limitations should also be considered, such as restrictions on the denominations available, limits on withdrawal amounts, or requirements to make a minimum purchase in order to access cashback services.

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?

The proposed considerations, including the commitment to update the notifier, are welcome. For example, where an issue is temporary or where new cash infrastructure is planned for an area, it is important that the notifier is informed accordingly and that relevant information is updated on the website.

However, there should also be provision for ongoing dialogue and communication, particularly to provide updates on when temporary issues are expected to be resolved or if any delays arise.

In addition, where it is determined that existing cash infrastructure is sufficient—despite concerns regarding limited availability or operating hours—clear reasoning should be provided. This should include an explanation as to why a particular type of infrastructure has been deemed appropriate over alternative options.

Irish Rural Link the Organisation

Irish Rural Link (IRL), formed in 1991, is a national network of organisations and individuals campaigning for sustainable rural development in Ireland and Europe. IRL, a non-profit organisation, has grown significantly since its inception and now directly represents over 600 community groups with a combined membership of 25,000.

The network provides a structure through which rural groups and individuals, representing disadvantaged rural communities, can articulate their common needs and priorities, share their experiences and present their case to policy-makers at local, national and European Level.

Irish Rural Link is the only group represented at the national social partnership talks solely representing rural communities' interests.

'Our vision is of vibrant, inclusive and sustainable rural communities that contribute to an equitable and just society'

Irish Rural Link's aims are:

- To articulate and facilitate the voices of rural communities in local, regional, national and European policy arenas, especially those experiencing poverty, social exclusion and the challenge of change in the 21st century.
- To promote local and community development in rural communities in order to strengthen and build the capacity of rural community groups to act as primary movers through practical assistance and advice.
- To research, critique and disseminate policies relating to rural communities including issues such as sustainability, social exclusion, equality and poverty
- To facilitate cross-border networking between rural communities

'Our mission is to influence and inform local, regional, national and European development policies and programmes in favour of rural communities especially those who are marginalised as a result of poverty and social exclusion in rural areas.'