

CODE OF BANKING PRACTICE FOCUS GROUP

Voluntary Guidelines
to Assist Banks to
Meet the Needs
of Older and
Disabled Customers

Introduction

- 1.1 The UN Convention on the Rights of Persons with Disabilities (CRPD) has been ratified by New Zealand. This is an important step in recognising the needs and aspirations of disabled people and complements the New Zealand Human Rights legislation.
- 1.2 A stated objective of the Code of Banking Practice (the Code) prepared by the members of the New Zealand Bankers' Association¹ (the Association) is to recognise the needs of older and disabled customers and to use reasonable endeavours to enhance their access to banking services (Clause 1.2 (c) of the Code).
- 1.3 In order to support members with their responsibilities under the Code and encourage the ongoing development of access to banking services to the older and disabled, these voluntary guidelines have been developed by member banks in consultation with representatives of older and disabled communities as aspirational goals for the member banks.
- 1.4 These guidelines are neither exhaustive nor comprehensive of issues relating to access to banking services by older and disabled people. Banks may consult further with their older and disabled customers and seek input from the resources listed in Appendix 'A'.

¹ Collectively ANZ National Bank Limited, ASB Bank Limited, Bank of New Zealand, Citibank, N.A., The Hongkong and Shanghai Banking Corporation Limited, Kiwibank Limited, TSB Bank Limited, Westpac Banking Corporation (New Zealand division).

Purpose of Guidelines

2.1 The purpose of these guidelines is to:-

Provide information to banks for them to develop, plan, promote and aspire to implement:-

- a) systems and processes; and
- b) best practice and standards

to improve access to banking services for the older and disabled.

- 2.2 Support banks' understanding of the needs and aspirations of the older and disabled.
- 2.3 Acknowledge the rights of older and disabled people under New Zealand's Human Rights legislation and CRPD in the context of access to banking services.

3 Target Audiences

- 3.1 Staff of member banks of the Association.
- 3.2 Customers of the member banks of the Association.
- 3.3 Office of the Banking Ombudsman.

Reasons for Banks to Adopt the Guidelines

- 4.1 Disabled and older people should have access to banking products and services in a fair and reasonable manner.
- 4.2 People with disabilities and older people need to be able to access their financial information held by banks and conduct their banking efficiently, conveniently and independently.
- 4.3 It is important for banks to consult with older and disabled customers as part of their business planning processes, thereby ensuring that they have:
 - a) a broad awareness of the diversity of their customer bases;
 - b) an ongoing awareness of the different needs of their customers; and
 - c) an awareness of issues relating to accessibility to bank services.
- 4.4 Older and disabled people represent a significant proportion of banks' customer bases, as highlighted by the following facts published by Statistics New Zealand:
 - a) the 2006 census undertaken of the 'resident' population showed that 675,213 (16.7%) were aged 60 years or over;
 - b) it is projected that by 2051, 25% of New Zealanders will be aged 65 years and older; and
 - c) in 2006, a total of 660,300 people (17% of New Zealanders) reported some level of disability. It is also noteworthy that a majority of people with disabilities reported more than one disability.

Voluntary Guidelines for Customer Service

Member banks adopting these guidelines will endeavour to:-

- 5.1 Provide training for all staff interacting with customers to include:
 - a) disability awareness training to understand and assist older and disabled customers;
 - b) the need to value all customers;
 - c) information on banking services available to best serve the needs of older and disabled customers;
 - d) the ability to recognise signs of potential financial abuse while being sensitive to customers' situations and wishes; and
 - e) the use of New Zealand Relay service.
- 5.2 Develop internal procedures to deal with possible financial abuse of older and disabled customers.
- 5.3 Take the following requirements into consideration when designing physical access to banking services:-
 - a) applying the standards required by the Building Act 2004 in respect of access to buildings by disabled people;
 - b) availability of low tables;
 - c) ramps on bank premises where steps are the only means of access;
 - d) meeting spaces large enough to accommodate wheelchairs;

- e) power assisted doors wide enough to allow wheelchair access;
- f) queuing aisles wide enough for wheelchairs;
- g) teller counters low enough for people in wheelchairs;
- h) layout and signage designed with colour contrast and size suitable for people with vision and other impairments; and
- i) accessible and user friendly ATMs for disabled people.
- 5.4 Consult and consider the needs of older and disabled customers when designing new services.
- 5.5 Consider reduction in fees (at the request of the customer) if they are not able to use particular services due to age or disability.
- 5.6 Consider calling out numbers when queues are managed by numbers in addition to appearing on a screen.
- 5.7 Provide personal banking options where it is reasonable to do so if requested by customers who experience anxiety or other difficulties waiting in queues.
- 5.8 Work alongside older and disabled customers to identify and assist their communication and language needs including the acceptance of interpreters used by customers depending on the availability and suitability of such services.

- 5.9 Consider the following when developing ATM technology:-
 - a) the provision of alternative banking services to those older and disabled customers who may be unable to use technological innovations;
 - audible ATMs to have an option to have the screen on to ensure that verbal prompts complement on screen instructions. (This should take into consideration the security risk of 'shoulder surfing');
 - c) large buttons to assist customers who have coordination difficulties;
 - d) ATM screens to improve the clarity of display for vision impaired and wheelchair bound customers;
 - e) all machines to have a dot on the key number five;
 - f) easy on-screen prompts in plain language; and
 - g) availability of ATM instructions in large print booklets/audiotapes/DVDs.
- 5.10 Consider the following when offering Internet services:-

Use of international W3C web accessibility best practice standard, the accessibility-related New Zealand e-government web standards, and recommendations in respect of their websites, including:-

- a) user friendly websites that are compatible with commonly used browsers with assisted technology;
- simple screens (i.e. banks should focus on the use of Internet banking by all their customer base, including older and disabled customers);
- c) easy prompts/easy access; and
- d) plain language information on how to use Internet banking.

- 5.11 Consider the following when providing information, products and services to older and disabled customers:-
 - a) offer easy to read information in different formats, including Easy Read, large print, Braille, DVD, New Zealand Sign and audio (where appropriate and necessary);
 - b) publications in both larger print, clear fonts and colours;
 - c) plain language information (as well as Easy Read, which includes appropriate pictures/diagrams) about all banking services;
 - d) not too much information on a page; and
 - e) avoid printing texts over images (for the benefit of the people who are vision impaired).
- 5.12 Enhance older and disabled persons' access to their ranges of banking services by consulting with:
 - a) organisations representing older and disabled customers; and
 - b) keep pace with changing technologies involving ATMs, electronic and Internet banking.
- 5.13 Banks should do their best to inform older and disabled customers of the range of banking services available to them.
- 5.14 A list of useful resources and websites are included in Appendix 'A' for reference and further assistance.

Appendix 'A'

Standards

New Zealand Access Standard

NZS 4121:2001

Design for access and mobility: Buildings and associated facilities

Standards New Zealand

Government web standards

http://www.e.govt.nz/standards/web-guidelines

 Australian Bankers' Association voluntary industry standards to improve accessibility to electronic banking

http://www.bankers.asn.au/default.aspx?ArticleID=344

Information Resources

► United Nations Convention on Rights of Persons with Disabilities

http://www.odi.govt.nz/what-we-do/un-convention/index.html

► Disability Information and Advisory Service (a People First service)

mail@peoplefirst.org.nz

► EEO Trust and the National Equal Opportunities Network (Neon) both provide information on employing disabled people which may also assist with providing services to this group. Resources can be downloaded for free

www.eeotrust.org.nz www.neon.org.nz

► IHC Advocacy

http://www.ihc.org.nz/tabid/1193/Default.aspx

► Easy Read Guidelines

(Note: Easy Read differs significantly from what is usually understood as plain English. It is simpler and usually contains pictures to facilitate understanding)

http://www.odi.govt.nz/disability-perspective/resources/plain-language.html

http://www.drc.gov.uk/library/publications/advice_and_ information/how_to_use_easy_words_and_pict.aspx

► Large print guidelines, Braille and audio transcription services are available from the Royal New Zealand Foundation of the Blind (RNZFB)

www.rnzfb.org.nz

Training Resources

► Disability responsiveness training available from the Health and Disability Commission \$15.00

http://www.hdc.org.nz/resources/videos

Disability organisations such as CCS Disability Action, RNZFB and other disability and mental health service providers can provide training in disability awareness. The Health and Disability Commission has developed a training DVD, which is focused mainly on disability support service providers, but does have some value for other organisations providing services to disabled people

▶ Barrier Free New Zealand Trust can assist with expert advice and services related to accessible environments

http://www.barrierfreenz.org.nz/

Association of Blind Citizens of New Zealand Inc advocates on behalf of its members, including issues of accessibility, and can advise on training of people in blind awareness

www.abcnz.org.nz

► Age Concern New Zealand can provide information about financial abuse of older adults and can assist with training on identifying and sensitively managing potential abuse situations www.ageconcern.org.nz/?/ElderFinancialAbuse

Other Useful Websites and Organisations

- Human Rights Commission www.hrc.co.nz
- New Zealand Relay http://www.nzrelay.co.nz/
- ► New Zealand Sign Language Interpreter Services

 http://www.deaf.co.nz/index.php?option=com_content&task=vie
 http://www.deaf.co.nz/index.php?option=com_content&task=vie
 w&id=146&Itemid=82

