



**DRAFT**

**Submission to the Central Bank of Ireland**

**By**

**County Wicklow Public Participation Network**

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## **Introducing County Wicklow Public Participation Network**

County Wicklow Public Participation Network (PPN) was established in July 2014 under the directive of the Department of the Environment, Community & Local Government and in accordance with legislation in the Local Government Reform Act 2014 (Section 46).

Public Participation Networks were established to be an independent structure that would become the main link through which local authorities connect with the community, voluntary and environmental sectors in a process to facilitate communities to articulate a diverse range of views and interests within the local government system.

Co Wicklow PPN has 520 diverse member groups, some of these groups are networks in their own right. PPN representatives serve as a voice for the community on structures including: the Local Community Development Committee; Wicklow County Council Strategic Policy Committees, Co Wicklow Children & Young People's Services Committee; Co Wicklow Volunteer Centre, County Wicklow Partnership, and Co Wicklow Joint Policing Committee/Community Safety Partnership. PPN Representatives strive to ensure that the needs of the community sector are prioritised within local policy processes.

## **Submission Background and Context**

Following several complaints by member groups in relation to accessing financial services, the Wicklow PPN agreed to dedicate time at their mid-year member's meeting to further explore the challenges community groups encounter in relation to using financial services and identify what actions might help. Member groups that couldn't attend on the day were given the opportunity to submit their experience through email and these have been included in the outputs from the meeting and this report. The full extent of what people said can be found in Appendix 1 of this document.

Wicklow PPN presented this submission to Colm Kincaid, Deputy Governor of the Central Bank of Ireland during his visit to Wicklow in July 2026. **It is hoped that the Central Bank will consider the information in this document and use their influence to effect the changes needed in the financial sector to support community work in Wicklow and beyond.**

## **Acknowledgements**

The Wicklow PPN Secretariat and Staff Team are grateful to all the member groups that took the time to share their experiences and contribute to these important discussions. Gratitude is also extended to Susanne Rogers, Social Justice Ireland and Jamie Moore, Central Bank of Ireland for taking the time to speak to PPN members at the Summer Plenary and listen to their concerns.

## Summary

The recurring message from the meeting was that community groups believe that the banking system is primarily designed for businesses and does not take into consideration the uniqueness of community work, the society it serves and that it is driven by busy volunteers with many other time commitments.

PPN members feel that decisions and financial procedures are made by banking hierarchy with no understanding, trust or care for the voluntary effort that is at the heart of every local community, particularly in relation to the many smaller community groups that are not registered as CLGs. Procedures are found to be difficult, time consuming, expensive, and not inclusive of members of society facing additional challenges such as people with disabilities, older people, those with literacy difficulties etc.

The experiences of PPN Member groups can be grouped into the following main headings:

### Lack of Acknowledgement for Community Work

Conversations with PPN members indicate that there appears to be a lack of trust, participation and inclusion for the unique needs of community groups in banking procedures with one person stating that **“Banks don’t allow for local decisions with local knowledge”**.

Community groups need to have bank accounts to receive funding for their work. Experiences highlighted the frustration felt by groups in relation to the time it takes to set up and open an account, banking organisations excluding them from opening an account completely, delays and barriers to making transactions, being excluded from using online and debit card services, and extortionate costs.

Groups believed that banking challenges can significantly impact and sometimes deter community work. **Groups are asking that Banks consider developing a banking system explicitly for community groups with clear, simple, affordable and accessible processes and procedures.**

### Social Inclusion & Accessibility

Highlighting the importance of accessibility, Wicklow Visually Impaired Group (a member group of Wicklow PPN) put it perfectly when they said, **“Accessibility in banking is not just about compliance; it’s about creating an inclusive environment and a rights – based approach where everyone feels valued and understood.”**

Interaction with PPN members highlighted challenges and concerns including, bank closures and lack of access to ATMs and financial services, barriers to digitalisation (including physical challenges such as poor equipment and internet access as well as the lack of education in using digitalised processes), processes and procedures being designed without due

consideration of those with extra needs such as people with disabilities, older people, those with literacy difficulties etc.

### **Excessive and Unaffordable Costs**

Community groups have limited funding which usually comes from informal fundraising (raffles, bucket collections etc) or through funding applications. Some funding organisations have strict guidelines on how funding is spent often insisting that funding should be used for projects and activities and not administrative costs.

Groups reported struggling with high interest rates, accessing and paying for Bridging finance, account fees, audit fees, and mortgage fees. It was stated that Cheque Books are useful and easy for groups to use but these come with high charges. Furthermore, the cost of depositing/changing coinage was thought to be extreme considering it is one of the most used types of fundraising for small groups. **Groups are asking Banks to consider reducing if not abolishing fees and charges for voluntary groups as well as to invest some of their own profits into the local community.**

### **Complicated Procedures (including customer/community care)**

PPN Members highlighted a number of difficulties in accessing the services they needed including the long delay in opening accounts (which can affect a group receiving funding for their work), the level of detail needed in opening accounts, the unwieldy process in changing the names of trustees on the account (voluntary work by its nature can result in a high turnover of volunteers), problems in using cash, branch and staffing changes, barriers to making transactions and accessing services such as overdrafts, and clarity around procedures. Groups also highlighted that individual banking staff members can have different approaches which can be confusing and difficult to deal with. **Groups are asking the Banks to consider simplifying all processes and procedures for community groups (using plain English) as well as training staff members dedicated to support community groups.**

### **Governance & Risk Management**

Community volunteers are extremely concerned about the responsibility of being trustees, fearing any possible libellous action against them as individuals (particularly the smaller groups) in the event of a mistake. They are unsure how to protect themselves.

It was reported that accessing insurance can be difficult with few insurance companies being willing to cover community groups and the lack of competition making insurance expensive. It was stated that some insurance companies impose a restriction log on activities for some groups. Groups also highlighted a lack of understanding around insurance products and what they cover.

Cybersecurity was identified as an additional concern for groups, and it was suggested that training for groups around banking, insurance and cyber safety would be useful. **Groups are**

asking the Central Bank to use their influence to advocate on their behalf with insurance companies and consider providing supports to help groups navigate banking procedures, insurance coverage and cybersecurity information,

## **Appendix - Challenges in Accessing Financial Services – What People Said**

### **Wicklow PPN Plenary (13<sup>th</sup> June 2026) Discussions**

- High interest rates. Bridging finance for grants. Pay up front before you get grants
- Banks don't allow for local decisions with local knowledge
- Frustrating dealing with Banks. If it was easier you would see more voluntary organisations.
- Develop a package for community groups that doesn't cost money – Banks & policy makers
- Framework and template
- Online banking for volunteers
- Audited accounts cost money – reduce these costs
- Reduce fees for community groups
- Develop community bank accounts
- Long delays
- Change of names
- Levels of details needed – not clear
- Fees on the accounts
- If over €100,000 (Deposit Guarantee) told to open new account
- Business account for volunteer group
- Staff changes – different approaches
- Can bank have community account type
- Bank assign a community bank official staff training
- Not possible to get lower mortgage rates as a charity. Lack of option for Capital Purchases
- 6 weeks to get pre prepared lodgement forms (it was free)
- Online purchases for accounts with 2 signatories
- Paying of grants requires bank accounts
- Cheque books still handy but high charges – no fees on cheques
- Age profile of groups. Banks are dealing with older people's challenges
- Cash – new law some places must take cash
- Responsibilities of trustees – for example being sued, financial responsibilities/liabilities
- Insurance – does a general policy cover financial responsibility for directors
- Few insurance companies will cover community groups – lack of competition thus expensive
- Insurance companies impose a log of restriction on activities for community groups
- Training for volunteers in banking & insurance
- Simplify opening accounts
- Banks should guarantee cash in the future
- Banks should be required to invest their big profits in the local communities

- Cybersecurity issues (including accessibility issues)
- Banking services should not be optional eg no service in Tinahely
- ID can be a problem
- Delays in approval – it took 2 months or longer before the account was operational
- Unexpected restrictions eg community group opened new account in Greystones but must now go to the Bray branch to conduct their financial transactions
- Banking fees for community groups are excessive
- Bridging loans expensive for community groups. Need to take these out for LEADER funding
- Banks are slow
- Credit Union Account opening, looking for registration number
- Need simpler method for changing names on accounts
- EFTS to a deposit account
- Revolut – no community group name for set up
- Banks don't meet the needs of community group/charity
- Barriers to withdrawing money
- Penalised for coin deposits (Fundraising often through collecting coins)
- Problems getting an overdraft
- Obligation to accept cash
- Barriers to digitalisation (iPhone app)
- Too much responsibility for 1 person
- Not having debit card access
- Opening a 2<sup>nd</sup> account if over the threshold to travel to another bank
- Lack of trust/participation/inclusion from Banks
- Need free online access
- Need dedicated staff member trained to set up accounts
- Need to use plain English
- Need all financial institutions to reduce costs
- Need simpler transactions
- Kiosk waiting times
- Provide a better service for local communities
- Sum Up Account Features

### **Email Submission from Wicklow Visually Impaired Group (10<sup>th</sup> June 2026)**

#### **1. Critical Importance of Accessible Communications**

Ease of accessibility is essential for visually impaired people in communicating with banks. Accessibility in banking is not just about compliance; it is about **creating an inclusive environment and a rights-based approach** where everyone feels valued and understood.

Below are comments and suggestions from the Wicklow Visually Impaired Group on how banks need to enhance their investment and roll-out in universal design standards and concrete measures to address the challenges encountered daily by visually impaired people in engaging with their financial institutions.

## **2. Physical Access**

- Signing physical documents in a specific area without assistance can be challenging. Many users report having to rely on physical accommodations, such as sticky notes to mark signature lines. Offering alternatives is essential. Braille statements, large print documents, and audio formats are excellent options for visually impaired users.
- Card readers should incorporate an audio point so the user can hear what is on the card reader screen.

## **3. Online Access**

- Ensure that all bank websites and mobile apps are fully compatible with screen readers, like VoiceOver or TalkBack, which convert text into speech, allowing visually impaired users to navigate digital platforms effortlessly.
- Visual verification puzzles (CAPTCHAs) on login or reset pages can be impossible for blind users to bypass.
- Online chatbots equipped with natural language processing can assist visually impaired users by providing instant responses to their queries.

## **4. ATM access**

Visually impaired people experience numerous daily challenges in accessing ATMs. These include, but are not limited to:

- Cluttered or hazardous public areas where ATM machines are located that impede safe access.
- Many modern ATMs utilize flat, dynamic screens with no tactile markers or feedback, thereby removing the ability to "feel" for buttons or commands.
- Unpredictable or frequently changing menu layouts on screens create confusion and uncertainty. Advance notices of such changes would be beneficial to visually impaired users.
- Aligning and inserting a bank card into the correct slot and subsequently retrieving cash or a receipt can be highly disorienting.
- Lack of, or difficult to find, headphone jacks on ATMs for audio use for visually impaired users.
- ATMs do not in general facilitate after-hours lodgements which normally need to be done during banking hours or where there is a dedicated banking lobby.

- When ATMs are inaccessible, users must ask strangers or bank staff for help, which compromises their financial privacy and creates genuine security risks.

To address many of the above ATM issues, all banks should ensure easy and safe access to a **comprehensive suite of text-to-speech (audio) features** in the management of their ATMs, which allow users to privately and safely hear on-screen instructions.

### **5. Frontline Staff Training**

- Ensure that all frontline staff members are adequately trained, responsive, empathetic and respectful to the legal rights and needs of individuals with visual impairments, so as to facilitate them to hold an independent bank account and to carry out all necessary financial transactions and functions.

### **6. Bank Closures**

- The pattern in recent years toward a cashless, digital-only society forces a reliance on technology that may not be fully accessible, leaving those who depend on tactile or in-person interactions being left behind. Banks need to minimise the negative impacts of this pattern on their visually impaired customers, particularly those living in small towns or villages where there is often no banking alternatives.

### **7. Overall Recommendation**

- Organizations like Voice of Vision Impairment (VVI) continually press financial institutions in Ireland and globally to **prioritize universal design and digital accessibility compliance**.

They also emphasize that the most effective way to design accessible banking is to **actively consult with the visually impaired community from the concept stage** rather than as an afterthought when planning to put in place effective accessibility communications.

#### **Email Submission from Rathmore Resident's Association (5<sup>th</sup> June 2026)**

A representative of the group attempted to open an account with the Bank of Ireland in Arklow on 3<sup>rd</sup> March 2026. The manager informed them that they would need to make an appointment. Forms were filled in that day, and a call afterwards informed them that they would receive their appointment details soon. After a long delay the group received a call from the manager in the Carlow branch requesting further paperwork which the group submitted by return post. The group then received an Email from the Carlow manager to inform them that the paperwork was received. Following this the group received a text message to say that the account would be opened soon. At the time the group sent an Email to inform Wicklow PPN of their experience the account still wasn't open.