



BANK OF GHANA

Financial Inclusion for Persons with Disabilities Directive

For Banks and Specialized Deposit Taking Institutions, Finance Houses, Non-Banking Financial Institutions and Payment Service Providers

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PART I – PRELIMINARY

1. Title

This Directive may be cited as the Financial Inclusion for Persons with Disabilities Directive.

2. Introduction

This Directive is in line with internationally accepted financial inclusion principles which include safe, efficient, and widely reachable financial infrastructures, access to a broad network of service points and interoperability and effective awareness and financial literacy initiatives. These principles aim at ensuring that Persons with Disabilities have equitable and non-discriminatory access to the products, services and premises of banks and specialized deposit-taking institutions, non-banking financial institutions and payment service providers. It is aimed at ensuring that Financial Service Providers render equal standards of service to Persons with Disabilities. Such services shall ensure the required standard of confidentiality in service delivery, provide Persons with Disabilities, the capacity and opportunity to choose from various modes of service delivery, and provide clear, comprehensive, and accurate information on financial products and services, in a manner that is accessible at all stages of delivery, to Persons with Disabilities.

3. Application

This Directive is issued pursuant to sections 6 and 7 of the Persons with Disability Act, 2006 (Act 715), section 53 of the Borrowers and Lenders Act 2020, (Act 1052), section 92(1) of the Banks & Specialised Deposit Taking Institutions Act, 2016 (Act 930) and section 101(2)(f) of the Payment Systems and Services Act 2019 (Act

987). The Directive also seeks to implement the principles of the UN Convention on the Rights of Persons with Disabilities. The Directive shall apply to all Financial Service Providers regulated by the Bank of Ghana.

4. Objective of the Directive

The objective of this Directive is to:

- (a) Promote access to financial products and services for Persons with Disabilities.
- (b) Promote usage of financial products and services by Persons with Disabilities.
- (c) Establish a framework for Financial Service Providers to create policies, procedures and provide facilities to ensure that Persons with Disabilities have access to wide range of financial products and services.

5. Principles

This Directive is guided by the principles of the UN Convention on the Rights of Persons with Disability. This includes the following:

- **Equality of opportunity:** This implies taking positive action to ensure the removal of all barriers that inhibit Persons with Disabilities.
- Respect for inherent dignity, individual autonomy, including the right to make one's own choices and independence of persons.

- **Non-discrimination:** This refers to the equal treatment of all persons with dignity, regardless of race, ethnicity, colour, gender, religion, language, social origin, social status, or disability.
- **Full and effective participation and inclusion in society:** This principle aims to engage persons with disabilities in wider society and in decision making that will affect them. It seeks to make them active in their personal development and their community.
- Respect for difference and acceptance of Persons with Disabilities as part of human diversity and humanity.
- **Accessibility:** This implies the implementation of measures to provide access to, and usage of a broad range of affordable products facilities, products and services that are of universal design.

6. Interpretation

In this Directive, unless the context otherwise requires,

“**Accessibility**” means the ability to obtain financial products and services, including credit, deposits, and payment services devoid of barriers and limitations that potentially exclude persons with disabilities.

“**Bank**” means the Bank of Ghana.

“**Disability Inclusion Report**” means a report detailing activities undertaken by Financial Service Providers to facilitate the participation and usage of Persons with Disabilities in banking activities, products, and services.

“Discrimination” means any distinction, exclusion, or restriction on the basis of disability which has the purpose or effect of impairing or nullifying the recognition of enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms.

“Equality of opportunity” means the creation of financial systems that offer all persons, including persons with disabilities, the opportunity to access financial products and services without barriers and limitations.

“Financial Service Provider” means a bank, a specialized deposit-taking institution, a payment service provider, or non-bank financial institution regulated by the Bank of Ghana.

“Inclusive Banking” means the provision of financial products and services to everyone, regardless their income, social status, or physical impairment.

“Non-discrimination” means equal treatment of all persons with dignity, regardless of race, ethnicity, colour, gender, religion, language, social origin social status, or disability.

“Person with Disability” includes a person who has a physical, mental, psycho-social, intellectual, neurological, developmental, or other sensory impairments which in interaction with environmental, attitudinal, or other barriers hinder full and effective participation in society on an equal basis with others.”

“Reasonable Accommodation” means necessary and appropriate modification and adjustments of banking facilities to ensure that they do not impose a disproportionate or undue burden on Persons with Disabilities who wish to access and use banking products and services.

“Universal Design” means the design of products, environments, programmes, and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design. Universal Design shall not exclude assistive devices for particular groups of Persons with Disabilities where needed.

“Usage” means the extent to which, and manner in which Persons with Disabilities use tailored products and services offered by Financial Service Providers to targeted at promoting financial inclusion for persons with disabilities.

PART II – MINIMUM REQUIREMENTS FOR DISABILITY POLICY OF FINANCIAL SERVICE PROVIDER

GENERAL REQUIREMENTS

7. A Financial Service Provider shall formulate and implement internal policies and procedures in the delivery of products and services, to ensure that Persons with Disabilities have reasonable access to, and equitable usage of tailored banking facilities, products, and services aimed at promoting financial inclusion for persons with disabilities.
8. A Financial Service Provider shall review its Financial Inclusion Policy for Persons with Disabilities at least every two years.
9. A Financial Service Provider shall ensure that all its facilities and digital service channels including websites, branches, and agent locations for the delivery of its products and services, are disability friendly and promote

access to and usage of financial products and services. Financial Service Providers shall ensure that physical facilities provided to facilitate accessibility to branches and agent locations, meet Ghana's national accessibility standards.

10. A Financial Service Provider shall collect specific data of customers during client on-boarding, to identify customers who are Persons with Disabilities, in order to facilitate their access to, and usage of available tailored products and services specifically provided to promote financial inclusion of Persons with Disabilities.
11. A Financial Service Provider shall obtain prior approval of customers who are Persons with Disabilities and explain the purpose for collecting the disability specific data of a Person with Disabilities at the on-boarding stage, before procuring data from them.
12. Financial Service Providers shall use information obtained from customers who are Persons with Disabilities, only for the purpose of improving access to and enhancing usage of tailored products and services for Persons with Disabilities.
13. A Financial Service Provider shall offer tailored products and services to ensure that in-person and digital facilities and services are accessible, available, and convenient to customers who are Persons with Disabilities.
14. A Financial Service Provider shall conduct, at least, an annual disability inclusion training for staff and include as part of its training, an assessment of staff, to create sensitivity and promote awareness of the needs of Persons with Disabilities.

15. A Financial Service Provider shall provide at least, annual training and capacity building for frontline members of staff, Designated Technical Staff, and the Management Person responsible for the implementation of the Financial Institution's policy on financial inclusion of Persons with Disabilities, to enable the staff adequately support customers with disabilities.
16. A Financial Service Provider shall provide mediums such as voice notes and text messaging for customers with disabilities to give feedback on access to tailored products and services offered and convenience of usage. The feedback shall be utilised to improve access, product development and service delivery of tailored products and services to Persons with Disabilities.
17. A Financial Service Provider shall appoint an officer of the institution at a Senior Management level, to oversee the implementation of the institution's disability inclusion policy.
18. A Financial Service Provider shall include a disability inclusion report in its annual compliance report submitted to the Board of Directors of the Financial Service Provider for review. The annual disability inclusion report shall include areas indicated in schedule one (1) below.
19. A Financial Service Provider shall submit an annual report on disability inclusion activities undertaken during a stated year, to the Bank of Ghana by January 31 of the ensuing year.
20. A Financial Service Provider shall provide reasonable accommodation/channels to address the needs of Persons with Disabilities.

SPECIFIC REQUIREMENTS

Non-Discrimination

21. A Financial Service Provider shall ensure that the facilities, products, and services provided to Persons with Disabilities, promotes full and effective participation and inclusive banking.
22. A Financial Service Provider shall not deny Person with Disabilities, access to credit or any other bank product or service on the basis of his or her disabilities.
 - (a) In the event that a Financial Service Provider intends to refuse a service to a Person with Disability, based on lack of facilities to ensure safe usage and potential risks to the person with disability, the Financial Service Provider shall provide an opportunity for the person to indemnify the Financial Service Provider, where he/she decides to use the service, against the Financial Service Provider's advice.
 - (b) The Financial Service Provider may also grant the Person with Disability, specific assistance, where available, or grant the Person with Disability, the opportunity to use the service with the aid of an elected Assistant presented by the Person with Disability.
23. A Financial Service Provider shall incorporate in its ethical code, specific provisions against discriminatory behaviour against Persons with Disabilities and applicable sanctions for discrimination against Persons with Disabilities. The FSP shall sensitize staff on the policy and ensure its enforcement.

24. A Financial Service Provider shall ensure that its officers and agents do not use a derogatory language or exhibit discriminatory behaviour in their interactions with Persons with Disabilities.
25. A Financial Service Provider shall provide priority service to Persons with Disabilities. To facilitate this, Financial Service Providers shall display notices in accessible formats, to inform all customers, especially those who are Persons with Disabilities, that it offers priority service to them.

Accessibility

26. A Financial Service Provider shall ensure that Persons with Disabilities have appropriate physical access to banking halls and service points.
27. Financial Service Providers shall develop materials in accessible and user-friendly formats, to facilitate access, usage, service delivery and product and service education for Persons with Disabilities.
28. A Financial Service Provider shall, in addition to product and service education, undertake tailored financial literacy initiatives at least twice a year, for Persons with Disabilities to facilitate financial inclusion. Channels for literacy initiatives shall include digital and electronic delivery forms.
29. A Financial Service Provider shall add accessibility and user-friendly features to digital service platforms and online banking services including voice and audio controls, simplified layout, larger font, sign language videos.
30. A Financial Service Provider shall provide Persons with Disabilities access to custom-made electronic channels such as Automated Teller Machines

(ATMs), Points of Sale (POS) and mobile Points of Sale acceptance services. Such electronic payment channels shall:

- a. be placed at a level that will be accessible to persons with mobility impairments.
- b. have voice guidance software, sharp contrast keypads or braille keypads among others for persons with visual impairments.
- c. provide tailored support such as extensive disclosure and explanation of product and service terms and conditions, where necessary, for Persons with Disabilities who are illiterate.
- d. provide tailored customer services such as specially trained staff who can communicate in sign language, to a person who has a speech or hearing impairment.
- e. adhere to all standards stipulated in Bank of Ghana's **Guideline on Operation of Electronic Payment Channels.**"

Disclosure

31. A Financial Service Provider shall publish on its website, information on its policy for financial inclusion of Persons with Disabilities, its existing Fintech innovations specifically tailored to promote financial inclusion for Persons with Disabilities as well as available channels for complaint redress.

Training

32. A Financial Service Provider shall conduct disability inclusion training for staff and agents at least twice a year to create sensitivity to and awareness of the needs of Persons with Disabilities.
33. A Financial Service Provider shall provide customers with disabilities, at least once a year, information on available products and services and channels of redress. Financial Service Providers may conduct sensitization drives through their training channels. A Financial Service Provider may collaborate with disability organizations to provide consumer education for Persons with Disabilities.

PART III – REMEDIAL MEASURES AND SANCTIONS

Penalties for non-compliance

34. In accordance with section 92 (8) of the Banks and Specialised Deposit-Taking Institutions Act, 2016 (Act 930) and section 44 (3) of the Non-Bank Financial Institution Act, 2008 (Act 774), A Financial Service Provider that fails to institute policies, procedures, and facilities as prescribed by this Directive shall be liable to an administrative penalty of not less than two thousand penalty units.

Remedial measures

35. To ensure that a Financial Service Provider creates and implements policies and procedures to guarantee inclusive banking for Persons with Disabilities, the Bank of Ghana may in addition to administrative penalties, take any

remedial action that the Bank considers appropriate. The remedial actions that the Bank of Ghana may take shall include the following:

- A publication of periodic reports on its website, indicating the Financial Service Providers which are compliant with this Directive and those that are rated non-compliant. The report will periodically sight compliant institutions with additional facilities for Persons with Disabilities for special mention in the report.
- Publishing an annual Financial Inclusion Report which shall outline the various inclusion policies of Financial Service Providers. This report shall evaluate inclusive policies for Persons with Disabilities and rate institutions accordingly.

SCHEDULE 1

Reporting Template for Financial Inclusion of Persons with Disabilities

Percentage of Customers with Disabilities out of total customer base.	
No. of Persons with Disabilities banking with the Financial Institution	
Types of Disabilities within the institution. (Eg. visual impairment, hearing impairment, sensory impairment).	
Types of product/service delivery channels for Persons with Disabilities.	
Available channels of redress for complaints of Persons with Disabilities.	
Value of loans granted to Persons with Disabilities	
Persons with Disabilities focused Financial Literacy Initiatives for the year	

Types of Loans Applied for by Persons with Disabilities	
No. of SME Accounts owned by Persons with Disabilities within the financial Institution	
Rate of usage of specialized Products, services, and channels of transactions for Persons with Disabilities per month (Indicate each channel and rate of usage)	
No of specially trained employees who can facilitate the institution's service delivery to Persons with Disabilities. E.g., sign language interpreters, braille readers, etc.	