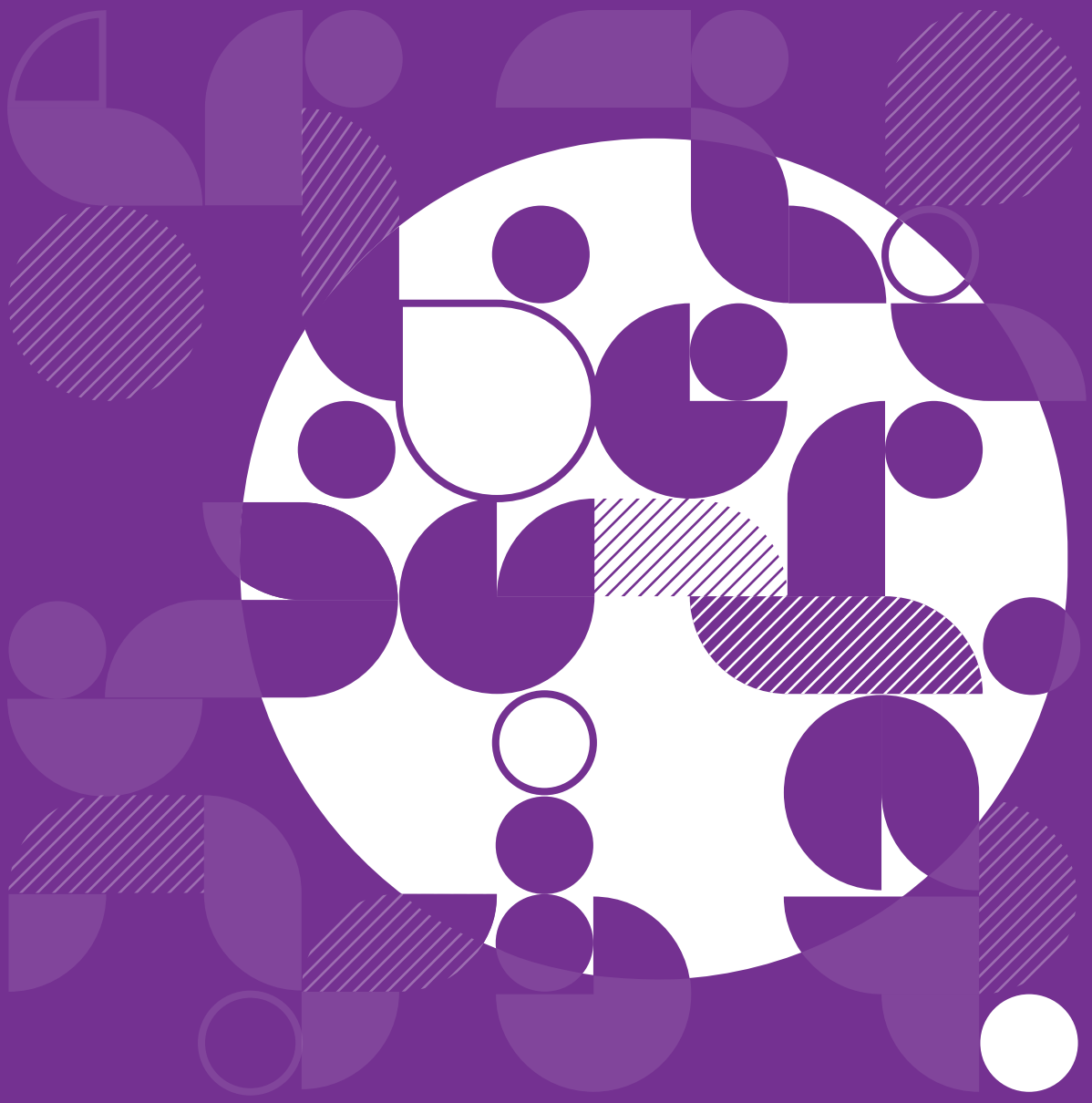
Westpac NZ

Disability and Inclusion in Banking

January 2025



ThinkPlace
WāhiWhakaaro

This report by ThinkPlace was commissioned by Westpac New Zealand Limited.

Contents

“Creating an inclusive banking environment in Aotearoa New Zealand is within the control of the banking sector.”

An exploration into the experiences of disabled people accessing banking and making payments in Aotearoa New Zealand.

Acknowledgements

We extend our sincere gratitude to all the people and organisations who generously gave their time to talk with us or referred us to other helpful people and information. We know this issue is important to all who participated and that their voluntary participation came from a passionate desire to make access to banking and payment services more inclusive.

Ngā mihi,

The ThinkPlace project team:

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Disclaimer

This project allowed us to explore the lived realities of some disabled people in Aotearoa New Zealand, when accessing banking and making payments. The disabled community is large and varied. The stories and findings reflect the experiences of those who participated in this research and do not reflect the experiences of all disabled people.

We also recognise the efforts of some banks to create greater inclusion and, where appropriate, have included references to these.

Language use

We use ‘disabled people’, ‘tāngata whaikaha’ (a Māori term that translates to ‘people in the pursuit of empowerment’), or ‘people with lived experience of disability’ in line with affirmative language recommended and used by New Zealand disabled-led organisations and strategy documents[1]. This terminology emphasises the capacities and strengths of the individuals and the ways that society, systems and processes disable and disempower individuals with impairments.

Throughout this report, we often refer to the concepts of ‘accessibility’ and ‘inclusion’. We rely on these definitions: “Accessibility is about ensuring systems are designed so everyone can fully participate in public or professional life, while inclusion means everyone has the resources and opportunities they need to participate”[2].

SECTION 1 —

Introduction

The opportunity

Almost 1 in 4 New Zealanders have a physical, sensory, learning, or other disability.[3] This equates to 1.1 million people in Aotearoa New Zealand who are active, contributing members of our society, economy and communities yet often face barriers and unaccommodating environments when accessing basic, fundamental services and spaces.[4] This number is only expected to increase in the coming years, mainly due to the nation's ageing population. Most recent data showed a 20% increase in disability in New Zealand across a 10-year period.[5]

Having access to banking is critical to meaningful participation in society for disabled and non-disabled people alike. The absence of an inclusive banking system has significant social and economic impacts on people and our society. Without access to banking, people cannot easily receive salaries, wages and benefits, and pay for everyday expenses such as rent or electricity. For the banking sector to provide services and options that meet the needs of an increasingly diverse population, a focus on accessibility and inclusion for disabled people is crucial. It will only become more critical in the decades to come.

This work set out to explore the experiences of disabled New Zealanders when accessing banking and payments, including the holistic impacts of any barriers, and to identify recommendations for change. To better understand these experiences, we engaged with people with lived experience of disability and those who work for advocacy or service providers for disabled people.

Our research highlighted many barriers in banking that disabled people experience every day. We learnt that they often experience multiple barriers simultaneously, compounding each person's challenge. Banks are only one of many fundamental services where disabled people experience barriers to access or full participation, however, the banking sector has a huge opportunity and broad scope to effect significant change. There are clear and achievable ways banks can be part of making our society more inclusive for all.

The findings and recommendations in our report offer practical, realistic ways for banks, the banking sector, and regulators to collaborate with each other and partner with disabled people to create an inclusive and accessible banking environment from which all can benefit.

There are clear and achievable ways banks can contribute to creating a more inclusive society.

Context

Nearly a quarter of our current population experience disability, and the number of disabled people and the rate of disability are set to increase significantly in the coming years, both in Aotearoa and around the world[6]. For example, the number of people living with dementia, just one of many health conditions contributing to disability, is projected to rise from 60,000 to 170,000 by 2050.[7]

Our ageing population is the primary reason that the number of disabled people is predicted to increase so dramatically.[8]

> The number of **people aged 65 years or older** living in Aotearoa is currently around 842,000; this is likely to increase to **1 million by 2028 and 1.5 million by 2050**.[9]

The likelihood of living with one or more long-term health conditions increases with age, with those over 65 more likely to be disabled than younger adults or children.[10] As our population has aged over time, we have already seen higher rates of disability; from 2001-2013, the number of those identifying as disabled increased by 20%[11], with Statistics New Zealand due to release updated data in 2025.

Alongside a vast range of experiences, there is a rich diversity in the disabled community of culture, gender, sexuality, identity, and socioeconomic status. These are not discrete categories – they are interconnected and overlapping – and that intersectionality influences how people see themselves and experience the world. Māori have relatively high rates of disability, and social and economic factors contribute to poorer outcomes for tāngata whaikaha Māori.[12] Pacific Peoples and people from Asian backgrounds are also a growing proportion of the disabled community in Aotearoa.[13]

Rates of employment and the economic status of disabled people are significantly lower than those of non-disabled people.[14] This has a significant impact not only on disabled people and their communities but also on our economy:

> **"Future economic growth of the country has the potential to be constrained by skill and labour shortages. The low employment rates of disabled people represent a significant loss of potential contribution to New Zealand's economy."** [15]

64% of disabled adults in Aotearoa have an annual gross income of $30,000 or lower, compared to 45% of non-disabled adults.[16] This is heightened further for tāngata whaikaha Māori, who earn less, have higher unemployment rates, and far more significant material disparities.[17] It is well-documented that disability brings hidden costs that make it more expensive to maintain the same standard of living as non-disabled people.[18]

Accessibility in Banking

Westpac's 2023 report into Access to Banking in Aotearoa speaks more broadly to the importance of all people having access to banking, concluding that barriers to banking impact the ability to participate in society fully.[19] Where disabled people experience barriers to everyday activities such as banking, they are unable to participate and contribute on an equal basis with non-disabled people.

The United Nations Convention on the Rights of People with Disabilities (UNCRPD), ratified by New Zealand in 2008, states that:

> **"Parties shall take all appropriate and effective measures to ensure the equal right of persons with disabilities to own or inherit property, to control their own financial affairs and to have equal access to bank loans, mortgages and other forms of financial credit, and shall ensure that persons with disabilities are not arbitrarily deprived of their property."** [20]

There is limited data that quantifies how many disabled people are unbanked or have limited access to banking in Aotearoa. Research in the United States[21], however, found that the unbanked rate of disabled people (of working-age households) was almost 15%, four times that of non-disabled people (4%).

The positive impact that greater accessibility can have on society is undeniable, though difficult to quantify in monetary terms. While the focus of improving the accessibility of banking services and payments should be first and foremost about the inclusivity for disabled people, international research shows that banks themselves would be set to benefit from this too. Studies in the United Kingdom[22] show that disabled people and their friends and family are less likely to support businesses with poor accessibility;

> **71%**
>
> of disabled people will **shop elsewhere** if a website has accessibility barriers.
>
> **75%**
>
> would **choose to pay more** for a product from an accessible website than buy the identical product from a less accessible website.

The impact of this on businesses, including banks, is significant. Globally, disabled households (households with at least one disabled person) are currently estimated to have more than $10.71 trillion in annual disposable income.[23]

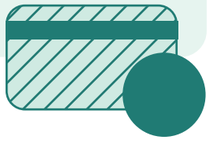
Contextual shifts

Contextual shifts such as technological advances and the COVID-19 pandemic have impacted and will continue to influence how we conduct everyday activities. In recent decades, we have seen significant shifts toward digital platforms, services, and experiences. Even in-person interactions have more digital aspects integrated into processes and services, such as ATMs and digital screens on EFTPOS machines.

Online banking, including banking apps, has become the most common and often most straightforward way to conduct simple and transactional banking tasks such as checking bank balances, making payments, or transferring money.

There are fewer bank branches across the country, and interactions with the bank are becoming increasingly less people-mediated due to automation or re-direction to self-service online or an ATM. Beyond banks, online shopping (including making payments online) has become commonplace, even for securing basics such as groceries. We are becoming an increasingly cashless society, with the number of card payments increasing every year[24].

In Aotearoa New Zealand, total card payments across online and in-store purchases are estimated to be at least $143 billion annually.[25]



Some of these changes might make banking services and payments more accessible for some disabled people (for example, those who find travelling to the bank or shop challenging, or those who benefit from supports such as screen readers). However, if the digital aspects are not designed in an inclusive or accessible way, these can create significant barriers for many.[26]

Anti-money laundering (AML) legislation has also changed the banking context in recent decades. The Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML Act) is designed to help detect and deter money laundering and terrorism financing. One of the changes this introduced was an obligation for banks to do more to collect and verify each customer's identity and address.[27] The Reserve Bank of New Zealand (RBNZ) monitors banks' compliance and has produced a Code of Practice that provides guidance on best practices for verification. However, banks do not have to adhere uniformly to the Code of Practice, and each bank can set its policies to meet its obligations.[28] Therefore, while all banks must have stringent processes to ensure they know the true identity of their customers, each bank's policy may vary in precisely what they require from customers or those managing their accounts. Previous research has identified that banks' best intentions to comply with the AML Act can inadvertently be a significant barrier to banking access, excluding some people altogether.[29] Since its inception, the regulations under the AML Act have been reviewed and developed, with the New Zealand Government recently announcing further changes to come in 2025.[30]

Method summary

To better understand disabled people's experiences of banking services and making payments, we engaged with a number of people with lived experience of disability, as well as those who worked for disability organisations, including advocacy groups, service providers and disabled people's organisations (DPOs).

Further detail on our methodolgy can be found in Appendix B.

About our participants

We had a total of

25 participants

across both in-depth and group engagements.

84%

of participants (21 of 25) have lived experience of disability themselves, or care for a disabled person in their family.

We had in-depth conversations with

13 individual participants

who worked for or represented a disability organisation. Nine of these participants have lived experience of disability themselves or were the parent or child of a disabled person.

The remaining **12 participants** have lived experience of disability and were part of a group engagement. They were members of a disability organisation but did not work for it.

Our participants experienced or represented one or more impairments related to vision, information processing, communication, memory, hearing, social interactions and other physical functioning limitations.

SECTION 2 —

Insights and recommendations

Making banking more inclusive for disabled people

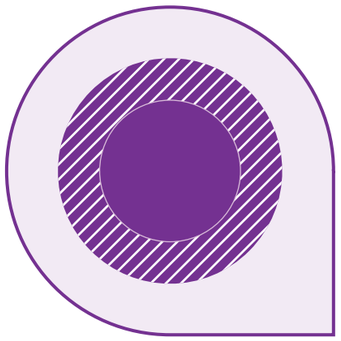
While in recent years, banks have made progress towards being more inclusive, there is still an opportunity to improve the accessibility of banking and payments, and there are simple changes that would make a big difference to disabled people's experiences.

This section defines four high-level recommendations for change and presents the findings, impacts, and a range of specific ideas that could assist in achieving them.

The recommendations are targeted at different levels of the banking system (see fig. 1 below) based on who has control or influence over each action. Changes are needed at multiple levels of the system by multiple types of system players.

- Some changes are needed at an individual bank's level, so we discuss processes **within a bank's control**. Some of these recommendations are already implemented in certain banks but not others; there is an opportunity to continue to learn from one another and set best practice standards.
- Some changes are needed at a **broader systems level** and will require collaboration across the banking sector, including with regulators or policymakers. At this level, individual banks can influence what changes are made but do not have direct control. This is why sector-wide collaboration is crucial and where organisations like the New Zealand Banking Association play a key role.

Figure 1: Levels of the banking system that are influenced and controlled by system players



In the control of individual commercial banks.

In the control of the collective commercial banking sector.

In the control of the commercial banking sector alongside regulators and government.

Note: Each of the recommendations in this report are tagged with the level of the banking system at which change needs to occur.

Introducing our themes

While participants provided nuance and specificity based on their own lived experience or advocacy, we have developed four key themes from the insights shared:

1. Balance risk and customer autonomy.
2. Make the mainstream accessible.
3. Allow equitable access to choice.
4. Build ongoing bank capability.

This section explores these key themes further and includes participants' stories that indicate that a number of accessibility issues currently exist.

We have highlighted where these themes align directly with Enabling Good Lives principles. Enabling Good Lives (EGL) is an approach and social movement that has been developed by the disability community to guide positive change for disabled people.[31] By integrating EGL throughout our recommendations, we hope to show how these ideas are grounded within the concepts and outcomes that disabled people and communities are more broadly advocating for.

Throughout this section we have integrated three illustrative vignettes that spotlight different banking experiences our participants shared with us. Some of these may be direct stories, others are composite narratives based on a number of stories we heard.

We hope these recommendations and findings shed further light on improvements that are achievable and actionable by the banking sector. The information that follows aims to balance what disabled people tell us will make a measurable difference to their experiences, with opportunities that banks and the sector can reasonably act on. The recommendations are a synthesis of what we heard directly from participants; in some areas we have expanded upon ideas or drawn from multiple sources to craft recommendations.

THEME 1 —

Balance risk and customer autonomy

Banks understandably hold considerable responsibility for managing financial risk for themselves and their customers. There are legal regulations, such as the AML Act, that banks must comply with that shape several risk management processes. Equally, disabled people deserve the space to make their own financial decisions, with the level and type of support they prefer. This aligns with the Enabling Good Lives principles of 'self-determination: disabled people are in control of their lives' and 'mana enhancing: the abilities and contributions of disabled people and their families are recognised and respected'.[32] This is further supported by the UN Convention on the Rights of Persons with Disabilities, which states that there should be "respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons".[33]

Insights

We heard that disabled people feel their autonomy is too limited due to the rigidity of some current risk management practices, some of which may be the unintended outcomes of government regulation. While banks must continue to take risk management very seriously, there is an opportunity to strike a better balance between managing risk and enabling disabled people to exercise their autonomy. This may require greater collaboration across the sector, including government and regulatory bodies.

The role of others (family, friends, support workers)

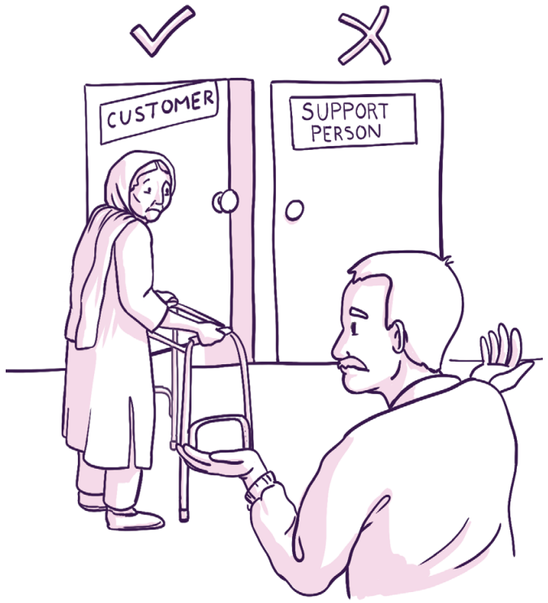
There was a strong sense amongst the disabled community that some well-intentioned efforts to preserve banking customers' independence could, ironically, inhibit their independence. A recurring issue was the role that others are able to play in supporting disabled people's self-determination over their money. Often, a disabled person's supporters help them to exercise their autonomy safely. Therefore, if others cannot be involved and provide support, people can be left with less independence than they would with those supports in place.

Currently, roles such as co-signatories, Property Managers, Welfare Guardians and an Enduring Power of Attorney (EPOA) are legally set up to give authority to certain people to support disabled people with different aspects of their banking. Many people spoke of the challenges of establishing these authorities. For example, one participant at a residential care facility shared their struggle to set up the same level of sign-off for online transactions as they could for in-person (also known as 'two-to-sign'), which limited their ability to support disabled people to manage their money.

There is an opportunity to strike a better balance between managing risk and enabling disabled people to exercise their autonomy.

Another participant working for an advocacy organisation talked about how they are constantly running education classes on setting up EPOA, because it is sometimes needed urgently, people don't know how to do it, and it can be risky for both the disabled person and their supporters if things aren't set up safely.

Along with these challenges to set up these legal authorities, we also learnt that these roles can be restrictive in that there is little room for any level of support to be offered by others who do not hold these roles. Participants raised that there are other degrees of support, such as attending bank appointments with them, that they hoped support workers or family members would be able to provide, without being an appointed legal authority.



Several parents of disabled people spoke of roadblocks they had encountered when trying to support their children. We learnt of an age-related gap some families had fallen through in the banking authorisation rules. Two participants shared that when a child turns 16, they can open an account independently, without parental permission. At this point, the parent is not authorised to access their child's bank account to support them with their banking. Until a child is 18, however, their parent is their legal guardian, rather than having an assigned Welfare Guardian, Property Manager or an EPOA. This means that between the ages of 16 and 18, there is no legal support in place to support the disabled person with their banking. While this might be appropriate for some 16-year-olds, others may not get the support they need in that two-year period. Our participants shared they have had to work very hard to convince bank staff to let them support their children between the ages of 16-18, often needing to bring their children into a bank branch to more clearly demonstrate their child's disability. Understandably, this feels uncomfortable:

> **"I don't want to be parading my daughter."**
> – Isaac.

The intention behind many of these processes — and the legal regulations they adhere to — are crucial to managing risk and keeping people's finances safe. Without some degree of protection, there is a risk that the wrong people can become involved in disabled people's finances and cause harm. However, banks, regulators and the government need to look at how they can collectively address some of these unintended consequences. Part of the issue is that inaccessible banking services and processes require disabled people to rely more heavily on others to assist them. In some instances, this means sharing personal banking information with others to navigate the banking system. This can happen in small but risky ways like sharing a PIN with a retailer, providing information to bank staff in public spaces like a bank branch where it can be overheard, and in less common but equally risky situations, even giving up control over entire accounts. The risk of scams, fraud or exploitation is real, and participants felt rightly concerned about this:

> **"Across the [disability support] space, whether intentionally or unintentionally, whether family or employed [support workers], there is always going to be potential for financial abuse."**
> – Abigail.

> **"It is about who is in [the disabled person's] life. Because often you need other people, sometimes paid people."**
> – Lisa.

> **"The main impact [of inaccessibility] is that [disabled people] end up having to ask other people to do stuff for them. And it probably breaches everything that you're not supposed to do with a bank account."**
> – Jacob.

There is a tension here; in some ways, it needs to be easier for others to support disabled people with banking (to better uphold their autonomy), yet there is a heightened risk around the role others should be able to play and needing to have measures in place to mitigate this. While this presents some complexity, there is an opportunity to innovate risk management practices to find new ways that better uphold people's autonomy. For example, how might banks give people more freedom over their money, while having systems in place that identify dangerous behaviour or risk early? What does a more people-centred approach to risk management look like? A solutions-focused approach is required, and co-designing these with the disabled community would be a great way to produce some meaningful changes to these measures.

Identification and authentication measures are too rigid

Identification protocols are necessary to keep individuals, businesses, banks, and the wider economy safe. However, multiple participants shared their experiences of banks being unwilling to accept forms of identification that they had readily available. For most banks, this is driven by the policies they have developed in order to comply with AML regulations.

One participant did directly connect these policies with AML law, though they expressed the need to have more flexibility within that:

> **"If you have an intellectual disability, it can be very challenging to get a bank account because you [...] probably don't have a driver's license. You may not have a passport if you've never travelled... and why are they getting a passport just to open a flipping bank account? They won't have a bill coming in their name to their address, because they might live at home with mum and dad[...]**
>
> **There seems to be so little flexibility. And I understand that some of it's around money laundering, but there doesn't seem to be any kind of discretionary mechanisms in there, when you know, oh, this is a genuine person, this person isn't about money laundering... This person just wants to open a bank account so their benefit can go in."**
>
> – Evelyn.

Disabled people are less likely to have the forms of identification that are deemed legitimate, for example:

Drivers licenses
Many disabled people, such as those with vision or learning-related disabilities, aren't able to drive and therefore don't have driver's licenses.

Passports
Similarly, given that disabled people are statistically more likely to earn lower incomes than non-disabled people, and that travel can be logistically or physically burdensome for some disabled people, many also do not have a Passport.

Kiwi access card
Many disabled people use the Kiwi Access Card (previously known as the 18+ Card), but they find these aren't consistently accepted by banks.

Our participants also told us about roadblocks when required to provide proof of address. With decreasing post mail, people cannot necessarily provide letters addressed to them. Some disabled people are not in a position to manage utility providers and payments and are, therefore, unable to provide utility bills as proof of address. The same applies to many people living in residential facilities. Similarly, not all disabled people can provide residential tenancy agreements, such as those living with family or friends, or those whose support people manage agreements for them.

Striking a balance between managing risk and upholding autonomy

Overall, participants felt that the current system too heavily prioritised risk management, at the expense of upholding autonomy and mana. Several participants noted that non-disabled customers are afforded greater freedom to manage their money and take the associated risks. Current banking systems and regulations do (and should) manage risk for all customers, but it often felt as though disabled people weren't sufficiently considered in rules, regulations and policies and as a result weren't given the same freedom to make mistakes as non-disabled people were.

> **"Our guys, just like everybody else, [have] the right to be stupid with their money, but they also have the right to access that money"**
>
> – Elizabeth.

Participants also shared that part of the issue is that banks, acting to keep both the customer and the bank safe, make their own assessments of disabled customers' capability. Disabled people we spoke to didn't feel that banks knew them deeply enough to accurately assess their capability, instead making an assumption based on a diagnosis label. For example, a participant shared a story of a family member with a learning-related disability who was told by their bank that they couldn't have an EFTPOS card because the bank didn't feel it was a safe option for them, given their diagnosis of Down syndrome. Participants noted that there are dedicated experts in their lives, such as family members and support workers, whose job it is to help them assess their capability; it is not the bank's assessment to make. Therefore, participants felt that if a person has been deemed capable of managing their money (and having an EFTPOS card) without having an EPOA or Property Manager, the bank should trust their capability.

Vignette

Inaccessibility increases risk

James is at the supermarket paying for his groceries. He is blind, so usually opts for contactless payments where he can, even though this incurs an additional surcharge.

Today James' groceries cost more than $200, exceeding the limit for contactless payment, so he must enter his PIN. The EFTPOS machine is touchscreen, which is a problem as James relies on the tactility of buttons to enter his PIN.

He needs his groceries so must find a way to complete the payment. He shares his PIN number with the shop assistant so they can enter it for him, unsure whether others in the store can hear him.

James leaves the store feeling concerned and unsafe.

Opportunities

- Consider disabled people when designing products and services.
- Ensure technological advancements don't exclude people, including from others in the banking ecosystem, such as payment terminal providers.
- Continue to investigate options for removing contactless payment surcharges.

Theme 1 Recommendations

1. Allow supporters and whānau to assist disabled people in banking processes and payments.

1.1 While still operating within a legal framework, consider additional levels or mechanisms for allowing support, outside of or in addition to stated legal roles, such as an EPOA

- Individual banks ●
- Regulators and Government ○

1.2 Offer tailored support options for young people between the ages of 16-18. For example, create opportunities for parents to attend bank appointments and/or receive correspondence from the bank alongside their child where needed.

- Individual banks ●
- Regulators and Government ○

1.3 Where there are mechanisms for support available, such as co-signatories, work to ensure these perform consistently across all channels and interaction points (digital and physical).

- Individual banks ●

2. Make it easier to give consent and prove identity.

2.1 Widen the forms of acceptable identification when opening an account to include what disabled people have easy access to. For example, Kiwi Access Card.

- Individual banks ●
- Regulators and Government ○

2.2 Widen the forms of acceptable proof of address documentation, giving greater consideration to what disabled people have easy access to. For example, a letter from a carer, parent, or support worker, or proof of address in a support person's name.

- Individual banks ●
- Regulators and Government ○

3. **Provide basic accounts with restrictions applied.**

3.1 Provide accounts with restrictions that can be applied to limit risk. Appropriate restrictions could include daily or weekly spending limits, withdrawal limits, balance limits, no access to overdrafts, and potentially be viewable by approved persons (similar to the visibility settings on the child accounts at some banks).

Commercial banking sector

Regulators and Government

4. **Explore innovative approaches to risk management, in collaboration with the disabled community, to ensure risk management practices adhere to regulations while still upholding people's autonomy and independence**

4.1 Different banks should continue to collaborate and learn from one another about their practices and policies with the goal of improving accessibility and inclusion across all banks.

Commercial banking sector

Regulators and Government

THEME 2 —

Make the mainstream accessible

There are simple improvements that can be made to banking services and payment processes that would have a significant positive impact on their accessibility. While some specialist services are needed (explored in theme 3) to better serve our diverse population, there are huge gains to be made by making mainstream banking services more accessible. At a minimum, these changes would not exclude or inconvenience those who do not need them, and at best, could be of benefit to many customers. A commonly used example of this is a ramp that is installed for wheelchair users, but anyone is able to use it, and it is particularly useful for courier drivers with trolleys or parents with prams. This approach aligns with the Enabling Good Lives principle 'Mainstream First: Disabled people are supported to access mainstream services before specialist disability services'.[34] Our participants felt that there was a lot more that banks could do to improve the accessibility of digital and in-person experiences and the way financial and banking information is communicated.

Insights

Digital channels

For online banking and apps, there are publicly available accessibility standards that should be a bare minimum for banks to adhere to; Web Content Accessibility Guidelines 2.2 (WCAG 2.2). WCAG 2.2 has three different levels of compliance (low, mid and high range).[35] Upon our brief review, the major banks' public-facing websites seem to comply with WCAG 2.2 mid-range standards, which are widely considered acceptable. There are, however, opportunities to improve website accessibility further to comply with the highest standard, optimising the user experience of digital channels for disabled people. For example, increasing colour contrast or font size further and ensuring this includes any icons or buttons, not just text. It is important that individual banks work to ensure WCAG 2.2 is met throughout the entire customer journey, not just on the public-facing websites, including once users log in, look for more information, or are accessing any service.

Neurodivergent people are likely to benefit from less cluttered web pages, clear visual hierarchy, and obvious interactive aspects such as clickable buttons.

Beyond these foundational standards, there is a great opportunity for banks to further improve the accessibility of their user experience. For example, while there are no specific formal standards to make websites easier for neurodivergent people, there is a lot of knowledge and guidance that could inform banks' website design. Neurodivergent people are likely to benefit from less cluttered web pages, clear visual hierarchy, and obvious interactive aspects such as clickable buttons. By designing mainstream services with these considerations, websites would

be better suited to those with diagnosed or un-diagnosed neurodiversity – and, in fact, everyone. Good user experience design acknowledges that people will not always have perfect focus and that conditions, such as screen size or contrast, will not always be ideal.[36] Therefore, many users can benefit from inclusive design; what would make digital banking experiences better for neurodiverse people would be useful for anyone in less than perfect conditions and would create a more accessible and inclusive banking environment for all.

By designing mainstream services with these considerations, websites would be better suited to those with diagnosed or un-diagnosed neurodiversity – and, in fact, everyone.

Physical bank branches

People have different preferences, and while many find digital solutions easier to use, a number of participants told us that they preferred to bank in-person, with the support of bank staff. Reasons for this preference vary but include, for example, finding that bank staff can better identify they have a disability, so they are more likely to provide flexible support, or that cognitive load is reduced by having someone assist them rather than doing it on their own online. Again, there are a number of reasonably minor or simple considerations that would create far more accessible environments. One example raised in our conversations was the challenges created by having inconsistent layouts across different bank branches, requiring people to constantly make sense of new spaces and adapt accordingly. One participant chose to exclusively go to the branch that they found most accessible and explained why:

> **"there's actually usually someone there when you come in the door that's checking to see what you're coming in for and point you in the right direction because there's a queue for this [in one place] and there's a queue for something else [somewhere]. Whereas in some of the smaller branches, [it's different]."**
> – Jacob.

Another participant, who identified as deaf, shared an example of attending a bank branch with a new security measure where the doors were shut and required hearing a loudspeaker announcement or using an intercom to understand this new process for opening the doors. They explained that not being able to hear the instruction or use an intercom means that as a deaf person, they might assume the bank was closed, or simply not be able to enter, meaning they would end up leaving the bank without having made their transaction.

EFTPOS and ATMs

In-person experiences also have an increasing number of digital touchpoints, such as ATMs or EFTPOS machines. While there are often accessibility features for these, the features may need to be manually switched on. Participants shared stories of store merchants or customer service representatives not knowing how to do this, resulting in disabled people having to either use them without these features, or not being able to make the transaction. Workarounds, such as giving someone else their card PIN or making a transaction without being able to see how much they are being charged, of course, pose significant security risks.

> **"You are left with one of two choices. You can turn around and walk out, or you can give someone else your PIN number. And when I am giving somebody my PIN number, I can't see what is on the terminal in terms of the amount that is being put in[...] You wouldn't feel comfortable doing it, right? But it's the way that we would get what we need"**
> – James.

Information

Accessing information was identified as both a crucial part of banking, and an area where there are often barriers for disabled people. This includes, but is not limited to:

- Needing to know the accessibility services that are available to them at bank branches, such as access to sign language interpreters. Our participants shared challenges in finding information around this, and being able to easily understand the information in the way that it is provided
- Having a clear understanding of what to expect before they engage with bank staff, whether in-person or on the phone. Being clear on a process, what an appointment will entail, and what is needed from them, supports disabled people to be prepared physically and mentally. This includes knowing what information they need to come prepared with that is essential for the bank to assist them with their required banking task.
- Where information is being provided, our participants found that it was not always in a format that was accessible for them to use. Video or physical paper formats can be beneficial, or other translations such as EasyRead,[37] or New Zealand Sign Language.

It is clear that there are a number of ways in which mainstream banking services can be made more accessible, across all channels. We believe that many of these improvements are reasonably minor, but could have a significant positive impact on disabled people's experiences of banking. Having more accessible mainstream services would benefit all people, not just disabled people.

Vignette

The cognitive load of accessing banking

Raewyn has a cognitive disability which affects her ability to communicate, process and recall information. She finds mobile banking via app easiest to use due to the limited information shown per page and the option to log in using Face ID.

Today she is unable to complete her task in the app and phones the bank for assistance. The automated system requires her to understand and remember many options at once, and she finds it tricky to navigate.

When she manages to reach a customer service representative, they speak quickly, use jargon, and ask Raewyn to provide information that she cannot easily recall.

Flustered and frustrated, she hangs up the phone without being able to complete her banking task.

Opportunities:

- Make the accessibility of mobile apps a priority, as this channel may be a preference for disabled people.
- Review phone automation systems to ensure there are options for simplified pathways to speak with a staff member, for those who need them.
- Ensure all customer-facing staff are trained to adapt their communication to meet different needs.

Theme 2 Recommendations

Digital spaces and solutions

5. Make sure digital interactions follow or surpass Web Content Accessibility Guidelines 2.2 (WCAG 2.2).[38] Consider becoming WCAG certified. Surpassing would involve referring to publicly available guidance for designing inclusive user experiences, beyond the WCAG low or medium range standard.

   Individual banks

6. Use tags on customer files to identify their self-identified disability status, and train staff to work with customers with their specific access needs in mind.

   Individual banks

7. **Choose to use inclusive digital tools and services.**

   7.1 Enable voice-activated functions, for example, to transfer money between accounts via mobile apps.

   Individual banks

   7.2 Integrate new and innovative open banking or transaction platforms, such as Volley or Payap, which can offer simplified payment solutions for people.

   Individual banks

   7.3 Allow people to fill and sign documents using the assistive technology they rely on, such as uploading e-signatures using speech-to-text or non-verbal communication software.

   Individual banks

   7.4 Provide a specific alternative to prove identity over the phone for blind and low-vision people where multi-factor authorisation via SMS code is inaccessible. Avoid the use of on-screen keyboards as part of this solution.

   Individual banks

Physical spaces and solutions

8. Require accessibility to be considered in the design of payment terminals and ATMs.

8.1 Develop industry-wide guidelines in New Zealand based on international regulation models. For example, the Australian Bankers Association requires payment terminal and ATM manufacturers that supply to Australia to meet certain accessibility standards in their technology.[39]

- Commercial banking sector
- Regulators and Government

9. Engage with accessibility auditors and use existing guidelines to make bank branches accessible and inclusive (considering the physical, spatial, social and sensory needs and preferences of clients).

- Individual banks

9.1 Aim for consistency in layout/design across bank branches.

- Commercial banking sector

10. Follow international guidelines such as from the International Organisation for Standardisation. For example, ISO 7001- Guides for the design and use of location signs and direction signs;[40] NZ resources and guidelines on government websites, e.g. Whaikaha, Te Pou, Health and Disability Commission.

- Individual banks
- Commercial banking sector
- Regulators and Government

10.1 For wayfinding and signage, use iconography as well as words. ISO provide recommendations for accessible, clear iconography and signage.[41]

- Individual banks

10.2 Signage that gives information about accessibility, such as instructions on how people can communicate their access needs, must be highly-visible. Use common icons that can be widely understood, alongside English text.

- Individual banks

Information

11. Offer accessible information and communication options.

11.1 Follow WCAG 2.2 guidelines[42] for typography.

- Individual banks

11.2 Provide EasyRead[43] versions of documents as an option.

- Individual banks

11.3 Ensure all written information is in plain language.

- Individual banks

11.4 Follow guidelines on creating aphasia-friendly and stroke-friendly information, available on Aphasia Association and Stroke Foundation websites.

- Individual banks

12. Be forthcoming and clear about the services and supports that ARE and ARE NOT available, and specify for each location.

- Individual banks

13. Tell customers what to expect by describing how the interaction will take place, what to bring, and how to prepare.

- Individual banks

14. Keep banking processes and tools as simple as possible. Don't add unnecessary extras.

- Individual banks

THEME 3 —

Allow equitable access to choice

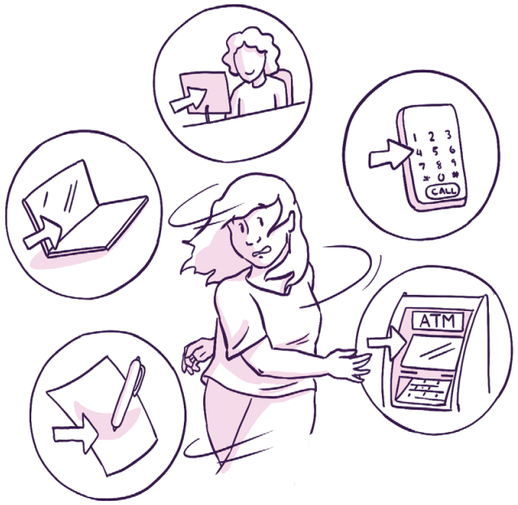
Along with making mainstream services accessible (theme 2), disabled people should have equitable access to choice in how they bank and make payments. Equity for disabled people doesn't necessarily mean they need the exact same choices as everyone else, but they should have access to a similar number, quality, or variety of choices as everyone else. Increased choice is one of the key objectives of the Enabling Good Lives model.[44] Sometimes, increased choice might require specialist services for disabled people, where they are unable to access mainstream options.

Insights

Current inhibitors of real choice

On the surface, it may seem that banks provide a wide range of options and services for customers. For many disabled customers, however, there is a lack of genuine choice because of the inaccessibility of certain options or channels – sometimes leaving disabled people with only one viable option. Some participants found online banking the only option for them due to the inaccessibility of travelling to or using bank branches in person.

Other participants felt that they were actively discouraged by banks from using the options most accessible to them. For example, being turned away from a bank branch and told to go online or use an ATM instead, or being penalised with bank teller fees. This is problematic for those who rely on visiting a bank branch to pay their bills and manage their accounts, such as those who struggle to access websites or benefit from having bank staff present to support them. Some participants shared that they were re-directed from one channel to another multiple times.



Choice is particularly limited for disabled people when making payments. Some of our participants told us they find cash much easier to use than payment methods such as cards; cash can be more tangible for people to make sense of. One participant spoke directly to the fact that this option is increasingly being taken away from people:

> **"Cash is becoming less and less [accepted]. We have a lot of our doctor's surgeries that say, 'We do not accept cash. … You have to pay via [card]. So, it means that [the disabled person's] world is getting smaller."**
>
> – Elizabeth.

Some disabled people are not deemed capable (by the bank) of using a card (whether debit, credit or EFTPOS), such as those with learning-related disabilities, or those whose disabilities affect their memory. If they don't have a card, they must get cash out from a bank teller rather than an ATM. However, an increasing number of bank branches are no longer offering this service. When there are no options left, disabled people must rely on someone else to have access to their bank accounts and get cash out for them. This removes their independence and assumes they have a willing and trustworthy person available to them.

Payment terminals, too, have accessibility challenges—particularly newer machines with touch screens, which don't have buttons accessible for people who are blind or have low vision. Contactless payment (PayWave) may then be considered a viable choice, yet charges are often attached (at merchants' discretion). Disabled people inequitably face these costs, as they don't have the option to opt-out by using another payment method, like swiping or inserting a card, as others do. One participant noted that it hasn't always been this way:

> **"At one stage in COVID, none of us paid PayWave fees because we wanted to keep people safe. But now they've introduced them back again."**
>
> – Jacob.

There are also limited choices for disabled people being supported by service providers such as residential care facilities. For example, phasing out cheques has reduced residential service providers' options for ways to support their clients' spending. One provider shared that they are having to find workarounds that allow them to give disabled people (in their care) autonomy with spending money, with cheques and cash not being viable options anymore:

> **"We are looking at potentially Prezzy cards, and you know, some sort of prepaid debit card. But the complication with those, of course, is that it is $7 any time you put money on it. So, there is, there is a cost to use it, a cost to actually just hold it, let alone to use it."** – Elizabeth.

Providing equitable choice

In some instances, allowing equitable access to choice may involve assessing and improving mainstream services to ensure they do not limit some people's choices – such as fees that disabled people cannot opt out of. In other cases, offering specialist or tailored options may be required – in addition to mainstream services – where those mainstream services cannot be inclusive. This includes being able to provide flexible and tailored solutions that would give disabled people the same access to choices that non-disabled people have. Offering graded, specialist service options (discussed in this theme) alongside accessible mainstream services (theme 2) are critical aspects of an inclusive banking system.

Theme 3 Recommendations

15. Remove barriers that prevent disabled people from interacting via their preferred channels.

15.1 Allow people to pay their bills, manage transactions, and take cash out with bank tellers at branches. — Individual banks

15.2 Ensure people have options for in-person services and support where they need it. — Individual banks

15.3 Consult the disabled community before removing services or channels, as doing so might limit their access to choice. — Commerical banking sector

15.4 Explore removing charges for services disabled people cannot opt out of, such as bank teller fees. — Commerical banking sector

15.5 Explore options for removing charges for services disabled people cannot opt out of, such as PayWave surcharges. — Regulators and Government

16. Provide flexible or specialist options for disabled people when the mainstream options are not accessible.

16.1 Have dedicated and specialist teams able to provide more flexible and tailored services, such as visiting disabled people in their homes if the bank branch is not open or being available to provide assistance at bank branches at certain times of the day. Ensure these services are communicated widely. — Individual banks

17. Support disabled people with the financial literacy skills required to manage their own money.

17.1 Provide ongoing education programs to address the specific scenarios that are most relevant to disabled people, including being targeted by scams and fraud. — Individual banks

17.2 Adapt existing outreach programs/educational modules to suit the learning styles and specific contexts of disabled communities. — Individual banks

17.3 Many organisations have already designed financial literacy programs tailored to their communities – invest in or sponsor those rather than reinventing what exists. — Individual banks

18. Extend community engagement services to disabled people's spaces. We heard banks regularly visit schools and community groups to deliver money management and financial literacy education. Several disability organisations we spoke to expressed their desire for banks to bring these services to existing contexts where disabled people feel safe and familiar, such as: — Individual banks

- Deaf Clubs.
- Self-Advocacy groups.
- Community support groups.
- Specialist schools and tertiary institutions.
- Disability organisations.

THEME 4 —

Build ongoing bank capability

To make banking services more inclusive, it is crucial to improve staff capability on accessibility and commit to ongoing revision and learning. Increasing the awareness and understanding of all bank staff will mean that inclusivity is considered in customer interactions and the design of bank services.

Insights

The capability and awareness of customer-facing staff significantly affect disabled people's ability to bank and pay

We heard many stories of disabled people not being well-supported with their banking needs due to a lack of understanding and awareness from their banks.

Participants identified staff who were aware and understanding of disabled people's needs as the most significant enablers in the current system. They were able to bring a solutions-focused mindset or a willingness to explore a range of options that could work best for the person, rather than relying on standard or rigid ways of doing things. These bank staff adapted their service appropriately, empowering disabled customers to bank more easily.

A participant shared an example of this being done well, outside of banking, by a receptionist at a clinic:

"She's amazing... I saw her one time [and] told her I had hearing loss, and I saw her again, and she was all over it... She was saying to the other staff, 'Now, she has hearing loss, so can you please face her and speak to her when you talk?' They're not even really prompted, but that's the level of, I guess, awareness" – Sophie.

A participant from a residential care facility shared that their staff will choose specific tellers at local bank branches who they know understand and can help residents with their banking. When these specific tellers are unavailable, residential care staff estimate that most residents would not get assistance.

"Each person is different, [and each] teller is different - and at the moment, that's the only advantage we have. Without that [specific teller], only 15% of our guys would have access to their money" – Elizabeth.

When customer-facing staff are not well-informed, they often stick to scripts and service styles unsuited to the customer, adapt their service inappropriately, or make incorrect assumptions about their customers' abilities or intentions. Our participants shared that this meant the service was, at best, unhelpful and frustrating and, at worst, prevented them from banking and paying in their daily lives.

"There needs to be some awareness training for bank staff [... if] someone's standing with a guide dog they say, 'Ok, now we need some ID, have you got a driver's license?'" –Jacob.

"There are often rules about wearing caps and things, but many autistics need caps to deal with the lighting. There might be an assumption by staff that person has a problem or is breaking the rules, so they need to be able to instead think that they might be neurodivergent and need some understanding." – Evelyn.

Many disabled customers prefer a relationship-based, personal banking experience.

A relationship-based experience reduces friction by providing some flexibility in communication style. However, shifts to increasingly digital banking have made this relationship-focused approach challenging. Even in branches, rigid processes can hinder the customer experience.

"Communication access is just about creating 'communication ramps'. Just like physical ramps, but they're really cheap! Just use a piece of paper and write some stuff down. Don't have a noisy environment. Talk to the person, not the person next to them. Accessible communication is often the really simple things done well. We keep resorting to technology, but often technology is the barrier." – Isabella.

"Autistics go in with a script. The bank tellers go in with a script too. The scripts often don't match up." – Evelyn.

For some, a relationship-based customer experience meant a *patient* experience. They feel there is a tendency to be rushed. Some participants, such as people with learning or cognitive difficulties, had experienced people taking over from them at their first hesitation or being expected to remember something after being shown once.
Patience from bank staff empowers disabled people to learn new things and exercise their autonomy while banking.

> **"You might have to repeat things over and over 10 times, but it's important because otherwise [the disabled person will] give up… [it can be] overwhelming for people with cognitive distress and easier to give up completely."**
>
> – Oliver.

> **"With cognitive disabilities - some [service providers] understand this is hard, and if [they] go slow and don't get irritated, it might work. But it is more common [for service providers] to get annoyed, and then the tension and annoyance makes it harder [for those with disabilities] to learn, so they give up control, [they'll say] 'I can't do it, you do it.'"**
>
> – Abigail.

Inclusive design of processes and services relies on the capability and awareness of staff who are not customer-facing

We often heard of disabled people experiencing significant changes to the ways they were able to bank or pay, due to large-scale decisions made without a deep understanding of diverse experiences or an appropriate level of consultation. Decisions made at this level can affect disabled customers directly, such as cancelling or changing preferred services, or indirectly, such as designing processes that make it harder for customer-facing staff to support disabled customers.

> **"I think not making decisions based on able-bodied people, or hearing people, and really having wider consultation when you're making significant changes [would be good]. There was no consultation for phasing out cheques and closing branches and things which has impacted [some people] greatly."**
>
> – Sophie.

Some progress is being made, but further steps are needed to embed the knowledge and commitment within an organisation

We were encouraged by some of the steps being taken by the major banks to be more accessible. For example, some have become members of the Hidden Disabilities Sunflower Network, others have begun extending their branch opening hours to increase access for those who rely on in-person services, one has the Accessibility Tick, and it is becoming more common to establish dedicated accessibility customer service teams. It is essential, however, that this progress doesn't stop here. Capability can continue to be built, and there is a great opportunity for further innovation to improve accessibility and inclusivity across the banking system. One participant summarised this as:

> **"What we do find, and can be a bit disheartening, is people wanting a tick box, like here's a thing that you need to do. If you tick that, then you've done your bit for this part of it. And that's not the case. It requires ongoing commitment, you know, refreshing."**
>
> – Sophie.

Vignette

Finding different, responsive ways of working

Isaac, who uses a wheelchair, took his child to the bank branch to support them with their banking. A bank branch can be a challenging environment for his child who is neurodivergent.

Upon meeting Isaac and his child, the customer service representative at the bank adapted their approach to better respond to the context. They moved away from the service desk to a quieter and more comfortable space. They sat down on a sofa next to the child, allowing all three of them to be at the same level. The staff member then assisted Isaac and his child, using the child's own device.

This was an incredibly positive and empowering experience for the child and for Isaac.

Successes:

- Provided an innovative and dynamic response to the context, rather than a cookie-cutter approach.
- Levelled power dynamics.
- Built relationships and trust.
- Created a safe space for the customer and family to engage and get the assistance they needed.
- Empowered the customer, upholding their autonomy by supporting them to manage their own banking.

Theme 4 Recommendations

19. Effective upskilling in disability inclusion – use available resources and make an ongoing commitment.

19.1 Train all staff to a minimum standard of disability competence, relevant to their roles.	Individual banks
19.2 Train a specialist group of staff to a higher level of disability inclusion competence. This group could support frontline staff and engage directly with disabled customers who prefer this.	Individual banks
19.3 Within each organisation, make a meaningful, ongoing commitment to understanding and delivering for disabled customers. Support this with policy.	Individual banks
19.4 Provide refresher courses rather than one-off training so knowledge is embedded within the organisation.	Individual banks
19.5 Use existing programmes and resources to build capability—for example, the Hidden Disabilities Sunflower Scheme or Aphasia New Zealand's low-cost training modules for supporting people with communication difficulties.	Individual banks
19.6 Work with organisations representing disabled people for training and refresher courses tailored to the banking context. For example, Air New Zealand worked with Deaf Aotearoa to learn signs relevant to their in-flight experience.	Individual banks
19.7 Sometimes, it may be beneficial for staff to go to disabled people's spaces to learn.	Individual banks

20. Prioritise the relationship-building capability of staff.

20.1 Support and train customer-facing staff (including call centre staff) to build relationships and provide a personal experience. For example, call centre staff could communicate who they are and where they are located when speaking with customers.

Individual banks

20.2 Be patient and don't rush customers, especially when they are learning something new.

Individual banks

20.3 Consider the person before the process, making appropriate adjustments to the approach or communication style to fit the customer.

Individual banks

Conclusion

Our research stressed the importance of an inclusive banking environment in Aotearoa. Designing with and for disabled people should not be an afterthought, and this presents a huge opportunity to better serve and provide for our increasingly diverse population. The stories we heard made it clear that many barriers currently exist across banking and payment services which contribute to a disabling environment for many people. Our ageing population and a related increase in the number of disabled people suggest that without improvement, these barriers will affect a more significant proportion of the population. Some participants stated a willingness to choose who to bank with based on whether services were accessible and inclusive, indicating a potential commercial imperative for banks to act accordingly.

We believe change is required and that much of this change is within the control of individual banks, the banking sector as a whole, regulators and government. This will require banks to change their individual ways of working and designing, and to learn from one another. It will also require collaboration with the broader banking sector, regulators and policymakers, to make meaningful changes. Favourably, the banking sector in Aotearoa, New Zealand, is strongly connected and well-placed to take this opportunity to become world-leading in disability inclusion.

From the stories we heard, we identified the importance of balancing risk while upholding customer autonomy (theme 1), designing accessible mainstream services (theme 2), providing equitable access to choice (theme 3), and improving the capability of all banking staff (theme 4). Additionally, several more detailed recommendations were shared, which we have included in this report. Individually, each of these would help to make banking more accessible, yet by implementing a number of these together, banking services and payments can become truly inclusive. While many of the recommendations provided are banking-specific, the themes and principles that underpin them may be relevant beyond the banking sector. Other industries, especially those providing essential services, may benefit from considering how these concepts could be applied to make our society more inclusive for all.

To achieve these changes and to uncover further opportunities for improving inclusivity in banking services, disabled people must be involved. Whether designing physical spaces, creating digital products and interactions, or deciding on processes or product and policy settings, disabled people need to be in the conversation. The banking sector has a lot to learn from disabled people and organisations, and by working together, we envision the banking sector can make significant contributions to the inclusivity of society in Aotearoa New Zealand.

Favourably, the banking sector in Aotearoa, New Zealand, is strongly connected and well-placed to take this opportunity to become world-leading in disability inclusion.

SECTION 3 —

Appendices

Appendix A —
Recommendations summary

These recommendations duplicate what is found earlier in the report. In this Appendix, these are provided in a categorised view based on whom the recommendations are targeted at, for easy reference by those groups.

In direct control of commercial banks

1. Allow supporters and whānau to assist disabled people in banking processes and payments.
    - 1.1 While still operating within a legal framework, consider additional levels or mechanisms for allowing support, outside of or in addition to stated legal roles, such as an EPOA.
    - 1.2 Offer tailored support options for young people between the ages of 16-18. For example, create opportunities for parents to attend bank appointments and/or receive correspondence from the bank alongside their child where needed.
    - 1.3 Where there are mechanisms for support available, such as co-signatories, work to ensure these perform consistently across all channels and interaction points (digital and physical).
2. Make it easier to give consent and prove identity.
    - 2.1 Widen the forms of acceptable identification when opening an account to include what disabled people have easy access to (Kiwi Access Card for example).
    - 2.2 Widen the forms of acceptable proof of address documentation, giving greater consideration to what disabled people have easy access to (a letter from a carer, parent, or support worker, or proof of address in a support person's name, for example).
4. Explore innovative approaches to risk management, in collaboration with the disabled community, to ensure risk management practices adhere to regulations while still upholding people's autonomy and independence.
5. Make sure digital interactions follow or surpass Web Content Accessibility Guidelines 2.2 (WCAG 2.2).[45] Consider becoming WCAG certified. Surpassing would involve referring to publicly available guidance for designing inclusive user experiences, beyond the WCAG low or medium range standard.
6. Use tags on customer files to identify their self-identified disability status, and train staff to work with customers with their specific access needs in mind.

7. Choose to use inclusive digital tools and services.
   - 7.1 Enable voice-activated functions, for example, to transfer money between accounts via mobile apps.
   - 7.2 Integrate new and innovative open banking or transaction platforms, such as Volley or Payap, which can offer simplified payment solutions for people.
   - 7.3 Allow people to fill and sign documents using the assistive technology they rely on, such as uploading e-signatures using speech-to-text or non-verbal communication software.
   - 7.4 Provide a specific alternative to prove identity over the phone for blind and low-vision people where multi-factor authorisation via SMS code is inaccessible. Avoid the use of on-screen keyboards as part of this solution.

9. Engage with accessibility auditors and use existing guidelines to make bank branches accessible and inclusive (considering the physical, spatial, social and sensory needs and preferences of clients).

10. Follow international guidelines such as from the International Organisation for Standardisation. For example, ISO 7001- Guides for the design and use of location signs and direction signs;[46] NZ resources and guidelines on government websites, e.g. Whaikaha, Te Pou, Health and Disability Commission.
    - 10.1 For wayfinding and signage, use iconography as well as words. ISO (see above) provide recommendations for accessible, clear iconography and signage.
    - 10.2 Signage that gives information about accessibility, such as instructions on how people can communicate their access needs, must be highly-visible. Use common icons that can be widely understood, alongside English text.

11. Offer accessible information and communication options.
    - 11.1 Follow WCAG 2.2 guidelines for typography.[47]
    - 11.2 Provide EasyRead[48] versions of documents as an option.
    - 11.3 Ensure all written information is in plain language.
    - 11.4 Follow guidelines on creating aphasia-friendly and stroke-friendly information, available on Aphasia NZ and Stroke Foundation websites.

12. Be forthcoming and clear about the services and supports that ARE and ARE NOT available, and specify for each location.

13. Tell customers what to expect by describing how the interaction will take place, what to bring, and how to prepare.

14. Keep banking processes and tools as simple as possible. Don't add unnecessary extras.

15. Remove barriers that prevent disabled people from interacting via their preferred channels.
    - 15.1 Allow people to pay their bills, manage transactions, and take cash out with bank tellers at branches.
    - 15.2 Ensure people have options for in-person services and support where they need it.

16. Provide flexible or specialist options for disabled people when the mainstream options are not accessible.
    - 16.1 Have dedicated and specialist teams able to provide more flexible and tailored services, such as visiting disabled people in their homes if the bank branch is not open or being available to provide assistance at bank branches at certain times of the day. Ensure these services are communicated widely.

17. Support disabled people with the financial literacy skills required to manage their own money.
    - 17.1 Provide ongoing education programs to address the specific scenarios that are most relevant to disabled people, including being targeted by scams and fraud.
    - 17.2 Adapt existing outreach programs/educational modules to suit the learning styles and specific contexts of disabled communities.
    - 17.3 Many organisations have already designed financial literacy programs tailored to their communities – invest in or sponsor those rather than reinventing what exists.

18. Extend community engagement services to disabled people's spaces. We heard banks regularly visit schools and community groups to deliver money management and financial literacy education. Several disability organisations we spoke to expressed their desire for banks to bring these services to existing contexts where disabled people feel safe and familiar, such as such as deaf clubs, self-advocacy groups, community groups, specialist schools, and tertiary institutions and disability organisations.

19. Effective upskilling in disability inclusion – use available resources and make an ongoing commitment.
    - 19.1 Train all staff to a minimum standard of disability competence, relevant to their roles.

19.2 Train a specialist group of staff to a higher level of disability inclusion competence. This group could support frontline staff and engage directly with disabled customers who prefer this.

19.3 Within each organisation, make a meaningful, ongoing commitment to understanding and delivering for disabled customers. Support this with policy.

19.4 Provide refresher courses rather than one-off training so knowledge is embedded within the organisation.

19.5 Use existing programmes and resources to build capability—for example, the Hidden Disabilities Sunflower Scheme or Aphasia New Zealand's low-cost training modules for supporting people with communication difficulties.

19.6 Work with organisations representing disabled people for training and refresher courses tailored to the banking context. For example, Air New Zealand worked with Deaf Aotearoa to learn signs relevant to their in-flight experience.

19.7 Sometimes, it may be beneficial for staff to go to disabled people's spaces to learn.

20. Prioritise the relationship-building capability of staff.

20.1 Support and train customer-facing staff (including call centre staff) to build relationships and provide a personal experience. For example, call centre staff could communicate who they are and where they are located when speaking with customers.

20.2 Be patient and don't rush customers, especially when they are learning something new.

20.3 Consider the person before the process, making appropriate adjustments to the approach or communication style to fit the customer.

In control of the collective commercial banking sector

3. Provide basic accounts with restrictions applied.

3.1 Provide accounts with restrictions that can be applied to limit risk. Appropriate restrictions could include daily or weekly spending limits, withdrawal limits, balance limits, no access to overdrafts, and potentially be viewable by approved persons (similar to the visibility settings on the child accounts at some banks).

4. Explore innovative approaches to risk management, in collaboration with the disabled community, to ensure risk management practices adhere to regulations while still upholding people's autonomy and independence

4.1 Different banks should continue to collaborate and learn from one another about their practices and policies with the goal of improving accessibility and inclusion across all banks.

8. Require accessibility to be considered in the design of payment terminals and ATMs.

8.1 Develop industry-wide guidelines in New Zealand based on international regulation models. For example, the Australian Bankers Association requires payment terminal and ATM manufacturers that supply to Australia to meet certain accessibility standards in their technology.[49]

9. Engage with accessibility auditors and use existing guidelines to make bank branches accessible and inclusive (considering the physical, spatial, social and sensory needs and preferences of clients).

9.1 Aim for consistency in layout/design across bank branches.

10. Follow international guidelines such as from the International Organisation for Standardisation. For example, ISO 7001- Guides for the design and use of location signs and direction signs;[50] NZ resources and guidelines on government websites, e.g. Whaikaha, Te Pou, Health and Disability Commission.

15. Remove barriers that prevent disabled people from interacting via their preferred channels.

15.3 Consult the disabled community before removing services or channels, as doing so might limit their access to choice.

15.4 Explore removing charges for services disabled people cannot opt out of, such as bank teller fees.

In control of commercial banks, alongside regulators and government

1. Allow supporters and whānau to assist disabled people in banking processes and payments.

   1.1 While still operating within a legal framework, consider additional levels or mechanisms for allowing support, outside of or in addition to stated legal roles, such as an EPOA.

   1.2 Offer tailored support options for young people between the ages of 16-18. For example, create opportunities for parents to attend bank appointments and/or receive correspondence from the bank alongside their child where needed.

2. Make it easier to give consent and prove identity.

   2.1 Widen the forms of acceptable identification when opening an account to include what disabled people have easy access to (Kiwi Access Card for example).

   2.2 Widen the forms of acceptable proof of address documentation, giving greater consideration to what disabled people have easy access to (a letter from a carer, parent, or support worker, or proof of address in a support person's name, for example).

3. Provide basic accounts with restrictions applied.

   3.1 Provide accounts with restrictions that can be applied to limit risk. Appropriate restrictions could include daily or weekly spending limits, withdrawal limits, balance limits, no access to overdrafts, and potentially be viewable by approved persons (similar to the visibility settings on the child accounts at some banks).

4. Explore innovative approaches to risk management, in collaboration with the disabled community, to ensure risk management practices adhere to regulations while still upholding people's autonomy and independence.

   4.1 Different banks should continue to collaborate and learn from one another about their practices and policies with the goal of improving accessibility and inclusion across all banks.

8. Require accessibility to be considered in the design of payment terminals and ATMs.

   8.1 Develop industry-wide guidelines in New Zealand based on international regulation models. For example, the Australian Bankers Association requires payment terminal and ATM manufacturers that supply to Australia to meet certain accessibility standards in their technology.[51]

10. Follow international guidelines such as from the International Organisation for Standardisation. For example, ISO 7001- Guides for the design and use of location signs and direction signs;[52] NZ resources and guidelines on government websites, e.g. Whaikaha, Te Pou, Health and Disability Commission.

15. Remove barriers that prevent disabled people from interacting via their preferred channels.

    15.5 Explore options for removing charges for services disabled people cannot opt out of, such as PayWave surcharges.

Appendix B –
Language and terminology

We recognise there are complex contextual factors surrounding disability experiences and wide-ranging approaches to disability identity and terminology. Language is important, and we are aware that the language we have used may not resonate with everyone.

We predominantly used identity-first language 'disabled people', recommended by the New Zealand Disabled Persons Organisation (DPO) Coalition and the Office for Disability Issues[53]. We have also relied upon the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) definition of disability:

> **"those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others."[54]**

Throughout our work, we have adopted a social model of disability lens, which views people as disabled not by their impairments but by the barriers created by an inaccessible society.[55] These barriers might be physical characteristics of the environment in which disabled people live or the attitudes they encounter.[56] While there are alternative frameworks that many people choose to understand or identify, our focus for this work is on how banking services and making payments can be made more inclusive, reflective of the social model of disability's focus on the barriers of society that disable people.

However, this use of terminology and 'the social model' of disability are Western, individualised approaches to disability and are "not relevant for many Indigenous disabled persons whose worldview is holistic, relational and collective in nature".[57] Therefore, when engaging with Māori or referring to Māori people with disabilities, we have used 'tāngata whaikaha Māori'[58] and the collective framing of 'whānau hauā' (Māori families who are living with disability).[59]

We acknowledge the diversity of disabled people and their choice of language, the ongoing debates around terminology, and that not all people will choose to identify in these ways. We hope our shared insights and recommendations can be viewed and understood as extending beyond the terminology.

Appendix C –
Method

We recruited participants who worked for disability organisations, including advocacy groups, service providers and disabled people's organisations (DPOs). Westpac New Zealand had several existing relationships with disability organisations established through the NZ Banking Association's (NZBA) Older and Disabled Customers' Working Group or their work directly with these organisations. These groups were our starting point for recruitment, and upon assessing the representation of different disability experiences among the willing participants, we contacted a small number of others to invite them to engage with us.

The banking system is multi-faceted, and many factors within it influence disabled people's experiences of banking across several touchpoints. Rather than trying to explore all of these, we narrowed our scope to everyday banking *services* and *making payments* in both physical and digital spaces. This allowed us to have in-depth conversations with participants to understand their experiences and practical ways to improve, without trying to cover the breadth of banking.

Given this focus on banking services and making payments, we focused on the key functions required to access these. Rather than limiting participation to those with any specific disabilities, health conditions or diagnoses, we used language that focused on the experiences of people who identified as having difficulties with key functions required to access banking and payments.

We defined these functions as:

- seeing, even when wearing glasses.
- understanding, using, and fully engaging with written or verbal/ audio information in their own language.
- communicating in their own language, e.g. understanding and being understood.
- remembering or recalling information.
- hearing, even when using hearing aids.
- managing social interactions.
- physical functioning.

Our participants

Lisa

- Works for a disability organisation.
- Supports a disabled child or parent.
- Provided insights on specific disability experiences related to communication, understanding information, and social interactions.

Jacob

- Works for a disability organisation.
- Has lived experience of disability.
- Provided insights on specific disability experiences related to vision.

Charlotte

- Works for a disability organisation.
- Has lived experience of disability.
- Provided insights on specific disability experiences related to hearing.

Sophie

- Works for a disability organisation.
- Has lived experience of disability.
- Provided insights on specific disability experiences related to hearing.

James

- Works for a disability organisation.
- Has lived experience of disability.
- Provided insights on specific disability experiences related to vision.

Isabella

- Works for a disability organisation.
- Provided insights on specific disability experiences related to communication and understanding information.

Oliver

- Works for a disability organisation.
- Supports a disabled child or parent.
- Provided insights on specific disability experiences related to memory.

Elizabeth

- Works for a disability organisation.
- Provided insights on specific disability experiences related to social interactions and understanding information.

Evelyn

- Works for a disability organisation.
- Has lived experience of disability.
- Provided insights about a range of disability experiences.

Abigail

- Works for a disability organisation.
- Provided insights on specific disability experiences related to physical functioning.

Isaac

- Works for a disability organisation.
- Has lived experience of disability.
- Provided insights about a range of disability experiences.

Amelia

- Works for a disability organisation.
- Supports a disabled child or parent.
- Provided insights about a range of disability experiences.

Sione

- Works for a disability organisation.
- Provided insights on a range of disability experiences.

Group engagement

- All had lived experience of disability.
- Provided insights on specific disability experiences related to communication, understanding information, and social interactions.

All data has been de-identified, and pseudonym names have been assigned to each participant when quoted in this report.

Engagements

We were flexible about our engagement styles, providing options for our participants such as online or in-person, individual or group conversations, or responding to our questions in a written format or via audio or video recording. The engagements were designed to be highly accessible, utilising different tools such as visual prompt cards and participant-led focus areas. Our lines of questioning focussed on different touchpoints for banking and payments and drew from the Enabling Good Lives (EGL) model to centre on concepts and experiences of *choice* and *control* in relation to these touchpoints. EGL is an approach and social movement developed by the disability community to guide positive change for disabled people.[60]

Analysis

We used data analysis software to support us in processing the data from the engagements and then used principles of thematic analysis[61] to guide our collaborative generation of themes for the recommendations and insights that follow.

We shared a written summary of key insights and recommendations with all participants and invited feedback, which was considered before producing the final report.

Limitations

We were able to engage people who had lived experience (or worked with those with lived experience) of difficulties across all of the key functions we identified as being essential for accessing banking services and making payments. This does not mean we were able to fully capture the rich diversity of all disabled people's experiences and perspectives. While many of our participants had lived experience of disability themselves or supported a family member with a disability, many participants worked for advocacy groups or service providers. Further research could involve quantitative elements or a larger sample size, recruiting more widely to achieve a greater representation of the disabled community. To better understand the experiences and worldviews of tāngata whaikaha Māori, as tangata whenua, a Kaupapa Māori research project could be conducted.

We focused our scope on banking services and payments. Therefore, we did not research accessibility or inclusion in relation to all banking products, policies, or other financial behaviours. This is another area where further research or co-design may be beneficial.

We are aware that social, cultural, and economic factors beyond the banking system, influence disabled people and their experiences of money and banking. These broader influences were beyond the scope of the project, and our recommendations only include those that we believe banks and the banking sector (including banks and regulators) could influence.

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