Irish Wheelchair Association

Submission to: CP163 - Access to Cash Consultation on Local Deficiency Guidelines

January 2026

Central Bank of Ireland: Stakeholder Consultation on the Implementation of New Access to Cash Legislation

The Finance (Provision of Access to Cash Infrastructure) Act 2025 (the Act) took effect earlier this year. Its primary goal is to ensure that individuals as well as small and medium-sized businesses across Ireland have sufficient, effective access to cash. Additionally, it seeks to guarantee that any future changes to cash infrastructure—including ATMs and Cash Service Points—are managed fairly, transparently, and equitably for everyone.

The Irish Wheelchair Association is Ireland's leading representative organisation and service provider for people with physical disabilities. With 20,000 members, over 2,500 employees, 57 local community centres, and approximately 1,000 volunteers, we are a nationwide movement advocating for the rights of people with physical disabilities.

In our experience, the inability to access ATMs creates significant physical and financial barriers for people with disabilities and wheelchair users. This limits independence and increases the risk of financial exclusion.

While it is vital to ensure a sufficient number of ATMs nationwide, many of the current machines are not wheelchair accessible.

We recommend conducting a comprehensive audit of ATMs, upgrading all non-accessible machines, and ensuring that all new installations are fully accessible to wheelchair users and meet the Irish Wheelchair Association's Best Practice Access Guidelines.

Physical and Environmental Access Barriers

- **Location and Approach:** Many ATMs are located in inaccessible areas, such as upstairs or on difficult terrain. Poor lighting and a lack of clear signage or tactile ground indicators make finding the correct machine and navigating to it a challenge.
- **Manoeuvrability:** Narrow entrances, self-closing doors, and obstructions within ATM kiosks prevent wheelchair users from easily entering and manoeuvring inside to reach the machine.
- **Height and Reach:** The height of the ATM screen, card reader, keypad, and cash dispenser often exceeds the optimal reach range for a person seated in a wheelchair, making independent use nearly impossible.
- **Physical Dexterity:** Inserting a card, taking cash, and collecting transaction slips can be difficult for individuals with limited dexterity, especially if the slots require fine motor skills or do not protrude sufficiently from the machine.

Operational and Security Challenges

- **Dependence on Others:** Due to accessibility issues, people with disabilities are often forced to rely on friends, family, or even strangers to assist with transactions. This compromises their privacy and the security of their PIN and financial details.
- **Lack of Assistive Features:** ATMs without essential features such as text-to-speech, headphone jacks for private audio guidance, and tactile keypads (with a raised dot on the 5) are effectively unusable for blind and visually impaired people.
- **Time Limits (Timeouts):** Short transaction time limits, set for the average user, can be a major source of stress and cause disabled users to make errors or time out of their session, forcing them to start over.
- **Inconsistent Design:** Different ATM models and banking institutions often have inconsistent user interfaces and physical layouts, which makes it difficult for a person with a disability to use an unfamiliar machine with confidence.

Public Access Terminals

The approach aisles to ATM machines, to coin- and card-operated machines, and to other public access terminals such as vending machines, weigh points, library return terminals, post boxes, etc. should have a minimum width of 1200mm.

Externally located machines should have a protective canopy extending not less than 1200mm and should be recessed into the building line or set into the grass verge.

The immediate space in front of the machine should be level and unobstructed for not less than 1800 x 1800mm. This area should be a clearly identified privacy space.

Wherever possible, a knee recess of a minimum of 500mm deep (and preferably 650-700mm) and 700mm high from ground level should be provided to the front of the terminal where the controls are located, to enable a person using a wheelchair to position and to reach the controls. Where this is not possible, then wheelchair footrest clearance should be provided with a clear space of 300mm in height and 200mm in depth located at ground level across the length of the machine.

Any public access terminal should be situated no more than 1200mm above floor level with the keypad/controls at a height of 900mm. There should be a small, raised dot on the figure five on the keypad, to aid orientation for people who are blind or have a visual impairment.

Any screen should be tilted towards the user. A privacy flap should be provided over an ATM keypad. An ATM can be hearing-enabled, with provisions for headphone connections and use. This will be of assistance to people who are blind and people with visual impairment. The area surrounding any public access terminal should be well-lit, with an illumination of at least 200 lux in the interactive area and 50 lux at background level, with non-glare properties. Immediate space in front of these public access terminals should be level and unobstructed for not less than 1800 x 1800mm.

Accessible ATM machines in Ireland are crucial for upholding the financial autonomy and independence of people with disabilities. Without accessible machines, individuals face significant barriers to managing their finances privately and on an equal basis with others. The forthcoming **European Accessibility Act (EAA)**, effective from **June 28, 2025**, mandates that ATMs and associated consumer banking services must be accessible, a significant step forward from previous regulations that were largely inconsistent on accessibility.

Importance and Rationale

- **Financial Independence**: Accessible ATMs enable people with disabilities to access their cash, budget, and perform transactions autonomously without relying on third parties, which is essential for personal dignity and security.
- **Legal Compliance and Rights**: Accessibility is a right, not a "nice-to-have". The UN Convention on the Rights of Persons with Disabilities (UNCRPD) and the Irish Disability Act 2005 (for public bodies) already require accessible services where practicable. The EAA solidifies these requirements in the private banking sector, making accessibility a legal imperative.
- **Safety and Privacy**: Features like text-to-speech guidance via headphone jacks allow visually impaired users to conduct private transactions, preventing others from seeing their PIN or screen information, a significant security advantage.
- **Market Inclusion**: Inclusive design ensures that banks and service providers maximise their customer base, benefiting from the inclusion of more citizens in the workforce and society.

Current Challenges

- **Inconsistent Implementation**: Previously, the number of truly accessible ATMs in Ireland with full audio guidance was extremely low (at one point, only one in the whole country). While AIB and Permanent TSB began rollouts in late 2024, implementation has been inconsistent.
- **Lack of Meaningful Consultation**: Advocacy groups like the Irish Wheelchair Association have reported a lack of meaningful consultation in the design and rollout of accessibility features, with "testing" often not leading to the inclusion of necessary prompts or logical user interfaces.
- **Fault Reporting Issues**: When accessibility features break (e.g., a non-functional headphone jack), reporting systems can be slow, leaving the ATM inaccessible to disabled users for extended periods.

Recommendations

- **Enforce EAA Standards**: The Central Bank of Ireland, as the regulator, must robustly enforce the EAA requirements from the **June 28, 2025** deadline and impose sanctions for non-compliance.
- **Mandatory Audio Guidance**: All ATMs should be equipped with functional headphone jacks and comprehensive, user-tested text-to-speech guidance that is enabled by a simple and obvious action (e.g., pressing a specific number on the keypad).
- **Meaningful Consultation with Disabled People**: Financial institutions must "closely consult with and actively involve" Disabled People and Representative Organisations during the design, testing, and implementation phases of all accessibility features.
- **Improved Maintenance and Support**: Banks should establish a priority fault reporting and maintenance system for accessibility features, ensuring rapid repairs and clear communication with users reporting issues.
- **Provide 24-Hour Sheltered Access**: Banks should explore options for secure, 24-hour lobby access to ATMs, providing a sheltered and less stressful environment for visually impaired users who rely on audio cues to navigate transactions.

Accessible ATMs are a fundamental element of inclusive banking and a just society, ensuring every citizen can manage their money with confidence and independence.