

Guidelines to help banks meet the needs of older and disabled customers

Introduction

Under the Code of Banking Practice, we agree we'll do our best to meet the needs of all our customers.

To help us achieve that goal under the Code we'll also follow these guidelines, which we've designed to help us meet the needs of older and disabled customers.

We'll follow these guidelines by 1 January 2020.

In these guidelines, 'we', 'us' and 'our' means your bank and 'you' and 'your' means you, the customer. These guidelines are also subject to the Code, including how the Code relates to bank terms and conditions.

Why these guidelines are important

We recognise that disabled and older customers should be able to access information, products, and services, in a way that's fair, reasonable, and easy, and encourages their independence and control.

We also recognise the need to understand and consider older and disabled customers when developing processes, products, and services, so we reflect the diversity of customers and the accessibility challenges they may face.

These guidelines:

- provide information and resources to help us develop systems and processes that promote and improve access to banking products and services by older and disabled customers
- support our understanding of the needs of older and disabled customers, and
- reflect our goal to meet the rights and needs, including accessibility needs, of older and disabled customers under human rights laws and the un convention on rights of persons with disabilities.

These guidelines aren't exhaustive

It's not possible for these guidelines to cover all the access and banking issues faced by older and disabled customers. We also recognise that not all disabilities are obvious and may still affect the way some people access information and banking services.

Banking services will also change over time to meet customer demand and to reflect new technologies, presenting new opportunities and challenges. We'll continue to evolve these guidelines as banking services and technologies, and accessibility options, change.

Where appropriate, we'll consult with older and disabled customers and communities as we consider banking issues that affect them. And we'll use the resources listed in the attached Appendix, if needed.

In these guidelines, 'reasonable accommodation' applies

We recognise New Zealand has signed the UN Convention on the Rights of Persons with Disabilities, which is an important step in recognising the needs of disabled people. The Convention complements New Zealand's human rights legislation.

In these guidelines, when we say we will or should do something, we'll aim to make 'reasonable accommodation' under the Convention.

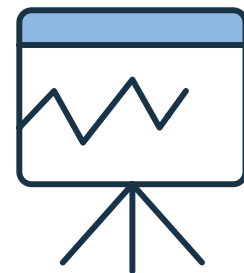
The Convention defines 'reasonable accommodation' as:

'necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden...to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms'

We'll train our staff to understand and help

We'll train relevant staff or provide processes to allow them to:

- understand and help meet the needs of older and disabled customers, including their communication needs
- know what products or services may best meet the needs of older and disabled customers
- recognise, escalate, and respond to possible financial abuse, while being sensitive to customer situations and wishes
- know how and when to use the New Zealand Relay services, if appropriate, and
- know what options are available to customers who may need independent advice.



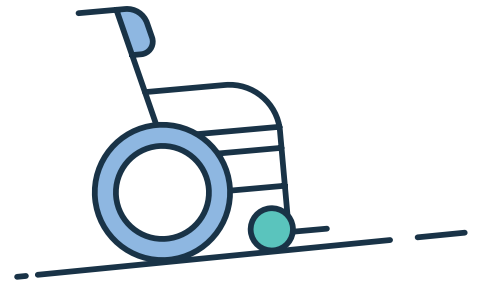
We'll consider older and disabled customer needs when we publish banking information

When we publish information about banking or products and services for older and disabled customers, we'll consider:

- providing different formats like braille, New Zealand sign, and audio if we can
- making documents easy to read, including by using large print or clear fonts and colours, and avoiding printing text over images
- making documents easy to understand, by using plain language, pictures, and diagrams, and
- limiting the information on a page.



We'll consider older and disabled customer needs in physical banking spaces



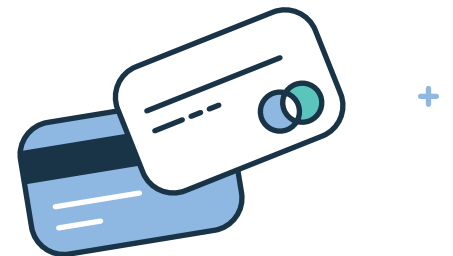
When we're designing physical banking spaces, we'll consider:

- the Building Act standards for access by disabled people
- the need for quiet spaces for people who might feel anxious, confused, or need support to concentrate or communicate
- the need for clear and easy to read signage and design features that help people navigate a space, including people with vision and other impairments
- the need for well-lit spaces, with plain-coloured and even flooring, and for obvious seating areas and low tables
- the need for ramps where access is otherwise by stairs, and
- the need for power-assisted doors, meeting spaces, teller counters, and queuing aisles that allow wheelchairs.

If we manage queues by assigning a number, we'll also consider calling out numbers as well as displaying them on a screen.

We'll be sensitive to the needs of customers who may experience anxiety or other difficulties waiting in queues. If asked, and where reasonable, we'll provide alternatives for those customers in our banking spaces.

We'll consider older and disabled customer needs in banking products and services



We'll work to help older and disabled customers to understand the range of banking products and services available, and how we can support customers as their needs change.

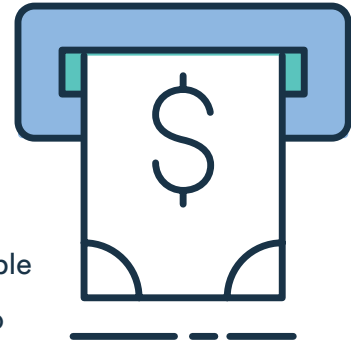
We'll consider the needs of older and disabled customers when we're:

- designing new products or services and related policies and procedures, and
- developing internal or public education initiatives.

We'll work with older and disabled customers and communities to identify and address communication and language needs. In particular, we'll welcome interpreters and support people if this is what customers want or need.

If a customer can't use a product or service we offer due to age or disability, we'll consider reducing the fee we charge them if they ask us to do so.

We'll consider older and disabled customer needs in ATMs and electronic banking services



When developing ATM services, we'll consider the need for:

- accessible and user friendly ATMs for older and disabled people
- alternatives, if possible, for older and disabled customers who can't use ATMs
- ATMs with verbal prompts to complement on-screen instructions, if possible, being aware of the security risk of 'shoulder surfing'
- clear and easy to use ATMs for people with vision and other impairments, including acceptable colour contrast, the ability to increase text size, or having larger buttons for those with coordination difficulties
- a dot on key number five for people with vision and other impairments, and
- clear, onscreen prompts in plain language.

When developing electronic banking services, we'll consider using the international W3C web accessibility best practice standard, the accessibility-related New Zealand e-government web standards, and recommendations, including the need for:

- user-friendly websites, compatible with browsers commonly used with assisted technology
- simple screens where possible that encourage and support the use of electronic banking by older and disabled customers
- easy prompts and access, and
- plain language information on how to use electronic banking.

Where appropriate, we'll engage with organisations representing older and disabled customers to help tell them about changing technologies around ATMs and electronic banking.

Appendix

Number of older and disabled people in New Zealand

Many bank customers are older and disabled people, as highlighted in information published by Statistics New Zealand:

- The 2018 census showed that 746,900 (15.2%) were aged 65 years or over.
- It is projected that by 2046, the number of people aged 65 years and older will double.
- In 2013, 1.1 million people (24% of the population) reported some level of disability. 53% of disabled people had more than one type of impairment.
- The number of people living with dementia is projected to rise from 60,000 to 170,000 by 2050.

Standards

New Zealand Access Standard NZS 4121:2001

www.building.govt.nz/building-code-compliance/g-services-and-facilities/g3-food-preparation-and-prevention-of-contamination/public-accommodation-access/access-standard-nzs-41212001

New Zealand government web standards

www.digital.govt.nz/standards-and-guidance/design-and-ux/accessibility

Australian Banking Association voluntary industry standards to improve accessibility to electronic banking

www.ausbanking.org.au/industry-standards/abas-accessibility-of-electronic-banking

Information resources

United Nations Convention on Rights of Persons with Disabilities

www.odi.govt.nz/united-nations-convention-on-the-rights-of-persons-with-disabilities

Guide to reasonable accommodation of persons with disabilities in New Zealand

www.hrc.co.nz/files/7814/4848/7923/imm_reasonable_accommodation_guide.pdf

Buildings for everyone: Designing for access and usability — A government guide about good practice for the design of buildings that are safe and easy to use for everyone.

www.building.govt.nz/building-code-compliance/d-access/accessible-buildings

Barrier Free New Zealand Trust — advice and services related to accessible environments.

www.barrierfree.org.nz

IHC Advocacy — information and advice on the rights and entitlements of people with an intellectual disability.

www.ihc.org.nz/advocacy

IHC Library — free information on all aspects of intellectual disability, autism, and other developmental disabilities.

www.ihc.org.nz/library-page

CCS Disability Action Library and Information Service — anyone can borrow from the library and loans are free of charge. The only cost to users is the return postage.
www.ccsdisabilityaction.softlinkhosting.co.nz/liberty/libraryHome.do

Disability Information and Advisory Service — a People First New Zealand Ngā Tāngata Tuatahi service about people with learning disabilities.
www.peoplefirst.org.nz/who-what-where/what-is-people-first/disability-information-and-advice-service

Blind Foundation — provides large print guidelines, braille, and audio transcription services.
www.blindfoundation.org.nz

Guidelines for producing clear print
www.printdisability.wordpress.com/guidelines/guidelines-for-producing-clear-print

Dementia Friendly Banking (Westpac NZ)
www.westpac.co.nz/who-we-are/sustainability-and-community/contributing-to-our-communities/providing-help/dementia-friendly

Dementia Friendly Financial Services Charter (Alzheimer's Society UK)
www.alzheimers.org.uk/sites/default/files/migrate/downloads/dementia_friendly_financial_services_charter.pdf

Useful services

iSign NZSL interpreter services
— New Zealand sign language interpreting services provided by qualified interpreters.
www.isign.co.nz

New Zealand Relay — provides relay services to help deaf, hearing-impaired, and deaf-blind people to communicate by phone, text, and internet.
www.nzrelay.co.nz

Make It Easy — Easy Read translation service. A way of presenting information for people with learning disability that is easier to understand, using everyday words and images. Provided by People First New Zealand Ngā Tāngata Tuatahi.
www.peoplefirst.org.nz/who-what-where/what-is-people-first/easy-read-translation-service

Training resources

Age Concern New Zealand — information about financial abuse of older adults and help with training to identify and sensitively managing potential abuse situations.
www.ageconcern.org.nz/?/ElderFinancialAbuse

How to spot the signs of financial abuse — a checklist
www.westpac.co.nz/assets/Who-we-are/Sustainability-and-Community/Dementia/Dementia-How-to-spot-the-signs-of-financial-abuse.pdf

Blind Citizens New Zealand — advocates for members, including issues of accessibility, and can advise on training of people in blind awareness.

www.abcnz.org.nz

Diversity Works — provides information on employing disabled people which may also assist with providing services to this group. Resources can be downloaded for free.

www.diversityworks.nz

Office for Disability Issues — disability responsiveness training.

www.odi.govt.nz/guidance-and-resources/disability-responsiveness-training/

Supported Decision-Making — tools you can use. Helping people make their own decisions with support that's right for them. Provided by People First New Zealand Ngā Tāngata Tuatahi.

www.peoplefirst.org.nz/supported-decision-making-tools-you-can-use

Other useful websites and organisations

Deaf Aotearoa — creating opportunities that enable deaf people to achieve their aspirations.

www.deaf.org.nz

Dementia New Zealand — supporting the delivery of high-quality services by dementia organisations working in the community.

www.dementia.nz

Disabled Persons Assembly New Zealand — works to realise an equitable society where all disabled people are able to direct their own lives.

www.dpa.org.nz

Grey Power New Zealand Federation — promotes the welfare and well-being of people over 50.

www.greypower.co.nz

Human Rights Commission — promotes and protects the human rights of all people in New Zealand.

www.hrc.co.nz

IHC New Zealand — advocates for the rights, inclusion and welfare of all people with intellectual disabilities and supports them to live satisfying lives in the community.

www.ihc.org.nz

People First New Zealand Ngā Tāngata Tuatahi — an advocacy organisation that is led and directed by people with learning disability.

www.peoplefirst.org.nz

Office for Disability Issues — the focal point in government on disability issues.

www.odi.govt.nz

Office for Seniors — advises the government on issues relating to older people and publishes the SuperSeniors e-newsletter.

www.superseniors.msd.govt.nz

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