

## **BANKING INDUSTRY** PERSONS WITH DISABILITY PILOT PROJECT

CASE STUDY Promoting Financial Inclusion and Digtal Accessibility (A11Y FINANCE)

FEBRUARY, 2021

in partnership with





#### **Partners**



The KBA Secretariat recruited banks to participate in the Digital Accesibility Project voluntary exercise. Ultimately, 7 banks expressed interest and participated in the project. The banks were required to cover 50 percent of the inAble project costs.

#### **Project Outcomes**

#### **PWD Customer & Staff**

 (Survey, Focus Group with 184 interviewees)

#### **Accessibility Assessment**

• (USSD, Mobile, Website)

#### Output

- Bank Report
- Consilidated Report & Industry Recommendations
- Case Study

This was a 4-month project (July to October 2020), assessing the status of digital accessibility for PWDs and areas for enhancement.



## Disclaimer

This Case Study assessed accessibility based on three broad impairment categories: vison, mobility, and hearing. Recognising that these disabilities vary from mild to total impairment, it is advised that this Case Study views accessibility from the wider perspective of the impairments.

## **Executive Summary**



t is estimated that one billion people (15 percent) of the world's population has some form of disability. From the number, between 110 million and 190 million people have significant disabilities, according to the World Bank. In Kenya, the 2019 census revealed that 0.9 million people live with some form of disability, translating to 2.2 percent of the total population. In this group, 1.9 percent are men

and 2.5 percent are women; with 0.7 million of them living in rural areas and 0.2 million living in urban areas.

Persons With Disability are among the most vulnerable, especially in developing countries like Kenya, where they face a myriad of challenges. While a lot of ground has been covered in promoting financial inclusion in the country, more efforts are needed to ensure full inclusion of Persons With Disability. In the Kenya Bankers Association Customer Satisfaction Survey (2020), 81 percent of PWDs reported that they were largely able to use banking services independently. The findings suggest the need for more work to wards ensuring banking services are accessible to all.

Coming after the Kenya Banking Industry PWD Digital Accessibility Pilot Project Report, this Case Study documents banking challenges from Clients With Disabilities' and bank staff perspectives. Its recommendations aim to support industry initiatives towards promoting financial inclusion in line with the banking industry's Strategic Plan (2019-2023).

#### Case Study Objectives

01

- To assess accessibility of banking services for Persons with Disabilities (PWDs) in response to increased digital-led banking models
  - Areas for assessment were Hearing, Visual and Mobility impairment

02

Raise awareness
 within the banking
 industry on the
 need to
 incorporate PWDs
 in the Financial
 Inclusion narrative.

03

 Build industry capacity in line with the KBA Strategic Plan (2019-2023), which underlines the need for banks to promote PWD and gender inclusion.

#### Banks should continue to innovate and develop products and services that accommodate the needs of PWDs

e are pleased to release the Banking Industry Persons With Disability Pilot Project: Case Study. This report follows the publication of the PWD Digital Accessibility Report in November 2020. Both reports aim to provide a fact-based background for the banking industry's efforts towards entrenching accessibility for PWDs to banking services from both the customer experience and product point of views.

Research has shown that, world over, banking systems are yet to fully accommodate PWDs and fully meet their financial needs. The findings of this report are, therefore, an inspiring stride for the banking sector in Kenya and the region to further improve financial services and ensure inclusion for this segment of customers. This focus fits perfectly within the KBA Strategic Plan (2019-2023) which seeks to deepen financial inclusion across all segments of the economy by facilitating access to affordable banking services through enhanced technological innovation and sector-wide efficiency programs.

On a national level, the 2019 Kenya Population and Housing Census results indicate that 0.9 million people live with some form of disability. It is, therefore, important for the banking sector to continue paying more attention to this segment of the population, considering their immense potential to contribute to the socio-economic growth of the country's economy.

In light of the recommendations of the PWD Digital Accessibility Report, the industry is formulating roadmaps that will see the implementation of wideranging initiatives geared towards addressing the challenges these customers face while accessing physical banking platforms, as well as, on digital platforms. The efforts serve as a precursor to the institutionalisation of policies on how to serve Clients With Disabilities better.

As an industry, we remain alive to the need to continue spearheading innovations and developing products and services that accommodate the needs of PWDs. There is no doubt that the findings and recommendations of this report - along with the Banking Industry Digital Accessibility Report - will go a long way in ensuring financial inclusivity and customer satisfaction.



Dr. Habil Olaka, CEO, Kenya Bankers Association

## Promoting inclusion for PWDs can boost the development of inclusive financial markets in Kenya, stimulate wealth creation and reduce poverty.

he COVID-19 pandemic has had an adverse impact on almost all sectors. It has not discriminated. Everyone, including governments, businesses, health systems and societies have felt the wrath of the virus, which has claimed more than 2.35 million lives as at mid-February 2021.

In the early days of the pandemic the Financial Sector Deepening Trust (FSD Kenya) set about documenting experiences of Kenyans in form of COVID-19 Diaries in a blog format on our website (<a href="http://www.fsdkenya.org/kenya-covid-19-diaries/">http://www.fsdkenya.org/kenya-covid-19-diaries/</a>). We found out that lower income countries like Kenya faced additional challenges in the wake of the global health pandemic that was spreading fast. Already, Kenya had existing challenges like high density informal urban settlements that have no access to clean water, sewerage, and handwashing facilities.

Most Kenyans we spoke to had been hard hit by the economic effects of the pandemic. Among them were Persons With Disability (PWDs) who account for 2.2 percent of the population, according to the 2019 Census; representing 1.9 percent of men and 2.5 percent of women.

By June 2020, when we spoke to Kenyans in our database, we found out the level of stress among rural respondents had risen from an average of 5.4 to 8, with 88 percent saying things had gotten worse. It is worth noting that a large percentage of PWDs (0.7 million of them) live in rural areas while 0.2 million live in urban areas – as per the 2019 Census.

The findings of the study showed that PWDs use services like ATMs, ATM cards, mobile money, online banking and USSD services. Due to the COVID-19 pandemic that occassioned health protocols like social distancing, PWDs also reduced visits to banks. This signalled an opportunity for banks to leverage on digital channels and develop products and services with PWDs in mind.

We are convinced, therefore, that the implementation of this report's recommendations will greatly support the development of inclusive financial markets in Kenya as a means to stimulate wealth creation and reduce poverty.



Tamara Cook, CEO, FSD Kenya

# Digital accessibility is paramount to assistive-technology users who want to independently access financial services

s partners in this study, we were keen to understand how PWDs interact with technology platforms provided by the banks. I am pleased to see that over 70 percent of the respondents surveyed reported that they use ATMs, compared to 34 percent who had registered for the USSD service and actively use it. These findings show that PWDs - like everyone else - are open to using technology to make their banking experiences more efficient. With the growing use of mobile phones and online banking, this is an opportunity for banks to take positive steps toward financial inclusion for PWDs.

It is encouraging to note that the banks that participated in this study showed willingness to make their digital products accessible to Customers With Disability. The findings, however, did uncover limitations experienced by Customers With Disability. They reported, for example, that banking Apps are still not easy to download and use.

Additionally, there were various gaps identified in the Banking Industry Digital Accessibility Report. Respondents highlighted challenges that inhibited their access to financial services. For example, some banks do not issue ATM cards to customers who are blind while bank websites are currently not fully accessible to Customers With Disability. It is worth mentioning that very few Customers With Disability reported accessing banking services via the banks' websites, with almost none of them indicating they were unable to use email to communicate with their bank.

In embracing technology, PWDs have shown interest and ability to adapt to the changing technological landscape. Banks should, thus, have this fact in mind and strive to involve PWDs when designing and developing new services or making upgrades to bank products. Websites and mobile Apps should be accessible to Persons With Disability to enable them to easily navigate and transact independently.

Banking is a very private affair. For this reason, it is important for banks to understand the usability needs of their Customers With Disability to support privacy, inclusion, and independence.



**Irene Mbari-Kirika,**Founder and Executive
Director, inABLE

# COVID Kairos Creates Opportunity For PWD Digital Accessibility In Kenya

window of opportunity - a "Kairos" - has opened up for the financial sector, leveraging on fintech, to better design human-centered solutions that ideally promote inclusivity while bridging the gaps that create social risks within an economy. The social risks unmasked by the Coronavirus (COVID-19) pandemic that policymakers and private sector need to address include transitioning a critical mass out of the informal economy — especially women micro and small business owners who typically operate informally— and the other, is financial inclusion of Persons With Disability (PWDs).

People living with an impairment have just the same aspirations and require the same, if not more, from financial service providers. And this pilot project has taught us that digital accessibility for PWDs is the next financial inclusion challenge that we must tackle and overcome together.

From previous analysis, it takes two to three years to settle into to the "next normal" after a pandemic. Therefore, as much as vaccines are making their way into health systems, we still have to navigate a complex, digital and highly-dynamic environment. For the next two years, the actions financial institutions invest in to bridge the digital inclusion gap will make a difference for 15 percent of the world's population, which is living with either a temporary or permanent disability.

In Africa, where financial inclusion has been demonstrated to directly contribute to economic growth, this translates to more than 180 million CWDs (or approximately the population of Nigeria)

who can more actively participate in the formal economy and thus mitigate social risks.

There are several learnings from this KBA project. One key lesson is that financial service providers should design products knowing that there certainly (not possibly) will be clients with hearing, vison, speech, mobility or learning impairments using those products. Having an inclusive, assistive technology-based organizational culture will spur greater innovation as firms race to be the gold standard of fully automated, intuitive and frictionless payments.

The second key learning is that financial institutions should partner with technology firms to leverage on artificial intelligence, and robotics to serve this segment. It is important to ensure customer relationship management systems are able to identify those with both permanent and temporary disabilities. Finally, and most importantly, we learned that people make all the difference. Bank staff are willing and excited to learn how to be more inclusive, including by learning sign language.

It has been an honour to serve as the lead on this A11Y Finance Pilot, which I am confident will shape the future of finance and payments. We have a long way to go as a financial sector, and banks in Kenya have committed to put in place roadmaps towards A11Y Finance by the end of the year. As such, the journey has begun.



**Nuru Mugambi,** FKIB
Director of Communications & Public Affairs,
Kenya Bankers Association

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### **Case Study - Voices In Banking**

To obtain a holistic assessment of banking experiences of Persons With Disability (PWDs), this case study used interviews with bank customers, a survey of bank customers, and interviews with a small sample of bank employees.

#### I. Case Study Methodology

#### I. a) Customer Interviews Methodology

Thirty-six Persons With Disability (16 female and 20 male) were interviewed between August 11 and 21, 2020. Their ages ranged from 18 to 65 years old. The breakdown was as follows: 18-25 years old (2), 26-35 years old (11), 36 to 45 years old (13), 46 to 55 years old (9), and over 65 years old (1). Most of them had wide-ranging academic qualifications, with a majority possessing a diploma. Their disabilities were categorised into three groups: those with hearing difficulties or deafness and hearing impairment (11); difficulties seeing or blindness or visual impairment (12); and difficulties doing physical tasks like walking or mobility impairment (13). The primary banks of the customers interviewed were KCB Bank (10), Equity Bank (7), Cooperative Bank (6), Rafiki Microfinance Bank (5), Absa Bank - Kenya (3), Family Bank (3) and Standard Chartered Bank (2). The ages of the accounts ranged from six months to 25 years.

#### I. b) Customer Survey Methodology

Between August 28 and September 7, 2020, 135 Persons With Disability - 48 female and 87 male - were surveyed. Their ages were: 18 to 25 (18), 26 to 35 (37), 36 to 45 (38), 46 to 55 (29), 56 to 65 (10) and over 65 (3). Out of the sample, 42 had difficulties

of hearing and deafness (hearing impairment) while 38 had difficulties seeing or blindness (visual impairment), while 55 had difficulties with physical tasks such as walking (mobility impairments). Their academic qualifications included: certificate (36) or diploma (32). Out of the respondent's sample, 34 had qualifications that were less than a certificate, and 32 respondents had qualifications higher than a diploma. There were some notable discrepancies in the typical level of qualifications attained across categories of disabilities (vision, mobility, and hearing). Only 19 percent of respondents with hearing impairments said they had academic qualifications beyond a certificate. This compared with 71 percent of respondents with visual impairment and 55 percent of respondents with mobility impairment, who said they had qualifications beyond certificate level.

The primary banks of the customers surveyed were KCB Bank (24), Equity Bank (37), Cooperative Bank (31), Absa Bank – Kenya (23), Family Bank (17), Standard Chartered Bank (1), or another bank (2). Sixty-three respondents had accounts with more than one bank. However, the focus of the survey questions was their experiences with their primary bank(s). Out of the respondents, 57 percent had accounts that had been operational for five years or longer by the time of the survey. It was noted that there were challenges recruiting Rafiki Microfinance Bank customers for the survey.

For most of the survey questions, respondents were asked to pick statements that best described the ease with which they accessed banking services. The options included "Agree", "Neutral", Don't Know", or "Disagree". Most of the percentages reported from the survey reflect the percentage of respondents who agreed with a particular statement.

#### Case Study Methodology

#### **Customer Interviews (36)**

- Hearing impairment (11), visual impairment (12), mobility impairment (13).
- Banks included KCB (10), Equity (7), Cooperative (6), Rafiki (5), ABSA Kenya (3), Family Bank (3) and Standard Chartered (2).

#### **Customer Survey (135)**

- Hearing impairment 31% (42), visual impairment -28% (38), mobility impairment - 41% (55).
- Banks included KCB (24), Equity (37), Cooperative (31), Rafiki (5), ABSA Kenya (23), Family Bank (17) and Standard Chartered (1).

#### **Employee Interviews (13)**

 Representation from KCB, Family, Equity, Standard Chartered, ABSA Kenya, Rafiki and Cooperative banks.

#### I. c) Bank Staff Interviews Methodology

In total, 13 bank employees were interviewed, representing KCB Bank, Family Bank, Equity Bank, Standard Chartered Bank, Absa Bank - Kenya, Rafiki Microfinance Bank, and Cooperative Bank. Seven employees reported no disability, whereas two had visual impairments (blind and low vision). Two of them reported mobility impairments. The employees said they had worked for their respective banks for an average period of 7 years. All of them had current or previous experience assisting Customers With Disability.

## II. General Background On Customers With Disabilities and Banking

The case study interviews provided a general background on why Persons With Disability use banks, what they need from banks, and how they choose to bank with a particular bank.

| Overall Banking Experience                     | Hearing impairment | Visual impairment | Physical impairment | Total |
|------------------------------------------------|--------------------|-------------------|---------------------|-------|
| The Bank Values Clients with Disabilities CWDs | 48%                | 82%               | 84%                 | 72%   |
| CwDs can access banking services independently | 57%                | 42%               | 80%                 | 62%   |
| The Bank understands CWD needs                 | 33%                | 55%               | 66%                 | 53%   |
| The Bank respected by PWDs                     | 14%                | 45%               | 53%                 | 39%   |
| Overall Positive Banking Experience            | 57%                | 82%               | 73%                 | 72%   |

## II. a) Why Do Customers With Disability Use A Bank?

Persons With Disability need banks for the same reasons as people without disabilities. Customers in the case study survey said they banked to save for their future. One customer said he was saving for his future family, and to build a house. A few mentioned saving for their children's school fees. One customer had a child at university. One was interested in starting a business, and others used banking services to run their own business. Further, Customers With Disability mentioned needing loans to buy cars and start businesses.

## II. b) What Do Customers With Disability Want From Banking?

The case study interviews revealed various key themes. First, Customers With Disability want independence and privacy. They prefer conducting banking tasks without assistance from anyone. Secondly, they want convenience, including fast, easy, and accessible services that are equal to what customers without disabilities access. Thirdly, they want proactive communication about the services available to them.

Like all customers, those with disabilities are keen to minimize the amount of fees they incur while banking. When their needs are met and they feel valued, Customers With Disability develop a sense of loyalty to their bank.

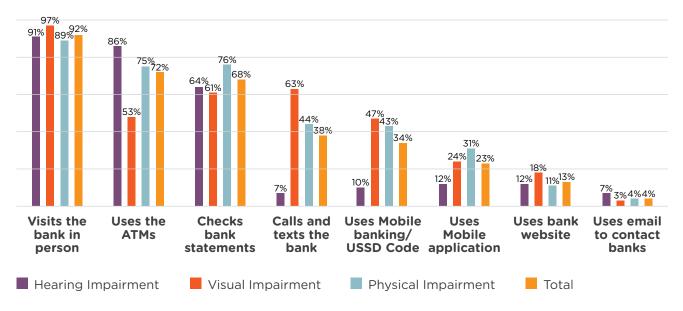
## II. c) Why Do Customers With Disability Choose A Bank?

In the interviews, proximity to a physical branch was the top reason given for choosing a bank, followed by the reputation of the bank. Availability of loans was also frequently mentioned. Some customers specifically mentioned dissatisfaction with their previous banks' services for Customers With Disability as the reason for choosing their current bank. Other reasons mentioned by more than one person included lack of fees, lack of queues, and accessibility to services for Customers With Disability.

## III. Banking Experiences of Customers With Disability

This section describes experiences of Customers With Disability, including experiences opening an account, experiences with various modes of accessing banking services, and experiences with bank staff.

#### Banking Services Accessed by Customers With Disabilities



The figure above shows the ways Persons With Disability reported accessing banking services in the survey.

#### III. a) Opening A Bank Account

Almost all customers opened their accounts in person. The experience of opening an account was generally acceptable for customers with visual and mobility impairments, but most customers with hearing impairments found communication a challenge due to the lack of interpreter services. As a result, the customers with hearing impairments reported feeling dissatisfied and less valued during their first experience as customers.

A customer's formal relationship with a bank begins when an account is opened. Almost all customers (94 percent) surveyed opened their accounts in person, and all customers interviewed opened their accounts in person. As such, the first customer experience with the bank is almost always during an in-person visit. For customers with hearing impairments, in particular, challenges can begin when they try to open an account.

Overall, most customers surveyed (75 percent) felt that it was easy to open their accounts. Among customers with hearing impairments, however, only 45 percent felt that opening an account was easy. The main challenge for people with hearing impairments is communication with the bank staff. Whereas 81 percent of respondents with visual impairments and 91 percent of respondents with mobility impairments felt bank staff communicated effectively when the account was opened, only 14 percent of customers with hearing impairments felt that communication was satisfactorily effective. Similarly, 87 percent of customers with visual impairments and 86 percent of customers with mobility impairments felt valued when opening their account, but only 43 percent of customers with hearing impairment felt valued. In the survey, no customers (0 percent) with hearing impairments reported being offered the services of an interpreter while opening their accounts. The lack of interpreters leads to negative experiences for customers with hearing impairments. In interviews, some reported leaving without completing the account opening process.

"I was stuck. I didn't have an interpreter. I almost gave up on my first visit."

Male, Age 36-45, with severe hearing impairment

"I went with my husband to the bank, but we had no interpreter. My husband is also deaf. The staff at the bank could not understand what we were writing. We left. When we went back, my husband had hired an interpreter to help in communication."

Female, Age 36-45, with severe hearing impairment

#### III. b) Visiting A Bank In Person

Lack of ramps makes accessing a bank's building difficult for customers with mobility and visual impairments. The respondents shared their varying experiences. In-person experiences are inconsistent. A security guard is usually their first point of contact. When they get into the banking hall, queues and queueing policies pose a challenge especially for customers with mobility impairments, while those with hearing impairments are often frustrated by the lack of interpreters. Customers with visual impairments find access to forms and paperwork challenging. Collectively, these experiences can result in dissatisfaction during inperson visits to a bank especially for customers with hearing impairments.

#### Visiting the Bank in Person: Challenges





communicating with

bank staff



Collectively, these experiences can result in dissatisfaction with banking in person, especially for people with hearing impairments.

After opening an account, 92 percent of customers surveyed and almost all customers interviewed said they sometimes visited the bank in-person. Of the customers who bank in-person, 77 percent felt the location of their bank was convenient to them, while 30 percent of customers with visual impairments and 27 percent of customers with mobility impairments found the locations inconvenient. An in-person visit for a customer with a disability involves a series of events, each of which can present various challenges.

#### III. c) Bank Entrances

The customer service experience for a person with a disability begins before the customer enters the bank. In the survey, 97 percent of customers with hearing impairments said they could enter bank premises easily. This was compared to 81 percent of customers with visual impairments, and 65 percent of customers with mobility impairments who said they found it easy to access their bank. In interviews, many customers with mobility impairment and visual impairment mentioned challenges with accessibility outside the building. The most common problem was lack of ramps. Other challenges faced included: rough, uneven ground and hard to manoeuvre parking spots. Ramps, when present, are noticed and appreciated.

"Their buildings are not accessible at all because most lack ramps, which makes most of us not able to visit those buildings frequently."

Female, age 18-25, with severe visual impairment

"We have a lot of cars outside there. Before you even get to the bank, you just get tired."

Male, age 26-35, with moderate mobility impairment

"The bank is disability friendly; I can get in so easily because there are ramps."

Female, age 36-45, with moderate mobility impairment

## III. d) Figuring Out Where To Go After Entering The Building

Several customers said after they entered the building that hosts their bank, they had sometimes been unsure of where to go. In the survey, 84 percent of respondents with mobility impairments said they could easily find their way to the counter or a staff member, but only 27 percent of customers with visual impairments and 45 percent with hearing impairments agreed. Only 50 percent of Customers With Disability felt that bank staff noticed them immediately they entered the banking hall, with only 24 percent of respondents with hearing impairments reporting feeling noticed by bank staff upon entering.

"Maybe when they see somebody like me who does not have some abilities like the normal people, they should even tell that we need help and come to help us. Like when they see us, they can direct us on what to do and all that.... they can help us transact because usually there is a lot of people and nobody wants to assist you, so you just stay alone."

Female, age 46-55, with moderate mobility impairment

#### III. e) Security Guards

In the survey, most customers (74 percent) indicated they usually speak with a security guard upon entering the building, including 84 percent of customers with visual impairments and 88 percent of customers with mobility impairments. Many participants in the interviews also spontaneously mentioned the security guard. As the first point of contact for a customer at the bank entrance, security guards serve as the de facto greeters - they are the first point of contact for Customers With Disability. In interviews, many participants mentioned a past positive experience with a security guard.

They have the security at the entrance who handles me as per the nature of the disability.

Male, age 26-35, with moderate visual impairment

When you arrive there, at the entrance you are received by the security guards who question you on how to help and if you need anything; they are ready to help or they show you where to go.

Female, age 18-25, with moderate visual impairment

Still, there is some concern from customers who feel they have had to rely too heavily on help from the security guards.

The bad thing is maybe you get this guard today, tomorrow it's another, and the next day too, so you find that many people can have your information.

Male, over age 65, with mobility impairment

At the door I have to talk to the guard, and he will hold my hand and take me to a corner [and complete forms] on my behalf. And [he] takes me to a desk and tells me to wait. So, I just sit and wait. Sometimes I go back to the door ask him how it's going. So, it's so slow and if I was normal like I could do things on my own. I would be doing it quickly and I go to my activities. But now here I have to wait and wait or ask a stranger that you don't know to help you with something. And you even don't know their heart. It becomes a challenge of guessing.

Female, age 26-35, with visual impairment

#### III. f) Getting Around Inside The Bank

Once inside the bank, moving around can be challenging for Customers With Disability. In interviews, several customers mentioned lack of access to spaces or counters that are not located on the ground floor.

They have floors and banking spaces that you have to use stairs, so going up is a struggle. And you may need to...ask the guard to go upstairs to call someone so that they can attend to you.

Male, over age 65, with mobility impairment

said policies allowing Customers With Disability to skip queues were not enforced or that they did not know how or who in the bank they should inform that they are a Customer With Disability. Some respondents said a security guard often helps them skip the queue, but in other instances, those who attempt to skip the queue had been asked to join the queue by a security guard. Some customers were also concerned about how other customers view them when they skip the queue.

Despite the fact that the banking hall is on the ground floor, the manager's office is on the first floor, and there is no ramp.

Male, age 36-45, with moderate mobility impairment

Sometimes when I go to the bank,
I am forced to queue; maybe the
customer care doesn't notice at the
beginning that I am visually impaired...
other bank users may also complain
when I am given the first priority.

Female, age 26-35, with severe visual impairment

#### III. g) Queueing

Queueing in banks is a problematic aspect of the in-person banking for Customers With Disability. According to both employee and customers interviews, most banks have a policy that allows Customers With Disability to skip the queue. Yet in the survey, 52 percent of respondents said they usually have to wait and queue to be served. Per disability categories, 70 percent of respondents with visual impairments, 55 percent of respondents with hearing impairments, and 37 percent of respondents with mobility impairments reported said they normally queue and wait like all other customers.

Regarding speed of service, 73 percent of customers with mobility impairments reported being served quickly. However, only 65 percent of customers with visual impairments and 40 percent of customers with hearing impairments said the speed of service was fast. From the survey data, it can be concluded that customers with less visible disabilities (hearing and visual impairment) are more likely to be forced to queue and are served more slowly. In the interviews, several respondents

Queuing is especially a major source of stress for customers with lower body mobility impairments, and long queues were described as a challenge that results in pain and discomfort. One customer did not bank in person, because they could not stand in a queue.

I am disabled, so standing on the queue is hard...that challenge of queuing. That discourages me from going to the bank. If I am busy, I can't go to queue because of many people not unless I want to withdraw. There are no staff who can help me... I fear going to queue at the bank. Standing even for one hour for my disability is a challenge.

Male, age 36-45, with severe mobility impairment

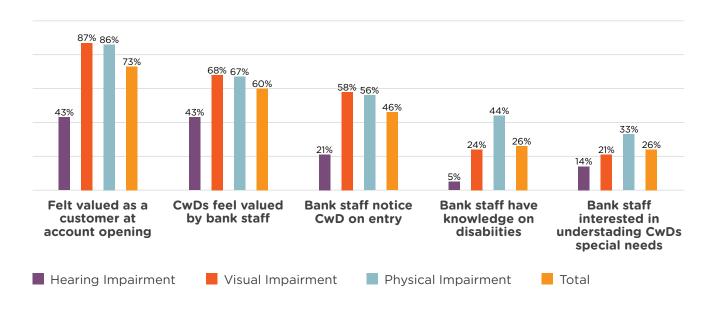
The only challenge that I faced was maybe standing on the line for too long. Like I really had to endure standing on the long line, and it was not really good. They do not have that facility for people like me.

Male, age 26-35, with moderate mobility impairment

#### IV. Opinions on In-Person Interactions with Bank Staff

The quality of physical interactions with bank staff is especially important. This section describes the experiences and opinions of Customers With Disability when they physically interact with bank staff, and the perceptions during their interactions.

#### Opinions Of Customers With Disabilities (CwDs) On Bank Staff



The figure above shows the perceptions and opinions of Customers With Disability regarding the quality of their interactions with bank staff.

#### IV. a) Interacting With Bank Staff At the Counter

Customers With Disability perceive the quality of service at the counter as inconsistent and uneven, with a mix of positive and negative experiences. In nearly all interviews, respondents reported having had some positive experiences with bank staff.

They are cooperative. They serve me with no problems...they listen to me... you can see the manager anytime you want to, and they will come to talk to you.

Male, over age 65, with mobility impairment

They have employees who understand Persons With Disability, and they are always ready to help... they have friendly personnel who handle Persons With Disability.

Male, age 26-35, with moderate visual impairment

It is the only bank where the manager has ever come out of his office to ask me how I was doing on that particular day...I would say that the staff are usually very ready to assist in case of a need.

Female, age 36-45, with moderate mobility impairment

When I get to the bank, they are always jovial and always get a pen and a paper and hand it to me. I am always smiling so maybe that is why they smile back...the staff at the bank treat me with respect.

Male, age 26-35, with severe hearing impairment

These positive experiences notwithstanding, Customers With Disability reported several challenges related to interacting with bank staff at the counter. Across all Customers With Disability who participated in the survey, only 26 percent said they were encouraged by bank staff to discuss their special needs, and 29 percent felt that bank staff are knowledgeable about Persons With Disability.

Although about half (49 percent) of customers with mobility impairments feel that staff are knowledgeable about Persons With Disability, only 24 percent of customers with visual impairments and only 5 percent of customers with hearing impairments agreed. Challenges at the counter appear to be more common for customers with visual and hearing impairments. In interviews, no participant with a mobility impairment described a negative experience with bank employees, whereas many customers with hearing impairment or visual impairment described a past negative experience with an employee.

I don't know if they really know how to handle clients. Even when I go to the wrong counter and want to be guided, they do not offer help immediately. If they were working on something (remember they are not with a client) they have to finish before attending to me. I think they are very arrogant.

Male, age 46-55, with severe visual impairment

It's like some people wonder what such a person would be doing here, and it's like they take you like you are not the same as others. It's like looking down on someone and seeing the abled people more important than the disabled...Like I am not saying they insulted me or something, but one can always sense that here I am not welcome.

Male, over age 65, with severe mobility impairment

Communication during physical visits to banks is especially challenging for customers with hearing impairments. In the survey, 84 percent of customers with mobility impairments and 76 percent of customers with hearing impairments reported that staff communicate with them effectively. Only 11 percent of customers with hearing impairments felt this way. No customers with hearing impairments (0 percent) reported that interpreters were available to assist. Similarly, during the interviews, almost all customers with hearing impairment highlighted communication difficulties. To compare, only one customer with a visual or mobility impairment described communication as a challenge.

I can tell they get really unhappy when they see me because they know they have to communicate with me, and it is difficult for them. I force myself to have patience and perseverance and remind myself that I came here for the statement and I'm not going home without it.

Male, age 36-45, with severe hearing impairment

When no interpreters are available, customers with hearing impairments communicate with bank staff in writing, which is time-consuming and frustrating for customers and staff alike. Several customers with hearing impairment said the level of English used by bank employees is too complex for them to understand. This may be related to the fact that customers with hearing impairment in the sample generally reported lower levels of educational qualification.

The English used by staff at the bank is very complicated and too detailed for a deaf person to understand.

Male, age 36-45, with severe hearing impairment

The exchange in writing between me and the staff is not easy. It is time consuming and the English is on another level!

Male, age 26-35, with severe hearing impairment

A customer described how communication challenges led to an embarrassing and awkward moment during a visit at the bank.

I came to inquire something. I wrote to the customer care person upstairs and I was assisted...some words she wrote were difficult to understand, she asked two staff to help her to explain to me. I ended up having three people assisting me. It was a very large crowd, and I was uncomfortable.

Female, age 26-35, with severe hearing impairment

Communication challenges tend to affect how persons with hearing impairment perceive their banking experiences. Only 47 percent of customers with hearing impairment said they feel valued whereas 70 percent of customers with visual impairment and 76 percent of customers with mobility impairment felt valued.

#### IV. b) How Customers With Disability Believe They Are Perceived By Bank Staff

The challenging experiences described above by Customers With Disability contribute to the fact that, during interviews, several customers believed that bank staff view them negatively. In the interviews, only one person with a mobility impairment felt that bank staff view him negatively, and nearly all customers with mobility impairments said staff seem to view them positively. Thus, concerns about being viewed negatively by staff were voiced mostly by customers with visual and hearing impairments.

When the staff see me at the bank, they are like "Oh no! Oh my God! It's the deaf guy again!"

Male, age 26-35, with severe hearing impairment

They have a very negative attitude towards persons with disability...

Their attitude really makes me feel bad. I believe everyone has a special need not only people with disability. Everyone needs to be addressed and treated with respect.

Female, age 36-45, with severe visual impairment

One customer linked negative customer service experiences to the bank's commission policies for staff, which he inferred was a quota system.

Some of the staff will not understand that you can't do it on your own when you request them for such challenges. Some may be arrogant. Some will be arrogant and wonder why you do not have sight. And you know some are also in a hurry to make ends meet. This means that the more the customers...that you serve or the more the customers that you are able to do...maybe the rates go high or maybe the commission. So, when you have to serve a blind person that means that you have sacrificed three customers.

Male, age 46-55, with moderate visual impairment

#### IV. c) Using An Automated Teller Machine (ATM)

Accessible ATMs offer a potential source of convenient, equitable, private, independent access to banking services for Customers With Disability. The findings reveal that access to ATMs is a weak point for customers with visual impairments. As a matter of policy, some banks deny ATM cards to customers with visual impairments, which angers and frustrates them. ATMs also often are not accessible to people with visual impairments.

#### i) ATM Strengths

In the survey, 72 percent of Customers With Disability reported using ATMs, including 86 percent of customers with hearing impairments, 53 percent of customers with visual impairments, and 75 percent of customers with mobility impairments. Of customers who used ATMs, 70 percent described the ATM locations as convenient. In the interviews, many customers reported positive experiences when using ATMs.

...the ATM and service machines in the bank are quite accessible. The ATM locations...are quite accessible for Persons With Disability...Their service machines are accessible including their height are accessible to a person on a wheelchair or short in stature.

Female, age 36-45, with moderate mobility impairment

Accessible ATMs can help Persons With Disability to accomplish their banking tasks independently and privately.

When I use the ATM, I serve myself therefore there is some independence there. Also, their ATM works well, it has never failed me.

#### Methodology

- Digital Banking Scenarios that were tested included balance enquiries and money transfer via M-Pesa
- Bank Web/URLS were tested under the Web Content Accessibility Guidelines (WCAG) 2.1 A, AA Standard
- The pages tested were the bank Home Page and About Us/ Contact US pages

#### Web Access Test

| Platform      | Browser | Screen Reader                   |
|---------------|---------|---------------------------------|
| Win10         | Chrome  | NonVisual Desktop Access (NVDA) |
| Android Phone | Chrome  | TalkBack Google Screen Reader   |
| iOS phone     | Safari  | Apple Voiceover (OS X)          |

#### **Digital Banking Scenarios**

#### **Mobile App-Android**

Register as an existing customer

Username and password

Transacting bank to MPESA

**USSD Transactions** 

Send money to another account - INTERNAL

Send money to another account - EXTERNAL

#### **Online Banking-Desktop**

View account balance

Send money to another account - INTERNAL

Send money to another account - EXTERNAL

Talk to US/ Contact US

Open an Account

The ATM makes me feel so independent, I go there, close the door and am alone, so even when I am stuck while making a transaction. I am not ashamed.

Female, age 36-45, with moderate mobility impairment

## ii) ATM Cards Denied To Customers With Visual Impairments

ATM interactions present challenges for customers with visual impairments. As a matter of policy, customers with visual impairments said some banks refuse to issue ATM cards to people with visual impairment for security reasons. This forces them to use other bank services that may come with higher transaction fees. In interviews, customers with visual impairments were unhappy with this policy.

Because I am blind, they told me that when I am being assisted to access the ATM services, I will be robbed. They even told me not use their agents for any service because the agents will steal from me. I was just surprised by this caution. So, if they know the agents are thieves, why are they employing them? I even told them that I normally pay (school) fees through an agent. Why shouldn't I use them to access their bank services? You see their ATMs have screen readers which tell us what is happening on the screen so someone stealing from me is out of auestion.

Male, age 46-55, with severe visual impairment

The consequences of not having an ATM are much because when you use mobile banking, then you'll be cut (sic) some money by the bank. And then again when you go to M-Pesa, money will be cut (sic) again. So, it is very expensive compared to an ATM.

Male, age 26-35, with severe visual impairment

They told me that since I am visually impaired, I can't have one.

Female, age 26-35, with severe visual impairment

#### iii) ATM Accessibility Challenges For Customers With Visual Impairment

For those who use ATMs, only 45 percent of customers with visual impairment said they are able to find the screen easily compared to 94 percent of customers with hearing impairment and 90 percent of customers with mobility impairment. Similarly, only 45 percent of customers with visual impairment said they can touch the screen or number pad easily as compared to 94 percent of customers with hearing impairment and 95 percent of customers with mobility impairment.

Notably, 55 percent of customers with visual impairment said they can enter their ATM card PIN easily, compared to 92 percent of customers with hearing impairment and 95 percent of customers with mobility impairment who said they can see or find the screen easily. Further, 60 percent of customers with visual impairment said the ATM clearly explained the services available, compared to 92 percent of customers with hearing impairment and 93 percent of customers with mobility impairment.

Only 55 percent of customers with visual impairment said they can access the ATM independently without help, compared to 89 percent of customers with hearing impairment and 80 percent of customers with mobility impairment. From the interviews, lack of braille on keypads and flawed audio menus were mentioned as challenges to ATM access. Updates or changes to the menus also present challenges.

Sometimes you may go, and you find that the menu has changed. You know I do cram, so I am used to that machine in that when I get there when I insert my card the first thing that I know the screen is supposed to read in a certain way. And when it changes, I know where to tap or press. And...I am used to it. I know when I press the "ok" button that has a circle, after I press the amount then click it, then some money will come. But now when you get the menu has been changed, it is difficult. Like it's (sic) two times I found it so. When the menu is changed and...does not have a speech, sometimes it just talks (sic) once then it goes mute. So, once they change the menus or when they get machines that are new, it becomes difficult.

Male, age 26-35, with severe visual impairment

I use the ATM as I told you, like I ask the police or guard to help me. So that's the issue there, like people seeing my details and know the PIN and even account and name. That's why I am saying if they can be able to put the braille even on the ATM one can transact alone without help.

Female, age 26-35, with severe visual impairment

Although the accessibility audit did not evaluate ATM interfaces, it is reasonable to expect that some of the concerns noted during the website audits will also come up in an audit of the ATM software. Problems with perceivable, operable, understandable, and robust interaction principles noted during the websites technical audit are likely to come up in some ATM interfaces.

#### IV. d) Calling The Bank

A considerable minority of Customers With Disability sometimes call the bank, usually to check balances or resolve problems. They are generally positive about the service they receive by phone. Concerns include policies for service over the phone that do not align with the capabilities of the customer.

In the survey, 38 percent of customers (who include 63 percent of customers with visual impairment, 44 percent of customers with mobility impairment, and 7 percent of customers with hearing impairment) said they had called or texted their bank. Almost all of these calls were to check balances or to resolve problems. Most respondents (86 percent) who called or texted their bank said the phone number was easy to find, they were able to access the bank by phone independently (88 percent), they were satisfied with the service received by phone (82 percent), and bank staff communicated with them effectively over the phone (86 percent).

It is possible that Customers With Disability report positive experiences when calling the bank because they experience less prejudice. Over the phone, a caller cannot be immediately identified as a person with a disability. It is worthwhile noting that these positive appraisals came from the 38 percent of customers surveyed who had self-selected to use the phone to access banking services. It is likely they chose to use the phone service based on its compatibility with their abilities.

Interviews revealed that phone calls can present challenges for Customers With Disability when the bank's policies for phone transactions and inquiries do not match customers' needs and abilities. Some customers are frustrated that bank staff answering their calls are not aware of their disability.

...once or twice when I have called and I am supposed to identify myself, there are several questions that they ask like my card number.

Since I cannot read, I have to ask my wife for help. When that happens, they start asking more questions. "Who is that? Who has access to your card?" If they had information about me and the kind of support that I need, they would serve me better.

Male, age 46-55, with severe visual impairment

...when I make a mistake and send money to the wrong person, the staff insists on speaking to the owner of the account. But I'm deaf. They insist (sic) to hear directly from the customer and yet I have already filled the forms and indicated I'm a deaf customer.

Female, age 46-55, with severe hearing impairment

## IV. e) Using Unstructured Supplementary Service Data (USSD)

Although used by only about a third of customers surveyed, USSD is well-liked by Customers With Disability who use it. Although USSD represents an option for some Customers With Disability to access banking services quickly, conveniently, and independently, the accessibility technical audit suggested that USSD transactions require some Customers With Disability, especially those with visual impairment, to remember too much information.

In the survey, 34 percent of customers reported using USSD services. Only 10 percent of customers with hearing impairment use USSD services compared to 47 percent of customers with visual impairment and 44 percent of customers with mobility impairment. Of the customers across all categories of disability, 96 percent of the respondents said USSD is convenient, 93 percent said it is easy to use, and 96 percent said they can complete tasks quickly using USSD.

Common banking tasks accomplished using USSD include withdrawing funds (87 percent), depositing funds (61 percent), checking balances (87 percent), checking statements (76 percent), and sending payments (65 percent). For each of these, over 95 percent of respondents found them easy to accomplish with USSD. In the survey, 71 percent of customers with mobility impairments and 63 percent of customers with visual impairments said they use M-Pesa/Airtel money. This is comparable to 24 percent of customers with hearing impairments. Of the customers using these services, 90 percent said it is easy to use. It is important to consider that these positive appraisals come from 34 percent of customers surveyed who had self-selected to use USSD services. It is likely they selected to use USSD based on its compatibility with their abilities. interviews, most respondents mentioned positive experiences with USSD. This service was viewed as fast, convenient, and accessible.

I use USSD more often as it's easy to use, fast, and it saves me time and energy as I don't have to move from where I am.

Female, age 36-45, with severe hearing impairment

It is convenient, easily available and makes me independent; I can perform transactions on my own.

Female, age 26-35, with severe visual impairment

I better use mobile banking because I am able to do it myself, I just sit somewhere comfortable and do what I want to do.

Male, over age 65, with severe mobility impairment

...moving towards this mobile banking is very good for blind people.

Male, age 46-55, with moderate visual impairment

Although there were generally few challenges highlighted among the customers interviewed, some difficulties with accessibility were mentioned.

...using the mobile the process is not that smooth because one has to remember the contacts... so there are various many options that you go through...it's not friendly because of the many processes or steps maybe. For me it is not that pleasing.

Male, age 46-55, with moderate visual impairment

It is important to note that the accessibility audit corroborated the concern mentioned here. The audit found that USSD transactions place a great deal of demand on the customer to remember number codes. The technical audit also noted that the order of USSD operations is not always logical for the customer, and the delivery of USSD services through screen readers was sometimes problematic.

#### IV. f) Using Banks' Mobile Applications

Only a fraction of Customers With Disability use their bank's mobile application. Those who use apps are generally satisfied with the service they get. Lack of accessibility, especially for customers with visual impairment was highlighted as a major reason why they do not use the app. Difficulties with accessibility were documented in the accessibility technical audit and the customer interviews.

Only 23 percent of customers surveyed reported using their bank's mobile application. Of those, 84 percent found it easy to download and/or install, 87 percent found it easy to use, 81 percent believed it clearly explained services available, 94 percent found it easy to log in, 87 percent were able to use the app independently without help, and 81 percent said they can complete banking tasks quickly while using the app. It is important to underscore that the positive appraisals come from 23 percent of all customers surveyed who have self-selected to use the mobile app. It is likely they chose to use the app based on its compatibility with their abilities. In interviews, the small number of participants who preferred the mobile app as their primary mode of banking had positive feelings about the app.

Checking balance is simple you just use the phone application.

Moderate, age 26-35, with moderate mobility impairment

It is easy to use, secure and fast.

Male, age 26-35, with severe hearing impairment

When I realized that the mobile application could provide me with the privacy that I need and I have the knowhow to operate it, I opted for it. The only platform I can use alone is the mobile banking. I am comfortable with mobile banking because of privacy, other people without disabilities have multiple options to access the banks services.

Male, age 36-45, with severe visual impairment

There were also challenges highlighted by some participants with visual impairments who said the mobile app was not accessible. One customer found it difficult to use the app after an update was done.

The...app [was] very well but for the past around three months, it is not that good. I think it does not activate some parts with the screen reader. Like the updates...have... destroyed its usability...things down there like my account ...you cannot click them and activate while the screen reader is on at the moment. It has stayed...three to four months...this started when they brought the update.

Male, age 26-35, with severe visual impairment

This concern was also corroborated in the findings from the accessibility audit. For example, the audit found that customers did not fully understand the information required to register as an existing customer with the mobile app, which may explain why few Customers With Disability reported using the mobile app.

#### IV. g) Using The Banks' Website

Very few Customers With Disability access banking services via the bank's website. Those who do are moderately satisfied with the service they receive from it. Lack of accessibility, especially for customers with visual impairment, appears to be the main reason why more customers do not use their bank's website. The accessibility audit corroborated the finding that the websites are not accessible for many customers.

Only 13 percent of customers surveyed said they access services via their bank's website. Of those, 100 percent said the website was easy to find, 72 percent said it was easy to use, 83 percent said it clearly explains the services available, 78 percent said they can easily log in to their account, 72 percent said they use the website independently without help, and 61 percent said they can complete their banking tasks quickly.

These appraisals come from the 13 percent of all customers surveyed who self-selected to use the website. It is likely they chose to use the website based on its compatibility with their abilities. Similarly, in interviews, we discovered very few customers had ever used their bank's website, and many did not know about the website. During the interviews, three participants with visual impairment said their bank's website was not accessible to a screen reader.

...there is a problem with the website. It is not accessible especially with a screen reader.

Male, age 26-35, with severe visual impairment

The case study findings corroborate the results of the accessibility audit. Compliance testing in the technical audit indicated a 22.7 percent accessibility failure rate. This failure rate is high enough to discourage customers from trying to access the website with a screen reader. As the technical audit revealed, even simple banking tasks like checking a balance can be difficult or impossible while using a screen reader on the website.

#### IV. h) Using Email

Almost no Customers With Disability use email to communicate with their bank.

Only 4 percent of customers surveyed said they contacted their bank via email.

#### IV. i) Written Materials And Forms

Accessibility of written materials and forms can be a challenge for customers with visual impairments. This finding was consistent across interviews, surveys, and the accessibility technical audit. For customers with hearing impairments, comprehensibility of written exchanges with bank staff came out as a challenge.

In the survey, 85 percent of customers with mobility impairments felt that written materials received at the bank were easy to understand, whereas only 32 percent of customers with visual impairments and 35 percent of customers with hearing impairments agreed. As described above, the language used in written exchanges with bank staff can be difficult for customers with hearing impairment to understand. Customers will visual impairments also reported challenges that include difficulties signing documents and inaccessible forms.

There is a time when I went to the bank to register for mobile banking. When doing so, one is required to write their name on a tablet provided using a specific pen. The staff attending to me insisted that I write my name without the help of my guide. I really got angry and told the staff that the manager had given me a go ahead to be assisted by my guide. After the staff heard me talking about the manager's approval that's when he cooperated.

Male, age 46-55, with severe visual impairment

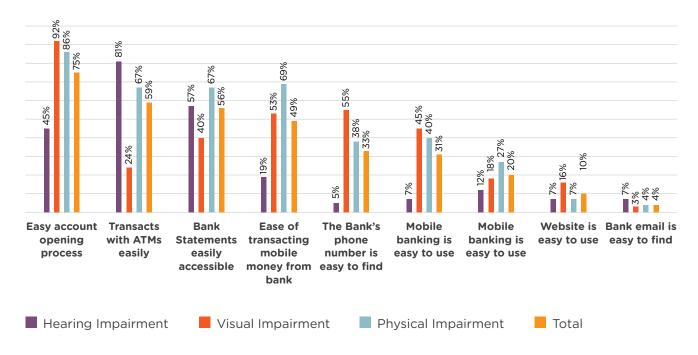
...even when you go to the banks, we have high dependence (sic) on being helped maybe to fill paperwork...when you rely on your eyes you may not see well.... to do it yourself, you will see...that they move the papers near their eyes so that they can see well...we say they nose read [hold the paper very close to their eyes to be able to read the small print]...sometimes it is not so good when people nose read in a bank because of the attention of everybody...

Male, age 46-55, with moderate visual impairment

Most participants (67 percent) said they receive their bank statements in person, whereas 21 percent said they get statements via their mobile devices. Percentages across disability categories were comparable. Although 89 percent of customers with hearing impairments and 83 percent of customers with mobility impairments found statements easy to access, only 65 percent of customers with visual impairments agreed. Further, whereas 78 percent of customers with hearing impairments and 88 percent of customers with mobility impairments could access statements independently, only 61 percent of customers with visual impairment reported the same.

This finding was also corroborated in the accessibility audit which revealed that most electronic bank statements do not contain tags to convey the structure of the statement via a screen reader. As such, customers attempting to read their statements using a screen reader are not able to understand how the document is organized, and they will also not be able to navigate the document

#### Perceptions of Ease of Accessing Banking Services



The figure above summarizes the perceptions of Customers With Disability regarding the ease of access of different banking services.

#### V. Overall Satisfaction With Banks And Banking Services

Customers With Disability have mixed feelings about their overall banking experiences, which appear to be uneven and inconsistent. They are concerned about lack of independent access to services and lack of proactive communication about the services available to them. Customers notice and appreciate when banks engage in efforts to promote inclusivity for Persons With Disability. When their needs are met with equitable and accessible services, Customers With Disability develop a sense of loyalty to their bank.

At the end of the survey, participants were asked to state their overall feelings about their bank. Across all respondent categories, 53 percent of customers surveyed said their bank understands their needs. This accounted for 33 percent of customers with hearing impairment, 55 percent of customers with visual impairment, and 65 percent of customers with mobility impairment. Although 72 percent of customers feel valued, only 48 percent with hearing impairment reported feeling valued as compared to 82 percent with visual impairments and 84 percent with mobility impairments.

Similarly, 70 percent of customers reported having a positive overall experience with their bank. Yet only 57 percent of customers with hearing impairment reported overall positive experiences compared to 82 percent with visual impairment and 73 percent with mobility impairment. Across all categories, only 62 percent of customers surveyed said they can access their bank's services independently. During interviews, some customers said their bank required them to have a helper or agent to aid them open or access their account —they were not allowed to open an account independently. Even those who have trusted family members to assist, said they prefer to manage their accounts without help.

I need someone to assist me. So, in one way or another even (sic) we are told that our pin is secret in reality it is not.

Male, age 36-45, with severe visual impairment

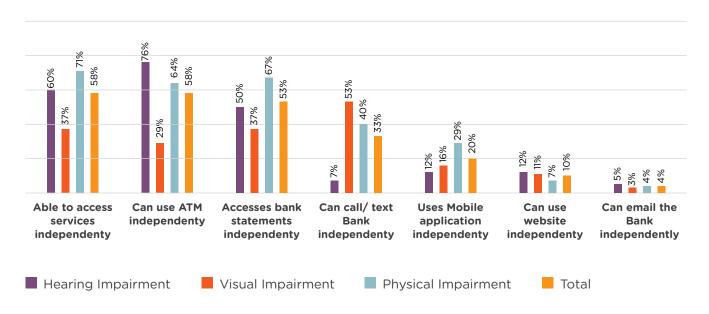
I really would wish to be able to operate my accounts independently. My wife has been very supportive, I fully trust her, and she has been doing a great job. But the fact that I have to depend on her to do most of these things is not good.

Male, age 46-55, with severe visual impairment

When I am visiting the bank like to check statements, I go with personal assistant (sic) to guide me. If it's a cheque I have to send somebody to bank it. If we have to withdraw cash, I have to go with my wife. Apart from when I have to swipe my card, I am never able to use the bank services independently.

Male, age 46-55, with severe visual impairment

#### Independence in Accessing Banking Services



The figure above shows the percentages of customers who said they can access various services independently.

Like all customers, Persons With Disability want to know which services are available to them. In the survey, 71 percent of customers with mobility impairments and 65 percent with hearing impairments said staff clearly explain to them the services available when they physically visit the bank. Yet only 16 percent of customers with hearing impairments said they feel the staff clearly explained to them services available. During interviews, many customers highlighted several positive experiences where they had received proactive communication about their accounts and the services available to them. Among them, only one had a hearing impairment. On the other hand, some customers viewed their bank's lack of proactive communication negatively.

On the TVs at the banking halls, we are not able to understand what is advertised or displayed as there is no interpreter caption box.

Female, age 46-55, with severe hearing impairment

Sometimes I also think they need to find a way of sharing information on the new developments that they have in the bank. I rarely go to the bank so there is a tendency of missing out on some new information.

Male, age 46-55, with severe visual impairment

Respondents gave suggestions of how banks should treat Persons With Disability. They asked banks to consider lower rates, lower fees, or special offers for Customers With Disability as an act of social justice. Mostly, Customers With Disability want equitable access to the same services offered to other customers.

I wanted a loan they could not help me...I don't know they thought like I could not pay or something...
But they have to see us as normal people...being disabled does not mean one cannot pay a loan because we are just like other people. We are businesspeople like the normal people only that we may have some difficulties, but the brains are just working the same.

Male, over age 65, with severe mobility impairment

One of the things that came out during interviews was that respondents noticed that their bank did not employ any staff with disabilities.

Since I became a customer...I have not seen a staff who has any kind of disability, yet the constitution is clear about the 5percent representation. Nothing for us without us. You see I am a person with disability, I know the challenges that people with disability face. If they employ people with disability, we will feel like we are part of the system.

Female, age 36-45, with moderate mobility impairment

I think they employ more personnel with disabilities so that at least you know [someone with] a disability will understand what Persons With Disability go through... let them employ Persons With Disability... they will make other Persons With Disability comfortable.

Male, age 26-35, with moderate visual impairment

I personally shared my concerns through the suggestion box about using the stairs and that they should have ramps, after three months the ramps were installed... if I could just drop a note on the issue of stairs and they responded, it means they value me.

Female, age 36-45, with moderate mobility impairment

Customers With Disability also noticed the presence or lack of public facing efforts by banks to promote inclusion for Persons With Disability, including scholarships.

When their needs are met with equitable, accessible services, Customers With Disability develop a sense of loyalty to their bank. In fact, during the interviews, most customers made statements expressing some sense of loyalty to their bank.

What are they doing? How many children with disabilities have they been able to assist?

They should give back.

Female, age 36-45, with severe hearing impairment

In the survey, only 20 percent of customers believe their bank has taken action to help Persons With Disability in the community; that includes 27 percent of customers with mobility impairments, 24 percent with visual impairment, and just 5 percent of customers with hearing impairment. The respondents also appreciate when a bank acted on their request or suggestion for improved accessibility.

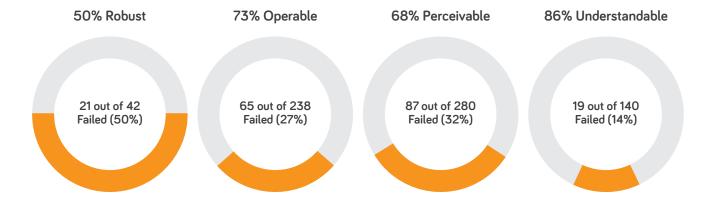
You know when you have a problem then people are there to help you then the only thing that you can pay them with is your loyalty. They are the only people who came for me when I needed them, I think with them now I can grow.

Male, age 26-35, with moderate mobility impairment

I know it is not easy dealing with a person with a disability. A lot of patience is required, and I applaud the staff for trying their best to assist us.

Male, age 18-25, with severe hearing impairment

Web Testing
Web Content Accessibility (WCAG) 2.1 A, AA Standard



#### VI. Impact Of COVID-19

Most Customers With Disability have reduced their visits to banks because of COVID-19, and remote or mobile access to services has become very important.

During interviews, most customers said they have changed their banking habits because of COVID-19. The most common adjustment mentioned was reducing their visits to banks. Other changes included using different banking services. Two respondents with hearing impairments and one with low vision said social distancing rules makes it more challenging for them to communicate when they visit the bank. This is because they cannot get close enough to a bank staff for them to exchange communications in writing (in the case of hearing impairment) or read documents (in the case of low vision).

One respondent with hearing impairment said masks make communication even more difficult because they cannot read the speaker's lips. Like most people, Customers With Disability have fears, anxiety, and concerns about catching the Coronavirus. They also pointed out that the COVID-19 health protocols are even more tough for Persons With Disability (e.g., because they must touch surfaces to navigate around). Several Customers With Disability said they had increased their use and appreciation of USSD services during the pandemic.

#### VII. Interviews With Bank Employees

Employees care about Customers With Disability and make extra effort to help them. They are also interested in training to improve their ability to handle Customers With Disability. However, findings revealed that more than half of employees interviewed had not been trained on how to serve Customers With Disability. For those who had been trained, the training focused on respect and courtesy rather than offering specific strategies to handle Customers With Disability. Even without training, bank employees believe they are effective at assisting Customers With Disability, which could reflect overconfidence. In some cases, "access" appears to be mistaken for "accessibility" by employees. Quota systems that underscore serving many customers quickly is a disincentive for employees and discourage them from serving Customers With Disability effectively.

#### VII. a) Strengths

Employees uniformly reported making extra effort to help Customers With Disability. Almost half of the employees interviewed for example, gave an example where went to a parking lot to help a customer with a mobility impairment complete a transaction. Majority of employees interviewed

expressed compassion towards Customers With Disability and had made effort to be thoughtful and considerate of their needs. Another positive was the willingness by employees to learn how they can serve Customers With Disability better. Nearly all employees interviewed said they would like to learn basic sign language to enable them serve customers with hearing impairments.

#### VII. b) Areas of Improvement

Employees recommended several areas of improvement. From the interviewees, only one respondent said he had attended a training that was specifically aimed at handling Customers With Disability. About half of the employees interviewed confirmed they had gone through general training which at some point, touched on serving Customers With Disability. Additionally, during the general training sessions, the focus was more on respect for Customers With Disability and the existing bank policies, rather than specific customer service strategies.

About half of the employees interviewed said they had not received any training on how to serve Customers With Disability. As such, it is not surprising that majority of the interviewees confessed to having challenges while serving Customers With Disability. The lack of training may also explain the negative statements some of the employees made when describing their perception of Customers With Disability (e.g., as being helpless, or incapable of being able to conduct their banking independently).

With one exception, every employee interviewed said they feel effective when handling Customers With Disability. To support their claim, they cited absence of complaints from customers as the primary proof for their self-assessment. This can be supported by reviews by some of the customers we interviewed who said some employees are effective when serving them.

The varying experiences highlighted by Customers With Disability does not fully match the nearly unanimous perceptions of bank staff who believe they serve Customers With Disability effectively, despite little or no training. There is certainly a gap in expectations and overconfidence among bank staff regarding how they serve Customers With Disability.

One potential source of this gap is the common misconception by employees on the meaning of "access" which is mistaken for "accessibility." "Access" refers to providing Customers With Disability some bare minimum ability to avoid being excluded from banking practices entirely.

With access, Customers With Disability are not explicitly forbidden or excluded from an activity - there is a way they can be served, even if that service is incomplete, inconvenient, and/or fundamentally not equivalent to the service a person without a disability would receive. Almost all employees said Persons With Disability can sign with a thumbprint instead of a signature.

There possibly is nothing wrong with this practice per se since it permits some customer's access. But access alone does not mean the banking experience is equitable or positive for all Customers With Disability. Similarly, when employees were asked about services for Persons With Disability at their banks, ramps were commonly mentioned. Ramps provide access and are necessary but achieving accessibility does not end with ramps. Majority of employees underscored bank policies that allow Customers With Disability to move to the front of the queues. However, as the customer interviews revealed, those policies are unclear or unevenly enforced. No employee seemed to be aware that Customers With Disability have experienced difficulties with the queueing policies.

Nearly all employees made a statement to show that they expect some Customers With Disability to use a guide or helper when banking. There was no expectation that those customers should be able to access banking services independently. Assisted banking permits access, but it does not mean accessibility. Every employee interviewed except one, said they know of at least one aspect of their bank's services that is not accessible to some Persons With Disability. Often, there seemed to be little concern about these inaccessible services, as long as there is an alternative. A more progressive solution is to achieve accessibility, i.e., access for all Customers With Disability to all services like other customers with equitable degrees of convenience and independence.

Some employees said their banks reward fast service using quotas (e.g., incurring penalties for serving fewer customers). There is consensus among employees that serving Customers With Disability takes more time. Employees are concerned about being penalized for missing quotas when they spend extra time with customers who have disabilities. It is worth relooking the quota system because it negatively impacts the customer experience for Persons With Disability.

## VIII. Recommendations On How To Improve Banking Services For Customers With Disability

The information obtained from the customer survey and interviews, as well as the employee interviews, provided recommendations below:

## VIII. a) Ensure all Banking Areas are Accessible by Ramps

This will benefit customers with mobility and visual impairments. Such "universal design" approaches also typically benefit many customers who do not have disabilities (e.g., parents pushing a stroller, a delivery person wheeling a cart, or a person with a temporary mobility challenge from an injury).

#### VIII. b) Train security guards to:

- i. Recognize Customers With Disability
- ii. Enforce consistent queuing policies
- iii. Aid Customers With Disability to skipping queues
- iv. Direct Customers With Disability to the correct counter

The first point of contact for most Customers With Disability is a security guard. Although many experiences with security guards are positive, the service levels were cited as inconsistent. Since security guards already play this customer-facing role by default, a bit of training and clarification of policies will significantly improve the banking experiences for Customers With Disability. From the research, queuing policies were uneven and

inconsistently enforced, and bank staff seemed unaware of this problem. Security guards can play a key role if they consistently notice Customers With Disability entering the building, help them to the front of queues, and direct them to the right place where they can be attended to.

VIII. c) Provide all staff with annual training that specifically addresses "access" versus "accessibility." In training, provide specific strategies for making in person services accessible to Customers With Disability.

Almost no employee confirmed going through training that was specific to teaching specific strategies for serving Customers With Disability, and many employees seemed to confuse "access" for "accessible".

## VIII. d) Train at least one staff member at every branch in basic sign language

Customers with hearing impairments consistently were the least satisfied group examined here, and their main area of dissatisfaction was communication. Bank staff also expressed frustration with communication while serving customers with hearing impairments. Customers want an interpreter or staff member who understands sign language.

Employees almost universally said they wish they knew and understood sign language to ease the communication gap.

VIII. e) Ensure that all websites, mobile applications, and written or electronic banking documents are accessible. Consider using braille, large print, and accessibility for screen readers, as appropriate

The results of the accessibility audit provide a useful starting point for these efforts. The audit documented a 22.7 percent failure rate in the compliance of banking websites with accessibility principles. The audit also noted multiple shortcomings with mobile apps, USSD transactions, and electronic statements.

VIII. f) Issue ATM cards to all Customers With Disability who want them, including customers with visual impairment. Make ATMs accessible to all customers, including those with visual and mobility impairments

Customers with visual impairments who had been denied ATM cards as a matter of policy were angry and felt discriminated against and belittled. ATMs provide an independent mode of access for Customers With Disability that some find less challenging to manage compared to making physical visits to the bank. ATMs, however, must be accessible to all customers, which means accessible locations and positioning of screens and keypads, braille on keypads, and a functioning, accessible screen reader option for customers with visual impairments.

## VIII. g) Ensure Customers With Disability are informed about (and trained to use) new and emerging services

Interview findings revealed that Customers With Disability are at risk of missing new and emerging services. In some cases, this happens because the new and emerging services are not accessible to them. In other cases, it happens when Customers With Disability are not informed of the services available to them. Customers With Disability may need specialized training to understand the new services.

## VIII. h) Hire more employees with disabilities, and listen to their advice on how to improve services

Customers With Disability notice the absence of bank staff with disabilities. The employees with disabilities we interviewed in our study provided specific recommendations of how to improve service for Customers With Disability. Some said the suggestions they made to their employers had not been implemented.

VIII. i) Consider how changes and updates to banking services, policies, and technology will affect accessibility of those services for Customers With Disability

Accessible and equitable access is an on-going process rather than an endpoint. As banking services, policies, and technologies evolve, each change needs to be evaluated for potential unforeseen impacts on accessibility. To the extent that a person with a disability becomes a frequent user of a particular service or mode of access (e.g., USSD or a mobile app), changes or updates to the service that disrupt accessibility will also affect the lives of Customers With Disability.

## VIII. j) Implement a special counter for serving Customers With Disability

Several customers recommended having a dedicated staff mandated to serve Customers With Disability. If this is not possible, banks should reevaluate their policies on quotas and commission. They should not penalize employees who take time to provide high-quality customer service to Customers With Disability.

#### VIII. k) Roadmap to Digital Accessibility:

Banks need to develop roadmaps to outline how they will ensure that their websites, mobile applications, and written or electronic banking documents will be accessible in line with internationally recognized best practice accessibility standards. The Bank PWD Digital Accessibility Roadmaps should have clear timelines, action owners and required support they would need from KBA.

#### VIII. I) Industry to Observe PWD Day:

Commencing December 2020, all banks will observe International Day of Persons With Disability which is marked on 3<sup>rd</sup> December annually, and will promote financial services accessibility for PWDs during the month of December.

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