

**Subject:**

ERP/ Informal Group on Accessibility - First results

Payments and Market
 Infrastructures
 Payments Policy

The ERPB is invited to:

- **endorse the note and agree with the suggested way forward.**

1. Introduction

Easy access to retail payments is important to support economic prosperity and growth and to foster consumers' financial inclusion. While digitalization of retail payment services can help reduce cost for the provider and improve speed and user-friendliness for many consumer, a growing group face barriers that prevent them from accessing these payment systems. This concerns, in particular, older persons and persons with disabilities, but also other vulnerable groups. Together they represent a significant part of the European consumers and their numbers are expected to grow rapidly over the next decades as a result of Europe's demographic ageing.

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Leaving accessibility of retail payments only to national authorities or individual payment service providers, technical service providers or retailers may lead to further fragmentation and additional barriers for consumers with special needs. This is especially so for those who travel to another EU Member State for work or other reasons. This is the reason why the European Commission has included banking services, ATMs and ticketing machines in the proposal for the European Accessibility Act (EAA) that they tabled in December 2015.

Although there are many financial inclusion programs across the world they apply only to national contexts while EU Treaties enshrine fundamental freedoms of movement for citizens, goods and services across the EU. That leads the group to conclude that possible financial inclusion problems, including the accessibility aspects, should be tackled at EU level and coordinated 'best practice' solutions should be promoted across Member States. This would prevent a fragmented approach and support the freedom of movement for *all* consumers by enabling them easy access to retail payment services across the EU regardless of age, impairments or social profile.

This note gives the first results of an analysis conducted by the ERPB informal group into the accessibility issues at stake and some 'best practice' solutions that have been introduced already to tackle these issues.



2. First results of identified accessibility issues and solutions found across countries participating in the informal ERPB WG

ATMs, POS and ticketing machines

Issues: Many ATMs, POS and ticketing machines are difficult to operate by persons with visual impairments and older persons, and – in some cases - wheelchair users. It might be difficult to see the numbers on the screen or keypad, to hear the sounds in a noisy environment, to press the keys (cf. Pay-Able campaign video) or to access the terminal (e.g. mounted too high). Some terminal designs have small screens, small pin code buttons, poor background light etc. The latest generation of POS are touchscreen and can sometimes create difficulties for users with visual impairments or older persons.

The lack of harmonization of key pads, screen layout and transaction process within and between EU countries is another issue reported as creating barriers both within countries and in a cross-border context.

Examples of solutions found by some providers:

- Some terminals are equipped with voice technology to guide persons with visual impairments.
- A bank in Malta produces cards with a special crop to help persons with visual impairments insert them in the ATM more easily and faster.
- Magnifying glasses available at POS in some (large) supermarkets.
- The app "BMap": which can detect an ATM nearby, giving information on offered services (Withdrawal, payments, Disabled Access, withdrawal system for Blind disabled people). (Italy)
- Raising awareness: the Pay-Able movement is campaigning for user-friendly payment terminals for all EU-citizens and has been advocating for the inclusion of payment terminals in the European Accessibility Act (EAA) (www.pay-able.eu)¹.

EAA requirements: Annex 1 Section II² provides specific accessibility requirements for the design and production, and user interface and functionality design of ATMs and self-service terminals.

¹ Pay-Able campaign: <http://pay-able.eu/>

² <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2015:0615:FIN>



Internet and mobile retail payment facilities

Issues: As highlighted by the Central Bank of Ireland in the recent discussion paper they launched in June 2017³, there is “*reduced access to financial products and services for consumers who lack the digital skills or access to technology to operate in the digitalized financial services environment.*” In addition, they highlight that there is an “*increased difficulty for firms to identify vulnerable consumers and engage with them accordingly due to loss of direct, human interaction.*” (p.28).

Older people and persons with certain disabilities may experience difficulties in using e-banking facilities to make payments, to use an e-banking code and more generally face problems with the lack of accessibility of PC banking software.

For mobile facilities: Nowadays apps do not always accommodate disabilities. Furthermore, the cost of mobile phones can be prohibitive for some social groups (high prices of mobile phones especially those with upgraded functionalities to address specific problems such as blindness and/or high subscription fees). Additionally, not all apps are easy to use and to navigate by vulnerable groups (small letters, poor colour selection). Apps do not always work well with the built-in accessibility options in smartphones because they need to make use of sufficiently large fonts and accessible colour schemes.

Regarding e-wallets there is a lack of availability of interaction options for older people as well as persons with a disability. There is often a lack of knowledge over how e-authentication works and no support to verify if a transaction completed successfully. This in combination with the feeling of insecurity creates a lack of use among vulnerable groups. Not many e-wallet apps are barrier-free. See also the accessibility problems mentioned under *Internet retail payment facilities* and *Mobile retail payment facilities*.

Examples of solutions found by some providers:

- Internet-banking can be made (more) accessible through videos in sign language and brochures in simple and easy understandable language.
- Work together with older people and persons with disabilities in creating the website or app.
- Special tokens to log on to internet-banking.

³ Discussion Paper : Consumer Protection Code and the Digitalisation of Financial Services, June 2017, <https://www.centralbank.ie/news-media/press-releases/discussion-paper-on-the-consumer-protection-code-and-the-digitalisation-of-financial-services-published>



- A mobile banking app which is accessible to vulnerable consumers and offers a wide range of services and thus helping them complete most of their operations location-independently.
- Accessible bank offices: As a result of the collaboration between the foundation ONCE and Bankinter there is a prototype accessibility office. The design, layout, provision of spaces, furniture and infrastructure have all been taken into account. People with disabilities can come to this office and will be helped with their questions regarding financial services. All employees who manage this office are persons with disabilities. (Spain)
- Trained staff: All employees are being educated to help persons with disabilities (German savings banks and banks)
- Different retailer initiatives to help, such as companies of all profiles working collectively together and participating in round tables discussing the EU accessibility act. (NL – Detail Handel)

EAA requirements: Annex 1 provides accessibility requirements for the design and production, and user interface and functionality design of General purpose computer hardware and operating systems (Section I), Banking services; websites used for provision of banking services; mobile device-based banking services; self-service terminals, including Automatic Teller machines used for provision of banking services (Section IV) and e-commerce (Section VIII).

Cards

Issues: Some persons with disabilities and elderly people face difficulties with the PIN code required to authorize payments with debit and credit cards - a legal requirement to reduce risks for consumers and banks. (See also the issues mentioned at POS terminals).

Examples of solutions found by some providers:

- For low value payments contactless cards may reduce the barriers.
- Cardless withdrawals: Using an app the customer can use the ATM without cards or PINs, instead using the QR code on the ATM screen. This system was immediately adopted and welcomed by many blind customers. (Italy)
- Some banks offer an additional communication channel, which offers the possibility to have video calls with advisors. In addition, one bank informed us, that there is the option of a special agreement for deaf persons allowing them to communicate in sign language with a member of a specially trained team. (Austria)



- One bank offers a disabled-friendly shuttle service in two major cities (Vienna, Graz) so that also frail and disabled persons may keep an appointment with their banking consultants. (Austria)

3. Interim conclusions and suggested way forward

In the framework of the Single Euro Payments Area (SEPA), in order to achieve an integrated retail payments market that helps guarantee freedom of movement of goods and services and of citizens, including for consumers with special needs, it is important to ensure that the supply and demand side of retail payments are aware and conscious of the needs of consumers with special needs and pursue together common accessibility features for retail payments that will be coherent and interoperable across SEPA.

In anticipation of the EEA and in light of the further digitalization, we want to remove obstacles to vulnerable groups' access to (new) payment products in a way that avoids fragmentation across the EU. So, cooperation between all stakeholders represented in the ERPB is very crucial. In the coming months, the informal working group will continue its work as was agreed in the mandate to be able to present the ERPB with a final report in 2018.



ANNEX 1: MANDATE OF THE INFORMAL ERPB GROUP ON BROADER ACCESSIBILITY

Based on the Euro Retail Payments Board (ERP/2017/016) November 2016 meeting, an informal ERP/2017/016 group is set up with the participation of interested members to identify possible further work on broader accessibility issues for retail payment users.

1. Scope

Easy access to retail payments is important to support economic prosperity and growth and to foster consumers' financial inclusion. However with the rapid digitalization of many retail payment systems, a growing group of consumers face barriers that prevent them from accessing these payment systems. This concerns mainly persons aged 50+ and persons with disabilities, but also other vulnerable groups. Together they represent a large part of the European consumers and their numbers are expected to grow rapidly over the next decades as a result of Europe's demographic ageing.

Leaving accessibility of retail payments to national authorities or individual banks or retailers will lead to further fragmentation and additional barriers for consumers with special needs who travel to another EU Member State for work or leisure. This is the reason why the European Commission has included banking services, ATMs and ticketing machines in their proposal for a European Accessibility Act tabled in December 2015.

In the framework of the Single Euro Payments Market (SEPA), in order to guarantee freedom of movement of goods and services and of citizens, including for consumers with special needs, it is important to take action at EU level to ensure that the supply and demand side of retail payments will analyze and pursue together common accessibility features for retail payments that will be coherent and interoperable across SEPA. So cooperation between all stakeholders represented in the ERP/2017/016 is key.

2. Informal ERP/2017/016 Group's goal, objective and task

According to article 1 of its Mandate the objective of the ERP/2017/016 is to contribute and to facilitate the further development of an integrated, innovative and competitive market for euro retail payments in the EU by identifying and studying obstacles, identifying and pursuing ways to address these obstacles and identifying and pursuing ways to foster innovation, competition and integration in retail payments in euro in the EU.

Even though the informal ERP/2017/016 group has no formal mandate of the ERP/2017/016, it is keen to ensure its work remains within the scope of the mandate of the ERP/2017/016.



Therefore in the framework of the ERPB mandate, the goal of the informal ERPB group is to improve the ERPB common understanding of broader accessibility issues for retail payment users, and its objective is to formulate common positions, statements and strategic views on the identified needs (barriers faced by users) and best practice to enhance accessibility of euro retail payments across the EU.

The task of the informal ERPB group will be to work further on broader accessibility issues for retail payment users. In conducting its work, the informal ERPB group will:

- identify practical issues (e.g. on products or channels) faced by consumers with special needs in accessing retail payments in the EU;
- study best practices set up by EU Member States, NCBs, banks or consumer organizations;
- conduct further analyses on common accessibility features for retail payments that will be coherent and interoperable across SEPA.

3. Deliverables and time horizon

The informal ERPB group is expected to start working in May 2017. The informal ERPB group will prepare a report for the November 2017 meeting covering an overview of identified practical issues (barriers) faced by consumers with special needs in accessing retail payments in the EU and a summary of best practices set up by EU Member States, banks or consumer organizations. The informal ERPB group will prepare a more elaborated report of the barriers faced by users and suggestions for common accessibility features for retail payments that will be coherent and interoperable across the Single Market based on identified good practice to be presented to the ERPB in 2018.

4. Participants and chairmanship

ERPB members are invited to participate in the informal ERPB group as active participants. The informal ERPB group will be chaired by AGE Platform Europe, while De Nederlandsche Bank will take care of the Secretariat.

Members representing their associations will be appointed by interested ERPB members. Other participants – after expressing interest to the Chair or the Secretariat – may be invited to join the group based on consultation with the members of the informal ERPB group.

5. Rules of procedure

The mandate of the ERPB defines a broad set of rules for the procedures of its working groups – these set of rules will also be applicable for the informal ERPB group.



The informal ERPB group takes positions on a $\frac{3}{4}$ majority basis; dissenting opinions are mentioned in any relevant documents prepared by the informal ERPB group. The members of the informal ERPB group decide on how to organise secretarial support, timing and rules of meetings and communication via written procedures, as well as on the need and format of any interim working document produced. Costs related to the operation, meetings, chairmanship and secretariat are carried by the members of the group themselves.

ANNEX 2: ERPB informal group on Accessibility - work plan



Introduction

1. At its June 2016 meeting, the ERPB considered a note on accessibility issues faced by retail payment users prepared by AGE Platform Europe and De Nederlandsche Bank (DNB) regarding potential future work on broader accessibility challenges.
2. In its November 2016 meeting, the ERPB noted the issues raised by AGE Platform Europe and DNB in their background note and several members expressed their interest in further work to be done. The ERPB concluded that further action was required and agreed to receive a more developed proposal by an informal group of interested members to identify possible further work that would fall within the ERPB remit at one of its upcoming meetings.

Background

3. Easy access to retail payments is important to support economic prosperity and growth and to foster consumers' financial inclusion. However with the rapid digitalization of many retail payment systems, a growing group of consumers face barriers that prevent them from accessing these payment systems. This concerns mainly persons aged 50+ and persons with disabilities, but also other vulnerable groups. Together they represent a large part of the European consumers and their numbers are expected to grow rapidly over the next decades as a result of Europe's demographic ageing.
4. Leaving accessibility of retail payments to national authorities or individual banks or retailers will lead to further fragmentation and additional barriers for consumers with special needs who travel to another EU Member State for work or leisure. This is the reason why the European Commission has included banking services, ATMs and ticketing machines in their proposal for a European Accessibility Act tabled in December 2015.
5. In the framework of the Single Euro Payments Market (SEPA), in order to guarantee freedom of movement of goods and services and of citizens, including for consumers with special needs, it is important to take action at EU level to ensure that the supply and demand side of retail payments will analyze and pursue together common accessibility features for retail payments that will be coherent and interoperable across SEPA. So cooperation between all stakeholders represented in the ERPB is key.

Informal ERPB Group's goal, objective and deliverables



6. According to article 1 of its Mandate the objective of the ERPB is to contribute and to facilitate the further development of an integrated, innovative and competitive market for euro retail payments in the EU by identifying and studying obstacles, identifying and pursuing ways to address these obstacles and identifying and pursuing ways to foster innovation, competition and integration in retail payments in euro in the EU.
7. Even though the informal ERPB group has no formal mandate of the ERPB, it is keen to ensure its work remains within the scope of the mandate of the ERPB. Therefore in the framework of the ERPB mandate, the goal of the informal ERPB group is to improve the ERPB common understanding of broader accessibility issues for retail payment users, and its objective is to formulate common positions, statements and strategic views on the identified needs (barriers faced by users) and best practice to enhance accessibility of euro retail payments across the EU.
8. The informal ERPB group will provide the following deliverables:

Short term:

- Overview of identified practical issues (e.g. on products or channels) faced by consumers with special needs in accessing retail payments in the EU;
- Overview best practices set up by EU Member States, banks or consumer organizations;

These two short-term deliverables will be drawn up by a review of papers published on the internet, for example papers published by the *Financial Conduct Authority of the UK* (consumer vulnerability and access to financial services in the UK), the *European Commission* (consumers vulnerability across key markets in the EU), *G3ict* (inclusive financial services) and *AGE UK* (age-friendly banking and The way we pay). The informal ERPB group members will also consult their grass roots members for other relevant papers and examples of barriers and best practice.

The informal ERPB group will seek to deliver the short-term deliverables for discussion in the ERPB meeting of November 29, 2017 (provided the ERPB Chair agrees to put the item on the agenda). This means that the short-term report on the overview of the barriers and examples of best practice has to be finalised and agreed by the informal group early November 2017.

Middle term:



- Conduct further analyses on common accessibility features for retail payments that will be coherent and interoperable across SEPA.

The middle-term deliverable will build on the two short-term deliverables and will be based on a thorough analysis of collected input to identify common accessibility features for retail payments that will be coherent and interoperable across the Single Market. The middle-term deliverable will be presented for discussion at one of the ERPB meetings in 2018 (provided the ERPB Chair agrees to put the item on the agenda).

Timetable

<i>Deliverables</i>	<i>Date</i>	<i>Action</i>
Draft work plan and mandate	May 24, 2017	Chair and secretariat
First meeting in Brussels	May 24, 2017	All members
Update in ERPB	June 12, 2017	Chair
Developed template for short-term deliverable	Mid-June 2017	Chair and secretariat
Adapted work plan and mandate	Mid-June 2017	Chair and secretariat
Collected issues and best practices	End-August 2017	All members
Telco	Mid-September 2017	All members
Draft report with short-term deliverables (issues and best practices)	Mid-October 2017	Chair and secretariat
Second meeting in Brussels	End-October 2017	All members
Report with short-term deliverables (issues and best practices) to ERPB secretariat	Early November 2017	Chair and secretariat
Presentation short-term deliverables in ERPB	November 29, 2017	Chair
Third meeting in Brussels	Early February 2018	Chair and secretariat

Resources

The informal ERPB group consists of 15 members (including the Chair and the Secretariat). Costs related to the operation, meetings, chairmanship and secretariat are carried by the members of the informal ERPB group themselves. (For the current members and observers of the informal ERPB group see Annex 1.)

Constraints



The time allowed for the short-term output may limit access to a wide range of papers and it will be important to ensure that the group does not limit its work to analyzing papers that may be obsolete in today's rapidly changing context. Financial technological developments and innovations are going so fast, that practical issues and best practices may not be identified yet.

Accountability

The informal ERPB group will be chaired by AGE Platform Europe while DNB will take care of the Secretariat. The Chair is responsible for sending the short-term outputs on time to the ERPB meeting on November 29, 2017, and the middle-term output on time for the ERPB meeting in 2018 where it will be presented.

The outputs may be developed in subgroups. The subgroups will appoint their own chair (NCBs/supply side of retail payments) and co-chair (demand side of retail payments) and divide the work among the members.