

Vision Australia Submission to 2016 Review of the 2013 Code of Banking Practice

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Introduction

Banking is an essential everyday activity, yet many people who are blind or have low vision continue to experience unnecessary barriers to accessing banking services and technology independently and with the same convenience as the rest of the community.

Vision Australia is pleased to provide a submission to this review, commenting on relevant items in the terms of reference to represent the interests, needs and preference of people who are blind or have low vision. Robust and systemic policies, such as the Code of Banking Practice, are essential for the 357,000 people who are blind or have low vision in Australia to access and benefit from progressive technologies and service delivery models emerging in the industry, such as contactless payment infrastructure, touchscreens, and mobile apps.

Further information about Vision Australia is found at the end of this submission.

Comments on the Terms of Reference

a. Purpose and role of the Code in setting the standards for good banking practices and the benefits that the Code provides to banks and their individual and small business customers.

The Code has an important role in setting standards for accessible and inclusive banking practices required for people who are blind or have low vision to access commerce. Setting industry wide standards benefits these individual customers so they are able to participate in commerce independently, conveniently and safely.

Competition underpins business in the banking sector, and as such, technology and service delivery models implemented by the banks are diverse. In practice, this results in inconsistencies in what users can expect and what they experience when using these technologies and services in their everyday lives, and in many cases, especially with regard to technologies, banking can be an exclusionary activity.

d. The effectiveness of the key commitments of banks and whether these commitments meet consumer and community expectations to:

- i. Promote better informed decisions about banking services.
- ii. Provide information about the rights and obligations of banks and their individual and small business customers in relation to banking services, including raising awareness of the legal and regulatory frameworks governing banks.
- iii. Act fairly and reasonably towards individual and small business customers in a consistent and ethical manner.
- iv. Comply with all relevant laws and regulations relating to banking services.
- v. Take reasonable measures to provide relevant information and enhance accessibility for people in remote Indigenous communities, older persons and customers with a disability.
- vi. Provide hardship assistance to individual and small business customers experiencing financial difficulties.
- vii. Resolve complaints and disputes between banks and their individual and small business customers.
- viii. Provide appropriate staff training, including on discharging their functions, providing banking services and knowledge of the Code.
- ix. Promote the existence of the Code.

While the Code discretely communicates general standards in the form of key commitments for good banking practices, the Code should also be supplemented by other resources to be more effective to meet consumer and community expectations.

Supplementary policy and guidelines, such as the Standards for Accessible Banking (currently also under review) can provide more detail about how banks can meet the needs of their individual customers, including those who are blind or have low vision.

Specifically, the current Code provides the following commitment regarding customers with special needs: “We recognise the needs of older persons and customers with a disability to have access to transaction services, so we will take reasonable measures to enhance their access to those services” (Code of Banking Practice 2013, Section 7). The Standards have supplemented this commitment in the Code by providing practical details on what these reasonable measures to enhance access are and how they can be implemented.

Since their release, the Standards have been well-received by both the banking industry and the disability sector and have led to significant improvements in the accessibility of ATMs, POS terminals, telephone banking and Internet banking for people who are blind or have low vision. We understand that electronic banking

services in Australia have been regarded as amongst the most accessible in the world and this is in large part attributable to the Standards.

q. Commitments to accessibility and financial inclusion, including account suitability and basic bank accounts, financial literacy and the implications of technology developments on banking services.

The Code should retain and strengthen commitments to accessibility. In particular, we recommend that commitments referring to “reasonable measures” should be defined. Action to realise these commitments should require banks to comply with all relevant legislation, guidelines and standards, measures should balance the interests of the banks and their customers and ensure that measures are independently functional and convenient for their customers.

Based on our knowledge of consumer experiences, as well as ongoing engagement with individual banks, there is a continued need to ensure that systemic action is taken to ensure accessibility and financial inclusion, and ensure there are no negative implications of technology developments on access. During the past few years, technology and its use in banking service delivery have been evolving rapidly, and key commitments to ensure this does not exclude people who are blind or have low vision are essential.

As discussed earlier in this submission, these commitments should be supplemented by further guidance on how to fulfil these commitments through practical measures, such as Standards and other guidelines.

r. The desirability for the Code to provide for banks to develop standards for communicating and dealing with vulnerable customers including older persons, customers with a disability and Indigenous customers.

As we have discussed throughout this submission, Vision Australia considers the development of supplementary standards and guidelines as essential for communicating and dealing with customers with a disability, meeting their needs and preferences and assisting the banks to meet their obligations under the Disability Discrimination Act.

Key commitments do not outline the measures required to ensure accessibility, encompassing functionality, preferences, convenience and compliance, so we would strongly support the Code providing for banks to develop Standards to address this.

About Vision Australia

Vision Australia is the largest provider of services to people who are blind, deafblind, or have low vision in Australia.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families. The service delivery areas include:

- independent living
- early childhood
- orientation and mobility
- employment
- accessible information (including alternate formats and library services)
- recreation
- aids and equipment
- social support
- Seeing Eye Dogs
- advocacy, and working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has gained unrivalled knowledge and experience through constant interaction with our 27,500 clients and their families, and also through the involvement of people who are blind or have low vision at all levels of the organisation. Vision Australia is therefore well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant client consultative framework, with people who are blind or have low vision representing the voice and needs of clients of the organisation to the Board and Management.