Submission by Voice of Vision Impairment (VVI)
to the Central Bank of Ireland (CBI)
on accessible automated teller machines (ATMs)

1. Who We Are

Voice of Vision Impairment (VVI) is run, led, directed and mostly membered by blind or partially sighted people, and we are founded to be the primary consultees in disability-proofing from a visually-impaired perspective. In other words, we are making this submission as a Disabled Persons' Representative Organisation (DPRO), as part of our rights to be "closely consulted and actively involved" in all disability-proofing of policies and legislation etc., as per Article 4 (3) of the UNCRDP. Under the UNCRDP, DPROs are the only representative voice of disabled people, and, as such, our opinions and perspectives should be prioritised in all disability-proofing (UNCRDP, General Comment No. 7, paras. 13-4, 23, 49, etc).

2. Background.

in October 2024, following the dissolution of the Dáil, The implementation of the Finance (Provision of Access to Cash Infrastructure) Act was delayed, and was, instead, in the program for Government 2025 to 2030. We only found out recently that the Act was signed into law on May 30th, 2025, and that the Central Bank are seeking feedback from interested stakeholders on the proposed regulations that will apply to ATM operators. The deadline for feedback is tomorrow, March 4th.

In April 2023, Ulster Bank, the only bank in Ireland with accessible ATMs with voice guidance, left Ireland's market. This left us with no accessible ATMs.

Since then however, there have been improvements. PTSB updated their ATM's with voice guidance software in March/April 2024. AIB followed in November 2024 and updated all their ATM's with voice guidance. Bank of Ireland are replacing all their 800 ATMs with new models that have voice guidance. To date over 140 have been replaced. VVI has been working closely with AIB and Bank of Ireland in disability-proofing their newly-accessible ATMs.

The European Accessibility Act has been active from June 28th, 2025, and in relation to ATM's, it requires all new ATMs sold and supplied after that date to be accessible. However, it gives until 2040 for existing ATM's to be replaced. In that context, it was good to see AIB and PTSB updating the software on their existing ATMs.

There seems to be some other stipulations in relation to machines in use needing to be replaced under the European Accessibility act after a life of 20 years but we cannot find the details on this.

Here is some latest information relating to accessible ATM's in Ireland.

Blind customer lodging cash to new NCR Atelos ATM with voice guidance at AIB, Ranelagh on 03.12.2025
Link: https://youtu.be/fMKwYZbNqE8

Blind customer using AIB ATM on Castle Street, Tralee, Co. Kerry with voice guidance (30.10.2024).
Link: https://youtu.be/41iBp836SEI

PTSB ATM on O'Connell Street, Dublin with voice guidance 13.03.2024
Link: https://youtu.be/r7RqYFyqcUs

Bank of Ireland Diebold Nixdorf ATM with voice guidance.
Link: https://youtube.com/shorts/GwgNCBwlmNE

Some additional information:

'The Finance (Provision of Access to Cash Infrastructure) Act 2025 was signed into law by the President on 20 May 2025 and commenced on 30 June. Two statutory instruments made pursuant to Section 5 and Section 10 of the Act subsequently came into effect on 28 November. The Section 5 Order prescribed the access to cash criteria, while the Section 10 Order set thresholds for the designation of entities responsible for maintaining the criteria.

The Act requires ATM operators and CIT providers to be registered and supervised by the Central Bank of Ireland (CBI). Section 31 of the Act requires the CBI to introduce regulations prescribing notification and appropriate service standard requirements for ATM operators. The regulations, expected to be published in 2026, will set service standards in relation to the hours of ATM availability, withdrawal limits, denomination stocking, maximum ATM unavailability periods, and signage and information requirements. In addition to this, all new ATMs must fully comply with the accessibility requirements set out in Directive (EU) 2019/882, the European Accessibility Act.

On 5th December, the CBI published a Consultation Paper seeking feedback from interested stakeholders on the proposed regulations that will apply to ATM operators. The Consultation Paper sets out detailed proposals for the service standard and notification requirements of ATM operators. Stakeholders and members of the public have the opportunity to email their feedback on the proposals to accesstocash@centralbank.ie. The public consultation will remain open until 4 March 2026.

Our submission is within that context.

3. Outstanding Issues.

Currently, in relation to Euronet and Brinks ATMs, it's "access to cash" for people who are not blind, but no access to cash for independent blind people. The provision of cash needs to be on an equal basis for all.

We find that where accessible ATMs are provided, that there can be an imbalance in terms of indoor vs. outdoor. Clearly, this cuts visually impaired customers from accessing their money in out-of-hours circumstances.

There are sometimes designs of the curtilage around an ATM or to the ATM itself which make them hazardous to visually impaired people, for example, we have examples of Perspex privacy screens can be waist-to-head-height, making them undetectable to assistance dogs or long-cane-users, and making injury likely.

We find that there is insufficient accessible signage to let us know which ATMs are accessible.

We find that the process of making a complaint about a malfunctioning ATM (e.g., in terms of headphone jack not working) can be inaccessible or unusable.

Some features are still not supported by voice-feedback. For example, Voice guidance for receipts, and for cheque lodgements.

4. Our Asks as Prerequisites to Full Accessibility of ATMs.

With the Central Bank of Ireland (CBI) being an arm of the European Central Bank in Ireland, we ask that in ICB's "Access to Cash" criteria that there be enhanced regulations that will apply to ATM operators – i.e., sufficient remedy to make our right of access to cash a reality if it is not being fulfilled.

For example, While the ICB is the national enforcement body for the European Accessibility Act in relation to finance (ATM etc) in Ireland, we would like to see it go beyond the European Accessibility Act, if necessary, by, for instance, stipulating that the likes of Brinks and Euronet must have voice guidance on their current ATMs. and not having us potentially wait until 2040 when ATM's become end of life?

We also ask that the particular role of DPROs, as set out in the introduction, above, be acknowledged and respected by the Central Bank in this and all other fields relating to accessible finance for disabled individuals.

Notwithstanding the ICB's obligations under the UNCRDP, it would be useful for there to be a long-term iterative process by ICB with consistent organisations with a representative mandate, leading to continuity in standards, for example, in accessible design of ATMs, accessible help or complaints mechanisms etc.