

## **Submission to the Code of Banking Practice**

People First New Zealand Ngā Tāngata Tuatahi is pleased to make this submission to the Code of Banking Practice

### **1. About People First New Zealand**

People First NZ is a Disabled Persons Organisation and a national self-advocacy organisation run by and for people with learning disability.

People First NZ uses the term “learning disability” rather than “intellectual disability” as members think it is more respectful.

People First NZ was set up in New Zealand in the 1980’s and has been an independent Incorporated Society for over 12 years. There are over 28 local groups around New Zealand where members meet monthly to learn about their rights and how to speak up for them.

To be a member of People First NZ you must be a person with a learning disability, over 18 years of age.

People First NZ members speak up on issues that are important to them such as:

- having the same rights as all other New Zealanders
- being a member of the community
- being a citizen of New Zealand.

People First NZ works in a human rights framework and works to implement the United Nations Convention on the Rights of Persons with Disabilities, UNCRPD, to make sure people with learning disabilities have a good life. People First NZ is also a member of the New Zealand UN Convention Coalition Monitoring Group that monitors the rights of disabled people against the UN Convention.

People First NZ runs a translation service called **Make It Easy**, which translates information into Easy Read – everyday words and pictures. Easy Read is a format that is more accessible for people with a learning disability, low-literacy or English as a second language.

People First NZ also provides information and advice about rights and supports for people with learning disability. We run courses for people with learning disability and deliver educational presentations about how to provide a service to people with learning disability to organisations and the wider community.

People First New Zealand is part of the Disabled Persons Coalition that works in partnership with the government making Article 4.3 real.

## **2. Why People First New Zealand wants to make this submission.**

People First NZ members are concerned with the human rights of all people and want to have their say about important issues.

Members believe it is particularly important to speak up on issues for disabled people and in particular the rights of people with a learning disability.

Members believe the rights in the UNCRPD are the minimum standard for disabled people and it is important that New Zealand puts in place policies and practices that make these rights real.

People First New Zealand thinks the Code of Banking Practice is important as people with learning disability are bank customers.

## **3. What People First NZ New Zealand thinks:**

1. It is pleasing to read that the Code will be written in plain language. However the Code needs to be accessible to all new Zealanders. The plain language version can be used as a good starting point to translate into other accessible formats.

For people with learning disability this means being written in Easy Read – a way of giving information using every day words and images to assist meaning. People First NZ runs Make it easy, an Easy Read translation service and could work with the Bankers Association to make the final code in Easy Read.

People First NZ suggests the Bankers Association also work with other Disabled Person's Organizations to make the code accessible in all other alternative formats for other disabled people.

Additionally the Code should be available in all formats all banks across New Zealand.

2. People First NZ supports the five principles in the draft Code. However we believe there should be an additional principle statement about honouring international treaties and obligations and domestic laws that have a committed to human rights and the rights of disabled people and older persons.
3. Any complaints process also requires to be put into Easy Read both within the Code and also as stand-alone information, along with information about the role of the Banking Ombudsman. Additionally the Banking Ombudsman needs to ensure that their staff are able to address complaints by people with learning disability and have been trained on providing a service to people with learning disability.

Additionally the voluntary guidelines for banks should be part of the Code. People First NZ thinks the guidelines should be compulsory. Article 9 of the UNCRPD refers to accessibility and banks along with

other government and non-government organisations should be working to implement this Article.

Additionally the guidelines require reviewing and should be reviewed every three years to make sure they up are as up to date as possible.

4. In the section We will treat you fairly and reasonably you refer to the “needs ‘of all our customers, including older and disabled customers. For disabled people the correct term is reasonable accommodations as in the UNCRPD and the NZ Human Rights Act. For the full guidelines refer to <http://www.ombudsman.parliament.nz/resources-and-publications/guides/disability-rights-guides>

For further information please contact Cindy Johns, National Manager on [Redacted]