National Disability Authority submission

on the

Central Bank's Access to Cash consultations

on

Local Deficiency Guidelines

and

Requirements for ATM Operators

(CP163 & CP164)

Údarás Náisiúnta Míchumais
National Disability Authority

March 2026

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Introduction

The National Disability Authority (NDA) is the independent statutory body with a duty to provide information and advice to the Government on policy and practice relevant to the lives of persons with disabilities, and to promote Universal Design (UD). We work through our Centre for Excellence in Universal Design (CEUD) to promote and advance Universal Design of the digital and built environments, services and systems so that they can be easily accessed and used by everyone, regardless of age, size, ability or disability. There are 7 UD principles and 29 guidelines. The principles include:

- equitable use
- flexibility of use
- simple and intuitive use
- perceptible information
- tolerance for error
- low physical effort
- size and space for approach and use.

UD provides a framework to ensure environments, products and services work for everyone, regardless of ability, age or circumstance. UD can be thought of as "three legs of a stool" – accessible, understandable and usable.

- **Accessible** means that a person can physically enter or access a space or service
- **Understandable** means they can find their way around and make sense of it, for example, through clear wayfinding or intuitive information
- **Usable** means they can comfortably and independently use what is provided, such as shop floors or service interfaces

All three "legs" must be in place for genuine inclusion to work. This analogy encapsulates the NDA's approach: UD is not an add-on, but essential to creating services, systems and environments that work for all.

We welcome the opportunity to respond to the Central Bank of Ireland's consultations on:

- CP163 – Local Deficiency Guidelines
- CP164 – Requirements for ATM Operators

Framing Statement for Access to Cash

We encourage the Central Bank to continue to enhance its framework by recognising functional accessibility and inclusion in addition to geographic availability.

Digital exclusion from essential Financial Services for people with disabilities, older persons and other marginalised groups, can occur due to complex authentication requirements, inaccessible information, and online automated customer support systems.

In recent years, it has become commonplace for banking institutions to move their services online. Whilst such advances may be useful to the public in accessing their accounts out of hours, it has proved to be an additional obstacle for some. Moreover, for some disabled people, it is a barrier to access as they may need to navigate increasingly complex authentication and security measures with short time limits. For some people with disabilities, it can be the case that they are not familiar with accessing services using technology and they may not have access to a computer, tablet, phone, or internet, which further excludes them from the banking world. People with reduced dexterity and mobility may also experience challenges in effectively using such technology or authentication measures.

Access to cash should be understood as a lived service experience in addition to the provision of infrastructure. Proximity to an ATM or cash service point does not automatically ensure that access is equitable, usable, reliable or predictable. A system can be technically compliant and yet still create exclusions if real-world conditions are not considered.

Reporting from the UK[1] suggests that many people with disabilities prefer, or in many cases rely on, cash for daily transactions to maintain independence, manage budgets, and overcome barriers associated with digital banking. While not the same for every individual, cash is considered a crucial, accessible, and inclusive payment method.

Key reasons for the preference for cash among disabled people include:

- **Financial Autonomy and Independence**: Using cash allows individuals to manage their own money without relying on caregivers or family members, reducing the risk of financial abuse.
- **Budgeting and Budget Tracking:** Physical money provides a tangible sense of control and makes it easier to track spending, which is particularly helpful for people with certain cognitive, neurodevelopmental, or intellectual disabilities.

[1] https://www.bbc.com/news/articles/cp3yz40r2zyo

- **Overcoming Digital Barriers:** Many, including those with vision impairments, motor skill issues, or learning disabilities, find PIN pads, touchscreen apps, and complex banking systems inaccessible or confusing.
- **Reliability:** Cash is not subject to technology failures, such as frozen cards, forgotten PINs, or declining systems, which can severely limit access to funds for periods of time.

CP163 – Local Deficiency Guidelines

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?

The notification process can benefit from following a UD approach to customer communications. In partnership with the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation the NDA published an updated version of its Customer Communications Toolkit for Services to the Public — A Universal Design Approach. The Toolkit explains the importance of simple, clear language for effective communications. It contains guidance on written, spoken and signed communications, plus specific guidance on designing forms, documents and signage. It also highlights the importance of offering communications in more than one format. In addition, it provides guidance on developing and maintaining high-quality online services, which are user-centred, regularly updated and easy to navigate.

As a public body the Central Bank is covered by the EU Web Accessibility Directive (WAD). Under the WAD, public bodies in Ireland must ensure their websites and mobile apps are accessible to all people, including persons with disabilities. The Central Bank was subject to a Simplified Review in 2021 (p. 87) and 2023 (p. 116) receiving scores of 7.8% and 0.75% respectively. The NDA encourages the Central Bank to focus on significantly improving these scores if it wants to develop an accessible process for disabled people to participate in on the same basis as other potential notifiers.

The NDA welcomes the publication of the revised Consumer Protection Code by the Central Bank of Ireland, which will take effect on 24 March 2026. To support the revised Consumer Protection Code, the Central Bank also published new Guidance on Protecting Consumers in Vulnerable Circumstances. We welcome the development of this Guidance and the specific references within this document to the Assisted Decision-Making (Capacity) Act 2015 (ADMA) and the European Accessibility Act.

In its recent report on a Regulatory Framework for Adult Safeguarding the Law Reform Commission made several recommendations that are designed to strengthen protections for vulnerable customers set out in the above-mentioned Code and the Guidance. They recommended that the Central Bank's Central Bank Reform Act 2010 (Section 17A) (Standards for Business) Regulations 2025 and the proposed Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Conduct of Business) Regulations, which were enacted as the Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Consumer

Protection) Regulations 2025, should be consistent with the ADMA. They also recommended that existing codes of practice are consistent with the Code of Practice for Financial Service Providers published under the ADMA.

The Guidance on Protecting Consumers in Vulnerable Circumstances document introduces several reforms designed to support customers in vulnerable circumstances, including a new measure permitting consumers to nominate a trusted contact person (TCP), whom the financial service provider can contact to discuss concerns about possible financial abuse, or where the financial service provider experiences difficulties communicating with the consumer. The TCP has no power to give instructions on the consumer's behalf, but the financial service provider can share information with them and act on information provided by them.

This approach is also consistent with Ireland's commitments under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), particularly on Accessibility and Access to Information (Articles 9 and 21, respectively). Embedding UD principles in access to cash systems supports the UNCRPD's goal of ensuring persons with disabilities can access services on an equal basis with others.

It is worth noting that 12% of the casework of the National Advocacy Service for People with Disabilities related to financial issues in 2023[2] and 6.7% of their casework in 2024[3].

Recommendations:
In order for the notification system to align with universal design principles and existing public sector accessibility obligations, the below measures should be incorporated into the guidance document:

- Accessible form that is compliant with the Web Content Accessibility Guidelines
- Plain language guidance and examples
- Multiple submission channels (e.g. digital, telephone, assisted)
- Availability of alternative formats
- Ability to notify on behalf of others, with appropriate safeguards
- Consideration that the notification process itself should not be a barrier to reporting deficiencies, placing undue stress on the user

[2] https://advocacy.ie/app/uploads/2024/12/24.12.09_NAS_Report-3.pdf
[3] https://advocacy.ie/app/uploads/2025/12/NAS-Report-2024.pdf

Question 2: Do you agree with the proposed manner of assessing local deficiency notifications to the Central Bank? If not, please explain why

We welcome the proposed notification mechanism. If the process involves completing an online form or structured submission process, it is important that this mechanism is inclusive and accessible by design. The same recommended measures should be incorporated into the guidance.

Recommendations:

- Accessible form that is compliant with the Web Content Accessibility Guidelines
- Plain language guidance and examples
- Multiple submission channels (e.g. digital, telephone, assisted)
- Availability of alternative formats
- Ability to notify on behalf of others, with appropriate safeguards
- Consideration that the notification process itself should not be a barrier to reporting deficiencies, placing undue stress on the user

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

Considering headcount alone may underrepresent the impacts. Smaller communities with higher proportions of older people, persons with disabilities or cash-reliant users may experience disproportionate effects. Headline disability statistics show the importance of considering demographic factors when assessing access essential services. In Ireland, approximately 22% of the population reports a disability, and disability prevalence increases significantly with age. Older age groups are more likely to experience accessibility barriers when accessing services such as banking and cash withdrawal. The reality of such demographic facts reinforce the need to include disability prevalence and ageing population data when assessing potential local deficiencies. Please see the NDA Factsheets for more information.

We welcome the inclusion of deprivation indices and recommend clear reference to established national data such as the Pobal HP Deprivation Index to support consistent and evidence-based assessment.

Recommendation:

Consider applying a demographic or vulnerability lens/overlay as well as population metrics, including reference to disability prevalence (census data), ageing population data, transport dependency and deprivation indicators such as the Pobal HP Deprivation Index

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

Determinations should distinguish between infrastructure presence and lived service experience. We again recommend referencing the Pobal HP Deprivation Index for evidence-based assessments.

Recommendation:

Access to cash should be assessed holistically, incorporating usability and functional accessibility, reliability and/or frequency of ATM downtime, predictability and hours of availability, travel burdens (including transport availability, terrain conditions, safety and cost).

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?

Economic efficiency should be balanced with broader social and exclusion costs. Referencing demographic vulnerability indicators, including Pobal HP Deprivation data could assist in understanding the wider community impact of remediation decisions.

Overall Considerations to Local Deficiency Guidelines

a) Baseline Conditions

Assessing prior ATM/CSP numbers is useful however previous presence of these machines does not necessarily account for performance or satisfaction.

Recommendation:
Consider distinguishing between prior supply numbers and prior sufficiency or satisfaction (qualitative assessment in addition to quantitative).

b) Hours of Availability

Limited or inconsistent availability disproportionately affects people relying on assisted travel, carers or shift workers for instance.

Recommendation:
Consider including consistency of service and predictability of service metrics.

c) Travel and Geographic Factors

While distance by road network is an important factor, travel burdens are not captured. This includes things such as transport availability, accessibility, terrain conditions, safety, weather conditions or cost of transport.

Recommendation:

We would recommend considering concepts of overall “travel friction” or “travel effort” when assessing access. Travel friction could refer to the compounding barriers that increase the effort required to access a service, such as transport availability, accessibility, cost of transport, physical terrain, safety considerations and the need for assisted travel – any barriers associated with accessing a service that are not just captured by distance.

d) Demographic Factors

We welcome the inclusion of deprivation indices.

Recommendation:

We would recommend referencing factors such as disability prevalence, ageing population and transport dependencies. The NDA has produced factsheets on different aspects of the lives of persons with disabilities in Ireland, which may offer further information. As well, referencing demographic vulnerability indicators such as the Pobal HP Deprivation data may help to assess wider impacts.

e) Cost of Remediation

Recommendation:

Consider balancing economic costs and efficiency with (often hidden) costs such as social costs, exclusion risks and community impacts.

f) Other

Recommendation:

We recommend acknowledging indicators such as reliability or downtime patterns, functional usability and the resilience of services.

CP164 – Requirements for ATM Operators

Question 1: Do you have any views on the proposed classification of four types of ATM provider? Are there any additional types of ATMs which may not fall within the scope of the proposed classes?

We recommend that consistency and predictability of service form part of the assessment. Limited or inconsistent availability disproportionately affects people reliant on assisted travel, carers, shift workers or individuals with restricted travel flexibility, for instance.

Availability should be understood as both physical availability and practical usability within real-world conditions.

Question 2: Do you agree with our proposals around the hours of ATM availability for the withdrawal of cash? If not, please explain why

Yes. They are practical based on the location and type of ATM.

Question 3: Do you agree with our proposals on the single transaction withdrawal amount? If not, please explain why.

The NDA is happy with the single transaction withdrawal amounts and with the fact that for security reasons the limit is higher within a branch as compared to an external ATM. Disabled people can be more vulnerable when it comes to security and cash handling.

Question 4: Do you agree with our proposals on cash denomination stocking? If not, please explain why.

It is important that denominations lower than €50 are always available. NDA analysis has shown that only 49.3% of disabled people of working age are employed, compared to 70.8% of non-disabled people.

Not only are people with a disability less likely to be in the labour force, but once in the labour force, they are also more likely to be unemployed than people who do not have a disability.

There were 52,509 unemployed people with a disability (including those looking for their first regular job) according to Census 2022. Therefore, the unemployment rate for people with a disability is 13.9% compared to 7.5% for people who do not have a disability. The unemployment rate of people with a disability to some extent is 11.7%, around half that of people with a disability to a great extent[4].

It follows that disabled people are generally less well-off and may have lower amounts in their bank accounts. A recent paper from PublicPolicy.ie highlights the importance of access to cash in allowing disabled people to manage the cost of their disability. The costs of disability can be met through cash payments (as in the UK Personal Independence Payment), through services; and/or through providing cash for services (such as the HSE personalised budget pilot). In addition, given the nature of the services required by some disabled people to assist them in their daily lives, cashless payments are, in some cases, not an option.

Question 5: Do you agree with our proposals for the maximum periods that an ATM may be unavailable? If not, please explain why.

We recommend recognising reliability and downtime patterns as accessibility indicators. Extended outages in areas with limited alternatives may cause exclusions for users. Monitoring resilience and recovery times would support a more inclusive approach, as access is dependent on geographic availability but also successful interactions with an ATM

Question 6: Do you agree with our proposals on the information that must be included on ATM receipts? If not, please explain why.

We are happy with the information to be included on the receipts, where possible, the information on receipts should be accessible. In line with the NDA Customer Communications Toolkit for Services to the Public, consideration should be given to legibility, font size, contrast and clarity of information. With the constraints of receipt formats, possibly the text size could be increased where possible to support users who may find standard receipts difficult to read.

Question 7: Do you agree with the proposals on signage requirements for ATMs? If not, please explain why.

We welcome the advance notification of service changes and would recommend that signage and notifications use plain language, are delivered through accessible and multi-channel communications and include alternative formats when possible, including Braille, tactile formats and accessible digital information.

[4] Discussion-paper-on-national-employment-targets.docx

Question 8: Do you agree with the information that ATM operators must publish in respect of the services provided relating to ATMs? If not, please explain why.

Published information should be accessible and comprehensible. We would recommend plain language descriptions of services, transparent information on availability and outages, clear details on accessibility features (e.g. audio, tactile support, height / reach specifications) and accessible digital formats that are in compliance with WCAG.

Overall Considerations to Requirements for ATM Operators

a) Accessibility and Usability

We note the importance of aligning ATM design and service provision with accessibility statutory requirements of the European Accessibility Act (EAA) in force in Ireland since June 2025 and applicable harmonised standards including EN301549 (Accessibility Requirements for ICT products and services) as published via the National Standards Authority (NSAI).

Access is dependent on availability as well as successful interactions.

Recommendation:
Consider the clarity of ATM interfaces, screen readability/glare, physical reach and height, audio/tactile supports and error recovery guidance. Accessibility of digital interfaces and ICT-related elements should align with relevant harmonised standards, including EN301549.

b) Signage and Notifications

Recommendation:
We welcome the advance notification of service changes and recommend that notifications are delivered through accessible, multi-channel communication, including plain language and alternative formats where possible.

Conclusion

We encourage distinguishing between infrastructure and overall lived experiences of the service. A UD approach that incorporates proximity, usability, reliability and travel burdens will better support older people, persons with disabilities, rural communities, small businesses and cash-reliant groups.

We appreciate the Bank's engagement with stakeholders and are available for further discussions at any stage. Thank you for your consideration of these matters.