# Vision Australia

# Access to Currency and Associated Financial Products and Services

**January 2021**

# Position Statement summary

This position statement is about the accessibility for people who are blind or have low vision of currency (banknotes and coins) and associated products and services provided by Australian banks and other financial institutions. Being able to identify currency accurately and independently, and having equal and independent access to financial products and services such as credit/debit cards and payment terminals are essential for full participation in the economic life of the community. All people must be able to exercise choice and control of how and when they use currency and associated financial products and services.

If you would like this position statement in an alternative format or wish to discuss it with Vision Australia’s Government Relations and Advocacy team, please contact us:

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# Background

The UN Convention on the Rights of Persons with Disabilities recognises the importance for people with disability of full participation in the wide range of economic activities that take place in all societies. The economic environment of the Australian community is founded on and shaped by the various denominations of coins and notes that constitute Australian currency. Mobile banking, contactless payment options, and other associated products and services provided by banks and financial institutions extend and diversify the ways in which currency is used, and facilitate convenient participation in many aspects of economic life.

## Accessibility of Australian Currency

All 6 Australian coins are distinguishable both tactually and visually, and their design has been influenced by the recognition that people who are blind or have low vision rely on these tactile or visual features to distinguish the various coins.

All five denominations of Australian banknotes now have a tactile feature on them. Each denomination has a different number of raised dots. The $5 note has one dot on each of its long edges, the $10 note has two dots on each long edge, the $20 note has three dots, the $50 note has four dots, and the $100 note has five dots. The first note to include this tactile feature was the new $5 note, introduced by the Reserve Bank of Australia in 2016.

The raised dots that comprise the tactile feature are incorporated into the polymer substrate of the note itself, which is designed to maintain the stability of the feature over time.

## Accessibility of credit and Debit Cards

Over the past four decades, the use of physical currency has been supplemented by an increasing number of plastic debit and credit cards provided by banks and other financial institutions. Some of the most popular of these cards have been developed by international companies including American Express, MasterCard and Visa. The uptake of these cards has increased even further during the 2020 COVID-19 pandemic, and the use of physical currency is predicted to decline over time.

It is as important for people who are blind or have low vision to be able to identify and differentiate between various credit or debit cards as it is for them to have an effective way of identifying banknotes and coins. As banks and other financial institutions expand their card offerings, the need for a national, consistent approach to accessibility has become more urgent.

The Australian Banking Association (ABA) is the peak advocacy body for the banking sector, and is therefore best placed to develop, promote and maintain standards and guidelines for the accessibility of banking products and services. In developing guidelines for the accessibility of credit and debit cards, the ABA should have regard to the following general principles, which Vision Australia has formulated through extensive experience working with people who are blind or have low vision:

1. Users should be able to identify tactually and visually the orientation of credit and debit cards so they can be inserted correctly into an ATM or point-of-sale terminal.
2. Users should be able to distinguish tactually and visually between multiple cards (for example, the difference between a MasterCard and a Visa card).
3. Users should be able to identify tactually and visually the cards of specific banks or financial institutions.
4. Users should be able to detect tactually and (ideally) visually the chip that indicates that it is a “tap and go” card.
5. The tactile identification feature of the card should ideally be both braille and tactile/visual print or a tactually-discernible symbol.
6. User testing should be conducted with customers who are blind or have low vision at all stages of the development and deployment cycle.

## Accessibility of Financial Products and Services Associated with Currency

## In 2002 the ABA released four voluntary standards for accessible electronic banking, and for a number of years the adoption of these standards by the major banks and some other financial institutions produced a consistent and comprehensive approach to accessibility in the sector. However, the rapid devolution of technology used in the banking sector, together with changes in customer needs and preferences, has led to many changes in the types of banking services and the way in which they are delivered, and over time the overall level of accessibility declined. Of particular concern has been the introduction of new touchscreen-based interfaces on ATM’s and point-of-sale terminals with insufficient regard to the implications for users who are blind or have low vision and who need to perform PIN entry when making payment transactions.

In November 2018 the ABA released a set of new principles for the accessibility of banking services.

These principles replace the previous voluntary standards, and cover all areas of banking, including general accessibility, digital channels such as websites and mobile banking, device design and use, telephone services, voice activated services or AI and specific areas related to customer authentication.

More information about the accessible banking principles can be found [here](https://www.ausbanking.org.au/accessible-authentication/).

In December 2019 AusPayNet released accessibility guidelines for PIN entry on touchscreens. These guidelines supplement, and are consistent with, the ABA’s accessibility principles.

In order to ensure appropriate levels of accessibility across all banking and products and services, banks and other financial institutions must follow both the ABA’s accessibility principles and the AusPayNet guidelines, together with any other standards and guidelines that may be developed by industry representatives and endorsed by Vision Australia and other organisations in the disability sector.

## Implications of the COVID-19 Pandemic

The COVID-19 pandemic has necessitated various measures to help protect the health and safety of the community, including physical distancing, use of hand sanitisers, and the wearing of masks in certain environments. These measures have implications for customers attending bank branches and using payment devices such as point-of-sale terminals.

Following initial work done by Vision Australia and the Commonwealth Bank, the ABA endorsed a set of guidelines for the provision of in-branch assistance to bank customers who are blind or have low vision. These guidelines are designed to ensure that customers who are blind or have low vision will not only stay safe when visiting bank branches but also receive the assistance they need to do their banking with independence and dignity.

## Review and monitoring

Periodic reviews are essential if consistent and appropriate levels of accessibility are to be maintained in the banking and financial sector.

The introduction of a tactile identification feature on Australia’s banknotes followed some consultation with the blindness and low vision sector. It is essential that the Reserve Bank of Australia implement a plan for ongoing consultation to monitor the effectiveness of the tactile feature. Elements that must be monitored include whether the dots that comprise the tactile feature are easily discernible by touch throughout the life of individual notes, and whether the various note denominations can be distinguished easily by touch in practice. Consultation should include Vision Australia and other organisations that represent the views of people who are blind or have low vision, as well as individuals who are blind or have low vision.

The banking and financial environment is characterised by rapid technological change and innovation in service offerings. It is essential that all current and new banking and financial products and services are fully accessible to people who are blind or have low vision. The replacement of detailed voluntary standards for accessible electronic banking by the higher-level Accessibility Principles for Banking Services marked a new approach to inclusive banking. The Australian Banking Association must undertake a review, at least once every two years, to assess the effectiveness of the Principles as the banking sector continues to evolve. These periodic reviews must be informed by substantial input from the disability sector. A similar review process must be implemented for the AuspayNet accessibility guidelines, and any other standards and guidelines that may be developed to enhance accessibility in the banking and financial sector.

# Position statement

# The design of notes and coins used as currency in Australia must continue to incorporate features that provide sufficient tactual and visual cues to their identification so that all members of the community, including the diverse community of people who are blind or have low vision, can identify them without the need for additional measuring devices or templates. Such currency is referred to as "accessible currency".

1. In order to ensure that banking and financial products and services are inclusive and accessible, All banks and financial institutions must follow the Australian Banking Association’s principles for the accessibility of banking services, the AusPayNet accessibility guidelines for PIN entry on touchscreens, and any other accessibility standards and guidelines that may be developed by the ABA or other industry representatives and endorsed by Vision Australia and other organisations in the disability sector.
2. There is a need for the development and promotion of guidelines for the accessibility of credit and debit cards. The Australian Banking Association is best placed to lead work in this area. The development of these guidelines should be informed by existing national and international experience, including principles that have been formulated by Vision Australia.
3. Banks and other financial institutions have a responsibility to ensure that all customers, including those who are blind or have low vision, can stay safe when visiting physical branches and receive the assistance they need in order to access services with dignity and independence. To help fulfil this responsibility, all banks and other financial institutions must follow the guidelines for the provision of in-branch assistance that have been endorsed by the Australian Banking Association.
4. The tactile feature included on Australia’s banknotes must be reviewed regularly by the Reserve Bank of Australia to ensure that it continues to meet the needs of people who are blind or have low vision. Such reviews must include feedback from Vision Australia and must also involve widespread consultation with the blind and low vision community.
5. All standards and guidelines relating to the accessibility of banking products and services must be reviewed regularly, ideally every two years, to ensure that they are current and reflect national and international best practice. These regular reviews must be informed by the experiences of people who are blind or have low vision.

# About Vision Australia

Vision Australia is the largest national provider of services to people who are blind or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind 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 or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support,

Seeing Eye Dogs, National Library Services, Early childhood and education services, and Feelix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and a national partnership with Radio for the Print Handicapped, NSW Spectacles Program and Government Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia, to strengthen the voice of the blind community.

**Position statement ends.**