

Submission on OECD/INFE Guidelines for the involvement of private and not-for-profit stakeholders in financial education.

Introduction

Sage Advocacy very much welcomes the opportunity to make a Submission on the Draft Updated OECD/INFE *Guidelines for the involvement of private and not-for-profit stakeholders in financial education*.

Sage Advocacy is the National Advocacy Service for Older People and Survivors of Institutional Abuse. In extenuating circumstances, it can support at-risk adults or healthcare patients where no other services are able to assist. Its services are free, confidential and independent of family members, service provider and systems interests. Sage Advocacy provides a continuum of services: Information – Support – Advocacy - Safeguarding – Systems & Policy Change. It works across all settings: homes, day centres, congregated care settings / nursing homes, hospitals, hostels, hospices, prisons and in the processes of transitions between them.

Many Sage Advocacy clients experience difficulty in controlling and managing their money. They may:

- Find financial services confusing and difficult to navigate;
- Struggle with digital tools frequently required to manage their finances;
- Need support with managing their money because of reduced decision-making capacity;
- Be dealing with accrued debt as a result of, for example, having to pay nursing home fees while waiting for State nursing home care support funding to be put in place;

In 2025, financial issues represented some one-fifth of all Sage advocacy cases. This is indicative of a significant deficit in the supports available to this cohort of the population to enable them to be in control of their finances to the greatest extent possible.

The OECD/INFE Guidelines are critically important not only in respect of improving financial literacy *per se* but also, and equally importantly, in terms of raising public awareness about the nature and extent of financial abuse which is very prevalent throughout society. For example, research commissioned by Safeguarding Ireland in 2024¹ found that:

- 30% of adults in Ireland had either personally experienced financial abuse or knew someone who had experienced it;
- 11% reported personally experiencing financial abuse;
- 81% of incidents were perpetrated by someone known to the victim, such as a family member, carer, neighbour, or trusted individual;

¹ <https://safeguardingireland.org/30-of-adults-have-experience-of-financial-abuse/>

Comments on Updated Draft Guidelines

The need for proactive financial literacy education so that each individual is better able to control and manage their money to the greatest extent possible and to be accommodated by financial services in so doing is self-evident.

In general, Sage Advocacy welcomes and supports the Updated Draft Guidelines, in particular, the reference to the need to focus attention on vulnerable or hard-to-reach populations and the potential of community-based not-for-profit organisations to make a valuable contribution to enhancing financial literacy.

However, Sage Advocacy is of the view that the Guidelines fall short in one important area, that is, how to ensure that all financial services and all those providing support services to people with reduced decision-making capacity (a high proportion of Sage Advocacy clients) are enabled and facilitated to control and manage their finances to the greatest extent possible.

The Updated Guidelines make no reference to the relationship between financial literacy and decision-making capacity. This, Sage Advocacy believes, is a significant omission which needs to be addressed. For example, research² has shown that financial capacity is already significantly compromised in mild Alzheimer's disease, especially in the more complex domains of bank statement management, bill payment, and financial judgement.

In Ireland, the Central Bank, in its Consumer Protection Code 2025³, has affirmed that consumers in vulnerable circumstances require an additional and informed response from providers of financial services.⁴ Sage Advocacy believes that the matter of people who are in vulnerable circumstances because their decision-making capacity is, or may be, in question requires much greater attention in the Guidelines in order to ensure that that this population group are not financially excluded and are enabled to manage their finances autonomously to the greatest degree possible and with safe support (the latter where necessary).

The need for people with reduced decision-making capacity to be provided with appropriate decision-making supports in relation to managing their finances is provided for under Irish legislation.⁵ There is a *prima facie* question as to whether the financial capacity of people can be fully maximised in a scenario where financial services do not provide appropriate decision-making supports to people who require them in order to enable them to engage to the greatest extent possible. This is a critically important factor in unpacking the concept of financial literacy in the sense that the main blockage may not be the individual's financial literacy skills *per se* but the ethos in financial services.

The challenges of developing for financial services in developing expertise and financial literacy
Sage Advocacy believes that there is a need for each jurisdiction to have a central locus of expertise on financial literacy. This is not the case in Ireland. The Competition and Consumer Protection Commission (CCPC) has taken significant steps to implement its statutory role in

² Giannouli, V., & Tsolaki, M. (2022). *Financial incapacity of patients with mild Alzheimer's disease: What neurologists need to know about where the impairment lies*. *Neurology International*, 14(1), 90-98.

³ <https://www.centralbank.ie/regulation/consumer-protection/consumer-protection-code>

⁴ Central Bank Consumer Protection Code, <https://www.centralbank.ie/regulation/consumer-protection/consumer-protection-code>

⁵ Assisted Decision-Making (Capacity) Act 2015, [Assisted Decision-Making \(Capacity\) Act 2015](#)

promoting financial education and capability through national strategies, school-based programmes, adult education initiatives, consumer information services, and financial literacy resources.⁶ However, further evaluation is required to determine the extent to which these measures improve financial capacity among vulnerable populations, including older persons and individuals with reduced decision-making capacity.

It has been argued that there is a pressing need to increase financial literacy awareness of financial institutions. This relates to their knowledge and understanding of their obligations under the UN Convention on the Rights of Persons with Disabilities and, in Ireland, the provisions of the Assisted Decision-Making (Capacity) Act 2015 and a related Decision Support Service, Code of Practice for Financial Services Providers.⁷ It should be noted that the Law Reform Commission in Ireland⁸ specifically examined financial abuse within banking and financial services, in relation to social welfare payments, and where adults may be subjected to coercion, fraud, theft, scams, or exploitation by family members, carers or third parties.

The Commission recommended strengthening obligations on financial institutions to help detect and prevent financial abuse.

Financial literacy and financial capacity

The Updated Draft Guidelines rightly focus on financial literacy. However, in order to fully understand financial literacy, the concept should be linked to the concept of financial capacity, i.e., the capacity of people to manage their finances at any given point in the life cycle. It can be argued that financial capacity is conceptually different to financial literacy in that a person may be financially literate but unable to act on that basis because of factors such as digital literacy, frailty associated with the ageing process, reduced decision-making capacity and an inability to attend financial services in person because of mobility difficulties.

UN Convention on the Rights of Persons with Disabilities

Sage Advocacy suggests that the Guidelines could usefully use as a starting point Article 12(5)⁹ of the UN Convention on the Rights of Persons with Disabilities which stipulates that:

States Parties shall take all appropriate and effective measures to ensure the equal right of persons with disabilities to own or inherit property, to control their own financial affairs and to have equal access to bank loans, mortgages and other forms of financial credit, and shall ensure that persons with disabilities are not arbitrarily deprived of their property.

⁶ <https://www.ccpc.ie/consumers/about/financial-education/our-money-our-future/about-our-money-our-future/>

⁷ Code of Practice for Financial Service Providers, <https://decisionsupportservice.ie/resources/codes-practice/code-practice-financial-service-providers>

⁸ Law Reform Commission, 2024. *A Regulatory Framework for Adult Safeguarding*. LRC 128-2024. Dublin

⁹ <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-12-equal-recognition-before-the-law.html#:~:text=Subject%20to%20the%20provisions%20of%20this%20article%2C,are%20not%20arbitrarily%20deprived%20of%20their%20property.>

This would provide a broader and more inclusive context for the promotion of financial literacy and the enhancement of financial capacity for those currently at risk of being 'left behind'.

Developing an integrated approach to financial literacy education

While the Guidelines are targeted at financial services and non-profit organisations, in order for them to be effective, there is a need to ensure that there is a common and collaborative approach by all stakeholders – the State, financial services and non-profit organisations. The effective functioning of all of these bodies in relation to financial literacy requires that they are operating clearly within a national financial literacy strategy. For example, in Ireland, the implementation of the Guidelines would be greatly enhanced by linking them into its National Financial Literacy Strategy 2025–2029¹⁰ which is focused on improving financial literacy, capability, wellbeing, and resilience across the population and intended to support people in managing day-to-day finances, preparing for major life events, and making informed financial decisions.

The Guidelines should, therefore, include a clear statement that all financial literacy initiatives should be linked into national strategies on financial literacy. They should also be linked into relevant Codes of Practice in each jurisdiction – in Ireland, relevant codes are:

Central Bank Consumer Protection Code 2025, <https://www.centralbank.ie/regulation/consumer-protection/consumer-protection-code>

Code of Practice for Financial Service Providers (under the Assisted Decision-Making Act 2015), <https://decisionsupportservice.ie/resources/codes-practice/code-practice-financial-service-providers>

Key Points

This submission has focused on the financial literacy support needs of a specific population cohort – those whose decision-making capacity may be reduced and for whom, the Guidelines in their current iteration fall short.

There are multiple actors that have a role in maximising financial capacity for this cohort:

- ✓ Not-for profit and statutory agencies providing services to people with an intellectual disability;
- ✓ Families and relatives of people with an intellectual disability in enabling and supporting their loved ones to make autonomous financial decisions;
- ✓ Independent advocacy organisations in their role as supporting and empowering people to make their own decisions;
- ✓ Citizens Advice and Information Services (in Ireland, Citizens Information Services and the Money Advice and Budgeting Services);

¹⁰ Department of Finance, 2025. *National Financial Literacy Strategy 2025–2029*. Dublin: Department of Finance. Available at: [National Financial Literacy Strategy](#)

- ✓ Financial services by providing individually tailored supports to people in vulnerable circumstances to enable them to control and manage their finances, including support with using digital banking;

Building financial capacity means education across ages and societal groups – building in appropriate interventions in schools, universities and developing targeted interventions for older people and people with reduced decision-making capacity. All citizens need to know how their personal data will be protected and how their money will be secure in a digital banking context. Sage Advocacy is of the view that the Guidelines for the involvement of private and not-for-profit stakeholders in financial education, while important in a general way, will only be fully meaningful when each jurisdiction puts in place a coherent, joined-up approach across all financial services and stakeholders which includes addressing current blockages to people whose decision-making capacity may be compromised being able to fully vindicate their right to own money and to manage and control it to the greatest extent possible.

