

BANKING ON ACCESSIBILITY

A case for accessible banking for
Persons with Disabilities (PwDs)

by

Xavier's Resource Centre for the Visually Challenged (XRCVC)



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Persons with Disabilities (PwDs)

by



XRCVC, St. Xavier's College, Mumbai

under the project

INCLUSION AND ACCESS: The 360 Degree Approach

supported by



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The Xavier's Resource Centre for the Visually Challenged
(XRCVC) St. Xavier's College, Mumbai, India

PREFACE

A nation's progress hinges on how effectively it caters to its most vulnerable and marginalised groups. Persons with Disabilities, although making up a minority of the population, constitute a critical segment which cannot and should not be ignored. Doing so would compromise holistic growth and human development.

India has taken the necessary positive steps in being a signatory to the United Nations Convention on Rights of Persons with Disabilities, as also updating its disability legislation in 2016 by enacting 'The Rights of Persons with Disability Act - 2016'.

Money is power and having the ability to control it is empowering. The financial sector in India has issued rules and circulars aiming to safeguard the interests and rights of persons with disabilities. Unfortunately, these rules do not go far enough and are more often than not appropriately adhered to. Despite these rules, regulations and guidelines, the ground level reality for persons with disabilities continues to remain abysmal. Such persons are constantly denied the full breadth and scope of banking services. In the cases where they are given access, they often experience discriminatory procedures, which contradict the essential spirit of the RBI and IBA rules and guidelines.

This is primarily on account of two major lacunae. Firstly, lack of uniform non-discriminatory operational level procedures to be followed in offering all banking services to persons with disabilities. This has led to a scenario where, whilst banks do comply with the RBI and IBA (Indian Banks' Association) guidelines on this subject, these services are offered as per the Bank's / branch executive's procedural understanding, a lot of which in reality have been found to be contrary to the spirit of the rules and guidelines.

Secondly, undue fear and apprehension that the banker feels to ensure the disabled person's safety. This often comes from a lack of awareness and knowledge about the lives of persons with disabilities. Bankers, well-meaning as they may be, fail to understand that banking is an informed choice that the said individual customers are making, hence they should be naturally aware of the risks involved in the same. Further, persons with disabilities are competent to enter into a legal contract. The banker's duty lies in offering the services in a non-discriminatory and accessible manner to such customers.

The Xavier's Resource Centre for the Visually Challenged (XRCVC), St. Xavier's College, Mumbai has been working in the area of Inclusive Banking since 2006 and has partnered with RBI, IBA and NSDL through the course of issuing their rules, and also with Banks to ensure that ground level lacunae are weeded out.

In 2009, the XRCVC took the initiative to coordinate with the banking industry and ATM vendors to make ATMs fully accessible. The first demonstration of such an ATM was organized on August 12th, 2009 in the XRCVC office at St Xavier's College, Mumbai. These machines were also showcased the same year in St Xavier's College at its annual awareness event, Antarchakshu®. Work continued, and a fully accessible bilingual ATM was showcased at St Xavier's College during Antarchakshu® in 2011. In June 2012, Union Bank of India became the first bank in the country to launch a fully accessible bilingual ATM, at Ahmedabad.



Digital banking has the potential to provide equal opportunities to persons with disabilities. This is provided they are made available in an accessible manner. Today, unfortunately, in spite of technical solutions, almost all digital platforms are plagued with some problem or the other. It is in this context that the XRCVC embarked on this project. It is hoped that this report will help in stimulating the appropriate decision-making processes which will help in building financial inclusion for persons with disabilities.

It is to be noted that all persons with disabilities face diverse problems and need to be further examined. The scope of this study has been largely focussed on banking access problems faced by persons with visual impairment. However, we propose that a similar in-depth study be conducted to understand the ground level realities for various other kinds of disabilities and ensure that everyone has a seamless and accessible banking experience.

The XRCVC would like to extend heartfelt gratitude and thanks to the SBI Foundation Centre of Excellence for persons with disabilities for supporting our project INCLUSION AND ACCESS: The 360 Degree Approach through which we have undertaken this work.

We are also grateful to the Access India mailing list and the EYEWAY helpdesk for providing us illustrative cases of issues faced by persons with disabilities with regards banking access.

Thanks also go out to Prashant Naik, Saidarshan Bhagat, Kanchan Pamnani, Ketan Kothari, Harish Kotian, Jatin Shah, Nagraj More and Vishakha More, for providing valuable inputs.

We would be happy to collaborate with the authorities, decision makers and financial institutions to help create systems that would foster financial inclusion.

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ABOUT THE XAVIER'S RESOURCE CENTRE FOR THE VISUALLY CHALLENGED (XRCVC), ST. XAVIER'S COLLEGE, MUMBAI

Established in 2003 as a department of St. Xavier's College, Mumbai, the XRCVC is a national support and advocacy centre working towards creating an inclusive society. Through constant innovation, it has been successful in providing direct support services, and creating awareness in the fields of print access, financial access, education access and independent living. It played a key role in ensuring that the Parliament of India passed a suitable clause to the Copyright Law of India, thus promoting access to the printed word. Its innovative mass awareness and sensitization event, Antarchakshu® - The Eye Within, has served to create awareness about the lives of persons with disabilities among thousands of participants including government officials, bankers, educators, corporate executives, students and many more.

In order to promote financial Inclusion, the XRCVC has played an important role in collaborating with the RBI, IBA and NSDL from 2006. It has served on IBA committees aimed at promoting equal access for persons with disabilities. It has pioneered the setting up of thousands of fully accessible bilinguals talking ATMs across the country. It also manages Talking ATM India website ([1](#)). This website is designed to help users locate accessible ATMs.

It has authored and published

1. Banker's Guide to Inclusive Banking. ([2](#))
2. RBI's Circular on Accessible ATMs - 5 years on - a Retrospect and Prospect. ([3](#))

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EXECUTIVE SUMMARY

This is a representation report voicing concerns of Persons with Disabilities in access to financial services despite existing legal and executive provisions mandating their financial inclusion. It is a comprehensive document that can be used by regulatory and governance authorities like the Reserve Bank of India, banks, other associated bodies, decision makers and policy experts. It shall aid them in monitoring and evaluation of existing guidelines and the level of their implementation in reality. It articulates problems faced by users and makes strong recommendations to improve the scenario. The scope of the report is largely focussed on infringement of rights of persons with visual impairment who use or propose to use banking facilities. However, we propose that a similar in-depth study be conducted to understand the ground level realities for various other kinds of disabilities and ensure that everyone has a seamless and accessible banking experience.

INTRODUCTION

The Introduction Chapter highlights the demographic and social realities of persons with disabilities in India. As per the 2011 Census, there are 26.8 million persons with disabilities in India. They constitute 2.2 per cent of the total population of the country. (1) The World Bank, however, pegs this figure to be anywhere between 5%-15%. (2). This includes persons from range of disabilities including visual, hearing, and speech, loco motor and mental disabilities. Despite these numbers, there is a lack of understanding of their needs, and people with disabilities face a number of obstacles when it comes to living a normal life, and they face major hurdles while availing banking facilities. The scope of the report is largely focussed on infringement of rights of persons with visual impairment who use or propose to use banking facilities. In the wake of all banking and financial transactions becoming digital and online, sufficient measures ought to be taken to ensure that the entire population, including the persons with visual impairment continue to have access to these services.

LEGAL PROVISIONS

The Legal provisions given in Indian Constitution, Rights of Persons with Disabilities Act, 2016 (RPwD Act) and the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) have been described in Chapter 2. It is humbly submitted that being legally competent to contract, visually challenged persons have a right to independently handle their financial services. It is therefore necessary that all such provisions are made which would enable them to have access to these services. Visually challenged persons are increasingly occupying professional positions and handling all their day-to-day affairs independently. Denial of access to these services at par with other citizens of the country is in violation of their right to be treated equally under Article 14 of the Constitution, their right to practise any profession, or to carry on any occupation, trade or business under Article 19(1) (g) and their right to a dignified life under Article 21 of the Constitution.

HISTORICAL BACKGROUND - RBI NOTIFICATIONS AND IBA GUIDELINES

Chapter 3 discusses the Historical Background of a series of Circulars by the Reserve Bank of India (RBI) and Indian Bank's Association (IBA) that direct the Banks to make adequate provisions for accessibility in the entire lifecycle of banking services. There are landmark notifications which include-

2008 Circular by RBI that directs banks should offer all the banking facilities including cheque book facility, ATM facility and locker facility to the visually challenged and also assist them in withdrawal



of cash. Further, it is directed that persons with visual impairment cannot be denied the above facilities, as the element of risk is involved in case of other customers as well. ([Annexure 2](#))

2009 Circular by RBI -mandated that banks should make *at least one third* of new ATMs installed as talking ATMs with Braille keypads and place them strategically in consultation with other banks to ensure that at least one talking ATM with Braille keypad is generally available in each locality for catering to needs of persons with visual impairment. ([Annexure 3](#))

2012 Circular by RBI -reiterated that banks should make *all new ATMs* installed from July 1, 2014 as talking ATMs with Braille keypads. Banks should lay down a road map for converting all existing ATMs as talking ATMs with Braille keypads and the same may be reviewed from time to time by the Customer Service Committee of the Board. In addition to the above, magnifying glasses should also be provided in all bank branches for the use of persons with low vision, wherever they require for carrying out banking transactions with ease. The branches should display at a prominent place notice about the availability of magnifying glasses and other facilities available for persons with disabilities. ([Annexure 4](#))

ACCESSIBILITY OF MAJOR INDIAN BANKS

A preliminary examination to check accessibility of digital banking websites and mobile applications revealed that there are major problems and are discussed in detail in Chapter 4. It is a significant reference that showcases real issues faced by PwDs and we encourage these findings be further examined to hold the banks accountable. The key Findings can be summarized in the following tables.

TEST SUMMARY OF BANK WEBSITES

Number of Public Sector Bank Websites: 11

Number of Private Sector Bank Websites: 6

Number of Foreign Bank Websites: 5

	Number of Public Sector Bank Websites (11)			Number of Private Sector Bank Websites (6)			Number of Foreign Bank Websites (5)			Total Passed on (22)
Testing Elements	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	
Keyboard Operable	6	5	NA	3	3	NA	2	3	NA	11
Form Elements	2	9	NA	0	6	NA	3	2	NA	5
Captcha	1	9	1	1	4	1	0	0	5	2
Descriptive link (Read More, Click Here)	0	11	NA	0	6	NA	3	2	NA	3
Focus visibility	6	5	NA	1	5	NA	4	1	NA	11
Zooming	11	0	NA	6	0	NA	5	0	NA	22



	Number of Public Sector Bank Websites (11)			Number of Private Sector Bank Websites (6)			Number of Foreign Bank Websites (5)			Total Passed on (22)
Testing Elements	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	
Colour Contrast	1	10	NA	0	6	NA	3	2	NA	4
Accessibility Statement/Features	10	1	NA	2	4	NA	4	1	NA	16

TEST SUMMARY OF BANKING APPS

Number of Public Sector Bank Apps: 11

Number of Private Sector Bank Apps: 6

Number of Foreign Bank Apps: 5

	Number of Public Sector Bank Apps (11)			Number of Private Sector Bank Apps (6)			Number of Foreign Bank Apps (5)			Total Passed on (22)
Testing Elements	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	
Keyboard / Gesture Operable	11	0	NA	4	2	NA	4	1	NA	19
Form Elements	2	9	NA	0	6	NA	1	4	NA	3
Captcha	1	1	9	0	0	6	0	0	5	1
Descriptive link (Read More, Click Here)	0	11	NA	0	6	NA	2	3	NA	2
Focus visibility	10	1	NA	4	2	NA	4	1	NA	18
Zooming	11	0	NA	6	0	NA	5	0	NA	22
Colour Contrast	2	9	NA	0	6	NA	2	3	NA	4



	Number of Public Sector Bank Apps (11)			Number of Private Sector Bank Apps (6)			Number of Foreign Bank Apps (5)			Total Passed on (22)
Testing Elements	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	
Touch Target Size	0	11	NA	0	6	NA	0	5	NA	0

TEST SUMMARY OF THIRD-PARTY MOBILE WALLETS AND UPI APPS

Number of Wallets and UPI Apps: 6

Testing Elements	Passed	Failed	Not Found/NA	Total Passed on (6)
Keyboard / Gesture Operable	6	0	NA	6
Form Elements	1	5	NA	1
Captcha	NA	NA	6	NA
Descriptive link (Read More, Click Here)	1	5	NA	1
Focus visibility	6	0	NA	6
Zooming	6	0	NA	6
Colour Contrast	2	4	NA	2
Touch Target Size	2	4	NA	2

ACCESSIBILITY FEEDBACK ON ONLINE DOCUMENTS AVAILABLE ON BANKS' CORPORATE WEBSITES

The summary below provides our findings followed by bank wise details.

1. Our overall key findings are that none of the banks have properly tagged fully accessible PDF.
2. PDFs which are OK are mostly searchable PDF or they are HTML pages.
3. This sample testing for just two links/PDF does not indicate all PDFs would be searchable/readable by screen reader.

Banks do not seem to be aware of online document accessibility and best practices to make web/documents optimally accessible for persons with disabilities.

MAJOR PROBLEMS IN BANKING ACCESS

A gross violation of above discussed legal provisions is highlighted in the following info graphic (Figure 1) and has been discussed in detail in Chapter 5. There have been references made to Access India Mailing List and Project Eyeway where users have filed repeated complaints on a range of issues that need to be resolved. The major issue remains that the digital banking solutions are marred with problems of inaccessibility and there is clear gap in implementation of guidelines.

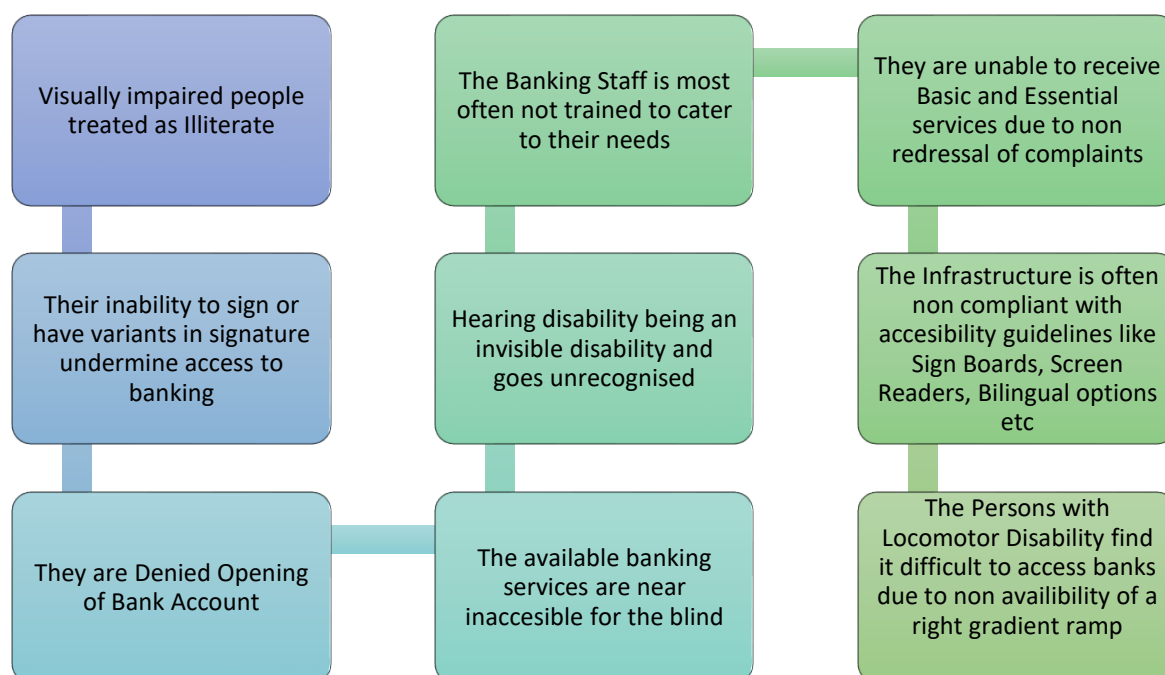


These include-

1. Continuing to Treat PwDs as illiterate
2. Signature mismatch
3. Procedural hurdles in money transfer
4. Poor compliance with Accessible ATM Regulations
5. Inaccessible Touch screen devices
6. Inaccessible websites and apps as also CAPTCHA
7. Accessibility issues of third-party wallets and UPI apps
8. Quick Session Time Out
9. Poor Customer Care
10. Lack of awareness on redressal mechanism
11. Communication challenge for hearing impaired customers
12. Issues with handling currency notes and coins

The readers are encouraged to refer to these problems in detail as they cause great distress to PwDs and must be resolved on priority.

Figure 5.1 - Inaccessibility Issues for the Persons with Disabilities



ACCESSIBLE BANKING - BEST PRACTICES

This section will look at some examples of standards and guidelines, as well as the success of efforts being made in that region. These best practices can be referred and adopted to resolve above mentioned problems.

RECOMMENDATIONS

We encourage that the Recommendations discussed in Chapter 7 be followed in letter and spirit to provision an inclusive and accessible financial system. Ultimately, making financial services more



accessible will only mean that the banks are responsibly catering to a significant, special and mammoth customer base which has potential to grow.

Some of the key recommendations include -

1. Comprehensive Master Circular/Directive by RBI on banking services for persons with special needs and Disabilities.
2. Compliance Audit.
3. Ensuring Digital Accessibility Standards.
4. Awareness and provisioning accessible formats for disabled customers.
5. Accessible Point of Sale machines and Kiosks.
6. Provisioning fully accessible multilingual ATMs.
7. Accessibility Cell/Centre of Excellence on Accessibility at RBI
8. Special Drive for Banking Access for PwDs.
9. Participatory Policy Formulation.
10. Training and sensitisation by Banks.
11. Training and sensitisation by RBI.
12. Better currency design

Conclusion

In Conclusion, we would like to reiterate that -

- a. The need of the hour is to create an inclusive financial sector which offers fully integrated services and facilities, upholding the constitutional and legal spirit.
- b. The RBI should formulate a policy or issue Master Circular/Guidelines as discussed above, to all Indian Banks with regard to the facilities and services offered to its Visually Impaired/Physically disabled Customers.
- c. The RBI must ensure that accessibility be incorporated as a key strategy in all future policies and programmes planned by it and is also incorporated in any existing policy which is executed by the department.

The XRCVC and other important stakeholders express their willingness to provide further inputs and participate in any consultations/committee headed by the Reserve Bank of India/ related organisations taking up the cause of PwDs financial Inclusion and providing accessibility solutions.



CHAPTER 1. INTRODUCTION

As per the 2011 Census, there are 26.8 million persons with disabilities in India. They constitute 2.2 per cent of the total population of the country. (4) The World Bank, however, pegs this figure to be anywhere between 5%-15 %. (5) This includes persons from range of disabilities including visual, hearing, and speech, loco motor and mental disabilities. Despite these numbers, there is a lack of understanding of their needs, and people with disabilities face a number of obstacles when it comes to living a normal life, and they face major hurdles while availing banking facilities. There is a general lack of infrastructure and awareness in India that permits people with disabilities to use banking services. This translates to problems not just in accessing a physical bank and seeking help from a bank official, but also extends to accessing services such as ATM machines and online banking options.

The problem is exacerbated by the fact that around 69 per cent of persons with disabilities live in rural areas, and only around 55 per cent of the disabled population is literate and only 36.34 per cent is employed. (4) Although one may find some rare cases of disabled-friendly banking options in the metros, in the rural areas, the focus is lesser and there is a gap in the sensitisation towards meeting the needs of the disabled.

India is a signatory to both the United Nations Convention on the Rights of Persons with Disabilities, 2006. (Hereinafter, “UNCRPD”) and Biwako Millennium Framework towards an Inclusive, Barrier-free and Rights-based Society for PwDs in Asia and the Pacific, 2002.(6) and thus has an international obligation to ensure equal access to all members of the population. This obligation extends to giving people with disabilities the right to conduct banking services. This has been recognised by several Reserve Bank of India (RBI) directives as well, although these guidelines have not been fully implemented so far.

Currently, it is very difficult for people with disabilities to use banking services in India. If a person who has a hearing disability walks into a branch for a home loan, the branch often does not have a person who can understand or interpret sign language. More usually, the branch does not even have the resources or knowledge about whom to contact to facilitate the interaction by interpreting. These obstacles mean that a person with disability/ies always has to latch on to someone who is fully capable to help them. Without such help in the form of guarantors or co-borrowers who are fully capable, the chances of obtaining finance from the banks are low because bank's probably give a person with disability/ies a much lower credit rating based on their own internal criteria. These determinations automatically put the disabled at a disadvantage. A person with a learning disability, for example, dyslexia, will face severe difficulty filling out an application form (or any document) and the non-cooperative behaviour by bank staff.

Making banking accessible for people with disabilities is a necessary fundamental right guaranteed by the Indian Constitution and is a necessary best practice with a sound commercial decision. There are a large number of people in India with differing levels of disability, who would benefit from using banking services. Additionally, the number of people will only increase with time as India's young population grows old, since incidence of disability increases with age.

Digital finance technologies have revolutionized the way we access and use money. It has become an essential tool for people with disabilities to bridge the differences between them and others,



and all efforts must be made to ensure that they are not at a disadvantage when it comes to using digital financial services. There is also the consideration that improving accessibility improves access for all users, and makes it possible for them to make use of more services. A lot of accessibility issues (such as the physical, digital inaccessibility to branches and ATMs, signature mismatches due to hand tremors or strokes) are common to the disabled, the elderly and those with neurological conditions. Taken together, this constitutes a significant percentage of the customer base - so these issues should be addressed by banks for that reason alone.

This Representation has been drafted by Xavier's Resource Centre for the Visually Challenged (XRCVC) voicing the sentiments of scores of Persons with Disabilities (PwDs). It will look at the legal imperatives that govern accessibility in banking services in India, and look at the various problems being faced by people with disabilities when trying to use banks. It will also look at sample guidelines from other countries and suggest clear and specific recommendations that should be incorporated by RBI for making banking institutions accessible in its true spirit.

The scope of this study has been largely focussed on persons with visual impairment who use or propose to use banking facilities. (Defined in [Annexure 1](#)). However, it is imperative to ensure a fully accessible banking system that encompasses the needs of all kinds of disabilities and elderly population.

This report serves as a ready reckoner that can be used by policy makers, decision makers, banks and subject experts to further the cause of rights of persons with disabilities in the banking sector.



CHAPTER 2. LEGAL PROVISIONS

The section below discusses the various legal mandates at national and international level that guarantee financial access to PwDs. Given below is an info graphic listing the several legal provisions for rights of PwDs. (Figure 2.1)

Figure 2.1 - Infographic of Legal Provisions in India for Rights of PwDs.



2.1 CONSTITUTIONAL PROVISION FOR INDIAN CITIZENS

The Constitution of India applies no discrimination to all legal citizen of India, whether they are healthy or disabled in any way (physically or mentally). Under the Constitution, the disabled are guaranteed the following fundamental rights and constitutional provisions:

1. The **Constitution Preamble** secures to the citizens including the disabled, a right of justice, liberty of thought, expression, belief, faith and worship, equality of status and of opportunity and for the promotion of fraternity.
2. **Article 14** states that- "The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India." Thus, it ensures that PwD are equals under law and must be necessarily provided every right to have be included granted equal protection of laws.
3. **Article 15(1)** assures that no discrimination against any citizen of India (including disabled) on the ground of religion, race, caste, sex or place of birth. This right clearly secures the position of disabled and reprimands any form of discrimination against PwDs.
4. **Article 15 (2)** guarantees that no citizen (including the disabled) shall be subjected to any disability, liability, restriction or condition on any of the above grounds in the matter of their access to shops, public restaurants, hotels and places of public entertainment or in the use of bathing ghats, wells, tanks, roads and places of public resort which are maintained wholly or partly out of government funds or dedicated to the use of the general public. This right clearly articulates that the obstacles and inaccessibility faced by PwD in access to general public services is violation of a fundamental right and strongly discouraged.
5. **Article 21** of the Constitution guarantees the every person including the disabled, the right of life and liberty. This encompasses several rights that contribute to an overall decent and



dignified life for the individual. The Hon'ble Supreme Court has held, in *Francis Coralie Mullin v. The Union Territory of Delhi* [1981 1 SCC 608] that Article 21's guarantee to life and personal liberty includes the right to live with human dignity and all that goes with it. Complete control over one's finances is a major aspect of a life with dignity, including the visually impaired. Requiring others to handle one's money or property because banking services have not been made fully accessible denies a visually impaired person personal autonomy, and thus infringes upon his or her right to life a live of dignity under Article 21.

6. Every disabled person can move the Supreme Court of India to enforce his fundamental rights and the rights to move the Supreme Court is itself guaranteed by right of constitutional remedies under **Article 32** of Constitution. Thus the everyday violation of essential fundamental rights of PwD can be checked by moving the justice systems of the nation.
7. **Article 41** obligates the state, within the limits of its economic capacity and development, make effective provisions for securing the right to work, to education and to public assistance in cases of unemployment, old age, sickness and disablement, and even in the other cases of undeserved want. This directive principle of state policy clearly puts the onus on state to provision for the above for all citizens and special mention of PwDs.

In the wake of all banking and financial transactions becoming digital and online, sufficient measures ought to be taken to ensure that the entire population, including the visually challenged persons continue to have access to these services. It is humbly submitted that being legally competent to contract, visually challenged persons have a right to independently handle their financial services. It is therefore necessary that all such provisions are made which would enable them to have access to these services. Visually challenged persons are increasingly occupying professional positions and handling all their day to day affairs independently. Denial of access to these services at par with other citizens of the country is in violation of their right to be treated equally under Article 14 of the Constitution, their right to practise any profession, or to carry on any occupation, trade or business under Article 19(1) (g) and their right to a dignified life under Article 21 of the Constitution.

2.2 THE UN CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES (UNCRPD)

The UN Convention on the Rights of Persons with Disabilities is an international human rights treaty dealing with the rights of disabled people. It is legally binding and India has ratified the same. The following articles make a strong case for ensuring universal accessibility and financial inclusion of PwD and their grievance redress as a universal right.

1. **Article 5 - Equality and non-discrimination** - Everyone is entitled to the equal protection and benefit of the law without discrimination.
2. **Article 9 - Accessibility**-People with disability have the right to access all aspects of society on an equal basis with others including the physical environment, transportation, information and communications, and other facilities and services provided to the public.
3. **Article 10 - Right to life**-States Parties reaffirm that every human being has the inherent right to life and shall take all necessary measures to ensure its effective enjoyment by persons with disabilities on an equal basis with others.
4. **Article 12 - Equal recognition before the law** -The Section 5 of Article 12 states that -“ Subject to the provisions of this article, 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.”.

5. **Article 13 - Access to justice** - People with disability have the right to effective access to justice on an equal basis with others, including through the provision of appropriate accommodations.
6. **Article 14 - Liberty and security of person** - People with disability have the right to liberty and security of person on an equal basis with others.
7. **Article 19 - Living independently and being included in the community** - People with disability have the right to live independently in the community.
8. **Article 21 - Freedom of expression and opinion, and access to information** - People with disability have the right to express themselves, including the freedom to give and receive information and ideas through all forms of communication, including through accessible formats and technologies, sign languages, Braille, augmentative and alternative communication, mass media and all other accessible means of communication.
9. **Article 28 - Adequate standard of living and social protection** - People with disability have the right to an adequate standard of living including food, water, clothing and housing, and to effective social protection including poverty reduction and public housing programmes.
10. **Article 31 - Statistics and data collection** - Countries must collect information about people with disability, with the active involvement of people with disability, so that they can better understand the barriers they experience and make the Convention rights real.

Thus all of the above rights have a direct or indirect linkage to ensure that banking and financial services be made accessible to all including PwDs. India has ratified the above convention and has enacted appropriate national legislations and guidelines as discussed in the section below.

Even as per the United Nations’ Department of Economic and Social Affairs Division For Social Policy And Development, “accessibility” is “the provision of flexibility to accommodate each user’s needs and preferences” and declares places, items and services (whether physical or virtual) accessible when it can be “easily approached, reached, entered, exited, interacted with, understood or otherwise used by persons of varying disabilities”. Therefore, full accessibility demands that differently abled members of society are able to interact with any service, place, or item as thoroughly as an abled member of society. It is humbly submitted that currently the online banking and financial services are not accessible to the visually challenged persons.

2.3 RIGHTS OF PERSONS WITH DISABILITIES ACT, 2016

Rights of Persons with Disabilities Act, 2016 (RPwD Act), was enacted to give effect to the proclamation on the full participation and equality of people with disabilities on both central and state governments. The RPwD Act has been enacted under Article 253 of the Constitution to give effect to the United Nations Convention on the Rights of Persons with Disabilities and connected matters. It has several provisions for people with disabilities, including education, employment, creation of barrier free environment, social security and similar overlooked areas.

The salient features of the Act

- The Act lays Responsibility on the appropriate governments to take measures and ensure that PwDs enjoy equal rights.



- The types of disabilities have been increased from 7 to 21. The Central Government will have the power to add more types of disabilities.
- Disability has been defined based on an evolving and dynamic concept.
- Additional benefits have been provided for persons with benchmark disabilities and those with high support needs
- Stress has been given to ensure accessibility in public buildings in a prescribed time frame along with Accessible India Campaign.
- The office of the Chief Commissioner of PwDs and the State Commissioner of disabilities will be strengthened and will act as regulatory bodies and Grievance Redress Agencies and also monitor implementation of the Act. These Offices will be assisted by an Advisory Committee comprising experts in various disabilities.
- Designated special Courts to handle cases concerning violation of rights of PwDs.

Furthermore, Sections 12, 13, 40, 42, 43 and 46 are of crucial role for financial inclusion of PwDs.

Section 12 (Right to access to justice) dictates that appropriate government shall ensure that persons with disabilities can exercise the right to access any court, tribunal, authority, commission, or any other body having judicial or quasi-judicial or investigative powers without discrimination based on disability. The implication for PwD is that they can approach any court without having to prove that they are not actively symptomatic.

Section 13 (Legal Capacity) states that appropriate government shall ensure that the persons with disabilities have rights, equally with others, to own or inherit property, movable or immovable; to control their financial affairs; and to have access to bank loans, mortgages and other forms of financial credit. The implication for persons with mental disability is that they can enjoy legal capacity on an equal basis with others in all aspects of life and have the right to equal recognition everywhere, like any other person, before the law.

SECTION 40 of the Act requires the central government to notify accessibility standards for different domains, including ICTs.

SECTION 42 requires the appropriate government to ensure that all content in audio, print and electronic formats are accessible, that there is access to electronic media for all by providing audio descriptions, sign language and close captioning and that daily use electronic goods are available in universal design.

SECTION 43 requires the appropriate government to take measures to promote development, production and distribution of universally designed consumer products and accessories for general use for persons with disabilities.

SECTION 46 requires all service providers, whether government or private, to make their services accessible within 2 years of notification of rules formulated in this regard by the Central Government under section 40.

The New Act will bring our law in line with the United National Convention on the Rights of Persons with Disabilities (UNCRPD), to which India is a signatory. This will fulfil the obligations on the part of India in terms of UNCRD. Further, the new law will not only enhance the Rights and Entitlements



of Divyangjan but also provide effective mechanism for ensuring their empowerment and true inclusion into the Society in a satisfactory manner. (7)

2.3.1 ACCESSIBILITY IN THE RPWD RULES 2017

There is a crucial mandate in the RPwD Rules in Chapter 6, titled - “Accessibility” which has the following rules for accessibility. These include -

1. Every establishment shall comply with the following standards relating to physical environment, transport and information and communication technology, namely: -
 - standard for public buildings as specified in the Harmonised Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons as issued by the Government of India, Ministry of Urban Development in March, 2016;
 - Information and Communication Technology -
 - i. Website standard as specified in the guidelines for Indian Government websites, as adopted by Department of Administrative Reforms and Public Grievances, Government of India;
 - ii. Documents to be placed on websites shall be in Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf format: Provided that the standard of accessibility in respect of other services and facilities shall be specified by the Central Government within a period of six months from the date of notification of these rules.
2. The respective Ministries and Departments shall ensure compliance of the standards of accessibility specified under this rule through the concerned domain regulators or otherwise.
3. Review of Accessibility Standards - The Central Government shall review from time to time the accessibility standards notified based on the latest scientific knowledge and technology.

2.4 ACCESSIBLE INDIA CAMPAIGN OF 2015

Department of Empowerment of Persons with Disabilities introduced flagship campaign called “Accessible India Campaign” in December, 2015. It intends to establish that barriers (physical, social, financial, attitudinal) which society sets for disabled are what prevent their participation in socio-economic and cultural activities equally like others. To overcome this barrier, it envisages accessibility in built environments, transport and ICT ecosystem. Similarly, mobility options from airports to railways and government public transport carriers have been assigned targets. With help of Ministry of Electronics and Information Technology, web accessibility of government websites is being targeted.

It has laid down specific time bound targets to achieve appropriate access to government buildings with access audits, these include-

Target 5.1: Conducting accessibility audit of 50% of all government (both Central and State Governments) websites and converting them into fully accessible websites by June 2022,

Target 5.2: Ensuring that at least 50% of all public documents issued by the Central Government and the State Governments meet accessibility standards by June 2022. (8)

It is imperative that a clear monitoring and evaluation of the scheme implementation be conducted to ensure it is fully translated on ground.



CHAPTER 3. HISTORICAL BACKGROUND - RBI NOTIFICATIONS

The most important resource when it comes to banking guidelines is the RBI, which comes out with regular notifications. The RBI has been conferred wide powers under the Banking Regulation Act, 1949 (BRA), under which it can supervise and control the various banking companies, and they are bound to follow its directions. Section 35A of the Act specifies that in public interest or in the interest of banking policy, the RBI can issue such directions as it deems fit, and the banking companies or the banking company, as the case may be, shall be bound to comply with such directions. RBI has released several notifications dealing with the rights of the disabled as described below.

3.1 BANKING FACILITIES TO THE VISUALLY CHALLENGED - 4TH JUNE 2008

The visually challenged persons have been facing several problems in availing banking facilities they were treated at par with illiterate people as they faced difficulties and practical challenges in signing the documents. The RBI recalled the Case No. 2791/2003 of the Honourable Court of Chief Commissioner for Persons with Disabilities in the above circular ([Annexure 14](#), [Annexure 15](#)). It has directed that banking facilities including cheque book facility / operation of ATM / locker etc. cannot be denied to the visually challenged as they are legally competent to contract. It has also directed that Banks must also advise their branches to render all possible assistance to the visually challenged for availing the various banking facilities. ([Annexure 2](#))

3.2 NEED FOR BANK BRANCHES ATMS TO BE MADE ACCESSIBLE TO PERSONS WITH DISABILITIES - 13TH APRIL 2009

The RBI has advised that banks must take necessary steps to provide all existing ATMs / future ATMs with ramps so that wheel chair users / persons with disabilities can easily access them and also make arrangements in such a way that the height of the ATM does not create an impediment in its use by a wheelchair user. Banks may also take appropriate steps including providing ramps at the entrance of the bank branches so that the persons with disabilities / wheel chair users can enter the bank branches and conduct business without much difficulty.

Further, banks should make at least one third of new ATMs installed as talking ATMs with Braille keypads and place them strategically in consultation with other banks to ensure that at least one talking ATM with Braille keypad is generally available in each locality for catering to needs of persons with visual impairment. Banks may also bring the locations of such talking ATMs to the notice of their visually impaired customers. ([Annexure 3](#))

3.3 BANKING FACILITIES TO VISUALLY CHALLENGED / PERSONS WITH DISABILITIES - 5TH SEPTEMBER 2012

The RBI acceded to the requests made by Office of the Chief Commissioner for Persons with Disabilities that visually challenged persons are facing problems in availing banking facilities like internet banking. It again directed the Banks to strictly adhere to instructions contained in the previous circulars dated June 4, 2008 and April 13, 2009 and extend all banking facilities to persons with blindness, low-vision and other disabilities. ([Annexure 4](#))



3.4 NEED FOR BANK BRANCHES ATMS TO BE MADE ACCESSIBLE TO PERSONS WITH DISABILITIES - 21ST MAY 2014

The RBI released this notice as several banks were found to be non-compliant to the above circulars, wherein banks were advised to provide, inter alia, ramps in all existing and future ATMs, and make at least one third of new ATMs installed as talking ATMs with Braille keypads.

In addition to the above, magnifying glasses should also be provided in all bank branches for the use of persons with low vision, wherever they require for carrying out banking transactions with ease. The branches should display at a prominent place notice about the availability of magnifying glasses and other facilities available for persons with disabilities. Banks are advised to report the progress made in this regard periodically to their respective Customer Service Committee of the Board and ensure compliance. ([Annexure 5](#))

3.5 NEED FOR BANK BRANCHES ATMS TO BE MADE ACCESSIBLE TO PERSONS WITH DISABILITIES - 11TH JUNE 2014

The RBI again took cognizance that some banks have not yet made at least one third of the new ATMs installed as talking ATMs with Braille keypads as advised vide the above circular. It, therefore, directed that banks should make all new ATMs installed from July 1st, 2014 as talking ATMs with Braille keypads and lay down a road map for converting existing ATMs as talking ATMs with Braille keypads as advised in the circular dated April 24th, 2009 *ibid* and the same may be reviewed from time to time by the Board of Directors/Customer Service Committee of the Board. ([Annexure 6](#))

3.6 RBI MASTER CIRCULAR ON CUSTOMER SERVICE - 1ST JULY 2015

- **Need for Bank Branches / ATMs to be made accessible to persons with disabilities**

Banks are advised to take necessary steps to provide all existing ATMs / future ATMs with ramps so that wheel chair users / persons with disabilities can easily access them. Care may also be taken to make arrangements in such a way that the height of the ATMs does not create an impediment in their use by wheelchair users. However, in cases where it is impracticable to provide such ramp facilities, whether permanently fixed to earth or otherwise, this requirement may be dispensed with, for reasons recorded and displayed in branches or ATMs concerned.

Banks are also to take appropriate steps, including providing of ramps at the entrance of the bank branches, wherever feasible, so that the persons with disabilities/wheel chair users can enter bank branches and conduct business without difficulty. Banks are advised to report the progress made in this regard periodically to their respective Customer Service Committee of the Board and ensure compliance.

- **Providing banking facilities to persons with visual impairment**

In order to facilitate access to banking facilities by visually challenged persons, banks are advised to offer banking facilities including cheque book facility / operation of ATM / locker, etc., to the visually challenged as they are legally competent to contract. This was reiterated in the order passed by the Honourable Court of Chief Commissioner for Persons with Disabilities, dated September 5th, 2005.

Further, in Paragraph 14 of the above Order, the Honourable Court has observed that visually Impaired persons cannot be denied the facility of cheque book, locker and ATM on the possibility



of risk in operating / using the said facility, as the element of risk is involved in case of other customers as well.

Banks should therefore ensure that all the banking facilities such as cheque book facility including third party cheques, ATM facility, Net banking facility, locker facility, retail loans, credit cards etc., are invariably offered to the visually challenged without any discrimination.

Banks may also advise their branches to render all possible assistance to the visually challenged for availing the various banking facilities

- **Talking ATMs with Braille keypads to facilitate use by persons with visual impairment**

Banks should make all new ATMs installed from July 1st, 2014 as talking ATMs with Braille keypads. Banks should lay down a road map for converting all existing ATMs as talking ATMs with Braille keypads and the same may be reviewed from time to time by the Customer Service Committee of the Board.

In addition to the above, magnifying glasses should also be provided in all bank branches for the use of persons with low vision, wherever they require for carrying out banking transactions with ease. The branches should display at a prominent place notice about the availability of magnifying glasses and other facilities available for persons with disabilities. ([Annexure 7](#))

3.7 WITHDRAWAL OF PENSION BY OLD / SICK / DISABLED / INCAPACITATED PENSIONERS - 1ST JULY 2017

Banks were advised to sensitise staff members to enable the old/sick/incapacitated pensioners to operate their accounts for pension disbursement. They were directed with the following guidelines-

- Wherever thumb or toe impression of the old/sick pensioner is obtained, it should be identified by two independent witnesses known to the bank, one of whom should be a responsible bank official.
- Where the pensioner cannot even put his/her thumb/toe impression and also would not be able to be physically present in the bank, a mark can be obtained on the cheque/withdrawal form, which should be identified by two independent witnesses, one of whom should be a responsible bank official. ([Annexure 8](#))

3.8 RBI INTEGRATED OMBUDSMAN SCHEME

It amalgamates three ombudsman schemes of RBI - banking ombudsman scheme of 2006, ombudsman scheme for NBFCs of 2018 and ombudsman scheme of digital transactions of 2019.

The unified ombudsman scheme will provide redress of customer complaints involving deficiency in services rendered by RBI regulated entities viz. banks, NBFCs (Non-banking Financial Companies) and pre-paid instrument players if the grievance is not resolved to the satisfaction of the customers or not replied within a period of 30 days by the regulated entity.

It also includes non-scheduled primary co-operative banks with a deposit size of Rs 50 crore and above. The integrated scheme makes it a "One Nation One Ombudsman" approach and jurisdiction neutral. ([22](#))



3.9 BANKING FACILITY FOR SENIOR CITIZENS AND DIFFERENTLY ABLED PERSONS - 9TH NOVEMBER 2017

The RBI has taken cognizance of how banks discourage or turn away senior citizens and differently abled persons from availing banking facilities in branches. It has directed the banks to put in place appropriate mechanism with the following specific provisions for meeting the needs of such customers so that they are able to avail of the bank's services without difficulty.

Banks were advised to implement these instructions by December 31st, 2017 in letter and spirit and give due publicity in their bank branches and website.

- a. Dedicated Counters/Preference to Senior Citizens, differently abled persons
- b. Ease of submitting Life Certificate: Life Certificate be updated promptly in the Core Banking Solution (CBS) to avoid any delay in credit of pension
- c. Cheque Book Facility: Banks shall not insist on physical presence of any customer including senior citizens and differently abled persons for getting cheque books.
- d. Automatic conversion of status of accounts into 'Senior Citizen Accounts' on the basis of date of birth maintained in the bank's records.
- e. Additional Facilities to visually impaired customers -regarding operations of accounts through identification of thumb/toe impression/mark by two independent witnesses and authorising a person who would withdraw the amount on behalf of such customer shall also be extended to the visually impaired customers.
- f. Ease of filing Form 15G/H
- g. Door Step Banking-banks are advised to make concerted effort to provide basic banking facilities, such as pick up of cash and instruments against receipt, delivery of cash against withdrawal from account, delivery of demand drafts, submission of Know Your Customer (KYC) documents and Life certificate at the premises/ residence of such customers. ([Annexure 9](#))

3.10 INDIAN BANKS' ASSOCIATION (IBA) GUIDELINES - IBA GUIDELINES PROVIDING BANKING FACILITIES TO VISUALLY IMPAIRED PERSONS - 18TH NOVEMBER 2008

The Circular stated that the banks must provide the visually impaired with every facility viz., cheque Book facility, ATM facility, net banking facility, locker facility, retail loans, credit cards etc.

Further, it was suggested that when finger print technology is fully developed and made available in the market, banks should consider integrating it with their core banking platform so that cheque book facility can be extended to a larger segment of persons with visual impairment. ([Annexure 10](#))

3.11 IBA STANDARDS ON ACCESSIBLE ATM - 27TH FEBRUARY 2013

These standards outline what constitutes 'accessibility' features for blind and low vision users and wheelchair users and process standards that ought to be followed to ensure effective deployment and uniformity amongst accessible ATMs of different banks and therefore facilitating ease at the level of the end consumer. There is a necessity to standardize the talking ATM process across the industry both between banks and ATM manufacturers. ([Annexure 11](#))



3.12 IBA POSTER TO BE DISPLAYED AT THE ENTRANCE OF TALKING ATM - 16TH JANUARY 2014

India has over 15 million visually challenged persons, and banks need to make special efforts to ensure that they are able to meet banking needs of these persons. In line with the RBI guidelines, all the banks have made efforts to provide banking services to visually Challenged Persons.

The IBA Sub-Committee on ATM System for Visually Challenged Persons had deliberated on the issue of talking ATMs and has designed Standards for Accessible ATM with Complete example of the workflow and screen shots for an Accessible ATM as adopted by Accessible ATMs which is complete, comprehensive and extremely user friendly. These standards outline what constitutes 'accessibility' features for blind and low vision users and wheelchair users and process standards that ought to be followed to ensure effective deployment and uniformity amongst accessible ATMs of different banks and therefore facilitating ease at the level of the end consumer. The Standards for Accessible ATM with Complete example of the workflow and screen shots for an Accessible ATM as adopted by Accessible ATMs was thereafter circulated to member banks for adoption vide IBA Guidelines. ([Annexure 12](#))

3.13 IBA MODEL CUSTOMER RIGHTS POLICY - 5TH FEBRUARY 2015

In line with the RBI Draft Charter of Customer Rights comprising the following five basic customer rights -

- (i) Right to Fair Treatment
- (ii) Right to Transparency and Honest Dealing,
- (iii) Right to Suitability,
- (iv) Right to Privacy,
- (v) Right to Grievance Redress and Compensation.

Customer protection is an integral aspect of financial inclusion. The following comprehensive Customer Rights Policy based on domestic experience and global best practices is brought out to enhance such protection.

The Customer Rights Policy enshrines basic rights of the customers of the banks regulated by the Reserve Bank of India. It spells out the rights of the customer and also the responsibilities of the bank. The Policy applies to all products and services offered by the bank or its agents, whether provided across the counter, over phone, by post, through interactive electronic devices, on internet or by any other method. ([Annexure 13](#))

3.14 IBA MODEL POLICY FOR GRIVANCE REDRESSAL IN BANKS - 5TH FEBRUARY 2015

The bank's policy on grievance redressal follows the under noted principles.

- Customers be treated fairly at all times
- Complaints raised by customers are dealt with courtesy and on time
- Customers are fully informed of avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the bank to their complaints.
- Bank will treat all complaints efficiently and fairly as they can damage the bank's reputation and business if handled otherwise.



- The bank employees must work in good faith and without prejudice to the interests of the customer.

3.15 IBA REPORT ON WORKING GROUP OF IBA ON BANKING FACILITIES FOR PERSONS WITH SPECIAL NEEDS DATED - 04TH JUNE 2018

IBA had formed a Working Group comprising of bank officials, representatives from RBI and representatives from persons with disability organisations to look into comprehensive banking services to all categories of persons with special needs. The report focuses on the following four key areas-

- Overall accessibilities
- Physical accessibility, at branch
- Accessibility of Credit
- Accessibility in use of Technology, websites, Apps, etc ([Annexure 15](#))

3.16 THE POTENTIAL FOR DIGITAL BANKING AND ASSOCIATED PROBLEMS

India took a big leap towards its vision of 'Digital Economy' with the announcement of historical demonetization policy in November, 2016. This stimulated the process of Cashless India as envisaged in the PM Jan-Dhan Yojana (2014) to offer accounts on affordable cost for poor and unbanked areas taking them under bigger financial umbrella.

This strategic decision taken by Government of India created tremendous impact on all the sectors. The banking sector was one of the major affected sectors. This policy made a compulsion to perform online/cashless financial transactions and to adopt digital banking services. Various studies indicate that demonetization supported cashless society in India.([9,10,11](#)).The fintech revolution further got a boost by multiple waves like an increase in smartphone and 4g data penetration and Covid-19. We have seen over a 50 per cent rise in UPI transactions among the blue-collared workforce in the last 18 months of the pandemic.

However, there is a stark digital divide in India where almost half of the population do not have proper access to internet. Especially for Persons with Disabilities, this shift towards digital technology has brought in problems beyond just an internet access.

The three major problems include -

- 1. Internet Infrastructure:** In India, even today only 50% of the population has internet access. The gap in rural areas is even more. Close to 70% of persons with disabilities live in rural areas, according to the report 'Disabled Persons in India-A Statistical Profile 2016' and about 1 crore persons with disabilities are in the age group 10-29, for whom education and skill development are vital. Without proper internet access and adequate infrastructure, the PwDs are forced to visit the branches, the skill development and employability of this big chunk of population is also grim.([12](#))
- 2. Assistive Technology:** The accessibility to assistive technology like screen-readers, magnification devices, and augmentative and alternative communication (AAC) devices, that enable persons with disabilities to consume the digital information, is low in developing countries. High cost of such devices puts them out of reach for many. Without a screen reader, a visually impaired person cannot consume majority of digital information. Therefore, despite



shifting information online, if there is no proper access to assistive technology that aids in consuming the information, the information is of no-good use. Even when assistive technology is available, its functionality is further impacted by the fact that websites are not accessible as discussed in Chapter 4.2.

- 3. Disability friendly content:** The content should also be disability friendly. For example, many educational and skill development videos are not accessible to people with hearing impairment because they don't include a sign-language interpretation. Making all the content on initiatives disability friendly will go a long way in furthering the accessibility mission. Therefore, the focus should not only be on digitizing the content but also on making it disability friendly.

So, today even if a Person with Disability has access to the internet s/he should have assistive technology (ex: screen reader) that enables consuming the digital information and also the information should have been made disability friendly (ex: sign language interpretation). Therefore, bridging the digital divide to enable persons with disability requires not only addressing the internet infrastructure challenge but also the challenge of information consumption.

India is ranked 46th in the world and 9th amongst lower-middle-income countries behind Egypt, Kenya, Angola, and the Philippines according to the Digital Accessibility Rights Evaluation Index (DARE index) that measures worldwide implementation and outcomes relating to digital accessibility.

Table 1-DARE Index Summary (13)

Parameter	Score
Country Laws and Regulations	20/25
Country Capacity to Implement	15/25
Country Policies and Programs Outcomes by Areas of ICT Accessibility and Level of Implementation	13/50
Total Score	48/100



CHAPTER 4. ACCESSIBILITY OF MAJOR INDIAN BANKS

This section examines the accessibility of Bank Websites, Mobile Applications, as also third-party mobile wallets and UPI apps. The accessibility of documents uploaded on certain bank websites to assess the level of usability for PwDs is also examined. It showcases some significant results that must be addressed by concerned authorities to ensure the universal financial inclusion and accessibility for all.

We have evaluated the various elements of accessibility both among websites and mobile applications using the “passed or failed criteria”. For the purpose of this test analysis partially functional or usable features have been rated as fail. This has been done in the interest of true accessibility. A smart assistive technology user may be able to find a work around a partially functioning element such as CAPTCHA, however, an average or poor user would automatically hit a road block. Hence the decision to rate partially functional elements as failed. A truly accessible website or mobile application should be easily usable by all and not just the smart user. This would ensure true compliance with the accessibility standards.

4.1 ACCESSIBILITY REPORT OF SAMPLE BANKING WEBSITES AND APPS (PRELIMINARY EVALUATION)

The XRCVC has compiled the initial basic accessibility testing results of the public sector banks, private sector banks and foreign banks. This report is based on the XRCVC’s analysis of both websites and apps used by major banks in India.

EVALUATION SCOPE AND LIMITATIONS

- The criteria for accessibility evaluation involved basic testing elements which must be on a website or app.
- Apart from this there are other accessibility compliance criteria which need to be followed as per Web Content Accessibility Guidelines (WCAG 2.1) or Bureau of Indian Standard (BIS) Indian Standard on ICT Products and Services (IS 17802). These were however not analysed.
- This test report is not intended to be a comprehensive evaluation of every page and functionality of the accessibility of the Websites & Apps tested, but rather as an illustrative sample-based user experience.
- Hence the banking industry and developers are urged to comprehensively implement all suggestions across the websites & apps.
- Given that login credential was not always available the testing was carried out generally without a login in, hence most of the web / app functionality was not tested. Given the fact that a surface evaluation has thrown up a number of critical problems, deeper analysis of the websites and apps would definitely bring out greater issues. Hence the need to comprehensively test and work on rectifying critical errors.
- In the case of mobile applications testing was only confined to android apps and not iOS. This is given the fact that android is far more used.
- Testing was confined to English language websites and apps.

WHY WEB & APP ACCESSIBILITY IS IMPORTANT

- It is critical that online services become totally accessible for people with disabilities and senior citizens, so that equal access and equal opportunities are provided to all. The easiest way to



do this is by ensuring that the online offerings are totally accessible and compliant with international accessibility standards or BIS Indian Standard on ICT Products and Services (IS 17802).

- Additionally, this will help businesses to grow as it will give access to a bigger market.
- Another important consideration for organizations is that web and app accessibility is required by laws and policies in many cases. What is also critical to bear in mind is that a website or app once made accessible does not guarantee its perennial accessibility with all subsequent upgradation / modifications. The developers need to check out the websites and apps for accessibility before rolling out the modification / upgradation. Hence accessibility checking needs to be incorporated as part of standard operating procedure.

SUMMARY OF KEY DIGITAL ACCESSIBILITY REQUIREMENTS

The current study focused on a few key elements listed below for web and app accessibility:

Keyboard Operable: It is important that the interface and content to be operable, and navigable with keyboard. Some people cannot use a mouse, or may be using other assistive technologies that may not allow for hovering or precise clicking.

Form: Forms allow people to enter information into a site for processing and manipulation. This includes things like sending messages and placing orders.

CAPTCHA: CAPTCHA is used to differentiate between real users and automated users, such as bots. In case of financial institutes use of CAPTCHA is a critical element for authentication/login. However, use of inaccessible CAPTCHA creates major accessibility barrier. There are accessible forms of CAPTCHA using output modes for different types of sensory perception are provided to accommodate different disabilities.

Descriptive link (Read More, Click Here): Terms like “click here” and “read more” do not provide any context. Some people navigate using a list of all buttons or links on a page or view. When using this mode, the terms indicate what will happen if navigated to or activated.

Focus visibility: Can a person navigating with a keyboard, switch, voice control, or screen reader see where they currently are on the page?

Zooming: Is the content still readable? Does increasing the text size cause content to overlap?

Colour Contrast: Colour contrast is how legible colours are when placed next to, and on top of each other.

Accessibility Statement/Features: Information is available on website or if it is not available then special features provided on website to show developer were aware about accessibility such as skip to content, colour contrast, font size, etc.

Accessibility scanner: Accessibility Scanner, a Google accessibility evaluation tool for android mobile apps, scans the mobile app screen and provides suggestions to improve the accessibility of the app, based on: Content labels, Touch target size, Clickable items, Text and image contrast.

Touch Target Size: To ensure that target sizes are large enough for users to easily activate them, even if the user is accessing content on a small handheld touch screen device, has limited dexterity,



or has trouble activating small targets for other reasons. For instance, mice and similar pointing devices can be hard to use for these users, and a larger target will help them activate the target. This is especially critical for senior citizens.

Few other things which should also be look at to make more accessible:

Title: The title element, contained in the document's head element, is often the first piece of information announced by assistive technology. This helps tell people what page or view they are going to start navigating.

Landmark (NAME, ROLE, VALUE): Landmark regions help communicate the layout and important areas of a page or view, and can allow quick access to these regions. For example, use the nav element to wrap a site's navigation, and the main element to contain the primary content of a page.

Timing Adjustable: If session timeouts cannot be removed altogether, then let the end user using the site should be able to easily turn off, adjust, or extend their session well before it ends.

Images: Alt attributes (alt text) give a description of an image for people who may not be able to view them. When an alt attribute isn't present on an image, a screen reader may announce the image's file name and path instead. This fails to communicate the image's content.

Headings: Heading elements (h1, h2, h3, etc.) help break up the content of the page into related "chunks" of information. They are incredibly important for helping people who use assistive technology to understand the meaning of a page or view.

Lists: Lists elements let people know a collection of items are related and if they are sequential, and how many items are present in the list grouping.

Controls: Controls are interactive elements such as links and buttons that let a person navigate to a destination or perform an action.

Tables: Tables are a structured set of data that help people understand the relationships between different types of information.

Audio Control: Make sure that media does not auto play.

Captions: Confirm the presence of captions.

Audio: Transcripts allow people who cannot hear to still understand the audio content. It also allows people to digest audio content at a pace that is comfortable to them.

Animation: Content that moves, either on its own, or when triggered by a person activating a control.

Mobile and Touch

- Check that the site can be rotated to any orientation.
- Remove horizontal scrolling.
- Ensure that button and link icons can be activated with ease.
- Ensure sufficient space between interactive items in order to provide a scroll area.



ACCESSIBILITY FEEDBACK ON BANK WEBSITES AND APPLICATIONS

The XRCVC Testing team used the following for website testing:

Testing Period	7 th - 9 th June 2022
Screen Reader	NVDA
Screen Reader Version	2021.3.5
Browser	Chrome
Browser Version	102.0.5005.63 (Official Build) (64-bit)
Operating System	Windows 10
Operating System Version	21H2

The XRCVC Testing team used the following for mobile applications:

Testing Period	7 th - 9 th June 2022
Screen Reader	Talkback
Screen Reader Version	12.2
Operating System	Android
Operating System Version	11 and 12

The XRCVC Testing team used the following for third party wallets and UPI mobile applications:

Testing Period	21 st June 2022
Screen Reader	Talkback
Screen Reader Version	12.2
Operating System	Android
Operating System Version	11 and 12

COMMON ACCESSIBILITY PROBLEMS OF BANKING WEBSITES AND APPLICATIONS

The key findings can be summarized in the following tables.

TEST SUMMARY OF BANK WEBSITES

Number of Public Sector Bank Websites: 11

Number of Private Sector Bank Websites: 6

Number of Foreign Bank Websites: 5

	Number of Public Sector Bank Websites (11)			Number of Private Sector Bank Websites (6)			Number of Foreign Bank Websites (5)			Total Passed on (22)
Testing Elements	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	
Keyboard Operable	6	5	NA	3	3	NA	2	3	NA	11
Form Elements	2	9	NA	0	6	NA	3	2	NA	5
Captcha	1	9	1	1	4	1	0	0	5	2



	Number of Public Sector Bank Websites (11)			Number of Private Sector Bank Websites (6)			Number of Foreign Bank Websites (5)			Total Passed on (22)
Testing Elements	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	
Descriptive link (Read More, Click Here)	0	11	NA	0	6	NA	3	2	NA	3
Focus visibility	6	5	NA	1	5	NA	4	1	NA	11
Zooming	11	0	NA	6	0	NA	5	0	NA	22
Colour Contrast	1	10	NA	0	6	NA	3	2	NA	4
Accessibility Statement/Features	10	1	NA	2	4	NA	4	1	NA	16

TEST SUMMARY OF BANKING APPS

Number of Public Sector Bank Apps: 11

Number of Private Sector Bank Apps: 6

Number of Foreign Bank Apps: 5

	Number of Public Sector Bank Apps (11)			Number of Private Sector Bank Apps (6)			Number of Foreign Bank Apps (5)			Total Passed on (22)
Testing Elements	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	
Keyboard / Gesture Operable	11	0	NA	4	2	NA	4	1	NA	19
Form Elements	2	9	NA	0	6	NA	1	4	NA	3
Captcha	1	1	9	0	0	6	0	0	5	1
Descriptive link (Read More, Click Here)	0	11	NA	0	6	NA	2	3	NA	2
Focus visibility	10	1	NA	4	2	NA	4	1	NA	18
Zooming	11	0	NA	6	0	NA	5	0	NA	22
Colour Contrast	2	9	NA	0	6	NA	2	3	NA	4



	Number of Public Sector Bank Apps (11)				Number of Private Sector Bank Apps (6)		Number of Foreign Bank Apps (5)			Total Passed on (22)
Testing Elements	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	Passed	Failed	Not Found/NA	
Touch Target Size	0	11	NA	0	6	NA	0	5	NA	0

TEST SUMMARY OF THIRD-PARTY MOBILE WALLETS AND UPI APPS

Number of Wallets and UPI Apps: 6

Testing Elements	Passed	Failed	Not Found/NA	Total Passed on (6)
Keyboard / Gesture Operable	6	0	NA	6
Form Elements	1	5	NA	1
Captcha	NA	NA	6	NA
Descriptive link (Read More, Click Here)	1	5	NA	1
Focus visibility	6	0	NA	6
Zooming	6	0	NA	6
Colour Contrast	2	4	NA	2
Touch Target Size	2	4	NA	2

Following issues create major accessibility road blocks for the end users. This would result in.

- Links not being accessible with the keyboard
- Captcha would not be accessible
- The absence of heading levels or illogical sequence of the same would cause confusion
- Absence of landmarks would impact ease of navigation
- The Title of the page could be misleading or confusing.
- When Tables are used for form fields the end user would experience multiple challenges. Tables need to be used for data representation only
- Form fields are not appropriately labelled, or not labelled at all, the user would experience data input issues
- Poor colour contrast would impact functionality on the page / app for low vision persons
- The absence of appropriate labelling on buttons and graphics results in confusion and poor navigation. Buttons are not labelled
- Images are not comprehended as alt text is not made available at the back end.
- The absence of descriptive Links would cause confusion
- Inappropriately sized Touch target would cause poor selection



Banks and web / app developers therefore need to ensure that

- Keyboard navigation is guaranteed
- alternates modes of Captcha are available
- Heading levels are logical and sequential order
- Landmarks are appropriately defined
- Pages are properly titled.
- Table only represent data
- Appropriate form tags are use forms
- Appropriate Colour contrast is ensured
- Buttons are labelled
- All Images have alternate text at the backend for the screen reader to voice out.
- Links are appropriately described.
- Touch target should be large enough for users to easily activate

BANK SPECIFIC WEBSITE ANALYSIS**PUBLIC SECTOR BANKS**

The XRCVC tested the following public sector banks websites:

BANK NAME: STATE BANK OF INDIA (SBI)

URL: <https://www.onlinesbi.com/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Failed. Home Page. Combo box, Unlabelled image.
Captcha	Passed
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Failed

BANK NAME: STATE BANK OF INDIA (SBI)

URL: <https://sbi.co.in/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed. Home page. Submenu not operable
Form Elements	Failed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed. Home Page
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Passed



BANK NAME: BANK OF BARODA (BOB)**URL:** <https://www.bankofbaroda.in/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed. Sub-menu is not operable
Form Elements	Passed
Captcha	Failed. Online registration using debit card page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Passed

BANK NAME: UNION BANK OF INDIA**URL:** <https://www.unionbankofindia.co.in/english/home.aspx>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Failed. Online debit card application page. Table is used
Captcha	Failed. Online debit card application page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility Statement/Features	Passed

BANK NAME: PUNJAB NATIONAL BANK (PNB)**URL:** <https://www.pnbindia.in/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Passed
Captcha	Failed. Apply Online page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Passed

BANK NAME: CANARA BANK**URL:** <https://canarabank.com/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Failed. Apply debit page. Table is used



Testing Elements	Accessibility Criteria Passed / Failed
Captcha	Failed. Apply debit page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Passed

BANK NAME: BANK OF INDIA (BOI)**URL:** <https://www.bankofindia.co.in/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Failed. POS refund claim page
Captcha	Failed. POS refund claim page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Passed

BANK NAME: CENTRAL BANK OF INDIA**URL:** <https://www.centralbankofindia.co.in/en>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Failed. Online locker application page
Captcha	Failed. Locker application page. Table is used
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light text on blue background
Accessibility Statement/Features	Passed

BANK NAME: INDIAN OVERSEAS BANK (IOB)**URL:** <https://www.iob.in/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Failed. Apply online page
Captcha	Failed. Pension loan page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed



Testing Elements	Accessibility Criteria Passed / Failed
Accessibility Statement/Features	Passed

BANK NAME: INDIAN BANK**URL:** <https://www.indianbank.in/#>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Failed. Home Page - Submenus/Radio button not accessible.
Captcha	Failed. Internet Banking Page/Online SB Page - captcha is graphic
Descriptive link (Read More, Click Here)	Failed. Internet Banking Page
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Passed

BANK NAME: UCO BANK**URL:** <https://www.ucobank.com/English/home.aspx>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Failed. Home Page - Graphic Alt text is wrong, Submenus not accessible.
Captcha	Failed. Salary Account Apply Page - captcha is graphic
Descriptive link (Read More, Click Here)	Failed. Home Page "know more" not accessible
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Passed

PRIVATE SECTOR BANKS**The XRCVC tested the following private sector banks websites:****BANK NAME: HDFC BANK****URL:** <https://www.hdfcbank.com/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Failed. Home Page - Alt text is wrong & not labelled in Graphic, Submenus not accessible.
Captcha	Failed. Apply Saving Account Page - captcha is graphic
Descriptive link (Read More, Click Here)	Failed. Home Page "View All" need more descriptive.



Testing Elements	Accessibility Criteria Passed / Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Dark text on Dark background
Accessibility Statement/Features	Failed

BANK NAME: ICICI BANK**URL:** <https://www.icicibank.com/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Failed. Home loan page
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on light background
Accessibility Statement/Features	Failed

BANK NAME: AXIS BANK**URL:** <https://www.axisbank.com/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Failed. Gold loan page
Captcha	Failed
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light text on white background
Accessibility Statement/Features	Passed

BANK NAME: INDUSIND BANK**URL:** <https://www.indusind.com/in/en/personal.html>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Failed. Home Page - Graphic not labelled, Submenus not accessible.
Captcha	Failed. Credit Card Login Page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Shade of colour text on dark background
Accessibility Statement/Features	Passed



BANK NAME: KOTAK MAHINDRA BANK**URL:** <https://www.kotak.com/en/home.html>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Failed
Captcha	Failed. Report Fraud Page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on grey background
Accessibility Statement/Features	Failed

BANK NAME: YES BANK**URL:** <https://www.yesbank.in/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Failed. Home Page - Graphic not labelled, Submenus not accessible.
Captcha	Passed. UPI Page
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Shade of colour text on dark background.
Accessibility Statement/Features	Failed

FOREIGN BANKS**The XRCVC tested the following foreign banks websites:****BANK NAME: STANDARD CHARTERED BANK****URL:** <https://www.sc.com/en/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Failed. Home loan page
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility Statement/Features	Passed



BANK NAME: CITI BANK**URL:** <https://www.citi.com/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Passed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Passed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed
Accessibility Statement/Features	Passed

BANK NAME: DBS BANK**URL:** <https://www.dbs.com/in/index/default.page>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Failed
Form Elements	Failed. NRI account page
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on white background
Accessibility Statement/Features	Failed

BANK NAME: HSBC BANK**URL:** <https://www.hsbc.co.in/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Passed
Captcha	Not found
Descriptive link (Read More, Click Here)	Passed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility Statement/Features	Passed

BANK NAME: BANK OF AMERICA**URL:** <https://www.bankofamerica.com/>

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard Operable	Passed
Form Elements	Passed
Captcha	Not found



Testing Elements	Accessibility Criteria Passed / Failed
Descriptive link (Read More, Click Here)	Passed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility Statement/Features	Passed

BANK SPECIFIC MOBILE APPLICATION ANALYSIS

PUBLIC SECTOR BANKS

The XRCVC tested the following public sector bank Applications:

BANK NAME: STATE BANK OF INDIA (SBI)

App Name: Yono Lite SBI - Mobile Banking

App Version: 5.3.57

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed (unlabelled buttons)
Captcha	Failed. Lock/unlock user id page has graphic captcha
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light text on white background
Accessibility scanner	Post logged in dashboard page. 13 suggestions. Item label and Touch target size
Touch Target Size	Failed

BANK NAME: STATE BANK OF INDIA (SBI)

App Name: YONO SBI: Banking & Lifestyle

App Version: 1.23.54

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed (unlabelled buttons)
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light text on white background
Accessibility scanner	Pre logged in dashboard page. 23 suggestions. Item label and Touch target size
Touch Target Size	Failed



BANK NAME: BANK OF BARODA (BOB)**App Name: bob World****App Version: 3.2.0**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. (Unlabelled buttons)
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility scanner	Post logged in dashboard page. 13 suggestions. Item label, Item descriptions, and Touch target size
Touch Target Size	Failed

BANK NAME: UNION BANK OF INDIA**App Name: nxt-Union Bank of India****App Version: 7.24.0**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed (unlabelled buttons)
Captcha	Passed
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed. Light text on white background
Accessibility scanner	Post logged in dashboard page. 9 suggestions. Item label and Touch target size
Touch Target Size	Failed

BANK NAME: PUNJAB NATIONAL BANK (PNB)**App Name: PNB ONE****App Version: 1.6.3**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed (unlabelled buttons & graphics)
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed. Descriptive need more for tick and “i” button
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Dark Shade text on Dark background



Testing Elements	Accessibility Criteria Passed / Failed
Accessibility scanner	Pre-Login page. 27 suggestions. Item label, Touch target size, and Text contrast
Touch Target Size	Failed

BANK NAME: CANARA BANK**App Name: CANDI - Mobile Banking App****App Version: 3.0.32**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. Pre login page
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility scanner	Pre login page. 3 suggestions. Touch target, Text contrast
Touch Target Size	Failed

BANK NAME: BANK OF INDIA (BOI)**App Name: BOI Mobile****App Version: 1.1.43**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Passed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed. Pre-Login Page
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light Colour & Thin Text on Dark Background
Accessibility scanner	Pre-Login Page. 7 Suggestions. Touch Target
Touch Target Size	Failed

BANK NAME: CENTRAL BANK OF INDIA**App Name: Cent Mobile****App Version: 6.0**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. (Unlabelled buttons and graphics)
Captcha	Not Found



Testing Elements	Accessibility Criteria Passed / Failed
Descriptive link (Read More, Click Here)	Failed. Submenus not disclosed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Dark Shade text on Dark background
Accessibility scanner	Login Page. 8 suggestions. Item label, Touch target size, Text contrast
Touch Target Size	Failed

BANK NAME: INDIAN OVERSEAS BANK (IOB)

App Name: IOB Mobile

App Version: 6.3.6

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Passed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed. Pre-Login Page
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light Colour & Thin Text on White Background
Accessibility scanner	Pre-Login Page. 5 Suggestions. Touch Target
Touch Target Size	Failed

BANK NAME: INDIAN BANK

App Name: IndOASIS Indian Bank Mobile App

App Version: 2.1.4

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed (unlabelled buttons & graphics)
Captcha	Not found
Descriptive link (Read More, Click Here)	Failed. Submenus not disclosed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Dark Shade text on Dark background
Accessibility scanner	Login page. 16 suggestions. Item label, Touch target size, Image contrast
Touch Target Size	Failed



BANK NAME: UCO BANK**App Name: UCO mBanking Plus****App Version: 2.0.50**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. (Unlabelled buttons and graphics)
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed. Registration Page
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Dark text on Dark background
Accessibility scanner	Log in dashboard page. 30 suggestions. Item label and Touch target size
Touch Target Size	Failed

PRIVATE SECTOR BANKS**The XRCVC tested the following private sector bank applications:****BANK NAME: HDFC****App Name: HDFC Bank Mobile Banking App****App Version: 11.1.0**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed (unlabelled buttons and Link)
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light shade text on white background
Accessibility scanner	Post logged in dashboard page. 14 suggestions. Item label and Touch target size
Touch Target Size	Failed

BANK NAME: ICICI BANK**App Name: iMobile Pay****App Version: 14.8**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. (Unlabelled buttons, graphics & radio buttons)
Captcha	Not found
Descriptive link (Read More, Click Here)	Failed. Pre login page.



Testing Elements	Accessibility Criteria Passed / Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light shade text on white background
Accessibility scanner	Failed. Pre login page. Text contrast, Touch target
Touch Target Size	Failed

BANK NAME: AXIS BANK**App Name: Axis Mobile - Pay, Invest & UPI****App Version: 7.5**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Failed. App is not accessible with screen reader
Form Elements	Failed
Captcha	Not found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Failed. Pre login page. Not allowed to check.
Touch Target Size	Failed

BANK NAME: INDUSIND BANK**App Name: IndusMobile: Digital Banking****App Version: 9.2.3**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. (Unlabelled buttons & graphics)
Captcha	Not found
Descriptive link (Read More, Click Here)	Failed. Open an account
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed. Light Colour & Thin Text on Light Background
Accessibility scanner	Pre login page. 5 Suggestions. Touch Target, Item label
Touch Target Size	Failed. Open account page

BANK NAME: KOTAK MAHINDRA BANK**App Name: Kotak - 811 & Mobile Banking****App Version: 5.3.5**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard /Gesture Operable	Passed
Form Elements	Failed. (Unlabelled buttons)



Testing Elements	Accessibility Criteria Passed / Failed
Captcha	Not found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Pre logged in dashboard page. 11 suggestions. Item label, Item descriptions, and Touch target size
Touch Target Size	Failed

BANK NAME: YES BANK**App Name: YES BANK****App Version: 5.2.25**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Failed
Form Elements	Failed
Captcha	Not found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Pre logged in dashboard page. 2 suggestions. Text contrast and Touch target size
Touch Target Size	Failed

FOREIGN BANKS**The XRCVC tested the following foreign bank applications:****BANK NAME: STANDARD CHARTERED BANK****App Name: SC Mobile India****App Version: 8.24.0**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Failed
Form Elements	Failed
Captcha	Not found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Failed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Failed
Touch Target Size	Failed



BANK NAME: CITI BANK**App Name: CitiBank IN****App Version: 23.5.4**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed (unlabelled buttons, image and Link) - Pre-Login Page
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Pre log in dashboard page. 13 suggestions. Item label, Touch target size, Image contrast& descriptions
Touch Target Size	Failed

BANK NAME: DBS BANK**App Name: digibank by DBS India****App Version: 4.19.2**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard/Gesture Operable	Passed
Form Elements	Failed (unlabelled buttons)
Captcha	Not found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Login page. 5 suggestions. Item label, Touch target size, Image contrast
Touch Target Size	Failed

BANK NAME: HSBC BANK**App Name: HSBC India****App Version: 3.21.0**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Passed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Passed
Focus visibility	Passed



Testing Elements	Accessibility Criteria Passed / Failed
Zooming	Passed
Colour Contrast	Passed
Accessibility scanner	Failed. Pre login page. Item descriptions, Touch target
Touch Target Size	Failed

BANK NAME: BANK OF AMERICA

App Name: Bank of America Mobile Banking

App Version: 22.06.0

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. Login page. Multiple label
Captcha	Not Found
Descriptive link (Read More, Click Here)	Passed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility scanner	Failed. Login page. 16 Suggestions. Touch target, item descriptions
Touch Target Size	Failed

ACCESSIBILITY ANALYSIS OF THIRD-PARTY MOBILE WALLETS AND UPI APPS

App Name: BHIM - MAKING INDIA CASHLESS

App Version: 2.9.6

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. Pre & Post Login page. Multiple labels, Unlabelled & Heading
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility scanner	Failed. Login page. 17 Suggestions. Touch target, item descriptions
Touch Target Size	Failed

App Name: Google Pay: Save, Pay, Manage

App Version: 155.1.2

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed



Testing Elements	Accessibility Criteria Passed / Failed
Form Elements	Passed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Passed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Passed
Accessibility scanner	Failed. Login page. 1 Suggestions., item label
Touch Target Size	Passed

App Name: MobiKwik – UPI, Bills, Paylater

App Version: 22.37.2

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed. Buttons unlabelled.
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Failed. Post Login page. 13 Suggestions., Text Contrast, Item Label, Touch Target
Touch Target Size	Passed

App Name: Paytm: Secure UPI Payments

App Version: 10.7.0

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Failed. Post Login page. 15 Suggestions., Text Contrast, Touch Target, Item descriptions, Clickable items
Touch Target Size	Failed



App Name: Dhani: Online Shopping App**App Version: 2022.06.16**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Failed. Post Login page. 4 Suggestions., Text Contrast, Touch Target.
Touch Target Size	Failed

App Name: PhonePe UPI, Payment, Recharge**App Version: 4.1.36**

Testing Elements	Accessibility Criteria Passed / Failed
Keyboard / Gesture Operable	Passed
Form Elements	Failed
Captcha	Not Found
Descriptive link (Read More, Click Here)	Failed
Focus visibility	Passed
Zooming	Passed
Colour Contrast	Failed
Accessibility scanner	Failed. Post Login page. 28 Suggestions., Text Contrast, Touch Target, Item label
Touch Target Size	Failed

4.2 ACCESSIBILITY FEEDBACK ON ONLINE DOCUMENTS AVAILABLE ON BANKS' CORPORATE WEBSITES

Testing dates: 16th and 17th June 2022.

The Banks' corporate website are a very important source of information for the public. It would provide updated data with regards to bank's policies and interest rates as well as services and charges. It also provides product information, branch/ATM search and other key information.

Banks upload documents on their websites largely in PDF format these are downloadable. The accessibility of such PDF files available on the banks' website is very critical. An accessible document is a document created to be as easily readable by a sighted reader, as a low vision or totally blind person. Accessible PDF documents allow individuals who use a screen reader the ease of navigation to navigate the document, so as to skip or move to a part of the document as also listen to descriptions of images. This would provide equal access to information on par with the sighted.



We have tested few banks both public and private sector corporate website for two main types of documents as a sample test for online document accessibility.

I. Rates / service charges

II. A policy documents

The summary below provides our findings followed by bank wise details.

- Our overall key findings are that none of the banks have properly tagged fully accessible PDF.
- PDFs which are OK are mostly searchable PDF or they are HTML pages.
- This sample testing for just two links/PDF does not indicate all PDFs would be searchable/readable by screen reader.
- Banks do not seem to be aware of online document accessibility and best practices to make web/documents optimally accessible for persons with disabilities.

Bank name	Document Name	Links	Document Type	Test result
SBI	Savings Bank Account Interest Rate	https://sbi.co.in/documents/26242/65574/200521-SB+Deposit+Interest+Rate+for+last+10+years+for+SBI+web+site.pdf/392caacb-dbbd-9f45-8775-80a947fd8691?t=1621498677845	PDF	OK
	Policy On Doorstep Banking Services For Individual Customers	https://sbi.co.in/documents/53471/53742/2108201141-POLICY+ON+DOORSTEP+BANKING+SERVICES+FOR+INDIVIDUAL+CUSTOMERS.pdf/84978a6f-9b4b-157f-bb49-e096ce9ca4b4?t=1597990803610	PDF	NOT OK IMAGE PDF
PNB	Interest Rates - Deposit	https://www.pnbindia.in/Interest-Rates-Deposit.html	HTML	ok
	Customer rights policy	https://www.pnbindia.in/downloadprocess.aspx?fid=08MmVjp5qvYb0/1vqmfq+w==	PDF	NOT OK IMAGE PDF
Canara Bank	SERVICE CHARGES ON CREDIT RELATED TRANSACTIONS - NON-PRIORITY ADVANCES (OTHER THAN RETAIL LENDING SCHEMES) - COMMISSION AND OTHER CHARGES	https://canarabank.com/media/4589/Service%20charges%20-%20to%20be%20updated%20in%20website21422.pdf	PDF	OK



Bank name	Document Name	Links	Document Type	Test result
	CUSTOMER RIGHTS POLICY VERSION NO. 08 2022-2023	https://canarabank.com/media/20163/CUSTOMER%20RIGHTS%20POLICY%202022-23.pdf	PDF	OK
BOB	Customer Protection Policy (Unauthorized Electronic Banking Transactions)	https://www.bankofbaroda.in/writereaddata/Images/pdf/Cutomer-Protection-Policy-2018.pdf	PDF	OK
	service charges - HTML page	https://www.bankofbaroda.in/interest-rate-and-service-charges/service-charges	HTML	OK
Union Bank of India	service-Charges-on-inland-services-GBOD.pdf	https://www.unionbankofindia.co.in/pdf/service-Charges-on-inland-services-GBOD.pdf	PDF	NOT OK IMAG E PDF
	CUSTOMER RIGHTS POLICY 2022-23	https://www.unionbankofindia.co.in/pdf/CUSTOMER%20RIGHTS%20POLICY%202022-23-Annex-I.pdf	PDF	OK
Bank of India	Annexure- I General Banking Service Charges (Excluding GST)	https://bankofindia.co.in/UserFiles/File/General_SC_Annexure.pdf	PDF	OK
	Policy For Grievance Redressal	https://bankofindia.co.in/RedressalPolicy	HTML	OK
Central Bank of India	Debit card charges	https://www.centralbankofindia.co.in/sites/default/files/Service%20Charges/DEBIT-CARD-CHARGES.pdf	PDF	OK
	Policy_Customer_Grievances_Redressal_Mechanism-2021-22.pdf = image pdf	https://www.centralbankofindia.co.in/sites/default/files/Policy_Customer_Grievances_Redressal_Mechanism-2021-22.pdf	PDF	NOT OK IMAG E PDF
HDFC Bank	Revision in Service Charges and Fees html	https://www.hdfcbank.com/personal/resources/fees-and-charges/fees-and-charges-personal/revised-service-charges	HTML	OK
		NO PDF found		



Bank name	Document Name	Links	Document Type	Test result
Axis Bank	INTEREST RATES ON DOMESTIC DEPOSITS*	https://www.axisbank.com/docs/default-source/interest-rates-new/fixed-deposit-wef-16-06-2022.pdf	PDF	OK
	Specific fees and service charges pertaining to Current Account	https://www.axisbank.com/docs/default-source/library/current-accounts/important-notice-for-current-account-fees-and-service-charges-effective-from-july-01-2022.pdf	PDF	OK
ICICI Bank	Regular Savings Account	https://www.icicibank.com/service-charges/regular-savings-account?	HTML	OK
	Customer Grievance Redressal Policy	https://www.icicibank.com/managed-assets/docs/personal/general-links/code-of-commitment/customer-grievance-redressal-policy.pdf	PDF	OK
YES Bank	Savings Account Schedule of Charges	https://www.yesbank.in/pdf?name=Savings-account-combined-schedule-of-charges-w.e.f.-1st-Apr-2022.pdf	PDF	OK
	YES BANK Whistle Blower Policy	https://www.yesbank.in/pdf?name=whistleblowerpolicy.pdf	PDF	OK
IDBI Bank	Interest Rate on Term Deposits (w.e.f. June 15, 2022)	https://www.idbibank.in/interest-rates.aspx	HTML	OK
	Accounts of Visually Challenged Persons PDF accessible	https://www.idbibank.in/pdf/visually_challenged_person.pdf	PDF	OK



USEFUL LINKS

For Website:

- WCAG 2.1: <https://www.w3.org/TR/WCAG21/><https://www.w3.org/TR/WCAG21/>
- W3C: <https://www.w3.org/WAI/standards-guidelines/wcag/><https://www.w3.org/WAI/standards-guidelines/wcag/>
- CIS Web Accessibility: <https://cis-india.org/accessibility/accessibility-of-govt-websites.pdf/view>

For Mobile:

- W3C: <https://www.w3.org/WAI/standards-guidelines/mobile/><https://www.w3.org/WAI/standards-guidelines/mobile/>
- W3C: <https://www.w3.org/TR/mobile-accessibility-mapping/><https://www.w3.org/TR/mobile-accessibility-mapping/>

Bureau of Indian Standards (BIS)

<https://standardsbis.bsbedge.com/>

IS 17802: Part 1: 2021

Accessibility for the ICT Products and Services Part 1: Requirements

IS 17802: Part 2: 2022

Accessibility for the ICT Products and Services Part 2: Determination of Conformance

Test Reports compiled by the Testing Team at the Xavier's Resource Centre for the Visually Challenged (XRCVC).



CHAPTER 5. MAJOR PROBLEMS IN BANKING ACCESS

The Major Problems Faced by Visually Challenged persons include-

1. Continuing to Treat PwDs as illiterate

Lack of awareness among bank officials concerning PwDs customers in spite of important RBI regulations, many times potential customers and also customers of banks are denied basic banking services such as the issue of a chequebook or debit/credit card. They are still being treated on par with an illiterate person in spite of the rule as a result of lack of awareness and training.

The path breaking RBI Circular of 4th June 2008 is more often than not, not even heard of by the bank executives who in spite of being presented the same, find excuses not to comply.

2. Signature mismatch

The visually challenged customers are bound to have issues while signing documents and the resultant signature mismatch. The cheques are generally rejected automatically by the system without a just and humane process to ensure that signatures of visually challenged customers be identified and the problem be resolved by an effective customer care and service E.g. - Phone call or SMS alert.

3. Procedural hurdles in money transfer

In many cases where people who are blind have not signed their names and instead have provided thumb impressions. In such cases when they are required to transfer money (interbank transfer) either to their own account or a third-party account using NEFT or IMPS, banks have declined the process citing the reason that they do not possess a chequebook, etc. Many of these customers don't have cards. In such cases, it is difficult to carry cash especially if it is a big amount and/or the distance is more. Some banks have come out with solutions that are temporary. This poses a major difficulty and must be resolved. There should be some systemic arrangement that would be binding on all banks.

4. Poor compliance with Accessible ATM Regulations

The well-intentioned wording of Clause 3 in RBI's circular dated April 13th 2009, (see [Annexure 3](#)) has been diluted by many banks by merely sticking to the letter rather than the spirit of the RBI intent. This has significantly compromised the roll-out of truly accessible ATMs with banks claiming to have met the "Braille labels / talking ATM" requirement, which in reality is indeed problematic. Only a few banks have started rolling out truly accessible ATMs and even among some of these the one-third ratio post-April 2009 and 2012 circular for all ATMs since has not been met.

5. Inaccessible Touch screen devices

More and more devices are operating on touch-screen technology, including debit and credit card machines for making payments. While keypad-based devices have a feature that a visually challenged person can identify the keys through a raised dot on one of the keys, touch screen devices are completely inaccessible to them, unless provided by a screen reader in the back end. This results in them depending on other people which not only violates their right to secrecy regarding their financial affairs but also their right to dignity.

Several devices, other than the ATMs at banks are now gradually being converted into touch-screen technology, such as passbook update machine, cash- deposit machine, token-dispensing machine



etc. These machines not being disabled-friendly is causing a huge hurdle for the visually challenged persons to handle their financial affairs independently.

6. Inaccessible websites and apps as also CAPTCHA

As noted in the previous chapter one of the biggest challenges in the accessing of digital banking services by persons with disabilities are inaccessible websites and mobile applications. What is more most online payment services having a CAPTCHA programme (Completely Automated Public Turing test to tell Computers and Humans Apart) to distinguish a human being from a computer. It requires someone to correctly evaluate and enter a sequence of letters or numbers perceptible in a distorted image displayed on their screen. This is not possible for visually challenged persons. Some websites have an option where the CAPTCHA is read out with some disturbances in the background, but it has been reported that it is completely incomprehensible for human ears to understand it through this system, making this aid completely useless.

7. Accessibility issues of third-party wallets and UPI apps.

As noted in chapter 4 many of the third-party wallets and UPI apps have accessibility problems. Digital banking and money transfers can only succeed if these apps are made accessible.

8. Quick Session Time Out

One Time Passwords (OTP) are more convenient for visually challenged persons as compared to CAPTCHA. However, visually challenged persons find it extremely difficult to access the OTP and submit it within the prescribed time limit, which is sometimes only 180 seconds. That time period is not sufficient for them to complete the whole process and the password expires by the time they submit it. This also affects people using net banking and mobile banking users using assistive technology.

9. Poor Customer Care

Customer Care departments of most service providers lack training and understanding regarding the needs and requirements of visually challenged persons, making it extremely difficult for the Visually challenged customers to explain their grievance to them. There is a failure on their part to prioritize and address the grievances regarding denial of banking services and accessibility of digital platforms by visually challenged persons. Many of the phone banking application's new upgrade caused the application to stop being user-friendly for the visually challenged persons.

10. Lack of awareness on redressal mechanism

Many persons with disability who have been denied banking access are unaware of how they can remedy the situation. The few who manage to reach NGOs may find a solution but many lack any information. What is more, most banks do not have an effective articulated system which is widely publicised for PwDs to voice their grievance.

This is in spite of IBA having a special Committee recommendation that banks have a dedicated web page spelling out services available for customers with disability. (Annexure IBA 2018)

11. Communication challenge for hearing impaired customers

Bank branches are not at all equipped to handle hearing impaired customers using sign language. This poses a huge challenge to this category of customers.

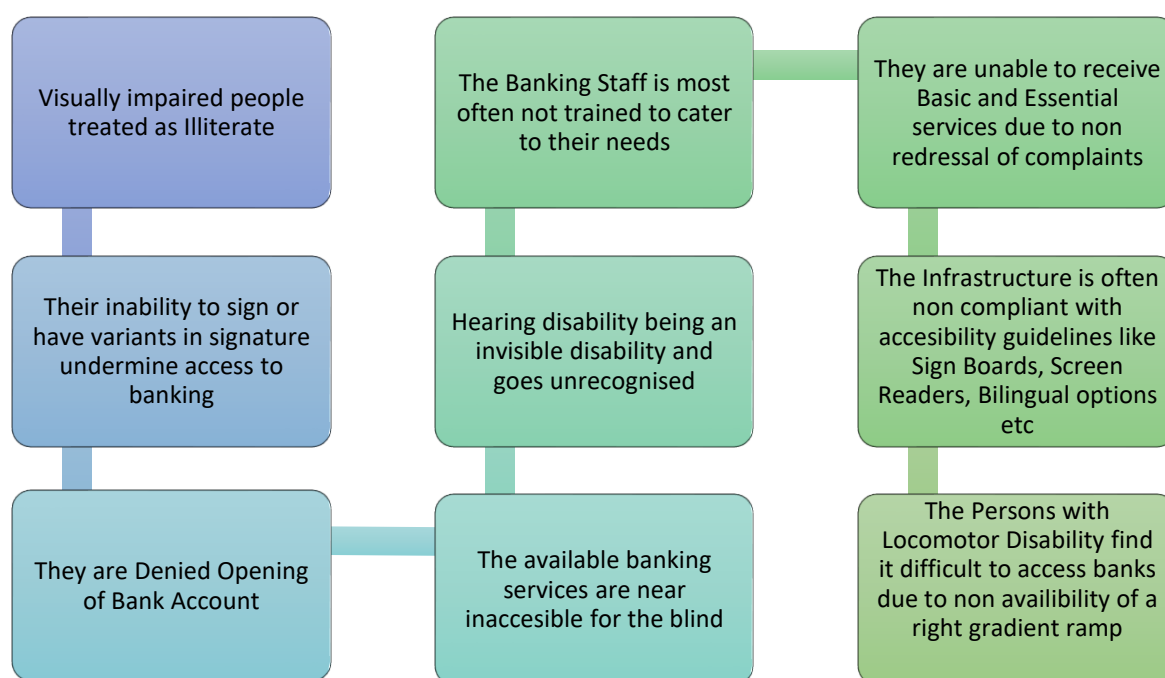


12. Issues with handling currency notes and coins

Demonetisation and the consequent issue of new currency and coin series has impacted blind persons very adversely. The tactile markings on these notes are barely perceptible and fade further with usage and handling. The currency recognition apps cannot be a substitute, given the fact that one is not recognising currency only in the comfort of one's home, but rather having to deal with number of notes in live public situations.

Given below is an info graphic explaining the inaccessibility issues faced by the Persons with Disability. (Figure 5.1).

Figure 5.1 - Inaccessibility Issues faced by the Persons with Disabilities



5.1 VOICES OF PEOPLE - THE HUMAN EXPERIENCE REFLECTING GROUND REALITY

The responses from a telephonic interview of several users indicate the following major operational challenges. The names of persons surveyed are withheld on request.

1. The Accessibility of Talking ATMs is still a dream as there are-
 - i. Very Few ATMs within specified geographical limits,
 - ii. The ones present are often dysfunctional due to poor maintenance,
 - iii. Some ATMS have been wrongly labelled as Accessible Talking ATMs with the audio feature of 'Welcome to the ATM' and 'Thank you for the transaction' being recorded as an Audio Feature,
 - iv. In the absence of accessible ATMs, the PwDs have to risk their privacy by sharing their ATM Pin while seeking assistance from someone.
2. The respondents complained of a plethora of operational issues and ethical dilemmas during physical visits to Bank Branches which include-
 - i. The obstacles in opening of bank accounts due to non-acceptance of signatures and labelling the PwDs as illiterate,



- ii. The Banking Staff's behavior towards PwDs are marked by misinformation on existing RBI Guidelines and insensitivity towards their disability,
 - iii. They refuse to provide in writing the denial of Bank Account openings leaving the PwDs helpless to seek further official recourse.
3. The respondents universally acclaimed of the several benefits of Digital Banking in the New India and hailed it as a milestone in provisioning financial inclusion and ease for the PwDs. However, they had some succinct challenges and suggestions to improve the banking experience-
- i. The several software updates in the mobile applications often overlook the user experience of a PwDs which blocks the seamless operation leaving them inaccessible to new features, creating log in issues and in turn affecting their independent transactions,
 - ii. Some applications like Google Pay and Uber have always ensured the needs of PwDs to create least hassle and must be an inspiration for other payment operating systems to have a mandatory accessibility audit system at every step of application development and audit.
4. The use and identification of currency notes has become increasingly challenging for the visually impaired due to uniformity in size of the new currency notes and a lack of proper training in identifying the new notes. The childhood training in identification of old version of currency notes was almost etched in their memories and with a shift it has become increasingly challenging for the to adapt. There is a gap in even awareness and use of the app to identify currency notes.
5. There is clearly rural-urban and rich-poor divide that deepens the digital divide and creates disparity in financial access for the people at margins, forcing them to continue struggle with banking access.

5.2 TESTIMONIALS BY VISUALLY CHALLENGED USERS

5.2.1 SOURCE - ACCESS INDIA MAILING LIST

Appended below is a set of complaints by visually challenged users of digital banking services directed to Access India Mailing List. It has complaints filed between April 2018 to January 2022. This list is not exhaustive and shows the worries of only very few users who have access to Information, Communication and Technology (ICT) and are both digitally literate and privileged. A vast majority of user complaints go unreported and thus the holistic picture of ground reality is not captured. This is an indication of the wide gap between legislation and its actual implementation.

Individual names withheld can be made available to authorities on request

ISSUES IN APP

Name: Person 1 - ICICI Bank

Hi, I am a frequent user of (ICICI) I mobile app on android. My recent observations are as follows.

1. Under the cards and forex section, selecting the credit card, pay button is visible for sighted users but, the button won't receive the keyboard focus.
2. There is no option to extend the session. Each 10 minutes, the user needs to re-login.

Name: Person 2 - ICICI Bank

Hi Sir, Not sure it's the app or it's me, I never found the Android version of ICICI Bank net-banking iMobile accessible enough. Their website on laptop is another disaster.



Name: Person 3- HDFC

Hello, HDFC is not an ideal website to use but it is manageable just fine. On the other hand, HDFC has maximum amount of offers on e-commerce sights so I think it is worth considering. Couple of things which may be difficult with jaws can easily be used either with virtual curser turned off in jaws or switching to NVDA.

Name: Person 4 - HDFC

Hi all, hope you are doing great. I am using Jaws 2022 and windows 10. when I do fund transfer, it does not read name of account from which I transfer the money. So, please do let me know what I do in this case. I explored some part of HDFC net banking is not accessible.

Name: Person 5 - SBI

Dear Friends, SBI's credit card statement is not accessible for screen reader. Please consider this working out in this matter.

Name: Person 6 - City Bank and Axis Bank

City Bank retail operations are set to be acquired by Axis, only the relevant approvals are to come in, both banks have finalized the deal otherwise. Axis is been coming out with some fine products in terms of credit cards as well as premium banking. However, their Android app is an accessibility disaster, and the technical team is so poorly trained in terms of accessibility that they don't even understand what you are trying to say when talking about Talkback and stuff. The website is something I haven't had a lot of opportunity to explore as I am only a credit card only user of Axis, but whatever I experienced of it, has to be said it isn't great either. So, with Axis you'll get great products, and poor accessibility and poor customer care.

Name: Person 7 - Axis Bank

Hi, I recently got a forex card from Axis bank through my company. For any operation I had to go to their website and do the operations. Their website with regards to this was nothing but a disaster. They use the same module for controlling debit card limits, etc. this also in their staff suggestion scheme.

Name: Person 8 HDFC bank and Kotak

I don't have good experience with HDFC internet banking as well on their android app for fund transfer and other account, debit card and credit card related activities. However, it's manageable. Apart from these three banks, you may have a look on Kotak Bank saving account as well, their services and mobile banking app is very much accessible and I have no difficulty in doing my all-transactions related activities in Kotak app. However, with a view of getting credit card in future, axis bank and ICICI are also good.

KYC ISSUES**Name: Person 9- Standard Chartered and ICICI**

Standard Chartered did V KYC for me without drama. With ICICI, it was originally very difficult, pre-Covid times it was and they originally refused to process my documents after home KYC. As I kept writing, and using up all avenues of protest and complained, they eventually processed my application. It was the ICICI Platinum card. On the basis of that card, I got the Amazon Pay card issued without any issues, and the on-boarding process in that case took just a couple of minutes.



CAPTCHA ISSUES

Name: Person 10 - SBI Bank

Dear List Members, The YONO portal of SBI (<https://sbiyono.sbi>) which is the modern internet banking portal of SBI doesn't has accessible captcha. I have already written to SBI. So, everyone who has account in SBI please write to top management of SBI for addressing this genuine concern of visually impaired community.

Sir, even if SBI implements audio captcha on <https://sbiyono.sbi> please also consider the fact that the YONO portal is not fully accessible. I earlier used to visit YONO portal when there was no captcha. While accessing mini statement on the portal JAWS didn't read out the amount column. Only date and narration were being read. All SBI staffers would be highly placed if they consider

5.2.2 SOURCE - EYEWAY HELP DESK

Given below are a set of ground level challenges faced by PwD while availing banking services. The given complaints are a random snapshot, reflect only a subset of the larger problem and the ground reality is worse. The names and contact details of the complainants have been withheld and could be provided on special request from the authorities.

Sr No	Complainants	City/State of residence	Bank & Branch	Issue
1	Complainant 1	Ratangarh, Rajasthan	State Bank of India, Ratangarh	Denied loan despite being a government employee
2	Complainant 2	Kalahandi District of Odisha	Union Bank of India, Bhawanipatna, Kalahandi District, Odisha	He has an account in the Union Bank of India. He wanted to avail an ATM card but the bank refuses to provide him the service because of his blindness.
3	Complainant 3	Nathupura, Delhi	Bank of Baroda, Burari Union Bank, Burari	Wants to open an account but both the banks are asking him to get a witness along and that without it they won't open his account since he is blind
4	Complainant 4	Thane, Maharashtra	Union Bank, Palgarh	Not getting an ATM card despite showing IBA & RBI Circulars. He uses thumb impression
5	Complainant 5	South Goa	State Bank of India, Margaon	The client wants to open an account the bank authorities have denied him ATM facilities and want him to give it in writing that he is responsible for any loss/ fraud since he is blind. Not allowed to do video KC.
6	Complainant 6	Khorda, Bhubaneswar	Bank of India, Khorda	Susant called on behalf of Kalpana who is blind and not comfortable speaking in English or Hindi. He has an account in the Bank of India from last 6 months but the bank manager



Sr No	Complainants	City/State of residence	Bank & Branch	Issue
				denied to provide ATM card to him on the grounds of his blindness, despite showing the RBI & IBA circulars.
7	Complainant 7	Deoria, Uttar Pradesh	Central Bank, Padri Bazaar, Deoria, Uttar Pradesh	Has an Account with Central Bank for the last 17 years but the bank authorities refuse to provide him with an ATM card because of his blindness. He has presented them with the IBA&RBI Guidelines but they don't budge.
8	Complainant 8	Indore, Depalpur	Bank of Baroda, Depalpur	He wanted to open an account with the bank but they denied him because of his blindness
9	Complainant 9	Kannad, district: Aurangabad	SBI bank, Sapaner branch, Taluka	He visited the bank many times to avail loan under Mudra yojana but bank rejected their proposal stating that he is blind and how he will return the loan. Bank did not accept his written application either.
10	Complainant 10	Nanded, Maharashtra	State Bank of India, BHOKAR ROAD, TAMSA,	Bank denied her ATM card facility stating that she is a visually impaired person. We provided her circulars of RBI and after seeing it, official told her that she is under 18 hence she cannot get ATM. We crosscheck with customer care of bank and representative told us that signature user may get ATM card of any age. As per RBI, thumb impression user should get all facilities.
11	Complainant 11	Patharadi, district: Ahmednagar	Bank of Maharashtra, Pathardi branch,	Many times, he visited Bank of Maharashtra for loan under Mudra yojana and the bank authorities kept given him conditions which he could not fulfil. For example, they wanted rent agreement of shop at the time of application but he did not have financial condition to pay rent before his loan could be sanctioned.
12	Complainant 12	Pune, Pimpri Chinchwad	Bank of Baroda, Pimpri Chinchwad Municipal Corporation Branch	Denied credit card despite being a government employee



CHAPTER 6. ACCESSIBLE BANKING- BEST PRACTICES

Governments and banking associations around the world have recognized that there is a severe lack of services for persons with disabilities. At various levels - national (mandatory) and private (voluntary) - standards and guidelines have been introduced to better the delivery of financial services. Countries such as Australia, Canada, and the United States have been at the forefront of this drive, and have to a large part been successful (Table 2). Certain Banks like Bank of America have left a significant benchmark. Their thousands of ATMs are talking ATM with range of accessible services from Braille and large-print statements to reader and interpreter services and more. They have an impeccable accessibility and usability of all websites, based on the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C). (14)

Moreover, Barclays Bank also has unique features to ensure accessibility for a range of disabilities like blind or visual impairment, deaf, hearing loss or speech impairment, mobility or dexterity impairment. They appreciate neurodiversity and offer services to reflect the fact that people learn and understand information in different ways. (15)

However, the problem arises at the implementation level. In several economically weaker countries (like India), though guidelines have been formulated, they are often not followed by banks because of their perceived non crucial nature. In order to come up with best practices and guidelines, it is necessary to see the successes in the past. This section will look at some examples of standards and guidelines, as well as the success of efforts being made in that region.

In India too certain noteworthy initiatives include-sign language service for hearing impaired launched by Standard Chartered India (16). World Gold for Senior Citizens with easy navigation, large fonts, sufficient spacing and clear menus by Bank of Baroda(17). Union Bank of India launched Union Access, a digital accessibility initiative for persons with disabilities and senior citizens. (18)

Table 2-Global Survey of Best Practices for Financial Inclusion of PwDs (19)

Sr No	Country	Legislation	Unique Features
1	Australia	The Disability Discrimination Act ,1992	These standards cover various areas: automated teller machines, electronic funds transfer at the point of sale, automated telephone banking and internet banking.
2	Canada	The Blind Persons Act ; The Employment Equity Act; Canadian Human Rights Act	Web accessibility and regulations such as the Accessibility for Ontarians with Disabilities Act (AODA) in Ontario, in line with the international web content accessibility guidelines
3	European Union	The Human Rights Act of 1993;	New Zealand Bankers' Association has released voluntary guidelines, providing personal banking, improving the print literature of the bank, training and sensitization of the customer service staff, redesign of the physical access to banks, and specific recommendations for the design and extension of ATMs and bank websites.



Sr No	Country	Legislation	Unique Features
4	South Africa	The Disability Act; National Disability Policy	The Code of Banking Practice is a voluntary code that lays down the foundation and basic requirements for taking accessibility into consideration.
5	Switzerland	The private sector pioneered the movement towards accessible banking. Credit Suisse, Switzerland's second largest bank, established its Centre of Accessibility in 2007 to provide beyond barrier-free products and services.	La Fédération Suisse des Aveugles et Malvoyants (Swiss association of the blind and visually impaired persons), produces a systematic report on the accessibility of Swiss banks which benchmarks the accessibility performance of the financial services industry.
6	United Kingdom	The Equality Act	Guidelines by The Royal National Institute for the Blind (RNIB) also laid down the economic benefits that would accrue to the bank if inclusive banking service is implemented
7	United States of America	The Americans with Disabilities Act (ADA) was passed in 1990	Section 508 of the Rehabilitation Act requires Federal electronic and information technology to be accessible to persons with disabilities,



CHAPTER 7. RECOMMENDATIONS

The report illustrates the gaps in the implementation of accessibility in banking services in India and strongly pushes for the following-

1. Comprehensive Master Circular/Directive by RBI on banking services for persons with special needs and Disabilities

RBI to review its circulars and guidelines regarding banking facilities for disabled in consideration of RPwD Act, UNCRPD, Accessible India Campaign, WCAG, BIS Indian standard on accessibility and need to review and renew Master circular on customer service in banks. The last circular updated was only on 1st July 2015 as reference wherein mentioned on banking facilities for disabled, post which there were several changes in banking sector and the rise of its digitalization.

We suggest RBI may come out with a master circular exclusively for banking services for customers with disabilities which will include the following and are further discussed in the subsequent points. Furthermore, there must be a system of checks and penalties in cases of non-compliance with above guidelines.

- a) Denial by banks for account opening and operation with thumb impression used by blind for signing.
- b) Clear guidelines on signature mismatch procedures for PwDs.
- c) Banks to comply with the scheme of flagging customers with disabilities on their system so as to provide effective and non- discriminatory service.
- d) Physical access at ATMs and branches.
- e) Clarity on doorstep banking for customers with disabilities.
- f) Clarity on KYC and simplification of a video KYC to be made available and publicizing the same.
- g) Accessible Point of Sale machines (PoS)
- h) Updating RBI circulars on accessible ATMs by adopting IBA standards on Talking ATMs.
- i) Digital accessibility compliance with set time frame by the RBI as per accessibility standards for digital banking channels
- j) Accessibility for banks e-contents - circulars, statements, brochures, policies, emails, social media, etc

2. Compliance Audit

A systematic audit by RBI and associated authorities to check the implementation of the guidelines/directives to assess the actual extent of its implementation. Such a study would give good empirical evidence and serve as the starting point for improvement on the current scenario. The RBI must also devise ways of stringent enforcement of its guidelines and penalize the banks that have not implemented the guidelines.

3. Ensuring Digital Accessibility Standards

World Wide Web Consortium (W3C) guidelines have been developed and accepted as international standards to make online content accessible to disabled persons. The guidelines address the entire life cycle of a website, web portal/application right from its conceptualization to design, development, maintenance and management. The purpose is to ensure that websites and online operations are accessible to everyone, including people with disabilities. This includes using technologies such as screen readers, speech recognition, providing text for all the non-text content etc. Compliant websites also permit the usage of keyboard as an alternate to the mouse, as it is



not possible for visually challenged persons to use a mouse. Accessibility compliance criteria which need to be followed as per Web Content Accessibility Guidelines (WCAG 2.1) or Bureau of Indian Standard (BIS) Indian Standard on ICT Products and Services (IS 17802) need to be ensured.

Technical Solutions which include Web Content Accessibility Guidelines (WCAG) compliant websites, assistive technology and ensuring accessibility audits as an essential part of the software development. The recurring updates on websites and mobile applications, must also pass the accessibility checks to ensure seamless user experience rather than creating additional operational hurdles for PwDs. [\(21\)](#)

Authorities also need to strictly enforce accessibility among third party mobile wallets and UPI apps given their wide spread popularity.

4. Awareness and provisioning accessible formats for disabled customers

Banks should publish instruction manuals for digital banking channels as well as banking procedures in accessible formats such as Braille and DAISY. The banks can collaborate with various volunteer organisations in producing and distributing the books to the relevant segments of the population. Such materials should also be made available for download, free of cost, on the bank's website.

5. Accessible Point of Sale machines and Kiosks

Touch-screen Point-of-Sale machines are gradually replacing key pad-based devices across the country, making the procedure to pay with a debit/credit card inaccessible to the visually challenged persons. Ensuring that hand held Point of Sale Machines are made fully accessible. The touch screen readers must necessarily be accompanied by screen readers to ensure the privacy, security and accessibility are non-negotiable.

The following visual impairment accommodations must be ensured-

- Small or ornate fonts are difficult for visually impaired customers to read. Information presented in large text-3/16-inch and contrasting colours is much easier for a low vision person to read and must be provisioned.
- Low contrast between the foreground and background or glare can make items on the screen difficult to read. High-contrast colours and either light-on-dark or dark-on-light elements can provide sufficient contrast.
- Kiosks should have screens that allow zoom access for inputs and responses to accommodate the visually impaired. The units also should be equipped with assistive technology such as audio or tactile responses for the customer's confirmation.
- Kiosks should have audio feedback systems for customers who are completely blind. The audible prompts can be used in conjunction with Braille keyboards to assist with navigation. These should be fully accessible and usable.
- The operable parts must be discernible by touch without activation-not a strong suit for touch screens-so kiosks typically need to provide alternative controls for the blind customer. Those controls could be a keypad.
- At least one tactilely discernible input control shall be provided for each function on kiosks used by customers who are unable to use a touch screen. The kiosk should be equipped with tactile input controls with speech output.



- Kiosks that require a great deal of data input must have a keyboard as a core feature. Taking inspiration from ADA compliant kiosks, these kiosks must have a physical qwerty keyboard with tactile indicators for finding the F and J keys on the home row([20](#))

6. Provisioning fully accessible multilingual ATMs.

These have the capacity to empower not just blind and low-vision persons but also the vast majority of illiterate and semi-literate people across rural, urban and semi-urban areas of India. Such ATMs have great untapped potential in the area of Direct Cash Transfers to the marginalized sections of society. Given the fact that the Government of India are routing subsidies and other wage payments (NREGA) through the banking channels, thus banking a very large unbanked population, there is a major need to build safe, user-friendly, direct interfaces which banking customers can interact with and use. This elimination of a human third party would help build confidentiality and greater security.

India is on the cusp of a major financial inclusion revolution as Post Offices across the country will soon become major deployers of ATMs, especially in rural areas. It is imperative that these ATMs are made fully accessible, so that a vast majority of blind, low-vision, illiterate and semi-literate persons could be included into the financial mainstream.

The benefit of deploying fully accessible multilingual ATMS are as follows:

- They are easy to learn for all target groups - be they blind, low-vision, illiterate and semi-literate persons.
- On account of them being the standard ATM with the add-on software, they provide a universal solution and can be thus used by all concerned.
- Accessibility (active voice guidance) can be triggered simply through the insertion of a standard headphone pin. These headphones are inexpensive and easily available.
- The IVRS-based menus follow the standard telephone keypad protocol and allow for upgradation in menu choices.
- The system currently offers a choice between English and Hindi. This language option can easily be widened to incorporate regional language requirements. This would thus provide local solutions to populations not familiar with either English or Hindi.
- Unlike some ATM solutions with touch-screens and voice prompts designed for semi-literate /illiterate populations, these ATMs offer wider choice options and allow the user greater choice in cash withdrawals and moreover the option of balance enquiry and PIN change.
- The optional “screen-off menu” provides greater privacy during banking operations.

7. Accessibility Cell/Centre of Excellence on Accessibility at RBI

RBI to set up an accessibility wing/centre of excellence to take care of physical and digital banking needs and guidance as an example for banks in India. For example, they have two initiatives where they can set up such a wing - Reserve Bank Innovation Hub (RBIH) at Bengaluru or RBI information Technology Pvt Ltd. (ReBIT) at Navi Mumbai.

8. Special Drive for Banking Access for PwDs

Along the lines of Jan Dhan Yojana, having a special drive to providing banking solutions for unbanked populations from PwDs and to promote the growth of banking services for people with



disabilities. This shall facilitate financial independence and encourage the opening of bank accounts by the disabled, ensure targeted delivery of subsidies and prevent fund leakages.

9. Participatory Policy Formulation

The Banks may involve persons with disabilities in executing its accessibility strategy and identify goals/ targets to be achieved over the next 2 years in terms of making banking services accessible in India.

10. Training and sensitisation by Banks

Banks must not only train and sensitise their employees to increase awareness of the various kinds of disabilities and the services to be provided to the disabled, but must actively solicit those with special needs and make it clear that they "understand their requirements" and welcome their business. Banks need to consider whether it makes sense to have separate or specially prepared paperwork for the disabled to fill out if the regular forms are difficult to read or understand. They must also have a sensitized, trained staff to assist the PwDs in filling up of forms and other documentation.

11. Training and sensitisation by RBI

RBI to proactively work in awareness in areas concerning the rights of customers with disabilities. For Example -The RBI Kehta hai / jingles / radio advertisement on banking rights of disabled.

12. Better currency design

Future currencies need to be designed keeping accessibility in mind and need to go through actual testing with users before being adopted.

CONCLUSION

- a) The need of the hour is to create an inclusive financial sector which offers fully integrated services and facilities, upholding the constitutional and legal spirit.
- b) The RBI should formulate a policy or issue Master Circular/Guidelines as discussed above, to all Indian Banks with regard to the facilities and services offered to its Visually Impaired/Physically disabled Customers.
- c) The RBI must ensure that accessibility be incorporated as a key strategy in all future policies and programmes planned by it and is also incorporated in any existing policy which is executed by the department.
- d) Awareness and sensitization should form the bedrock of all implementation. Hence it is very critical that all bankers are effectively sensitized and made aware of their needs and rights of PwDs.



LIST OF ABBREVIATIONS

AAC: Augmentative and Alternative communication devices

ADA: Americans with Disabilities Act

ATM: Automated Teller Machines

BIS: Bureau of Indian Standard

BRA: The Banking Regulation Act, 1949

CAPTCHA: Completely Automated Public Turing test to tell Computers and Humans Apart

GIGW: Guidelines for Indian Government websites

IBA: Indian Banks' Association

IVR: Interactive Voice Response

KYC: Know Your Customer

NIC: National Informatics Centre

NSDL: National Securities Depository Limited

OTP: One Time Passwords

RPwD: Rights of Persons with Disabilities Act, 2016

PwD: Persons with Disabilities

RBI: Reserve Bank of India

UNCRPD: United Nations Convention on the Rights of Persons with Disabilities

W3C: World Wide Web Consortium

WCAG 2.1: Web Content Accessibility Guidelines

XRCVC: Xavier's Resource Centre for the Visually Challenged



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ANNEXURES

In the interest of providing accessibility, we have reproduced RBI and IBA circulars in text only format rather than their original pdf versions which are available on their respective websites.

ANNEXURE 1 - DEFINITION OF PERSON WITH BENCHMARK DISABILITY

As per Persons with Disabilities Act, 2016 (PWDA) - has the following definition

“person with benchmark disability” means a person with not less than forty per cent. of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority;

“person with disability” means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others;

“person with disability having high support needs” means a person with benchmark disability certified under clause (a) of sub-section (2) of section 58 who needs high support;

ANNEXURE 2 - BANKING FACILITIES TO THE VISUALLY CHALLENGED - 4TH JUNE 2008

RESERVE BANK OF INDIA

RBI / 2007-08 / 358 DBOD.No.Leg BC. 91 /09.07.005/2007-08 June 4, 2008

To

All Scheduled Commercial Banks
(excluding RRBs)

Dear Sir,

Banking facilities to the visually challenged It has been brought to our notice that visually challenged persons are facing problems in availing banking facilities. It may be noted that banking facilities including cheque book facility / operation of ATM / locker etc. cannot be denied to the visually challenged as they are legally competent to contract.

2. It may be recalled that in the Case No. 2791/2003, the Honourable Court of Chief Commissioner for Persons with Disabilities had passed Orders dated 05.09.2005 which was forwarded by IBA to all the member banks vide their circular letter dated October 20, 2005. In the above Order, the Honorable Court has instructed that banks should offer all the banking facilities including cheque book facility, ATM facility and locker facility to the visually challenged and also assist them in withdrawal of cash. Further, in Para 14 of the above Order, the Honorable Court has observed that visually impaired persons cannot be denied the facility of cheque book, locker and ATM on the possibility of risk in operating / using the said facility, as the element of risk is involved in case of other customers as well.

3. Banks are therefore advised to ensure that all the banking facilities such as cheque book facility including third party cheques, ATM facility, Net banking facility, locker facility, retail loans, credit cards etc. are invariably offered to the visually challenged without any discrimination. Banks may



also advise their branches to render all possible assistance to the visually challenged for availing the various banking facilities.

Yours faithfully
(Prashant Saran)
Chief General Manager-in-Charge

Source: <https://www.rbi.org.in/Scripts/NotificationUser.aspx?Id=4226&Mode=0>

ANNEXURE 3 - NEED FOR BANK BRANCHES ATMS TO BE MADE ACCESSIBLE TO PERSONS WITH DISABILITIES - 13TH APRIL 2009

RESERVE BANK OF INDIA

RBI/2008-09/431 DBOD.No.Leg.BC.123 /09.07.005/2008-09 April 13, 2009
All Scheduled Commercial Banks
(Excluding RRBs)

Dear Sir,

Need for Bank Branches / ATMs to be made accessible to persons with disabilities

We have been receiving several suggestions including from Government of India to make bank branches and ATMs easily accessible to persons with disability by providing ramps so that wheel chair users can access them and the height of the machine is also appropriate for them. Further we have also been receiving suggestions for installing speaking software and key pads with letters in Braille to facilitate use by persons with visual impairment.

2. We have examined the above suggestions and banks are advised to take necessary steps **to provide all existing ATMs / future ATMs with ramps** so that wheel chair users / persons with disabilities can easily access them and also make arrangements in such a way that the height of the ATM does not create an impediment in its use by a wheelchair user. **Banks may also take appropriate steps including providing ramps at the entrance of the bank branches** so that the persons with disabilities / wheel chair users can enter the bank branches and conduct business without much difficulty.

3. Further, banks should **make at least one third of new ATMs installed as talking ATMs with Braille keypads and place them strategically in consultation with other banks to ensure that at least one talking ATM with Braille keypad is generally available in each locality** for catering to needs of visually impaired persons. Banks may also bring the locations of such talking ATMs to the notice of their visually impaired customers.

Yours faithfully
(Prashant Saran)
Chief General Manager-in-Charge

Source: <https://www.rbi.org.in/scripts/NotificationUser.aspx?Mode=0&Id=4923>



ANNEXURE 4 - BANKING FACILITIES TO VISUALLY CHALLENGED / PERSONS WITH DISABILITIES - 5TH SEPTEMBER 2012

RESERVE BANK OF INDIA

RBI /2012-13/191 DBOD.No. Leg.BC. 38/09.07.005/2012-13 September 5, 2012

All Scheduled Commercial Banks
(Excluding RRBs)

Dear Sir,

Banking facilities to visually challenged / persons with disabilities

Please refer to our Circular DBOD. No. Leg BC. 91 /09.07.005/2007-08 dated June 4, 2008 on the captioned subject advising that all banking facilities such as cheque book facility including third party cheques, ATM facility, Net banking facility, locker facility, retail loans, credit cards etc., are invariably offered to visually challenged persons without any discrimination as they are legally competent to contract. Further, please also refer to Circular DBOD.No.Leg.BC.123 /09.07.005/2008-09 dated April 13, 2009 advising banks to take necessary steps to provide all existing ATMs / future ATMs with ramps and to make at least one third of new ATMs installed as talking ATMs with Braille keypads.

2. It has been brought to our notice by Office of the Chief Commissioner for Persons with Disabilities that visually challenged persons are facing problems in availing banking facilities like internet banking. Banks are, therefore, advised to strictly adhere to instructions contained in the above circulars and extend all banking facilities to persons with blindness, low-vision and other disabilities.

Yours faithfully,

(Rajesh Verma)

Chief General Manager

Source: https://www.rbi.org.in/scripts/BS_CircularIndexDisplay.aspx?Id=7548

ANNEXURE 5 - NEED FOR BANK BRANCHES ATMS TO BE MADE ACCESSIBLE TO PERSONS WITH DISABILITIES - 21ST MAY 2014

RESERVE BANK OF INDIA

RBI/2013-14/598 DBOD.No.Leg.BC.113 /09.07.005/2013-14 May 21, 2014

All Scheduled Commercial Banks
(excluding RRBs)

Dear Sir/Madam,

Need for Bank Branches / ATMs to be made accessible to persons with disabilities

Please refer to our circular DBOD.No.Leg.BC.123 /09.07.005/2008-09 dated April 13, 2009 on the captioned subject, wherein banks were advised to provide, inter alia, ramps in all existing and future ATMs, and make at least one third of new ATMs installed as talking ATMs with Braille keypads.



2. We have been receiving several suggestions from members of public through Government of India and otherwise, on facilitating easy access to bank branches and ATMs by persons with disabilities for undertaking day to day banking transactions. We have examined such suggestions. As advised in the above circular, banks have to take necessary steps to provide all existing ATMs / future ATMs with ramps so that wheel chair users / persons with disabilities can easily access them. Care may also be taken to make arrangements in such a way that the height of the ATMs do not create an impediment in their use by wheelchair users. However, in cases where it is impracticable to provide such ramp facilities, whether permanently fixed to earth or otherwise, this requirement may be dispensed with, for reasons recorded and displayed in branches or ATMs concerned.

3. Banks are also to take appropriate steps, including providing of ramps at the entrance of the bank branches, wherever feasible, so that the persons with disabilities/wheel chair users can enter bank branches and conduct business without difficulty. Banks are advised to report the progress made in this regard periodically to their respective Customer Service Committee of the Board and ensure compliance. 2

4. Further, it has come to our notice that some of the banks have not made at least one third of the new ATMs installed as talking ATMs with Braille keypads as advised vide circular referred to above. It is, therefore, reiterated that banks should make all new ATMs installed from July 1st, 2014 as talking ATMs with Braille keypads. Banks should lay down a road map for converting all existing ATMs as talking ATMs with Braille keypads and the same may be reviewed from time to time by the Customer Service Committee of the Board.

5. In addition to the above, magnifying glasses should also be provided in all bank branches for the use of persons with low vision, wherever they require for carrying out banking transactions with ease. The branches should display at a prominent place notice about the availability of magnifying glasses and other facilities available for persons with disabilities.

Yours faithfully,
(Rajesh Verma)
Chief General Manager

Source: <https://www.rbi.org.in/scripts/NotificationUser.aspx?Id=8891&Mode=0>

ANNEXURE 6 - NEED FOR BANK BRANCHES ATMS TO BE MADE ACCESSIBLE TO PERSONS WITH DISABILITIES - 11TH JUNE 2014

RESERVE BANK OF INDIA

RBI/2013-14/ 637

UBD.BPD.Cir.No. 70/13.03.000/2013-14

June 11, 2014

The Chief Executive Officer
All Primary (Urban) Co-operative Banks

Dear Sir / Madam

Need for bank branches/ATMs to be made Accessible to persons with disabilities



Please refer to our circular UBD.CO.BPD.(PCB) Cir. No.63/9.39.000/2008-09 dated April 29, 2009 on the captioned subject, wherein banks were advised to provide, inter alia, ramps in all existing and future ATMs, and make at least one third of new ATMs installed as talking ATMs with Braille keypads. It was also advised to ensure that at least one talking ATM with Braille keypad is generally available in each locality for catering to the needs of visually impaired persons.

2. UCBs are now advised to take appropriate steps to provide ramps at the entrance of the bank branches so that persons with disabilities / wheel chair users can enter bank branches and conduct business without difficulty. Banks are advised to report the progress made in this regard periodically to their Board of Directors/Customer Service Committee of the Board and ensure compliance. However, in cases where it is impracticable to provide such ramp facilities, whether permanently fixed to earth or otherwise, the requirement may be dispensed with, for reasons recorded or displayed in branches or ATMs concerned.

3. It is observed that some banks have not yet made at least one third of the new ATMs installed as talking ATMs with Braille keypads as advised vide our circular referred to above. It is, therefore, advised that banks should make all new ATMs installed from July 1st, 2014 as talking ATMs with Braille keypads and lay down a road map for converting existing ATMs as talking ATMs with Braille keypads as advised in our circular dated April 24, 2009 *ibid* and the same may be reviewed from time to time by the Board of Directors/Customer Service Committee of the Board.

4. In addition to the above, magnifying glasses should also be provided in all bank branches for the use of persons with low vision, wherever they require, for carrying out banking transactions with ease. Branches should display at a prominent place notice about the availability of magnifying glasses and other facilities available for persons with disabilities.

Yours faithfully, (P.K.Arora)
General Manager

Source: <https://rbi.org.in/scripts/NotificationUser.aspx?Id=8936&Mode=0>

ANNEXURE 7 - KEY POINTS RELATED TO PWD CUSTOMER SERVICE FROM THE RBI MASTER CIRCULAR 2015

1.1 General

Policy for general management of the branches

Banks' systems should be oriented towards providing better customer service and they should periodically study their systems and their impact on customer service. Banks should have a Board approved policy for general management of the branches which may include the following aspects:-

(a) Providing infrastructure facilities by branches by bestowing particular attention to providing adequate space, proper furniture, drinking water facilities, with specific emphasis on pensioners, senior citizens, disabled persons, etc.



9. Operation of Accounts by Old & Incapacitated Persons

9.1 Facility to sick/old/incapacitated non-pension account holders

The facilities offered to pension account holders should be extended to the non-pension account holders also who are sick / old / incapacitated and are not willing to open and operate joint accounts.

9.2 Types of sick / old / incapacitated account holders

The cases of sick / old / incapacitated account holders fall into following categories:

- (a) An account holder who is too ill to sign a cheque / cannot be physically present in the bank to withdraw money from his bank account but can put his/her thumb impression on the cheque/withdrawal form;
- (b) An account holder who is not only unable to be physically present in the bank but is also not even able to put his/her thumb impression on the cheque/withdrawal form due to certain physical incapacity

9.3 Operational Procedure

With a view to enabling the old / sick account holders operate their bank accounts, banks may follow the procedure as under:

- a. Wherever thumb or toe impression of the sick/old/incapacitated account holder is obtained, it should be identified by two independent witnesses known to the bank, one of whom should be a responsible bank official.
- b. Where the customer cannot even put his / her thumb impression and also would not be able to be physically present in the bank, a mark can be obtained on the cheque / withdrawal form which should be identified by two independent witnesses, one of whom should be a responsible bank official.
- c. The customer may also be asked to indicate to the bank as to who would withdraw the amount from the bank on the basis of cheque / withdrawal form as obtained above and that person should be identified by two independent witnesses. The person who would be actually drawing the money from the bank should be asked to furnish his signature to the bank.

9.4 Opinion of IBA in case of a person who cannot sign due to loss of both hands

Opinion obtained by the Indian Banks' Association from their consultant on the question of opening of a bank account of a person who has lost both his hands and could not sign the cheque / withdrawal form is as under:

"In terms of the General Clauses Act, the term "Sign" with its grammatical variations and cognate expressions, shall with reference to a person who is unable to write his name, include "mark" with its grammatical variations and cognate expressions. The Supreme Court has held in AIR 1950 - Supreme Court, 265 that there must be physical contact between the person who is to sign and the signature can be by means of a mark. This mark can be placed by the person in any manner. It could be the toe impression, as suggested. It can be by means of mark which anybody can put on



behalf of the person who has to sign, the mark being put by an instrument which has had a physical contact with the person who has to sign”.

10. Providing bank facilities to persons with disabilities

10.1 Guidelines framed by IBA based on the judgment of Chief Commissioner for Persons with Disabilities

Indian Banks' Association has framed operational guidelines for implementation of its member banks on providing banking facilities to persons with disabilities. Banks should adopt / follow the operational guidelines meticulously.

10.2 Need for Bank Branches / ATMs to be made accessible to persons with disabilities

Banks are advised to take necessary steps to provide all existing ATMs / future ATMs with ramps so that wheel chair users / persons with disabilities can easily access them. Care may also be taken to make arrangements in such a way that the height of the ATMs does not create an impediment in their use by wheelchair users. However, in cases where it is impracticable to provide such ramp facilities, whether permanently fixed to earth or otherwise, this requirement may be dispensed with, for reasons recorded and displayed in branches or ATMs concerned.

Banks are also to take appropriate steps, including providing of ramps at the entrance of the bank branches, wherever feasible, so that the persons with disabilities/wheel chair users can enter bank branches and conduct business without difficulty. Banks are advised to report the progress made in this regard periodically to their respective Customer Service Committee of the Board and ensure compliance.

10.3 Providing banking facilities to Visually Impaired Persons

In order to facilitate access to banking facilities by visually challenged persons, banks are advised to offer banking facilities including cheque book facility / operation of ATM / locker, etc., to the visually challenged as they are legally competent to contract.

In the Case No. 2791/2003, the Honourable Court of Chief Commissioner for Persons with Disabilities had passed Orders dated September 5th, 2005 which was forwarded by IBA to all the member banks vide their circular letter dated October 20th, 2005. In the above Order, the Honourable Court has instructed that bank should offer all the banking facilities including cheque book facility, ATM facility and locker facility to the visually challenged and also assist them in withdrawal of cash.

Further, in Paragraph 14 of the above Order, the Honourable Court has observed that visually impaired persons cannot be denied the facility of cheque book, locker and ATM on the possibility of risk in operating / using the said facility, as the element of risk is involved in case of other customers as well.

Banks should therefore ensure that all the banking facilities such as cheque book facility including third party cheques, ATM facility, Net banking facility, locker facility, retail loans, credit cards etc., are invariably offered to the visually challenged without any discrimination.



Banks may also advise their branches to render all possible assistance to the visually challenged for availing the various banking facilities.

10.3.1 Talking ATMs with Braille keypads to facilitate use by persons with visual impairment

Banks should make all new ATMs installed from July 1st, 2014 as talking ATMs with Braille keypads. Banks should lay down a road map for converting all existing ATMs as talking ATMs with Braille keypads and the same may be reviewed from time to time by the Customer Service Committee of the Board.

In addition to the above, magnifying glasses should also be provided in all bank branches for the use of persons with low vision, wherever they require for carrying out banking transactions with ease. The branches should display at a prominent place notice about the availability of magnifying glasses and other facilities available for persons with disabilities.

****11. Guidelines for the purpose of opening/ operating bank accounts of Persons with Autism, Cerebral Palsy, Mental Retardation, Mental Illness and Mental Disabilities**

The following guidelines would be applicable for the purpose of opening / operating bank accounts of the above persons:

- i. The Mental Health Act, 1987 provides a law relating to the treatment and care of mentally ill persons and to make better provision with respect to their property and affairs. According to the said Act, “mentally ill person” means a person who is in need of treatment by reason of any mental disorder other than mental retardation. Sections 53 and 54 of this Act provide for the appointment of guardians for mentally ill persons and in certain cases, managers in respect of their property. The prescribed appointing authorities are the district courts and collectors of districts under the Mental Health Act, 1987.
- ii. The National Trust for Welfare of Persons with Autism, Cerebral Palsy, Mental Retardation and Multiple Disabilities Act, 1999 provides a law relating to certain specified disabilities. Clause (j) of Section 2 of that Act defines a “person with disability” to mean a person suffering from any of the conditions relating to autism, cerebral palsy, mental retardation or a combination of any two or more of such conditions and includes a person suffering from severe multiple disabilities. This Act empowers a Local Level Committee to appoint a guardian, to a person with disabilities, who shall have the care of the person and property of the disabled person.
- iii. Banks are advised to take note of the legal position stated above and may rely on and be guided by the orders/certificates issued by the competent authority, under the respective Acts, appointing guardians/managers for the purposes of opening/operating bank accounts. In case of doubt, care may be taken to obtain proper legal advice.

Banks may also ensure that their branches give proper guidance to their customers so that the guardians/managers of the disabled persons do not face any difficulties in this regard.

11.1 Display of information regarding Local Level Committees set up under the National Trust for the Welfare of Persons with Autism, Cerebral Palsy, Mental Retardation and Multiple Disabilities Act, 1999



In a case which came up before the High Court of Delhi, the Honourable Court had directed that all banks should ensure that their branches display in a conspicuous place (i) essential details about the facilities under the enactment (Mental Disabilities Act); (ii) the fact that the parties can approach the Local Level Committees, for the purpose of issuance of the certificate and that the certificate issued under the Mental Disabilities Act is acceptable; and (iii) the details of the Local Level Committees in that area. The Court had further directed that the information shall be displayed in the local language and English / Hindi (or both). Banks are advised to strictly comply with the above orders of the Court.

Source: https://rbi.org.in/scripts/BS_ViewMasCirculardetails.aspx?id=9862

**** (Note for banks - Mental Health Act, 1987 is replaced by Mental Health Care Act 2017. Also refer Rights to Persons with Disabilities Act 2016)**

ANNEXURE 8 - WITHDRAWAL OF PENSION BY OLD/ SICK/ DISABLED/ INCAPACITATED PENSIONERS - 1ST JULY 2017

Master Circular - Disbursement of Government Pension by Agency Banks

RBI/2017-18/1

DGBA.GBD.No.-1/31.05.001/2017-18

July 1, 2017

All Agency Banks

Dear Sir/Madam

Master Circular - Disbursement of Government Pension by Agency Banks

Please refer to our Master Circular RBI/2015-16/63 dated July 1, 2015 on the above subject. We have now revised and updated the Master Circular which consolidates important instructions on the subject issued by the Reserve Bank of India till June 30, 2017.

2. A copy of the revised Master Circular is enclosed for your information. This circular may also be downloaded from our website www.mastercirculars.rbi.org.in.

Yours faithfully

(S. Ramaswamy)

Principal Chief General Manager

Encl.: As above

Withdrawal of pension by old/ sick/ disabled/ incapacitated pensioners

14. In order to take care of problems/ difficulties faced by sick and disabled pensioners in withdrawal of pension / family pension from the banks, agency banks may categorise such pensioners as under:

- Pensioner who is too ill to sign a cheque / unable to be physically present in the bank



- Pensioner who is not only unable to be physically present in the bank but also not even able to put his/her thumb impression on the cheque/ withdrawal form due to certain physical defect / incapacity.

15. With a view to enabling such old/sick/incapacitated pensioners to operate their accounts, banks may follow the procedure as under:

- Wherever thumb or toe impression of the old/sick pensioner is obtained, it should be identified by two independent witnesses known to the bank, one of whom should be a responsible bank official.
- Where the pensioner cannot even put his/her thumb/ toe impression and also would not be able to be physically present in the bank, a mark can be obtained on the cheque/withdrawal form, which should be identified by two independent witnesses, one of whom should be a responsible bank official.

Accordingly, the agency banks are requested to instruct their branches to display the instructions issued in this regard on their notice board so that sick and disabled pensioners could make full use of these facilities. Banks are also advised to sensitise staff members in the matter and to refer to the FAQs on pension disbursement hosted on our website www.rbi.org.in in case of any doubt.

Source: https://rbi.org.in/Scripts/BS_ViewMasCirculardetails.aspx?id=11020

ANNEXURE 9 - BANKING FACILITY FOR SENIOR CITIZENS AND DIFFERENTLY ABLED PERSONS - 9TH NOVEMBER 2017

Reserve Bank of India

www.rbi.org.in

Department of Banking Regulation, Central Office, 12th & 13th Floor, Central Office Building, Shahid Bhagat Singh Marg, Mumbai - 400001 Tel No: 22661602, 22601000 Fax No: 022- 2270 5670, 2260 5671, 5691 2270, 2260 5692

RBI/2017-18/89

DBR.No.Leg.BC.96/09.07.005/2017-18

November 9, 2017

All Scheduled Commercial Banks (including RRBs)

All Small Finance Banks and Payments Banks

Dear Sir/ Madam

Statement on Developmental and Regulatory Policies - October 4, 2017- Banking Facility for Senior Citizens and Differently abled Persons

Please refer to Paragraph 8 of Statement on Developmental and Regulatory Policies, released by Reserve Bank of India on October 4, 2017 as part of Fourth Bi-monthly Monetary Policy Statement 2017-18, a copy of which is enclosed. It has been observed that there are occasions when banks discourage or turn away senior citizens and differently abled persons from availing banking



facilities in branches. Notwithstanding the need to push digital transactions and use of ATMs, it is imperative to be sensitive to the requirements of senior citizens and differently abled persons.

2. In view of the above, banks are required to put in place appropriate mechanism with the following specific provisions for meeting the needs of such customers so that they are able to avail of the bank's services without difficulty.

a. Dedicated Counters/Preference to Senior Citizens, Differently abled persons

Banks are advised to provide a clearly identifiable dedicated counter or a counter which provides priority to senior citizens and people who are differently abled including visually impaired persons.

b. Ease of submitting Life Certificate

As per extant guidelines issued by Department of Government and Bank Accounts, in addition to the facility of Digital Life Certificate under "Jeevan Praman" Scheme (refer circular DGBA.GAD.H-2529/45.01.001/2014-15 dated December 9, 2014), pensioners can submit physical Life Certificate form at any branch of the pension paying bank. However, it is observed that often the same is not updated promptly by the receiving branch in the Core Banking Solution (CBS) system of the bank, resulting in avoidable hardship to the pensioners. It is, therefore, advised that banks shall ensure that when a Life Certificate is submitted in any branch, including a nonhome branch, of the pension paying bank, the same is updated/ uploaded promptly in CBS by the receiving branch itself, to avoid any delay in credit of pension.

c. Cheque Book Facility

- (i) Banks shall issue cheque books to customers, whenever a request is received, through a requisition slip which is part of the cheque book issued earlier.
- (ii) Banks are advised to provide minimum 25 cheque leaves every year, if requested, in savings bank account, free of charge.
- (iii) Banks shall not insist on physical presence of any customer including senior citizens and differently abled persons for getting cheque books.
- (iv) Banks may also issue cheque books, on requisition, by any other mode as per bank's laid down policy.

It is further clarified that providing such facility in BSBDA will not render the account to be classified as non-BSBDA (c.f. Bank's response to query number 14 and 24 of our circulars "DBOD.No. Leg. BC.52/09.07.005/2013-14 dated September 11, 2013 on Financial Inclusion - Access to Banking Services - BSBDA - FAQs").

d. Automatic conversion of status of accounts

Presently, in some banks, even fully KYC - compliant accounts are not automatically converted into 'Senior Citizen Accounts' on the basis of date of birth maintained in the bank's records. Banks are advised that a fully KYC compliant account should automatically be converted into a 'Senior Citizen Account' based on the date of birth available in bank's records.

e. Additional Facilities to visually impaired customers

Banks are advised that the facilities provided to sick/old/incapacitated persons vide Paragraph 9 of our Master Circular DBR.No.Leg.BC.21/09.07.006/2015-16 dated July 1, 2015 on Customer Service in Banks (regarding operations of accounts through identification of thumb/toe impression/mark



by two independent witnesses and authorising a person who would withdraw the amount on behalf of such customers) shall also be extended to the visually impaired customers.

f. Ease of filing Form 15G/H

Banks are advised to provide senior citizens and differently abled persons Form 15G/H once in a year (preferably in April) to enable them to submit the same, where applicable, within the stipulated time.

g. Door Step Banking

We have issued instructions on Doorstep Banking vide circular DBOD.No.BL.BC.59/22.01.010/2006-2007 dated February 21, 2007 under Section 23 of Banking Regulation Act, 1949. However, in view of the difficulties faced by senior citizens of more than 70 years of age and differently abled or infirm persons (having medically certified chronic illness or disability) including those who are visually impaired, banks are advised to make concerted effort to provide basic banking facilities, such as pick up of cash and instruments against receipt, delivery of cash against withdrawal from account, delivery of demand drafts, submission of Know Your Customer (KYC) documents and Life certificate at the premises/ residence of such customers.

3. Banks are advised to implement these instructions by December 31, 2017 in letter and spirit and give due publicity in their bank branches and website.

Yours faithfully

(Saurav Sinha)

Chief General Manager

Statement on Developmental and Regulatory Policies, Reserve Bank of India issued by the Governor on October 4, 2017

8. Banking Facility for Senior Citizens and Differently abled Persons

It has been reported that banks are discouraging or turning away senior citizens and differently abled persons from availing banking facilities in branches. Notwithstanding the need to push digital transactions and use of ATMs, it is imperative to be sensitive to the requirements of senior citizens and differently abled persons. It has been decided to instruct banks to put in place explicit mechanisms for meeting the needs of such persons so that they do not feel marginalised. Ombudsmen will also be advised to pay heed to complaints in this context. Necessary instructions in this regard will be issued by end-October 2017.

Source: https://rbi.org.in//Scripts/BS_CircularIndexDisplay.aspx?Id=11163

ANNEXURE 10 - IBA GUIDELINES PROVIDING BANKING FACILITIES TO VISUALLY IMPAIRED PERSONS - 18TH NOVEMBER 2008

No. CE/RB-1/vip/1766

November 18, 2008

The Chief Executives of all Member Banks

Dear Sirs,

Providing Banking Facilities to Visually Impaired Persons



We refer to our circular No.CIR/RB/1230 dated February 4, 2006 enclosing procedural guidelines on the captioned subject. Subsequent to which, we have received several representations from visually impaired persons regarding the facilities and services being provided by banks and the ground level difficulties being faced by them. As you are aware, procedural guidelines were issued in the context of the order dated September 5, 2005 passed by the Court of Chief Commissioner for Persons with Disabilities, New Delhi regarding facilities to be provided to visually impaired persons.

Following complaints from Visually Impaired Persons, the Commissioner for Persons with Disabilities had again issued an advisory to the Finance Ministry and the Reserve Bank of India (RBI) in May 2008 to take necessary steps to ensure that visually impaired persons are not denied normal banking facilities.

Subsequently, the RBI, vide circular DBOD.No.Leg BC.91/09.07.005/2007-08 dated 4th June 2008 advised banks that all banks must render the same services to a visually impaired person as it would to any other person without discrimination. The Circular stated that the banks must provide the visually impaired with every facility viz., cheque Book facility, ATM facility, net banking facility, locker facility, retail loans, credit cards etc.

Following the above RBI circular, we had examined the need to revise the procedural guidelines issued in February 2006 in consultation with IBA Sub-committee on Customer Service and Customer Rights. We also had interactions with a Mumbai based voluntary organization working for the welfare of Impaired persons. The interactions indicated that technology innovation in the recent years had greatly empowered visually impaired persons in leading a normal life. Technology applications such as screen readers for computers and mobile phones, which are being used by the visually impaired persons for online/net banking, were demonstrated to us. Visually impaired persons can read and understand printed documents etc. by first scanning them and then getting them read out by the screen reader.

Further, we have seen demonstration of finger print technology being developed by software firm which would enable banks to store thumb impression of visually impaired persons in place of signature in their system. Cheques authenticated by them with thumb impression can be scanned and the image compared with that stored in the system to honour the cheque. It is suggested that when this technology is fully developed and made available in the market, banks should consider integrating it with their core banking platform so that cheque book facility can be extended to a larger segment of visually impaired persons.

Our attention was also drawn to the United Nations Convention on the Rights of Persons with Disabilities, which clearly commits to rights of persons with disability and their access to services. Article 9 of the Convention enables persons with disabilities to live independently and participate fully in all aspects of life and also gives them access to facilities and services open or provided to the public, both in urban and rural areas.

Additionally, Article 12 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."



It is expected that the guidelines issued by the RBI would result in an increase in the number of ATM cards issued to visually impaired persons. This would enhance the case for installation of talking ATMs to facilitate hassle free operations by visually impaired persons. Banks are requested to consider installing talking ATMs wherever feasible. Keeping in view the above, we have revised the procedural guidelines for providing banking facilities to visually impaired persons, copy of which is enclosed. While finalizing the document the Subcommittee took into consideration that request for ATM facilities, online banking facilities etc., would come only from visually impaired persons who are capable of using the applications. Members are requested to kindly consider the revised procedural guidelines and issue necessary instructions to the operating staff.

Yours faithfully,

K Unnikrishnan
Dy. Chief Executive

Encl: As above

ANNEXURE 11 - IBA STANDARDS ON ACCESSIBLE ATM - 27TH FEBRUARY 2013

No.CIR/RB/ATMVCP/6846

February 27, 2013

The Chief Executives of all Member Banks

Dear Sirs/Madam,

ATMs installed for Visually Challenged Persons

We refer to the RBI circular vide DBOD.No.Leg.BC.123 /09.07.005/2008-09 dated 13th April 2009 which mandates that all new and existing ATMs have accessibility features for wheel chair users. It also mandates that 1/3rd of all new ATMs ensure accessibility features for blind and low vision users. There has also been a follow up RBI circular vide DBOD.No.Leg.BC.38 /09.07.005/2012-13 dated 5th September 2012 reiterating the same. Following the RBI circulars the IBA had constituted a Sub-Committee on ATM systems for Visually Challenged Persons. The Subcommittee was set up to iron out initial problems resulting in the field because of ineffective models as well as lack of standardization. It was also aimed to collectively work at ensuring that cross country deployment of accessible ATMs effective and possible. The Sub-Committee through its deliberations and interactions with ATM manufacturers over the past years has been able to address the key concerns and take forward the initiative of effective deployment of accessible ATMs across the country. It is worth mentioning that the successful working of the Sub-committee in collaboration with the Xavier's Resource Centre for the Visually Challenged (XRCVC) and pioneering initiatives taken by Union Bank of India and State Bank of India has made bi-lingual accessible ATMs a reality in India with over 2000 such machines deployed across the country. These were required in order to avoid partially speaking ATMs which may have a few voice prompts but do not meet the criteria of accessibility as also avoid duplication of efforts by learning from already successful models. Keeping in view of the above, the present document on Standards for Accessible ATMs aims to lay down industry criteria which may be adopted by all banks to ensure effective deployment and uniformity among accessible ATM machines of different banks and therefore facilitate ease at the level of the end consumer. .../-



At the Meeting of the above Sub-Committee held on 24th August 2012, a Report was submitted by the Working Group consisting members from State Bank of India, ICICI Bank and HDFC Bank constituted by the Sub-Committee. The Report suggested a Process Flow for cash withdrawal by a visually challenged person at an ATM. The Report was submitted to the Standing Committee at its meeting on 19th November 2012. The Committee deliberated on the issue in detail and decided to circulate (1) The Standards for Accessible ATMs prepared by Union Bank of India and XRCVC and

(2), The Suggested Process Flows and Additional Features among the member banks. The decision of the Standing Committee was ratified by the Managing Committee of the Association at its meeting held on 30th November 2012. A copy of the Standards for Accessible ATMs (**Annexure -I**) and the Process Flow for cash withdrawal by a visually challenged person at an ATM (**Annexure -II**) are enclosed for upgrading the ATM Standards. Member banks are requested to kindly consider adopting the Standards for Accessible ATMs and the Process Flow for cash withdrawal by a visually challenged person at an ATM, within your deployment process.

Yours faithfully,

K Unnikrishnan
Deputy Chief Executive

ANNEXURE 12 - IBA POSTER TO BE DISPLAYED AT THE ENTRANCE OF TALKING ATM - 16TH JANUARY 2014

Indian Banks' Association
No.CIR/RB/ATMVCP/8667
January 16, 2014

The Chief Executives of all Member Banks

Dear Sirs/Madam,

ATMs installed for Visually Challenged Persons

As part of the measures aimed at inclusive banking, RBI in the recent past have issued guidelines for providing all banking facilities to the visually challenged persons as being provided to normal customers. These services include cheque book facility, ATM cards, mobile and Internet Banking facilities. India has over 15 million visually challenged persons, and banks need to make special efforts to ensure that they are able to meet banking needs of these persons. In line with the RBI guidelines, all the banks have made efforts to provide banking services to visually Challenged Persons. However, feedback indicate that visually challenged persons face lot of difficulties at the ground level, be it for opening of accounts, securing cheque book, ATM cards or getting net banking facilities.

2. The Reserve Bank of India had advised that banks should make at least one third of new ATMs installed as talking ATMs with Braille keypads and place them strategically in consultation with other banks to ensure that at least one talking ATM with Braille keypad is generally available in each locality for catering to needs of visually impaired persons.

3. The IBA Sub-Committee on ATM System for Visually Challenged Persons had deliberated on the issue of talking ATMs and has designed Standards for Accessible ATM with Complete example of



the workflow and screen shots for an Accessible ATM as adopted by Accessible ATMs which is complete, comprehensive and extremely user friendly. These standards outline what constitutes 'accessibility' features for blind and low vision users and wheelchair users and process standards that ought to be followed to ensure effective deployment and uniformity amongst accessible ATMs of different banks and therefore facilitating ease at the level of the end consumer. The Standards for Accessible ATM with Complete example of the workflow and screen shots for an Accessible ATM as adopted by Accessible ATMs was thereafter circulated to member banks for adoption vide IBA.

4. The IBA Sub-Committee while adopting the Standards for Accessible ATMs, also suggested that IBA may also consider displaying a board at the ATM entrance, so as to give the information that a particular ATM is SPECIALLY DESIGNED FOR VISUALLY CHALLENGED. Annexure - 1

5. The matter was deliberated at the meeting of the managing committee of the association and decided that member banks may be requested to display the Board as given in Annexure (as per the colours shown) at the ATM entrance which has been enabled for the same, for the benefit of visually challenged person.

6. Accordingly we request you to consider displaying the board for the benefit of the visually challenged fraternity.

Yours faithfully,

K Unnikrishnan
Deputy Chief Executive

Encl: as above

ANNEXURE 13 - IBA MODEL CUSTOMER RIGHTS POLICY - 5TH FEBRUARY 2015

No.CIR/RB/CS/1292

February 5, 2015

The Chief Executives of all Banks

Dear Sir/Madam,

Model Customer Rights Policy

The RBI had placed a draft Charter of Customer Rights comprising the following five basic customer rights - (i) Right to Fair Treatment (ii) Right to Transparency and Honest Dealing, (iii) Right to Suitability, (iv) Right to Privacy, (v) Right to Grievance Redress and

Compensation along with the explanatory notes on each Right for public comments at their website on 22nd August 2014. IBA had collated the views received from its member banks on the draft and forwarded to RBI after scrutiny by the Managing Committee Meeting on 26th September 2014. After studying the feedback from various stake holders, RBI had requested IBA and BCSBI to draft a ***Model Customer Rights Policy inter alia in line with the extant regulatory guidelines.*** Accordingly, the Draft Model Customer Rights Policy encompassing the five basic customer rights prepared and forwarded to RBI duly approved by the Managing Committee.



Now, RBI vide their communication dated January 27, 2015 has advised us of having approved the Model Policy document with certain changes in the draft and requested IBA to forward the document to member banks asking them to formulate their own Board Approved Policy at the earliest but not later than July 31, 2015. A copy of the RBI letter along with the Model Policy document is enclosed.

The matter was placed in the IBA Managing Committee Meeting held on 31st January 2015. The Committee accorded its approval for IBA to circulate the Model Customer Rights Policy among its member banks.

We request you to kindly formulate your own Board Approved Customer Rights Policy at the earliest but not later than July 31, 2015 under advice to RBI. We further request you to advise RRBs sponsored by you also to adopt similar Board approved Customer Rights Policy. The Model Policy document is uploaded on our website www.iba.org.in [under heading Customer Care - Model Policy Documents].

Yours faithfully,

K Unnikrishnan
Deputy Chief Executive

Source: <http://www.iba.org.in/ModelPolicy.asp>

[http://www.iba.org.in/Model%20Policy/No CIR RB CS 1292 dtd 05 02 15 Model Customer Rights%20Policy.pdf](http://www.iba.org.in/Model%20Policy/No_CIR_RB_CS_1292_dtd_05_02_15_Model_Customer_Rights%20Policy.pdf)

ANNEXURE 14 - IBA MODEL POLICY FOR GRIEVANCE REDRESSAL IN BANKS - 5TH FEBRUARY 2015

1. Introduction

In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Customer complaints are part of the business life of any corporate entity. This is more so for banks because banks are service organizations. As a service organization, customer service and customer satisfaction should be the prime concern of any bank. The bank believes that providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. This policy document aims at minimizing instances of customer complaints and grievances through proper service delivery and review mechanism and to ensure prompt redressal of customer complaints and grievances. The review mechanism should help in identifying shortcomings in product features and service delivery. Customer dissatisfaction would spoil bank's name and image. The bank's policy on grievance redressal follows the under noted principles.

- Customers be treated fairly at all times
- Complaints raised by customers are dealt with courtesy and on time
- Customers are fully informed of avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the bank to their complaints.



- Bank will treat all complaints efficiently and fairly as they can damage the bank's reputation and business if handled otherwise.
- The bank employees must work in good faith and without prejudice to the interests of the customer.

In order to make bank's redressal mechanism more meaningful and effective, a structured system needs to be built up towards such end. Such system would ensure that the redressal sought is just and fair and is permissible within the given frame-work of rules and regulation. The policy document would be made available at all branches. The concerned employees should be made aware about the Complaint handling process.

1.1 The customer complaint arises due to;

- a. The attitudinal aspects in dealing with customers
- b. Inadequacy of the functions/arrangements made available to the customers or gaps in standards of services expected and actual services rendered.

The customer is having full right to register his complaint if he is not satisfied with the services provided by the bank. He can give his complaint in writing, orally or over telephone. If customer's complaint is not resolved within given time or if he is not satisfied with the solution provided by the bank, he can approach Banking Ombudsman with his complaint or other legal avenues available for grievance redressal.

2. Internal Machinery to handle Customer complaints/ grievances

2.1 Customer Service Committee of the Board

This sub-committee of the Board would be responsible for formulation of a Comprehensive Deposit Policy incorporating the issues such as the treatment of death of a depositor for operations of his account, the product approval process and the annual survey of depositor satisfaction and the triennial audit of such services. The Committee would also examine any other issues having a bearing on the quality of customer service rendered. This Committee would also review the functioning of Standing Committee on Customer Service

2.2 Standing Committee on Customer Service

The Standing Committee on Customer Service will be chaired by the Managing Director/ Executive Director of the bank. Besides two to three senior executives of the bank, the committee would also have two to three eminent non-executives drawn from the public as members. The committee would have the following functions.

- Evaluate feed-back on quality of customer service received from various quarters. The committee would also review comments/feed-back on customer service and implementation of commitments in the Code of Bank's
- Commitments to Customers received from BCSBI.
- The Committee would be responsible to ensure that all regulatory instructions regarding customer service are followed by the bank. Towards this, the committee would obtain necessary feed-back from zonal/regional managers/ functional heads.



- The committee also would consider unresolved complaints/grievances referred to it by functional heads responsible for redressal and offer their advice.
- The committee would submit report on its performance to the customer service committee of the board at quarterly intervals.

2.3 Nodal Officer and other designated officials to handle complaints and grievances *

Bank would appoint a Nodal Officer of the rank of General Manager (or its equivalent) who will be responsible for the implementation of customer service and complaint handling for the entire bank. The bank may also appoint other designated officers at specified centres Customer Relation Officer at Zonal/Regional offices to handle complaint grievances in respect of branches following under their control. The name and contact details of nodal officer (s) will be displayed on branch notice boards.

[*Individual banks may decide on the appointment of officials at various levels to handle complaints and grievances depending upon its administrative structure/ channels used for delivery of product and services.

3. Mandatory display requirements

It is mandatory for the bank to provide;

- Appropriate arrangement for receiving complaints and suggestions.
- The name, address and contact number of Nodal Officer(s)
- Contact details of Banking Ombudsman of the area
- Code of bank's commitments to customers/Fair Practice code

4. Resolution of Grievances

Branch Manager is responsible for the resolution of complaints/grievances in respect of customer's service by the branch. He would be responsible for ensuring closure of all complaints received at the branches. It is his foremost duty to see that the complaint should be resolved completely to the customer's satisfaction and if the customer is not satisfied, then he should be provided with alternate avenues to escalate the issue. If the branch manager feels that it is not possible at his level to solve the problem, he can refer the case to Regional or Zonal Office for guidance. Similarly, if Regional or Zonal office finds that they are not able to solve the problem such cases may be referred to the Nodal Officer.

4.1 Time frame

Complaint has to be seen in the right perspective because they indirectly reveal a weak spot in the working of the bank. Complaint received should be analysed from all possible angles. Specific time schedule may be set up for handling complaints and disposing them at all levels including branches, zonal and head office. Branch manager should try to resolve the complaint within specified time frames, decided by the bank. Communication of bank's stand on any issue to the customer is a vital requirement. Complaints received which would require some time for examination of issues



involved should invariably be acknowledged promptly. Branch and zonal office must send action taken report on complaints received to the head office at the end of every month.

5. Interaction with customers

the bank recognizes that customer's expectation/requirement/grievances can be better appreciated through personal interaction with customers by bank's staff. Structured customer meets, say once in a month will give a message to the customers that the bank cares for them and values their feedback/suggestions for improvement in customer service. Many of the complaints arise on account of lack of awareness among customers about bank services and such interactions will help the customers appreciate banking services better. As for the bank the feedback from customers would be valuable input for revising its product and services to meet customer requirements.

6. Sensitizing operating staff on handling complaints

Staff should be properly trained for handling complaints. We are dealing with people and hence difference of opinion and areas of friction can arise. With an open mind and a smile on the face we should be able to win the customer's confidence. **Imparting soft skills required for handling irate agitated customers, to be will be an integral part of the training programs. schedule.** It would be the responsibility of the Nodal Officer to ensure that internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels. He should give feedback on training needs of staff at various levels to the HR Dept.

Source: <http://www.iba.org.in/ModelPolicy.asp>

[http://www.iba.org.in/Model%20Policy/b\)%20IBA%20Model%20Policy%20for%20Grivance%20Redressal%20in%20Banks.pdf](http://www.iba.org.in/Model%20Policy/b)%20IBA%20Model%20Policy%20for%20Grivance%20Redressal%20in%20Banks.pdf)

ANNEXURE 15 - IBA REPORT ON WORKING GROUP OF IBA ON BANKING FACILITIES FOR PERSONS WITH SPECIAL NEEDS DATED 04TH JUNE 2018

No.RB/CIR/PwD/5255

June 4, 2018

MDs and CEO of all the IBA Member Banks

Dear Sir/Madam,

Report on working group of IBA on Banking Facilities for Persons with Special Needs

IBA had formed a Working Group comprising of bank officials. representatives from RBI and representatives from persons with disability organisations to look into comprehensive banking services to all categories of persons with special needs.

The final Report was placed before the IBA Managing Committee Meeting held on 29th December 2017 for their consideration and approval. The report focuses on the following four key areas;

- a) Overall accessibilities
- b) Physical accessibility, at branch
- c) Accessibility of Credit



d) Accessibility in use of Technology, websites, Apps. etc.

The Managing Committee accorded its approval to the final Report and decided to forward the same to RBI for consideration. A copy of the Report is enclosed as annexure-I.

Accordingly. It is forwarded to RBI for their consideration and to include in master guidelines to be followed by banks. RBI vide its letter DBR.LEG. No. 10151/09.07.007/2017-18 dated 14th May 2018 has advised IBA to initiate action for some of the recommendations.

Copy of the RBI letter is enclosed as annexure-II.

This is for your information and necessary action, please.

Yours faithfully.

D K Malhotra

Senior Advisor

ANNEXURE 16 - CCPD ORDER DATED: 23.02.2012

OFFICE OF THE CHIEF COMMISSIONER FOR PERSONS WITH DISABILITIES

Ministry of Social Justice and Empowerment, Govt. of India

Case No.21/1102/2011-12

Dated: 23.02.2012

Dispatch No.

In the matter of

Ramji Tripathi

Old H/9, Kabir Colony, B.H.U.,

- R1554

Varanasi

Complainant

Versus

State Bank of India

(Through: Chief Manager)

Banaras Hindu University Branch

- R1555

Respondent

Date of Hearing: 21.02.2012

Present:

i) Shri Ramji Tripathi.

ii) Shri Rama Kant Gupta, Chief Manager, SBI, BHU, Varanasi

ORDER

The above-named complainant a person with visual impairment filed a complaint dated 14.11.2011 before the Chief Commissioner for Persons with Disabilities under the Persons with Disabilities



(Equal Opportunities, Protection of Rights and Full Participation) Act 1995 here in after referred to as the 'Act" regarding refusing to provide banking facilities including ATM card by State Bank of India, BHU Branch on an equal basis with others.

2. The complainant submitted that he is a Visually impaired person and working as Personal Assistant in Banaras Hindu University. He is maintaining a Saving Bank account with State Bank of India BHU, Branch, Banaras. The said bank had expressed its inability to provide ATM card to visually impaired persons.

3. The matter was taken up with the respondent bank vide letter No 21/1102/11-12 dated 01.12.2011.

4 The respondent vide reply dated 12.01.2012 informed that the cheque book could not be issued to Shri Tripathi keeping in view his financial interest as his signatures were not consistent and could be copied easily. As regards ATM, as per the Instructions of Higher offices, as of now no ATMs have been "installed for persons with visual Impairment, therefore, ATM card could not be issued to Shri Tripathi".

Sarojini House, 6, Bhagwan Dass Road, New Delhi-110001 Tel.: 23386054, 23386154, Telefax: 23386006

E-mail: ccpd@nic.in Website: www.ccdisabilities.nic.in

(Please quote the above file/case number in future correspondence)

5. Upon considering the written submissions of the respondent, a personal hearing with scheduled for 21.02.2012. In the meantime, vide letter dated 13.02.2012 the respondent informed that the complainant was issued cheque book on 09 02 2012 following submission of the prescribed proforma by the complainant. He upon submission of the application in the prescribed proforma for ATM card and his details have been put in the CVS system. ATM Card No. 5048 0980 0211 0000 018 was also being issued to him. He also enclosed the supporting documents as proof of having issued the cheque book and the ATM card to the complainant

6. During the hearing the parties reiterated their written submissions. The complainant added that he has been issued the cheque book but only after he gave an undertaking on being asked by the bank, though initially, he was not willing to give any undertaking for providing any banking products. He feels that no additional requirement should be insisted upon which is not obtained from other citizens of the country. As regards ATM card he submitted that he was yet to receive the same.

7.The representative of the respondent submitted that the State Bank of India, Banaras Hindu University branch followed the instructions issued by State Bank of India, Corporate Centre, Mumbai vide Circular No.NBG/S&P-SP/4/2009-10 dated 06/07.05.2009 The same instructions have also been circulated vide the Master Circular. The said Circulars require the following undertaking to be given by an account holder with visual impairment for issue of a self- operated cheque book facility: -

i. That I am I we are visually impaired/ disabled and incapacitated from vision in both the eyes. Whereas, at my / our personal request the State Bank of India, BHU Branch has agreed to Issue /



provide me / us with a 'cheque book facility' so as to enable me/ us to operate my / our account by means of 'Self Operated Cheques', to facilitate various transactions relating to my / our account. I / We do hereby agree and undertake to utilize the said Cheque Book at my / own risk, costs and consequences.

ii. The Bank will not be responsible for any loss that may be attributed to me / us for negligence or misuse or otherwise by any third party whatsoever in so far as the cheque book is concerned.

iii. The undertaking has been read to me I us by my next friend and have been understood by me / us in the language known to me / us in the presence of the following witnesses

Signature of account holder(s) with left / right hand thumb impression".

8. He further submitted that the Corporate Centre Mumbai's circular No.NBG/S&PMisc./20/2009-10 dated 31.10.2009 provides that the third party self-drawn cheques by visually impaired persons are now permitted. Earlier, only the crossed cheques were being issued to them. He also submitted that the format of undertaking has since been revised as per which clauses relating to the instances of inconsistency in the signatures have been added. The bank has no intention to harass the complainant or any customer with disability.

9. It is observed that the Reserve Bank of India vide its Circular No. DBOD.No.Leg BC.91/09.07.00512007-08 dated 04.06.2008 had advised all the scheduled commercial banks including RRBs that persons with visual impairment are facing problems in availing banking facilities including cheque book facility/operation of ATM, Locker etc. and the said facilities cannot be denied to the visually challenged **as they are legally competent to contract.** The banks have further been advised that all the banking facilities such as cheque book facility including third party cheque facility, net banking facility, locker facility, retail loans, credit cards etc. are invariably offered to the visually challenged without any discrimination. Banks have also been requested to advise their branches to render all possible help to visually impaired persons for availing the above facilities.

10. Pursuant to the R.B.I. Circular dated 04.06.2008 the Indian Banks' Association (IBA) vide its Circular No. CE/RB-1Nip/1766 dt. 18.11.2008 refers to the available technology of storing thumb impression of visually impaired persons in place of signature, and also to Article 9 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in respect of accessibility to all facilities by persons with disabilities on an equal basis with others, and, accordingly, advises the banks to install Talking ATMs wherever feasible. IBA also requested its members to consider the revision of procedural guidelines and issuance of necessary Instructions to the operating staff. The general instructions of RBI on procedural guidelines for banking facilities to visually impaired persons also state that all banks must provide the same facilities to a customer with visual impairment as it would provide to any other customer. At the same time the customer should be made aware of the risk involved in some of these facilities which may be higher than that for a non-disabled customer. It is also pertinent for us to mention that Hon'ble Guwahati High Court in WP(C) No.2215 of 2006 filed by Shri Prasanna Kumar Pincha, the undersigned, who happened to face discrimination of similar nature while passing an interim order directed the respondent bank namely IDBI Bank, Guwahati that the petitioner be allowed to open a saving bank account in the Guwahati branch of IDBI with cheque book facility as in the case of persons with no Visual impairment or any other disabilities. The Hon'ble court further directed that the petitioner would



also be allowed to normal/usual operation of the said bank account. The said interim order of the court was implemented by IDBI bank in letter and spirit with the result that the petitioner has been enjoying all the banking facilities on an equal basis with others. If one bank in the country for one visually Impaired customer can successfully implement the said order, there is no reason why all other banks in the country cannot do so for all persons with visual impairment.

11. It is also observed that under the current procedure followed by the respondent bank, it requires a person with visual impairment to visit the bank in person every time, she/he needs to draw money thereby subjecting that person to avoidable harassment and iniquitous situation.

12. In the facts and circumstances stated above, and being alive to the discrimination routinely encountered by persons with visual and other disabilities, we hereby direct the respondent as follows:

i) ensure that all persons with visual and other disabilities including the complainant are allowed to access, use and enjoy all banking facilities on an equal basis with others. Such facilities include cheque facility, net banking facility, ATM facility, locker facility etc.

ii) While evolving safety mechanisms to safeguard the interests of the customers with disabilities rights of persons with visual and other disabilities should not be compromised at any cost

iii) Issues arising out of possible inconsistencies in relation to signature of the customer with visual disability can be handled in a variety of ways including by installation of Finger Probe Machines etc.

iv) Customers with visual disability be given the choice to operate the bank account either by putting their thumb impression or by the usual process of signature.

v) No additional undertaking (undertaking which is not obtained from any non-disabled citizen) be obtained from customers with visual disability; and banking policy should have a human face.

13. Since the respondent branch of SBI is reportedly following the procedure circulated by the Corporate Centre. It will be appropriate that the Corporate Centre, Mumbai of State Bank of India issues the revised circular and procedure in the light of the directions given above. A copy of this order is also being marked to Reserve Bank of India and IBA who may also issue appropriate circulars to all commercial banks/members. Moreover, the current procedure followed by the respondent bank is so utterly inconsistent with, and runs counter to the spirit and purpose of the aforesaid RBI circular dated 04.01.2008 and IBA circular dated 18.11.2008.

14. The case is disposed of accordingly.

(Prasanna Kumar Pincha)

Chief Commissioner for Persons with Disabilities

ANNEXURE 17 - CCPD ORDER DATED: 05.09.2005

(2005) CCDJI

IN THE COURT OF CHIEF COMMISSIONER FOR PERSONS WITH DISABILITIES

[Under the persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995]



V.P. SINGHANIA v. BANKING DIVISION AND ORS.

Case No. 2791 of 2003 - Decided on 05.09.2005

V.P. Singhania President
National Federation of the Blind (Ghaziabad Unit)
D-51, Sec. IX. Vijay Nagar
Ghaziabad (U.P.) Complaint

v.

Banking Division
(Through the Secretary)
Ministry of Finance, Govt. of India
Jeevan Deep Building
Parliament Street
New Delhi

Respondent No. 1
Indian Bank's Association (Through its vice president, Operations)
World Trade Centre, 6th Floor
Centre 1 Bldg., World Trade Centre Complex
Cuffe Parade
Mumbai - 400005

Respondent No. 2
Reserve bank of India

(Through its chief General Manager, Banking Operations)
Department of Banking Operations and Development
Central Office, Centre 1
Cuffe Parade, Colaba
Mumbai - 400005

Banking Service - Complainant is a visually impaired person working as an officer with a Nationalised Bank - Complaint is aggrieved because Banks do not provide cheque book facility to visually impaired persons especially to those who cannot sign thus making it impossible for such persons to avail of any loan facilities where issuing of post-dated cheques are necessary - Complainant prayed that cheque book facility be extended to visually impaired account holders after verification/certification of Left Hand Thumb Impression (LHTI)/Right Hand Thumb impression (RHTI) - Respondent No. 1 submitted that Banks already follow the practice or issuing cheque book facility to visually impaired persons on case-to-case basis - Further, stated that visually impaired persons can avail the benefit of Electronic mechanism like ECS Debit for the purpose of payment of Equal Monthly Instalments (EMI) - Respondent No. 3 was of the opinion that as visually impaired persons were otherwise legally competent to contract therefore issue of cheque book facility or operation of ATM/locker cannot be denied to them - Further, same benefits could be extended under the signature of a duly authorized persons or person having notarized power of attorney - Recognising the importance of the matter various issues were framed for the opinion of



Respondents - Respondent No. 2 referred the matter to the Standing Committee of Seniors Bankers which vide its decision proposed that no imminent change is required in the existing system as steps suggested by the complainant is fraught with risk of fraud - Held, operation of cheque book, locker and ATM facilities cannot be deride to visually impaired account holders - Detailed instructions issued.

Key term(s): Banking Service: Cheque Book: Thumb Impression

Represented by: Complainant in person, M.K. Rastogi and Subhash Vashishta, Advocate (for Complainant): A Thomas, Under Secretary, V.P. Grover. Sr. Research Officer, Ram Ranwar, Section Officer, Prem Miual, Section Officer and Hem Blutiya Assistant (for Respondents No. 1): V. Ramchandran. Vice President (for Respondent No. 2): Subata Das. Dy. General Manager (for Respondent No. 3)

T.D. Dhariyal, DCC. - Sh. V.P. Singhania, a person with visual impairment filed a complaint dated 18.08.2003 in the court of chief commissioner for persons with Disabilities. He is the president of National Federation of the Blind (Ghaziabad Unit) and individuals, especially those, who cannot sign, are not at all provided cheque books by any bank. Lender financial institutions demand post-dated cheques signed by the borrowers in advance. This way they are not allowed to avail housing or other loan facilities. He suggested that Bank should provide cheque books to their blind account holders after verification/certification of Left-Hand Thumb Impression (LHTI)/Right Hand Thumb Impression (RHTI) of such customers on each cheque leaf, all the cheque leafs may be crossed in favour of lending institution. He therefore, requested to take up the matter with Respondent No. 1 and 3.

2. Office of the Chief Commissioner for Persons with Disabilities registered the complaint under Section 59 of the persons with Disabilities Act, 1955, hereafter referred to as the Act and served Notice to Respondent No. 1 to show cause dated 09.09.2003 to submit his/her version of the case.

3. As there was no response, personal hearing was held on 21.01.2004. Ministry of Finance, Banking Division in the meantime informed that it did not receive the Notice, which was provided, on 21.01.2004, the representative of respondent No. 1 sated that Ministry of Finance needed to consult reserve Bank of India and sought more time. He was advised to submit reply within one month and the Complainant to submit rejoinder within two weeks thereafter.

4. Respondent No.1 vide letter No.3/2/2004-SCT (B) dated nil March 2004 received on 12th March 2004 informed that the matter had been examined in consultation with the Indian Banks' Association. It was stated that Banks on case-to-case basis, extend Cheque Book facility to visually impaired account-holders. They are so cautioned against misuse of Cheques by unscrupulous persons. The use of thumb impression is restricted for cash payments across the counter. The mechanism of electronic clearing arrangements (ECS Debit) could be used to collect the Equated Monthly Instalments by the lenders. The account holder could give a mandate to his banker to honor claims received from the lending institutions representing the EMI. In view of the foregoing, the Banking Division was of the view that it was not advisable to issue directions to the banks to issue compulsorily Cheque Books to visually impaired persons as a matter of routine. The Complaint vide his rejoinder dated 17th March 2004 submitted that thumb impression of customer is verified by the Bank Officer on a cheque leaf, there was therefore no chance of any fraud at all.



It seemed that this was not made clear to RBI or IBA. He requested to call Banking Division, Reserve Bank of India and Indian Banks' Association.

5. Second personal hearing was scheduled on 14.05.2004 during which Respondent No.1 informed that the matter had been taken up with the Reserve Bank of India (RBI) for examining the proposal for using cheque books to visually impaired person for specific purpose where amount of instalments is known. As soon as their views become available, the decision would be conveyed. The Complainant, appreciating the initiative being taken by the Ministry of Finance, submitted that the cheque book facility should also be allowed for any other specific purpose such as payment of electricity bill to be made to the concerned agency, the charges to be paid to the housing societies where the amount of payment is not known in advance. In such cases, he suggested that at the time of issuing the cheque book, the concerned bank should write the name of the payee and verify the thumb impression of the visually impaired account holder who cannot sign.

6. Respondent No. 1 vide letter No.3/2/2004-SOT(B) dated 25.06.2004 informed that IBA in consultation with RBI, had issued certain guidelines to the Member Banks vide letter No. OPR/JSM/17-04/2008 dated 15.04.2004. As per the letter, RBI had examined the issue and was of the view that legally speaking, the cheque book facility/operation of ATM/locker cannot be denied to blind persons/persons with low vision as they are legally competent to contract. Further, it would be safe and legally valid if such cheque book facility/operation of locker was allowed under the signature of a duly authorized person/persons having notarized power of attorney. The operation of ATM by blind person/persons with low vision would also be safe and legally valid with change of technology. In view of the above RBI was of the view that the banks could issue post-dated cheques after verification/certification of the LHTI/RHTI of the blind persons so that they could avail of loans from financial institutions.

7. Vide letter 04.08.2004 of this Court, Respondent No.1 was advised to take up with RBI for issuing instructions to Banks to issue cheque books and allow ATM/locker facility to blind/low vision persons. Vide letter No. 3/2/2004-SCT (B) DATED 27.08.2004, Respondent No. 1 forwarded a copy of letter dated 14.08.2004 of RBI which dated that the matter was being further examined in consultation with IBA with a view to find a legally sound and operationally feasible solution. RBI mentioned about the advice of IBA that where payment is not known in advance, the scope of misuse/fraudulent use of the cheques cannot be ruled out as the blind persons would not be able to independently fill the details on the cheque forms. As a probable solution, the blind persons may have to come to the bank with the electricity bill or such other bills and seek the assistance of the concerned bank official in filling the amount of the cheque since the concerned bank official would be one of the persons who would be witnessing/identifying the thumb impression of the blind persons. IBA further mentioned that they did not find any other workable proposition and have sought the views of the Office of the Chief Commissioner for persons with Disabilities on the above proposal.

8. The matter was pending since August, 2003 and considering the problems faced by visually challenged persons, a meeting of the representatives of Ministry of Finance, RBI, IBA, National Confederation of the India and All India Confederation of the Blind was called in the office of The Commissioner for Persons with Disabilities on 22.02.2005. After detailed deliberations, the following suggestions were made unanimously for examination by IBA in consultation with RBI.



- i) The persons with blindness and low vision should be allowed to open individual accounts and be issued account payee cheques only.
- ii) At the time of issuing of cheque book, signature or the thumb impression, as the case may be, of the account holder should be attested by the bank officials to avoid matching of signatures at the time of making payments to third parties.
- iii) IBA will examine the feasibility of printing appropriate warning on the cheques such as “Care-Cheque for Visually Impaired” to alert the bank officials.
- iv) The account holder should give an undertaking to the bank to the effect that the cheque book be issued to him/her at his/her own risk at the time of issuing.
- v) IBA will examine the concerns relating to allotment of locker and its operation by visually impaired persons in consultation with RBI. The fact that the individual himself/herself has to go to the bank to operate the locker and hence it would not involve much of the security problems, should be kept in view.
- vi) IBA will also examine the question of providing ATM facilities to visually impaired persons and explore the possibility of adopting latest banking technology for their benefit.

A report on the above issues was to be submitted by IBA by 31st March, 2005. IBA was also advised to address the issues relating to the eligibility conditions of scribes, extra time in examination etc. raised in the representation dated 12th September 2004 of the All-India Confederation of the Blind, a copy of which was handed over to Sh. Ramchandran.

IBA was also advised to intimate the outcome to this Court and All India Confederation of the Blind.

9. Vide letter No. OPR/17-04/007 dated 5th April 2005 IBA informed that they were referring the matter to their Standing Committee of Senior Bankers for consideration. Vide letter dated 17.06.2005, IBA communicated the following decisions of its Legal and Operational Committee, a Standing Committee chaired by Chairman and Managing Director, Vijaya Bank:

“The Committee discussed the above suggestions in detail and were of the view that with a view to protect the interest of the visually impaired (blind) customers to come personally to the bank with an escort and withdraw cash from their account. The withdrawal forms/cheques are filled by the escorts and the signature/thumb impression of the visually impaired customer are attested by the bank official and the amount withdrawn are also informed to such customers so that he/she is aware of the amount actually withdrawn from the account. The Committee felt that issuing cheque books to the visually impaired account holders is fraught with risk as there was scope for misuse/fraudulent withdrawal of money from such account holders’ account due to their impairment of vision. It was therefore, decided that with a view to protect the interest of such customers, as well as the bank, no change be recommended in the existing system of providing services to the visually impaired persons as stated above. In respect of the suggestion to provide account payee cheques to visually impaired customers for payment of predetermined EMIS for retail loan such as housing loan, consumer loans etc. the individual bank may take appropriate view in the matter. As regards providing ATM facilities to such class of customers, considering their disabilities and the possibility of unauthorized use of ATM cards of fraudulent withdrawal from the



account, the committee felt that providing ATM facility to such customer was not a feasible proposition unless technological advancements are made for providing ATM facility in a secured manner to a visually impaired person.

As regards providing Locker facility to visually impaired customers, the Committee was of the view that banks may open joint account with such customers with appropriate terms and conditions so as to protect the interest of the visually impaired customers as well as the banks.

Concluding the discussion on the issue, the Chairman stated an account holder should be equally responsible when fraudulent withdrawal from his account takes place allegedly signed by the account holder's next kin or relatives etc. copying his signature as the account holder has not taken adequate care/safe custody of the cheque issued to him by the bank."

10. As this Court, was not inclined to go along the above recommendation s/decisions of IBA, another hearing was scheduled for 28th July 2005, which had to be adjourned twice due to heavy rain in Mumbai and was finally held on 23rd August, 2005. During the hearing Sh. V Ramchandran, Vice President (Operations) Indian Banks' Association stated that the views and the decisions of the Standing Committee of IBA to consider the issues involved had already been communicated vide letter No. BD/L&O/200 dated 17.06.2005. He had nothing to add. He, however, stated that this Court may take a view after hearing the views of Reserve Bank of India and Ministry of Finance (Banking Division).

11. Sh. Ram Kanwar, Section Officer the representative of the Ministry of Finance, Banking Division, said that RBI being the regulatory authority for the banking industry. The decisions will have to be followed by all concerned.

12. Sh. V.P. Singhania, the Complainant stated that availability of a notarized power of attorney or a duly authorized person to such visually impaired persons whose spouse also happens to be blind and has minor children or a blind person who is single, is difficult. Therefore, issue of crossed cheque book for specific purpose like payment of loan, utility bills, etc. should not be denied. Crossed blank cheques with the undertaking of the visually impaired account holder that the cheque book be issued to him/her at his/her own risk should not be a problem. He further stated that operation of ATM and the Locker should also be allowed to visually impaired persons.

13. During the hearing on 22.02.2005 various issues as mentioned in para 8 were discussed in detail and suggestions were made for examination and consideration with a view to find a positive solution to the problems being faced by visually impaired persons in availing banking facilities.

14. Upon considering the written and oral submissions of IBA, RBI, Ministry of Finance (Banking Division) and the Complainant, this Court is of the firm opinion that visually impaired persons cannot be denied the facility of cheque book, locker and ATM on the possibility of risk in operating/using the said facility, as the element of risk is involved in case of other customers as well. Some banks have allowed almost every banking facility to the visually impaired customers. If one bank can allow the facility to such customers, other banks can also do so. This Court, therefore, advises Ministry of Finance, Banking Division and RBI to issue appropriate instructions to the following effect for implementation by all the banks within 45 days of receipt of this Order.



a) Visually impaired persons be allowed to open an account with cheque book facility (cheques to be crossed at the time of issue) with an undertaking by the account holder that the cheque book be issued at his/her own risk. On the request of the account holder, the bank should issue the cheques in the name of the specified payee to make periodic payments for the retail loans, utility bills, etc. At the time of issuing of cheque books, thumb impression of the account holder should be duly affixed and authenticated by the bank official.

A) For cash withdrawals the visually impaired person should personally present himself/herself before the bank official who will facilitate "filling up the cheque/withdrawal slips.

B) The facility of operating the Lockers be also allowed to the visually impaired account holders without insisting on the joint account, as this may not be possible for those who are single or whose spouse is also visually Impaired and children are minor,

C) ATM facility be also allowed on demand to the visually impaired customer as available to other customers, Bank should procedure talking ATMs whenever they install new ones. Such an ATM machine has already been installed by some bank in Pune/Mumbai.

D) Banks should also ensure that the ATMs, are accessible to other categories of persons with disabilities such as the wheelchair users.



**Banking on Accessibility
A case for accessible banking for
Persons with Disabilities (PwDs)**

by



XRCVC, St. Xavier's College, Mumbai

under the project

**INCLUSION AND ACCESS: The 360 Degree Approach
supported by**

SBI Foundation and Centre of Excellence for PwDs



This report is a comprehensive document that can be used by regulatory and governance authorities like the Reserve Bank of India, banks, other associated bodies, decision makers and policy experts. It shall aid them in monitoring and evaluation of existing guidelines and the level of their implementation in reality. It articulates banking problems faced by users and makes strong recommendations to improve the scenario. The scope of the report is largely focussed on infringement of rights of persons with visual impairment who use or propose to use banking facilities.

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