Society of St Vincent de Paul

# Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation

## Consultation on the introduction of a Digital Wallet

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## Introduction

The Society of St Vincent de Paul (SVP) is Ireland's largest voluntary charitable organisation. We have a membership of over 11,000 volunteers, supported by 600 staff, working in communities across the country. The Society was established in Ireland in 1844, and is present in every county in Ireland.

Our work is built on person-to-person contact. When someone reaches out to SVP, trained volunteers visit them at home to listen, understand their situation, and explore how we can help, offering practical or financial support alongside guidance toward other services. It is this direct, ongoing contact with people experiencing poverty and exclusion that gives SVP a grounded understanding of how government systems and emerging digital tools actually work for the people who rely on them, and where they don't. This experience is what informs our response to this consultation on the proposed Digital Wallet

We at SVP are pleased to provide our insight into the Digital Wallet Consultation, which is being developed in line with the Digital Public Services Plan 2030 and eIDAS 2 European directive.

The EU's SOTERIA[1] project was a thorough and engaging project which captured user engagement and experience for a citizen user digital tool. We believe the outcomes from this demonstrated the benefits of the wallet as a citizen-managed tool to help Irish citizens to manage their personal data and administrative tool for their essential interaction with government services.

We support the characteristics of selective disclosure, decentralised storage and genuine user control over data sharing within the eIDAS 2. We are in favour of the development of this service particularly the privacy-by-design, and the autonomy for the individual user to decide which documents they save on the application and who they share them with.

[1] European Commission, CORDIS, 2024, SOTERIA project fact sheet, available: https://cordis.europa.eu/project/id/101018342 accessed 16 May 2026

Unlike the BritCard[2] it will not be mandatory for access to work and other mechanisms will remain in place to ensure a person has a right to access employment. The EU and Ireland digital wallet will be a tool for someone to prove their identity and other working documents such as tax etc. and serve the public not use it as a tool to eliminate or alienate specific members of society.

## Key Recommendations

- Government systems should prioritise interoperability over citizen-managed documentation
- The Digital Wallet must remain voluntary and non-mandatory
- Dedicated supports must be funded for digitally excluded groups
- Assisted digital models should be delivered through trusted organisations

### The people we support

We can pre-view several scenarios where this application will support people and the potential it has particularly those that we support, who possibly have multiple interactions with government departments and agencies such as housing, social protection, access to identity, financial assistance, education, proof of guardianship and death of a family member to name but a few.

- Unmarried/ Separated/ Divorced/ Widowed Parents
  - A father may acquire guardianship of his children automatically, without ever going to court or receiving a document confirming it. With no easy way to prove this status, he can struggle to satisfy schools, social protection, and other bodies that he is a guardian. He should be able to register his guardianship with the General Register Office (GRO) and hold proof of it on his digital wallet, giving him a simple, ready way to evidence his status whenever it's needed.
  - Where a mother is sole guardian, she is often asked to prove this status well beyond passport applications, including at school enrolment and when accessing medical care or therapy for her child. In the absence of clear national guidelines on this issue, schools, GPs, and therapists are frequently cautious about the rights of a second guardian, and so request proof of sole guardianship before they will enrol a child or provide care. For passport applications, this proof takes the form of a sworn affidavit witnessed by an authorised person such as a peace commissioner, repeated at every renewal as children's passports are valid for five years. In other settings, the mother

[2] Government UK, available: https://www.gov.uk/government/news/new-digital-id-scheme-to-be-rolled-out-across-uk accessed 18 June 2026

must produce whatever evidence she has each time the question arises, often with no consistency in what is accepted. A digital wallet could remove this recurring burden by allowing her to hold verified proof of her sole guardianship and share it directly and consistently across every service that needs it, rather than re-proving her status, and re-explaining her situation, again and again.

- A mother whose surname differs from her child's can be stopped at passport control and asked to produce a letter of authorisation from the child's guardian, having no immediate means of evidencing her relationship to the child. SVP recognises the importance of these checks in safeguarding children and preventing trafficking. However, in cases of high conflict separation, a mother may have already secured a court order waiving the father's consent to the passport application. Requiring her to evidence her parentage and guardianship status again at the point of travel, having already had the matter determined by the courts, places an additional and avoidable burden on a parent in an already difficult situation. A digital wallet holding verified proof of parentage and guardianship would allow safeguarding checks to be satisfied without requiring the mother to revisit a matter that has already been resolved through the legal process.

- Homeless
  - Support those in emergency accommodation and homelessness to maintain documentation to share with the many and appropriate government agencies, particularly with the transience of their lives

- Community Welfare Service (CWS)
  - Those we support often too interact with the community welfare service, this is a service that has gone online. An application to the CWS requires the applicant to provide documentation and evidence with the application. We would hope that the digital wallet will enable the applicant to save and share their identity and other information with their application with more ease.

## Concerns

### Digital Exclusion and Digital Literacy

We cannot discuss any new digital governmental application and technology without acknowledging those who continue to be digitally excluded [3] and who have low levels of

[3] European Centre for the Development of Vocational Training, 2015, Terminology of European education and training policy, available: https://www.cedefop.europa.eu/en/tools/vet-glossary/glossary/digitale-uitsluiting accessed: 18 May 2026

digital literacy. The CSO reported that only 54% of people 75 years and over had used the internet within the previous three months,[4] which would raise concerns about the value of the wallet to them, despite them being in high need of state services. We would want to see a service that is developed with this group in mind, with an openness to provide the additional support that may been needed for people in this group. Inclusion measures should be introduced to ensure take-up from this group.

The digital wallet offers an opportunity to remove administrative tasks and burdens from citizens and it is important that this benefit enables all citizens to engage and manage necessary tasks and procedures in government applications/processes. [5]

Those who will struggle to manage another administrative burden, excessive or unjustified frictions that make it harder for people to do what they want. [6]

## System connectivity rather than citizen management

There is currently an expectation that the end user will manage and take responsibility for the use of their own data and documents when dealing with government departments.

In line with GDPR, we propose that the back end of government systems should be developed to interact and communicate with each other directly, improving how data is shared and how transparent that sharing is. This would remove much of the burden currently placed on individual citizens to hold and manage data and documentation that government systems already hold and could, with consent, share between themselves.

An example of this would be development of electronic health records where various GP, hospital or community health systems worked in the background to be able to access and share relevant patient information and data. These systems benefit patient care, more effective operations within the various health teams, and they do not require the user to engage, download or manage data. This puts the onus on the systems to be able to communicate to one another where applicable, following GDPR Legislation.

The benefit of the digital wallet will only be fully realised by a high take up rate and support and training for specific groups should be included in any roll out.

## Summary

SVP welcomes the development of the digital wallet under the Digital Public Services Plan 2030 and eIDAS 2 and recognises its potential to meaningfully ease the administrative burden faced by the households we support, including lone parents repeatedly evidencing guardianship, people in emergency accommodation managing frequent changes of

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[4] Central Statistics Office, 2024, available: https://www.cso.ie/en/releasesandpublications/ep/p-isshict/internetcoverageandusageinireland2024/keyfindings/ 18 May 2026

[5] Leonhard L., Johnson, J. and O'Connor R., Environmental Policy, University College Dublin, Ireland. 2022 Available: https://publicpolicy.ie/governance/sludge-in-irish-policymaking/ accessed 16 May 2026

[6] Ibid

circumstance, and applicants to the Community Welfare Service. Realising this potential will depend on how the service is designed and supported.

- **Support for the digitally excluded:** Provision should be made for those who are digitally excluded or have low levels of digital literacy, including older people, to access the wallet's benefits. This should take the form of dedicated support delivered through an independent organisation with established experience supporting the public, rather than an assumption that all citizens can or will engage with the tool directly.

- **System interoperability over citizen burden:** Government systems should, wherever possible, be developed to communicate and share relevant information with each other in the background, with citizens' consent, rather than placing the burden of holding, managing, and presenting that information onto citizens themselves. The digital wallet should complement this kind of system-level integration, not substitute for it.

- **A citizen-led, non-mandatory tool:** SVP supports the development of the digital wallet as a citizen-led and non-mandatory service. Use of the wallet should remain a choice available to citizens, not a requirement for accessing employment, services, or entitlements.