



Submission on the Draft Legislation of the Access to Cash Bill 2024

21st February 2024

Contact
Seamus Boland or Louise Lennon

Irish Rural Link is core funded by the scheme to Support National Organisations (SSNO) funded by the Department of Rural and Community Development through Pobal



Rialtas na hÉireann
Government of Ireland

Overview

- I. 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. We welcome the opportunity to make a submission to Joint Committee on Finance, Public Expenditure and Reform and the Taoiseach on the draft legislation of the General Scheme of the Access to Cash Bill 2024. This submission focuses on the Heads contained within Bill that are most relevant to the people and communities we represent.
- II. Overall, Irish Rural Link welcome the new Access to Cash Bill. We have campaigned for many years the importance of retaining cash in circulation and accepting it as legal tender for purchases of goods and services. We are aware that more people, especially younger generations rarely, if ever use cash to pay for goods or services. However, there are certain cohorts of people, mainly older people, low income households and people with low digital and literacy skills, that still depend on cash to make purchases and we welcome that this has been acknowledged in the Access to Cash Bill 2024.
- III. The closure of bank branches and post offices in rural areas over the past number of years has impacted on rural communities and micro and small businesses. Having access to an ATM machine in their community has become even more important so they can still access cash close to where they live.
- IV. IRL are aware of the difficulties some people are experiencing in shops, restaurants, coffee shops who display 'Card Only Payments' statements at the till or in their windows. However, organisers of sporting and other social and cultural events have been guilty of enforcing policies that require people to purchase tickets online to gain entry to these events. Such a policy had to be reverted by the organisers of the Ploughing Championship in 2023 as it excluded the attendance of a large number of farmers, who the event is targeted at.
- V. The GAA's policy of entry only with online ticket, even for local club games has had a very negative impact on a lot of older people living in rural areas. We are aware through our membership, that many people who once looked forward to attending a game and supporting their local club at the weekend are no longer going or cannot decide on the day of the match to attend as they are unable to purchase a ticket online, due to not having the skills or having access to a device or internet. We know this is also being introduced in cinemas and also on some national rail and bus services where tickets have to be booked online.

- VI. There is a risk that this will now increase loneliness among older people and other vulnerable groups. While the majority of people aged 66 and people with disabilities are entitled to the free travel pass, this again is not always free. Tickets need to be booked online for most national rail and bus services. Some fare types and train services there is now a charge of €2.50 being imposed. For people who do not have the digital skills to book a ticket or who decide to go somewhere at the last minute, there is no guarantee they can get access to travel.
- VII. People have not reached the level of digital skills required to fully implement a cashless society. IRL delivered training to non-liners but this funding ceased or was redeployed to other agencies to deliver this training and support older people to get online. We delivered training on banking online, security and been aware of scams and fraudulent activity. However, as technology advances, people will need to continuously upskill to be able to bank online or use different ways to pay for goods or services. The Bill and reviews of the Bill must be conscious of the level of digital skills among different cohorts of people.

Views and Recommendations of Heads of Bill

The following are the views of IRL on the Heads of the new Access to Cash Bill relevant to the people and communities we represent and recommendations on its implementation.

Head 2: Purposes of this Bill

- VIII. IRL welcome this Bill and its purpose to ensure the continuation of **reasonable access to cash**. As mentioned, while cash is being used less as a type of payment in our society and its use may continue to decline, it is still recognised as legal tender and therefore, must be still accepted as payment.
- IX. There are still cohorts of people, many vulnerable groups in society that still prefer to use cash. The lack of digital skills among many older people makes it difficult for them to purchase goods and services online. They are more vulnerable to fraud and are cautious of using cards so prefer to use cash. For low income households it allows them to budget better. They often feel more comfortable using cash to pay bills and other items as it gives them more control over how much they spend and what they spend their income on.
- X. We also welcome the **development of a framework** to manage future changes in the **access to cash infrastructure in a fair, equitable and transparent manner**. IRL recommend that this framework should include the acceptance of cash as legal tender beyond shops, supermarkets and pharmacies.
- XI. The introduction of ticket only sales for sporting events, agricultural events and other social activities has caused a lot of concern in rural areas. The Ploughing Championship

2023 had to revise their policy of purchase of tickets online in advance as it excluding many farmers who attend the event each year. Been allowed to pay the entry fee by cash on the day you attend needs to be enforced. The change by the GAA to require advance online ticket sales for not only county games but also at club level has excluded many people who do not have access to purchase tickets online from attending matches. IRL are aware of people, mainly older people who enjoyed attending a local game at the weekend, can no longer attend. Similarly, many cinema theatres and other social and cultural events require online purchase of tickets. This is leading to an increase risk of loneliness and social exclusion among households who do not have or cannot access the internet. IRL will follow up with the various organisations on this matter, but acceptance of cash as entry to; sporting, entertainment, social and cultural events, must be included in the new Bill to ensure fairness and inclusion.

- XII. We also welcome that ATM deployers and Cash in Transit (CIT) companies will be regulated by the Central Bank of Ireland (the Bank).

Head 6: Reasonable Access to Cash

- XIII. Under the Access to Cash, IRL would like to see more details on the percentage be of the population within no more than 10km of an ATM and a cash service point and what this percentage would be. We would also like more clarity on the minimum of ATMs per 100,000 people.
- XIV. IRL together with Social Justice Ireland conducted a survey of its members and found that 37% of respondents were between 10km and 20km of a bank while 17% were more than 20km from a bank. It highlights the importance of having an ATM and access to cash within distances below the 10km. IRL would have some concern about an ATM or cash service being within no more than 10km, if a person does not have access to transport to these services. From our members' survey, a good percentage of people lived within 5km of a post office. While these can offer cash services and possibly ATMs, it did not suit everyone if they needed access to cash outside of their opening hours, which is usually 9am to 5pm and in smaller towns and villages close for lunch.

Head 7: Local Deficiencies

- XV. We welcome that the new Access to Cash Bill 2024 that gaps and deficiencies in access to cash is identified at the NUTS3 regional level. The relevant factors to be considered by the Bank are appropriate. IRL would recommend that age of population be also included. In some regions, especially the Border and West regions, population may decline but the age profile of the population increase. This should be included also in

the impact on financial inclusion and the level of digital skills older and other vulnerable groups have.

As mentioned under Head 6, the hours available to access cash is important and must be available outside the normal working hours of cash institutions.

Head 8 - Monitoring

- XVI. IRL welcome there will be periodic reports produced in relation to cash provision and that the number of ATM's and cash services available will be monitored at least every 3 months. Reports must be easily accessible and if there are changes to be made, necessary stakeholders must be contacted early to determine what the impact of these changes will be and who will be impacted.
- XVII. IRL recommends the establishment of a Monitoring/Review Group. We know that the use of cash will become less and less but there will be a cohort of groups who will still depend on cash for a number of years to come. Ensuring that the necessary stakeholders, including relevant civil society organisations (CSOs) are engaged with will be important and we suggest that CSO's and Community and Voluntary sector are part of any Monitoring/Review group that is established to ensure the cash needs of vulnerable groups continue to be met. Irish Rural Link are one such group who would be happy to be involved in this.
- XVIII. There must be a mechanism in place where vulnerable groups can raise concerns if there is an ATM or cash service in their area is under threat of closure. Again, Civil Society Organisations can be the conduit between these people and the Bank on this.

Head 9: Designated Entities

- XIX. Under this Head, IRL would like reassurance that a reasonable access to cash will be available through credit institutions in rural towns and villages, where such institutions are still open. Where a designated entity no longer meet the criteria set, the community in which that entity is located must be engaged with so ensure alternatives are put in place and the area will still have a facility or infrastructure to access cash available to them.

The Bank should engage with relevant stakeholders on this, including local community groups. This is another factor that should be part of the role of a monitoring or review group.

Head 10: Prohibition of Charging of Access Fees

- XX. In rural towns and villages where there is no longer a bank branch available and where an ATM operated by a private operator is in place, there is often a fee charged to access cash from the ATM. This can deter people using the machine but leaves

vulnerable groups and low income households further out of pocket by this charge. IRL welcome that the new Bill will remove this charge for all EU account holders.

Head 11: Scope of Bank's Supervision

- XXI. We welcome that under the new Bill ATM deployers and CIT companies will now need to register with the Bank and will need to comply with regulation. We would call for better regulation on the hours of availability of ATMs and also the availability of lower denominations than is often currently available.

Head 12 – Obligation on Cash-In-Transit companies and ATM deployers to register with the Bank.

- XXII. This head is welcome. However, administrative and compliance costs and paperwork involved must be kept to a minimum so companies are not deterred from establishing an ATM service.

Head 13 – Transitional provision for existing CITs and ATM deployers

- XXIII. While we welcome that all CITs and ATM deployers will need to register with the Bank, we recommend that the registration process and any documents require be not too onerous that it may deter ATM operators and CIT's from continuing to provide the service, thus reducing the number in operating.

Head 26 – Prescribed Requirements for ATM Operators

- XXIV. We welcome that ATM operators will be required to notify the Bank if they plan to withdraw the service in an area within 2 months of doing so. And also to notify them immediately if third party premises on which an ATM is located will close with or otherwise rendered inoperable with little or no notice.
- XXV. IRL would recommend that the Bank, once notified of changes by the operator, relevant stakeholders are notified of the closure so that the public in the area where the ATM is located are aware in advance. Working with local communities to see if an alternative operator could take over the ATM or if it could be relocated to another premises. Civil Society Organisations working with vulnerable groups who are reliant on cash must be engaged with to help develop plans to accommodate those most affected by the closure of an ATM.
- XXVI. IRL also welcome ATMs be stocked with different denominations. Low income households may not have large amounts of money available in their bank account and unable to withdraw higher denominations of cash.

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.'