



Australian Federation of Disability Organisations

Submission on Regulating Cash Distribution Consultation Paper

**Council of Financial Regulators
&
Australian Competition and Consumer Commission**

August 2025

Primary author & approved by:

Ross Joyce
Chief Executive Officer

Reviewer & contact:

Matthew Hall
National Manager - Systemic Advocacy & Policy



ABN: 25 105 510 898

Email: office@afdo.org.au

Website: www.afdo.org.au

Phone: 1800 219 969

Table of contents

ACKNOWLEDGEMENTS	4
LANGUAGE USED IN THIS DOCUMENT.....	4
ABOUT AFDO	5
<i>Our vision</i>	5
<i>Our mission</i>	6
<i>Our strategic objectives</i>	6
<i>Our members</i>	6
<i>Full members</i>	7
<i>Associate members</i>	7
1. INTRODUCTORY COMMENTS.....	8
2. CASH ACCESS AND PEOPLE WITH DISABILITY	8
3. OUR KEY RECOMMENDATIONS.....	9
4. SUMMARY OF KEY MESSAGES	13
5. FINAL COMMENTS	13
<i>Contact details</i>	13

Australian Federation of Disability Organisations (AFDO) Ltd is registered as a charity with the Australian Charities and Not for profit Commission. It is also a Public Benevolent Institution, endorsed by the Australian Taxation Office as a Deductible Gift Recipient. A donation of \$2.00 or more is tax deductible.



Consent to publication

Australian Federation of Disability Organisations (AFDO) consents to the publication of this submission, including the names and contact details of AFDO staff. The relevant AFDO staff also give that consent.

© 2025, Australian Federation of Disability Organisations (AFDO) Ltd
A.B.N. 25 105 510 898



- **CC BY-NC-SA (version 4.0):** AFDO publishes, distributes, and otherwise makes available its advocacy and policy materials, including this submission, under a Creative Commons licence.
- This licence allows any person to distribute, remix, adapt, and build upon the material in any medium or format for non-commercial purposes only, and only if AFDO is credited as the creator of the material. If you remix, adapt, or build upon the material, you must also license your modified material under identical terms.

The CC BY-NC-SA (version 4.0) licence includes the following elements:

BY You must give appropriate credit, provide a link to the licence, and indicate if changes were made. You may do so in any reasonable manner, but not in any way that suggests AFDO endorses you or your use.

NC You must not use the material for commercial purposes.

SA If you remix, transform, or build upon the material, you must distribute your contributions under this licence.

No additional restrictions — You must not apply legal terms or technological measures that legally restrict others from doing anything this licence permits.

Acknowledgements

Australian Federation of Disability Organisations (AFDO) acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the land on which we stand. We recognise their continuing connection to land, waters, and community. From our offices in Melbourne, Canberra, Sydney, and Newcastle, we pay our respects to the peoples of the lands on which we operate and to their Elders past, present, and emerging. We also pay our respects to the traditional owners of all lands on which we operate or meet around the country.

AFDO acknowledges people with disability, particularly those individuals that have experienced or are continuing to experience violence, abuse, neglect, or exploitation. We also acknowledge their families, supporters, and representative organisations and express our thanks for the continuing work we all do in their support.

Language used in this document

AFDO uses person-first language, like "people with disability," not identity-first language. This is a deliberate choice made by AFDO. This aligns with the UN Convention on the Rights of Persons with Disabilities. It also matches the language used by all levels of government in Australia. Most other peak bodies in the Australian disability sector also use person-first language.

AFDO chooses to use this language because it puts the person before the disability. It values the individual by seeing them as a person, not a condition.

Consistent with this position, AFDO uses person-first language in this document.

We know many people with disability prefer identity-first language. Disability is a part of their identity. This language shows a connection to the disability community and pride in their disability. It also says society is what disables them.

Views on language use reflect people's identities, experiences of disability, and community attitudes. It is a matter of individual choice and agency. AFDO respects everyone's right to choose how to describe their identity and experiences.

"People with disability," means anyone who is d/Deaf (including people who identify as culturally Deaf), or who has a learning disability, or a sensory, physical, hidden, or mental health condition.

About AFDO

Established in 2003, the Australian Federation of Disability Organisations (AFDO) is the peak body in the disability sector. AFDO is the national, cross-disability, peak body and a Disability Representative Organisation (DRO), funded by the Commonwealth government (through the Department of Social Services) to represent and advocate for people with disability and support them to fully take part in Australian life - socially, culturally, politically, and economically.

Many of AFDO's members are national peak bodies representing disability-specific cohorts (for example, Blind Citizens Australia, Deaf Australia, Down Syndrome Australia, and Physical Disability Australia) or State and Territory organisations with population-based memberships, representing people with disability in different locations or who have commonality of intersectionality (for example, People with Disability WA, Women with Disability ACT and South-West Autism Network (SWAN)). Through this membership mix, AFDO is the national "peak of peaks" in the disability sector, having a total reach of over four million Australians.

AFDO is also a Disabled Peoples Organisation (DPO), governed, led, and constituted by people with disability. We are within a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

AFDO is a strong, trusted voice for the disability sector. We advocate on national policy, inquiries, and initiatives with governments at all levels in Australia. We work to build a community where people with disability can take part in all aspects of social, economic, political, and cultural life. This means:

- real participation in community life
- building respectful, valued relationships
- social and economic participation, and
- contributing as valued citizens.

Our vision

All people with disability can take part equally in all aspects of social, economic, political, and cultural life.

Our mission

Using the strength of our member organisations to harness the collective power of uniting people with disability to change society into a community where everyone is equal.

Our strategic objectives

- To represent the interests and united voice of our members and people with disability at a national and international level in all relevant forums.
- To build the capacity, profile, reputation, and sustainability of AFDO through the strength of our member organisations.
- To enhance the connection and influence in international disability initiatives by policy, advocacy, and engagement, focused on the Asia Pacific region.

Our members

AFDO, together with our member organisations, make significant contributions to disability policy, the rights of people with disability, and the reform agenda in all Australian jurisdictions, and across civil society, more broadly. We also advocate for systemic change, and identify and seek to address issues that affect the lives of people with disability in Australia. We understand that disability specific organisations play a key role in the provision of information and peer support to people with disability and their families. This role keeps them closely connected to their grass roots communities. These connections also allow AFDO to understand and faithfully represent the views of people with disability to government.

You can access further information about AFDO's members on [AFDO's website](#). You can also find out more about our [policy priorities](#), and our [systemic advocacy and policy work](#).

Full members



Associate members



1. Introductory comments

The Australian Federation of Disability Organisations (AFDO) welcomes the opportunity to respond to the *Regulating Cash Distribution* consultation paper.

AFDO is the recognised national voice representing people with disability in Australia. Our submission highlights the critical need for the proposed regulatory framework to consider and respond to the access, inclusion and service needs of the 5.5 million Australians with disability, over one in five people in the population.

People with disability are more likely than the general population to face economic and social disadvantage, including lower incomes, higher cost of living, limited transport options, digital exclusion, and barriers to accessing banking and other financial infrastructure. For people with disability who have intersecting levels of marginalisation—such as being older, women, people of colour, migrants, refugees, others who are culturally and racially marginalized, or First Nations people—their experience of structural, economic, and social disadvantage is even more severe. These compounding factors make physical cash access a vital enabler of financial autonomy and inclusion for people with disability.

2. Cash access and People with Disability

Cash is, and will remain, essential for many people with disability for the following reasons:

- **Digital exclusion:** Many people with disability cannot access or effectively use digital banking platforms due to inaccessibility, low digital literacy, or cognitive barriers.
- **Reliability and control:** Cash provides a trusted, tangible means of managing money, offering autonomy for people who use supported decision-making or who rely on carers or support workers.
- **Independence:** For individuals living in group homes, supported accommodation, or independently on the Disability Support Pension, cash allows for independent purchases without surveillance or gatekeeping.
- **Regional inequality:** Access to both physical cash services and reliable digital alternatives is highly variable across Australia. For people with disability in regional and remote areas, this gap is wider.
- **Emergency resilience:** People with disability are disproportionately affected in natural disasters and service disruptions. Cash is a critical backup in these

situations when digital systems are more likely to fail. **Financial safety:** Reducing leverage points for abusers to financially exploit and abuse people with disability.

- **Financial safety:** Reducing leverage points for abusers to financially exploit and abuse people with disability. Having limited access pathways to cash can increase the vulnerability of people (and in particular women) with disability to financial abuse and exploitation.

A 2021 report¹ found “people with disability may be at greater risk of economic and financial abuse due to factors such as reliance and dependence on others ...”

Providing a diverse range of access options for financial transactions, including reliable access to cash enhances the control people with disability can exercise, and reduces dependence or reliance on others to make payments or obtain fundamental and necessary supports. This mitigates against abusers exploiting inaccessible financial and retail services for personal gain and control over a person with disability. It is important that multiple access points to cash and payment methods across banking, finance and retail are made available, including physical cash to support this independence and minimise opportunities for abuse or exploitation.

Despite these factors, the consultation paper does not recognise people with disability as a group requiring tailored consideration, nor does it embed any inclusive access requirements or obligations within the proposed framework.

3. Our key recommendations

3.1. Recognise People with Disability as a priority population

- The final framework must explicitly identify people with disability as a key priority population who require reliable access to cash.
- The framework must reflect Australia’s obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and Australia’s National Disability Strategy, which affirm the rights of people with disability to equal participation in economic and community life.

3.2. Ensure accessibility of cash access points

Under **Proposal 10 (Service Level Standards)**, regulators must require that:

- **all cash access points (ATMs, bank branches, retailers)** comply with the Disability Discrimination Act (DDA) and accessibility standards (including tactile keypads, audio output, wheelchair height access)
- **accessible infrastructure** is required not only in metropolitan areas but across regional and remote areas, and
- **alternative models** such as mobile banking services, community cash hubs, or partnerships with post offices or other suitable service providers must be considered where traditional infrastructure that provides access to cash is limited.

3.3. Address regional access for People with Disability

- Proposal 10 must ensure that regional service standards are designed in consultation with people with disability and their representative organisations, and address the transport, communication, service access and other barriers they face.
- Regulatory design must account for intersectional disadvantage, including people with disability and living in rural, remote, or other areas where service is limited or poor.

3.4. Build inclusive crisis and disaster management preparedness

Under **Proposals 4 and 5**, the crisis planning and continuity mechanisms must:

- include disability-inclusive protocols, including alternate cash delivery methods, prioritised customer lists, and engagement with local disability service providers, and
- require accessible communications about actual or possible disruptions or failures, including in Easy Read, large print, Auslan, captioning, and Auslan translated materials.

3.5. Embed disability consultation in design, implementation, and oversight

- **Proposal 6** must explicitly require effective and meaningful consultation with Disability Representative Organisations (DROs) when designing and implementing pricing, access regimes, and industry guidelines, and in the oversight or review of the effectiveness of any regulatory system.
- **Proposal 8** for dispute resolution systems must be:
 - physically accessible

- communicatively inclusive, and
- able to accommodate complaint support and advocacy for people with disability, including supported decision-making.

3.6. Protect consumers from unfair charges

The regulatory framework must include strong protections to ensure that consumers, particularly people with disability who rely on cash, are not subjected to surcharges, withdrawal fees, or penalties for using cash as their necessary or preferred payment method.

Maintaining equitable access by consumers to the financial system means ensuring that access to and use of cash by consumers (at the very least) remains cost-free or very low-cost at the point of access and use. As digital payments become more widespread, people with disability and other vulnerable groups who rely on cash must not be penalised by systemic cost-shifting.

To this end, the framework must (except in the context of exchange of Australian currency for another currency, or vice versa, in cash):

- **prohibit** registered entities, financial institutions, retailers, or any other provider of cash or access to cash, from charging, deducting or otherwise passing on to any consumer (and irrespective of whether the consumer is a regular or registered customer or client), any cash handling, withdrawal or any other fee, or commission, related to obtaining or accessing cash
- **require** that any business offering cash-related services **absorb the operational costs** of doing so, rather than shifting those costs to customers, and
- **ensure** regulators have the power to **monitor and enforce** these protections, especially in markets or sub-markets where there is limited competition or service alternatives.

As the consultation paper notes, the government has announced that it intends to mandate that “businesses must accept cash when selling essential items, with appropriate exemptions for small businesses”². On 20 December 2024, the Treasury released a consultation paper to gather insights and feedback on the cash acceptance mandate³. That consultation paper⁴ sought feedback on several options that would limit the proposed mandate, including a dollar limit, a time limit and a dollar and time limit.⁵ That consultation paper does not raise, or include in any way, whether fees can or cannot be charged by:

- (a) a person who provides essential goods and services and who must accept cash in payment, under the proposed mandate, or
- (b) a person who elects to accept cash in payment, if not bound to do so under the proposed mandate.

Whether dealt with in the mandate, or as part of the proposed regulatory framework, the Australian payment system must also prohibit any person from charging, deducting or otherwise passing on to any consumer (and irrespective of whether the consumer is a regular or registered customer or client), any cash handling, cash acceptance or any other fee, or commission, related to accepting cash as payment.

3.7. Define and tailor requirements for non-metropolitan areas

To ensure service level standards are regionally responsive and equitable, the regulatory framework must include clear definitions of non-metropolitan geographic categories. These definitions are critical for establishing differentiated obligations, service requirements, and pricing oversight that reflect the real conditions in each setting.

AFDO recommends the framework adopts and uses definitions of:

- Major city
- Inner Regional Australia
- Outer Regional Australia
- Remote Australia, and
- Very Remote Australia,

based on the Australian Statistical Geography Standard (ASGS) Remoteness Structure, with relative geographic remoteness measured in an objective way using the Accessibility/Remoteness Index of Australia Plus (ARIA+), which the Australian Bureau of Statistics encourages other organisations to use to improve the comparability and integration of statistical and other data on a common geographic basis.⁶

These classifications should be used to guide the design of tailored service level standards and regulatory expectations, ensuring just outcomes for communities that are frequently underserved in national service planning.

4. Summary of key messages

- Over 5.5 million Australians with disability rely on equitable access to the financial system. The move away from cash, while convenient for many, must not create a new form of exclusion for people with disability, or others.
- People with disability face structural and systemic disadvantage that makes cash essential, not just convenient.
- A sustainable, fair, equitable, and resilient cash distribution system and infrastructure must include explicit protections of, equitable access standards for, and regulatory attention to, people with disability, to remove or, at least, ameliorate the disabling barriers we face, under the current cash distribution arrangements and those proposed, or that are introduced.

5. Final comments

AFDO supports the broader intent of the proposed regulatory framework and its guiding principles. However, we believe the framework will fall short unless it is disability-inclusive by design, and in implementation.

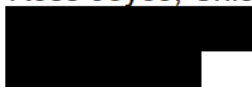
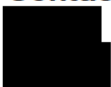
Financial access is a human right. The ability to access and use cash safely, independently, and with dignity is central to that right.

We urge the Council of Financial Regulators and the ACCC to take this opportunity to design and deliver a framework that is inclusive, equitable, and future-focused. AFDO also is willing to provide the Council of Financial Regulators and the ACCC, and the government more widely, guidance, assistance and the necessary input and feedback from people with disability represented by our broad membership.

Contact details

Australian Federation of Disability Organisations (AFDO)

Contact: Ross Joyce, Chief Executive Officer



Contact: Matthew Hall, National Manager – Systemic Advocacy & Policy



-
- ¹ Breckenridge, J., Singh, S., Lyons, G., Suchting, M., (2021) Understanding Economic and Financial Abuse and Disability in the Context of Domestic and Family Violence. Sydney, retrieved from https://www.researchgate.net/publication/360858094_Understanding_Economic_and_Financial_Abuse_and_Disability_in_the_Context_of_Domestic_and_Family_Violence, accessed 14 August 2025.
 - Gendered Violence Research Network, UNSW Sydney.
 - ² J Chalmers and S Jones, Ensuring the future of cash and next steps in phasing out cheques [media release], Australian government, 18 November 2024, retrieved from <https://ministers.treasury.gov.au/ministers/jim-chalmers-2022/media-releases/ensuring-future-cash-and-next-steps-phasing-out-cheques> accessed 8 August 2025.
 - ³ J Chalmers and S Jones, Next steps in ensuring the future of cash [media release], Australian government, 20 December 2024, retrieved from <https://ministers.treasury.gov.au/ministers/jim-chalmers-2022/media-releases/next-steps-ensuring-future-cash>, accessed 8 August 2025.
 - ⁴ The Treasury, Mandating cash acceptance, Australian government, 20 December 2024, retrieved from <https://treasury.gov.au/consultation/c2024-604832>, accessed on 8 August 2024.
 - ⁵ Note 4, pp. 21-22
 - ⁶ For further information, see <https://www.abs.gov.au/statistics/standards/australian-statistical-geography-standard-asgs-edition-3/jul2021-jun2026/remoteness-structure/remoteness-areas>, accessed 8 August 2025.