Promoting A11Y Financial Services within the Kenya Banking Industry

PWD Pilot Project Official Report
Version 2020
Following insights from the 2019 Banking Industry Customer Service Survey, Kenya Bankers Association (KBA) partnered with inAble and FSD Kenya on a project to enhance digital accessibility within Kenya's Banking Industry. KBA's objectives were to:

1. Assess accessibility of banking services for Persons with Disabilities (PWDs) in response to increased digital-led banking models
   - Areas for assessment were Hearing (deaf and hard of hearing), Visual (blind and low vision) and Mobility impairment
2. Raise awareness within the banking industry regarding the need to incorporate PWDs in the Financial Inclusion Narrative
3. Build industry capacity in line with the KBA Strategic Plan (2019 to 2023), which raises the need for banks to promote PWD and gender inclusion

With support from the KBA Customer Service Working Group and funding from FSD Kenya, KBA engaged inAble to undertake the Pilot Project in close collaboration with the KBA Secretariat.
The KBA Secretariat recruited banks to participate in the voluntary exercise. Ultimately, 7 banks expressed interest and participated in the project. The banks were required to cover 50 percent of the inAble project costs.
4 Month Project (July to October 2020) to Assess Status of Digital Accessibility for PWDs & Areas for Enhancement

Project Outcomes:

1. PWD Customer & Staff (Survey, Focus Group with 184 interviewees)
2. Accessibility Assessment (USSD, Mobile, Website)
3. 1) Bank Report
   2) Consolidated Report & Industry Recommendations
   3) Case Study
## Case Study Methodology

<table>
<thead>
<tr>
<th>Methodology</th>
<th>Participants</th>
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<tbody>
<tr>
<td><strong>Customer Interviews (36)</strong></td>
<td>- Hearing impairment (11), visual impairment (12), mobility impairment (13)</td>
</tr>
<tr>
<td></td>
<td>- Banks included KCB (10), Equity (7), Cooperative (6), Rafiki (5), ABSA (3),</td>
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<tr>
<td></td>
<td>Family Bank (3) and Standard Chartered (2)</td>
</tr>
<tr>
<td><strong>Customer Survey (135)</strong></td>
<td>- Hearing impairment-31% (42), visual impairment-28% (38), mobility impairment-41% (55)</td>
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<td></td>
<td>- Banks included KCB (24), Equity (37), Cooperative (31), Rafiki (5), ABSA (23),</td>
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<tr>
<td></td>
<td>Family Bank (17) and Standard Chartered (1)</td>
</tr>
<tr>
<td><strong>Employee Interviews (13)</strong></td>
<td>- Representation from KCB, Family, Equity, Standard Chartered, ABSA, Rafiki,</td>
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<tr>
<td></td>
<td>and Cooperative Banks</td>
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*Promoting PWD Access to Digital Products and Services*
### Overall Banking Experience for Clients with Disabilities (CwDs)

<table>
<thead>
<tr>
<th>Overall Banking Experience</th>
<th>Hearing Impairment</th>
<th>Visual Impairment</th>
<th>Physical Impairment</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Bank values Clients with Disabilities (CwDs)</td>
<td>48%</td>
<td>82%</td>
<td>84%</td>
<td>72%</td>
</tr>
<tr>
<td>CwDs can access banking services independently</td>
<td>57%</td>
<td>42%</td>
<td>80%</td>
<td>62%</td>
</tr>
<tr>
<td>The Bank understands CwD needs</td>
<td>33%</td>
<td>55%</td>
<td>66%</td>
<td>53%</td>
</tr>
<tr>
<td>The Bank respected by PwDs</td>
<td>14%</td>
<td>45%</td>
<td>53%</td>
<td>39%</td>
</tr>
<tr>
<td>Overall Positive Banking Experience</td>
<td>57%</td>
<td>82%</td>
<td>73%</td>
<td>70%</td>
</tr>
</tbody>
</table>

Pilot Project Findings
Banking Services Accessed by CwDs
Visiting the Bank in Person: Challenges

1. Customers with mobility impairments: lack of ramps and queuing

2. Customers with hearing impairments: lack of interpreters and trouble communicating with bank staff

3. Customers with visual impairments: access to forms and paperwork; queuing

Collectively, these experiences can result in dissatisfaction with banking in person, especially for people with hearing impairments
Perceptions on Ease of Accessing Banking Services

ATMs and Mobile Banking offer an opportunity for customers with disabilities to access banking services quickly, conveniently, and independently.
USSD Service & Mobile Banking

- USSD or Mobile Banking is used by only about a third of customers surveyed
- Digital platforms are well-liked by customers with disabilities who use it
- USSD and Mobile Banking represent an option for some customers with disabilities to access banking services quickly, conveniently, and independently
- Digital platforms require some customers with disabilities, especially those with visual impairment, to remember too much information
Perceptions of CwDs about Bank Staff

- Employees care about customers with disabilities and make extra efforts to assist them.
Employee Interviews

• Employees care about customers with disabilities and make extra efforts to assist them
• About half of employees who were interviewed had received training on assisting customers with disabilities
• Employees believe they are personally effective at assisting customers with disabilities, which could reflect overconfidence
• Quota systems that emphasize serving a high volume of customers quickly may disincentivize employees from serving customers with disabilities effectively
• Employees are interested in receiving training to improve their ability to serve customers with disabilities
Accessibility Assessment
Methodology

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

<table>
<thead>
<tr>
<th>Platform</th>
<th>Browser</th>
<th>Screen Reader</th>
</tr>
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<tbody>
<tr>
<td>Win10</td>
<td>Chrome</td>
<td>NonVisual Desktop Access (NVDA)</td>
</tr>
<tr>
<td>Android Phone</td>
<td>Chrome</td>
<td>TalkBack Google Screen Reader</td>
</tr>
<tr>
<td>iOS phone</td>
<td>Safari</td>
<td>Apple Voiceover (OS X)</td>
</tr>
</tbody>
</table>

Digital Banking Scenarios

Mobile App - Android
- Register as an existing customer
- Username and password
- Transacting bank to MPESA
- USSD Transactions
- Send money to another account - INTERNAL
- Send money to another account - EXTERNAL

Online Banking - Desktop
- View account balance
- Send money to another account - INTERNAL
- Send money to another account - EXTERNAL
- Talk to US/Contact US
- Open an Account
FINDINGS

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

50% Robust
21 out of 42 Failed (50%)

73% Operable
65 out of 238 Failed (27%)

68% Perceivable
87 of 280 Failed (32%)

86% Understandable
19 of 140 Failed (14%)

Pilot Project Findings
FINDINGS

Mobile
Mobile App - Android:

- For Android devices, 55% of scenarios tested passed.
- The assessed banks are working to remediate 45% of the issues identified by the testers.
- Username and password; and Transacting to MPESA were the top performing areas.
- USSD transactions; and sending money to other bank accounts were the bottom performing areas.
Mobile App - Apple:

- For Apple devices, the failure rate for scenarios tested was 79%.
- The assessed banks are working to remediate the issues identified by the testers.
- Banks fared better in the sending money to other bank accounts scenario.
Key Insights

• Banks should have readily available information on Customers and Employees with disabilities [lack of data analytics]

• ATMs offer a potential source of convenient, equitable, private, independent access to banking for customers with disabilities

• USSD & Mobile is well-liked by customers with disabilities who use it

• USSD & Mobile Requires customers, especially those with visual impairment, to remember too much information; banks do not design with PWDs in mind
Key Insights

• Employees care about customers with disabilities and make extra efforts to assist them, including security guards.

• Employees are interested in receiving training to improve their ability to serve customers with disabilities.

• Some banks deny ATM cards to customers with visual impairments, which is a point of frustration for customers.
Overall Recommendations

1. **Data and Engagement:** Banks need to identify their customers with disabilities and engage them as they design products and services, especially the digital services; banks should avail all services to all customers.

2. **Appropriate and accessible facilities:** Banks should individually develop an Accessibility Roadmap to ensure their PWD customers have access to banking halls and digital services; banks should ensure that all banking areas are accessible through ramps, lower ATMs or counters.

3. **Train relevant branch staff (including security guards):** Banks need to ensure their branch staff are alert and sensitive to PWDs by (i) recognize customers with disabilities; (ii) enforce consistent queuing policies; (iii) aid customers with disabilities in skipping queues; and (iv) direct customers with disabilities to the correct counter.

4. **Inclusive Banking Industry Policies:** Banks should have policies in place that will transition their banking services and technologies to full inclusiveness to persons with disability, including adherence with internationally-recognized best practice accessibility standards.
Specific Recommendations & Timelines

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

2. **Quick Wins:** All banks should immediately issue ATM cards to all customers with disabilities who want them, including customers with visual impairment, and make ATMs accessible to all customers, including those with visual and mobility impairments.
3. **Train Staff:** Banks should capitalize on staff interest to begin training staff on basic sign language. Training of bank staff should be incorporated into the Digital Accessibility Roadmaps.

4. **Industry to Observe PWD Day:** Commencing December 2020, all banks will observe *International Day of Persons with Disabilities* which is marked on 3rd December annually, and will promote financial services accessibility for PWDs during the month of December.
## Contacts

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<tr>
<th>Organization</th>
<th>Name</th>
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<th>Phone</th>
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