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# Report on Banking Services and Products for People who are Blind or Vision Impaired

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## Executive Summary

Australians who are blind or vision impaired face significant barriers and issues when accessing banking and financial institutions and products in Australia, primarily resulting in complete inaccessibility to these institutions and products.

Blind Citizens Australia (BCA), a national representative organisation of Australians who are blind or vision impaired, calls on Australian banks and institutions, under the Disability Discrimination Act (DDA) (1992) and as a signatory under the United Nations Convention on the Rights of Persons with Disability (UNCRPD) (2008) to:

1. Implement staff training for frontline staff assisting consumers with disability, with specific information on how to support people who are blind or vision impaired

2. Provide accessible format information access when requested including braille, paper copy large print, audio/telephone banking or electronic access that is Web Content Accessibility Guidelines (WCAG) 2.1. compliant for banking statements and bills

3. Provide alternative access methods for withdrawing cash with Automatic Teller Machines (ATMs) or making purchases using Electronic Funds Transfer at Point of Sale (EFTPOS) devices which do not use touchscreen, and

4. Provide alternate methods for paying BPAY or other financial bills and accessing digital identity checks.

## Introduction

Blind Citizens Australia (BCA) is the national representative organisation of people who are blind or vision impaired. Our mission is to inform, empower, and connect Australians who are blind or vision impaired and the wider community.

We provide peer support and individual advocacy to people who are blind, or vision impaired across Australia. Through our campaign work, we address systemic barriers limiting the full and equal participation of people who are blind or vision impaired. Through our policy work, we provide advice to government and the community on issues of importance to people who are blind or vision impaired. As a consumer-based organisation, our work is directly informed by lived experience of blindness and vision impairment.

BCA is comprised of a staff and board with lived experience. Board members must be full members of BCA, and the majority of staff are blind or vision impaired. We have a national membership of approximately 3000 members, with 2450 active members.

Access to banking and financial services and products is a matter which affects all Australians. For Australians who are blind or vision impaired, this access poses additional challenges and presently, there are numerous barriers to access.

This report will examine the additional challenges and barriers, with recommendations outlining best practice solutions to these challenges and barriers, in relation to their provision under the Commonwealth Disability Discrimination Act (DDA) (1992) and the United Nations Convention on the Rights of Persons with Disability (UNCRPD) (2008). Australia is a signatory to the Convention and has agreed to uphold the principles of human rights for Australians with disabilities under this Convention.

These solutions will assist banks and financial institutions in avoiding claims against the DDA being brought to the Australian Human Rights Commission and assist them in widening market share to include consumers who are blind or vision impaired.

In addition to the solutions and recommendations outlined in this document, The Australian Banking Association (ABA) Every Customer Counts: Accessibility Principles for Banking Services (November 2018) provides excellent insight in accessibility principles for banking and financial institutions. The case for accessibility is grounded in UNCRPD and the DDA, noting that Principles developed do not have the force of law whereby institutions are obligated to abide by them, but rather, there is a strong recommendation upfront for adherence to them. Similarly, BCA calls for these Guidelines to be adopted by all banking and financial institutions, in addition to those recommendations made in this document.

## 1. Banking Services and Products

### 1.1 Accessibility and banking

The information about accessibility for each of the banks across Australia is quite mixed, with some banks providing detailed information about their Diversity and Inclusion Plan in relation to their workforce, whilst others provide some details about their accessibility support for customers. Within the detail provided about accessibility support, many issues currently experienced by consumers who are blind or vision impaired are minimally addressed, or not addressed at all. Members expressed a desire to compare banks in terms of the measures of accessibility offered, to make an informed choice when choosing a bank and banking product/s.

Article 9 - Accessibility of the UNCRPD stipulates that "states Parties shall also take appropriate measures to ensure that private entities that offer facilities and services which are open or provided to the public take into account all aspects of accessibility for persons with disabilities."

In the following sections, the issues raised throughout consultation with our members who are blind or vision impaired will be explored in detail, beginning with access to bank statements.

#### 1.1.1 Bank statements

Access to bank statements has generally shifted to online or internet banking options, with a push to eliminate the environmental footprint created through a paper trail. Consumers who are blind or vision impaired have indicated that their preferences in receipt of their statements is far more complex, split between accessible formats of their statements, to using telephone banking to hear statement information.

In terms of accessible format production, the experience of getting accessible formats from banks is one which is mixed, with our members indicating that overall, it is challenging to set this up through banks. Accessible formats include braille, paper copy with large print, audio/telephone banking, or electronic methods of access. If electronic access is used, it must be compatible with Web Content Accessibility Guidelines (WCAG) 2.1, to ensure that it is screenreader compatible.

Additional feedback received on the option of telephone banking was that our members want the provision of extensive detail of their bank statements via telephone banking. Further, there is an appetite for training around understanding complex details relating to banking statements.

In terms of accessible format production, Article 9 - Accessibility, and Article 21 - Freedom of expression and opinion, and access to information, both stipulate the requirements for this to be undertaken. Article 21 states: "States Parties shall take all appropriate measures to ensure that persons with disabilities can exercise the right to freedom of expression and opinion, including… receive and impart information and ideas on an equal basis with others and through all forms of communication of their choice…including by: a) Providing information intended for the general public to persons with disabilities in accessible formats and technologies appropriate to different kinds of disabilities in a timely manner and without additional cost."

#### 1.1.2 Making cash withdrawals

The issue of accessing cash in both a safe and accessible manner was the issue which generated substantial feedback from our members. Members indicated a strong preference for being provided with cash by cashiers at their local branches, providing both a safe and accessible means of cash provision. Members indicated that this preference over automatic tellers (ATMs), due to numerous issues identified with ATM accessibility. ATMs generally have accessibility features including tactile buttons, and an audio option via the use of a headphone jack. Where the ATM is not maintained or the third-party provider of the accessibility feature is not engaged on a longer-term basis, resulting in the audio feature not being usable. Further, for members who are deafblind, ATMs can be more difficult to use, therefore they prefer a face-to-face option for cash withdrawal.

If a member did use an ATM, they stated they would find a preferred ATM whereby the audio access worked and heard without the interference of background noise, like nearby traffic. Members were questioned about what they would do if this preferred ATM were malfunctioning or if the audio system had been disrupted for some reason, and they indicated their solution would be to phone the bank for assistance.

Members who preferred using the ATM further indicated that the recent amendments to card design with notches in the card indicating the difference between debit, credit, and prepaid cards has assisted in identifying a particular card in their wallet and to identify the orientation that the card to be held to put it into the ATM. Some of our members had also added braille labels to the end of the card, on the opposite end to the end inserted into the ATM.

BCA is aware that in international markets, particularly in the United States, there are ATMs which have speech activation in addition to the audio features provided in the Australian market. Any provision to change ATMs in Australia needs to be co-designed from the stages of product design and procurement with consultation and user testing at every stage of development with people who are blind or vision impaired.

Corresponding with this preference for branch access for cash withdrawal was a growing concern, echoed by several members, about physical branch closures, particularly in regional and remote communities impacting their ability to access face-to-face assistance at their local branch.

It must be emphasised that although society is moving towards a cashless society, for people who are blind or vision impaired, between inaccessible ATMs and inaccessible touchscreen EFTPOS, there is a growing concern about being able to retain the ability to withdraw cash and complete financial transactions paying with cash. In fact, this inaccessibility has created a push towards cash withdrawals and payment by people who are blind or vision impaired; withdrawing cash and payment in cash provides security, protection, and consumer confidence.

### 1.2 Communications

Rules and regulations relating to bank accounts, products and services are frequently updated, and these changes need to be communicated to consumers impacted by these changes. For people who are blind or vision impaired, the updates are frequently delayed, because by the time the information has been converted into an accessible format for the person to understand, it was either already been implemented and operational, or it had been superseded by new advice.

Article 21 - Freedom of expression and opinion, and access to information, section a) of the UNCRPD, quoted on page 3, stipulates that this provision of information must be completed "in a timely manner and without additional cost."

## 2. Financial Services and Products

### 2.1 Accessibility for financial services and products

#### 2.1.1 Paying for services and products

Paying bills presents a myriad of payment options. For many people who are blind or vision impaired, a preferred option is to automate their bills to be paid by direct debit, with the bill being provided by email or through an account login to minimise the issues surround accessibility of bill payments. For BPAY options, it is known that Australia Post can provide support to make the payment, however upon contacting Australia Post to ask about options for accessible formats of BPAY bills, they were unable to assist, instead redirecting the enquiries back to the individual bill providers.

An overarching theme around accessibility for online bill payment was the presence of a CAPTCHA security system before completing their payment online. CAPTCHA is inaccessible to people who are blind or vision impaired, due to requiring visual identification of an object within a set of tiles of a photograph. Although there is an alternate audio option available, the design makes it extremely difficult to use effectively; this is also not an accessible solution for people who are deafblind.

If a payment for a service is required in person, see page 2-3 about the issues withdrawing cash.

### 2.2 Avoiding financial scams

Avoiding scams and being able to identify fraudulent activity is a matter which affects all consumers, however, for people who are blind or vision impaired, the methods for detection are more challenging to identify than for people who have no vision loss. The visual 'tells' that may alert a person who is blind or vision impaired, which might be deviations from how a statement from that provider usually looks, cannot be seen by someone who is blind or vision impaired. For example, banks often send alerts for new payees, however a currently identified scam by the Commonwealth Bank is a text message reading COMMBANK ALERT: Request for NEW payee has been made on your account. If this was not done by you visit https://security-commnet.com Currently there are no resources that are readily available, however an education resource and training would be ideal, developed in co-design with people who are blind or vision impaired. Further, it would be helpful to brief consumer watchdog organisations on the extra vulnerability posed to people who are blind or vision impaired or other disabilities when confronted by material from a nefarious source.

## 3. Intersection between banking and financial services and products

### 3.1 Touchscreen EFTPOS

In recent times, Electronic Funds Transfer at Point of Sale (EFTPOS) machines have undergone a transition from being keypad-controlled to touchscreen-controlled. For people who are blind or vision impaired, this has made touchscreen ETFPOS very inaccessible, leading to the only solutions for transactions resulting in providing their Personal Identification Number (PIN) for their card to another person to complete a transaction, if it is over $100 in value. This is a security risk leaving a customer who is blind or vision impaired vulnerable to fraudulent transactions.

While the recently released touchscreen EFTPOS have greater accessibility, with a tactile edge included, they still require an accessibility mode, and require extra information to turn on accessibility mode, and to enter a PIN independently. This goes against the Universal Design Principles outlined in the ABA's Banking Accessibility Guidelines.

For further information, please consult BCA's Position Statement on Touchscreen ETFPOS (2018).

### 3.2 Digital identity checks

Increasingly, formal identity checks are shifting from face-to-face completion to online verification. For people who are blind or vision impaired, this poses significant challenges. One type of digital identity checks often will require an individual to submit photo identification and then they are asked to follow a process where they must line themselves up with the camera, and follow instructions given to turn to the left or right for the program to match up features of the person's face against their submitted photo identification. Most people who are blind or vision impaired who attempt this will require assistance since it is a very visual process. The proof of identity documentation should not be reliant on having a driver's license or passport. As a person who is blind or vision impaired is not able to drive, they are not eligible to hold a driver's license. Proof of Age or Identity cards are provided by each state government, but there is inconsistency in when this identification is accepted as an alternative to a driver's license. A passport can be financially prohibitive for some people with disability.

## 4. Recommendations

To ensure the rights of people who are blind or vision impaired are effectively upheld for banking and financial products and services, Blind Citizens Australia is calling on:

1. Australian banks to establish clear frameworks and protocols around accessibility measures for consumers who are blind or vision impaired, including processes about how to contact banking or financial institutions for additional support for accessibility.

2. Australian banks to provide specific methods for people who are blind, or vision impaired to contact for accessibility support.

3. Australian banks should provide access to alternative formats for bank statements and information, including braille, paper copy with large print, audio/telephone banking, or electronic access which is compliant with Web Content Accessibility Guidelines (WCAG) 2.1.

4. Australian banks are strongly encouraged to extend options available through telephone banking for the provision of detailed audio access to bank statements.

5. Australian banks providing Automatic Teller Machines (ATM) should ensure the following:

a) Audio options for the ATM are enabled, and that audio guidance is set to a level to assist with hearing the playback if there is significant background noise.

b) Information about machine access, including where ATMs are located in quieter locations, is made available to consumers through the bank's Accessibility Plan which would have communication plan for consumers who are blind or vision impaired.

c) Updates to ATMs for optimum access for consumers who are blind or vision impaired are conducted in codesign with consumers with disabilities, including consumers who are blind or vision impaired, from planning phases, through to procurement and development phases, prior to rollout.

6. Australian banks continue to allow cash withdrawals at local bank branches, with staff training supporting frontline cashier staff in assisting consumers who are blind, or vision impaired in making cash withdrawals and completing any other banking tasks.

7. Australian banks consider access in regional and remote areas for consumers with disabilities, especially in areas where there are no current physical branches for consumers to access. If there is not capacity to have a physical branch in that locality, it is critical that banks develop methods to provide support to consumers there who have disabilities.

8. Representatives for consumers to engage in advocacy to institutions, including Australia Post where many bills can be paid, and BPAY, to ensure that accessible methods of transactions can be offered to consumers who are blind or vision impaired. These communications should be directed to telecommunication providers via Australian Communications Consumer Action Network (ACCAN), electricity providers, water and gas suppliers, and local Councils who provide rates notices, about accessible and timely access to payment options for consumers who are blind or vision impaired. These communications should include requests for:

a) removing CAPTCHA for online payment systems

b) alternative format production of bills

c) staff training to frontline staff assisting consumers who are blind or vision impaired.

9. Australian banks include in their Accessibility Plan, information, and training to assist consumers who are blind, or vision impaired in avoiding scams, developed in codesign with representative organisations for Australians who are blind or vision impaired.

10. Australian consumer watchdog organisations e.g., Australian Securities & Investments Commission (ASIC), Australian Competition & Consumer Commission (ACCC) to be briefed about the extra vulnerability posed by scams to consumers who are blind or vision impaired, and to include the information developed for consumers who are blind, or vision impaired in their online resources.

11. Australian banks and financial institutions must work in codesign with the disability sector when upgrading or developing new EFTPOS terminals, avoiding touchscreen interfaces which are inaccessible for consumers who are blind or vision impaired.

12. Australian banks and financial institutions ensure there are alternative methods which are accessible, for consumers who are blind or vision impaired, in place of digital identity checks

13. Australian banks and financial institutions are strongly encouraged to adopt the Accessibility Principles outlined by the ABA Accessibility Principles (November 2018) document.