



Final report ERPB informal working group on Accessibility

November 2018

DeNederlandscheBank

EUROSYSTEEM



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Executive Summary

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This report contains the analyses conducted by the ERPB informal Working Group on Accessibility (hereafter the Working Group) of accessibility issues encountered in different EU countries. This report contains 'best practice' solutions that have already been implemented to solve some of these issues and looks whether solutions are missing for some issues mentioned. The report is closely linked with the European Accessibility Act (EAA), a European Directive that is currently at the trilogue stage and is expected to significantly improve the accessibility of retail payment services.

In this report, the identified issues and best practices are categorized according to the following five retail payment channels/segments:

- ATMs
- POS terminals and ticketing machines
- eCommerce payment facilities
- mobile retail payment facilities
- cards

The way forward

The Working Group would like to make the following suggestions:

- Accessibility is a relevant issue for the coming years that merits attention from the ERPB.
- All relevant working groups and topics covered by the ERPB should be asked to take accessibility aspects into consideration as part of their assignment.
- Accessibility of mobile payments in particular will become more relevant in the coming years due to the increasing importance of mobile payments and the current lack of good accessibility practices, as the analysis conducted by the Working Group shows.
- The ERPB should revisit the accessibility of retail payments two years after the implementation of the EAA.

1 Introduction

Easy access to retail payments is important to support economic prosperity and growth and to foster consumers' financial inclusion. While the digitalisation of retail payment services can help reduce cost for providers and improve speed and user-friendliness for many consumers, there is a growing number of consumers faced with barriers that prevent them from accessing these payment services. In particular, this concerns older persons and persons with disabilities, but also other vulnerable groups. Together they represent a significant part of European consumers, and their number is expected to grow rapidly over the next decades due to Europe's demographic ageing. According to the European Accessibility Act (EAA), some 120 million persons in the EU will have multiple and/or minor disabilities by 2020.

The EAA, which is a follow-up to the EU's ratification of the UN Convention on the Rights of Persons with Disabilities, is expected to significantly improve the accessibility of retail payment services. In parallel with the finalisation of the EAA, the ERPB created an informal working group to share views on conducting further analyses of the practical issues faced by vulnerable groups of society in the euro retail payments market and on existing best practices. Leaving the issue of retail payments accessibility 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 the reason why the European Commission has also included banking services, ATMs and ticketing machines in the EAA. Furthermore, partly due to the efforts of the Pay-Able campaign, payment terminals have been added to the proposal. The EAA is expected to be finalized at the end of 2018.

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 the EU level to ensure that the supply and demand side of retail payments analyse and pursue common accessibility features together for retail payments in order to achieve coherence and interoperability across SEPA. Thus, cooperation between all stakeholders represented in the ERPB is of key importance.

This report gives the results of the analyses conducted by the ERPB informal Working Group on Accessibility (hereafter the Working Group) regarding accessibility issues encountered in different EU countries, 'best practice' solutions that have already been implemented to solve some of these issues and examines where solutions are still missing for some issues mentioned. However, the analyses cannot be considered to provide an exhaustive picture of the situation in Europe since it does not cover all Member States nor all stakeholders involved in the retail payments ecosystem, but rather illustrates the landscape in the countries represented in the Working Group.

6 The identified issues and best practices are categorised according to the following five retail payment segments covered by the EAA:

1. ATMs
2. POS terminals and ticketing machines
3. eCommerce payment facilities
4. mobile retail payment facilities
5. cards

Furthermore, the report distinguishes the following three categories:

Physical surroundings (e.g. shops, PSP offices)

Devices (e.g. physical terminals, tokens)

Digital environments (e.g. online shops, internet banking)

2 How do we define accessibility?

Accessibility can have different meanings. The Working Group identified several meanings of accessibility in the context of retail payments. First of all, the EAA defines accessibility as follows:

- “Accessible products and services” are products and services that are perceptible, operable and understandable for persons with functional limitations, including persons with disabilities, on an equal basis with others.”

Preferably, the aim of making retail payment products and services accessible should not be to create remedies but to create “accessibility by design”. At the same time, it is recognised there may be individual impairments that may need individual approaches and that not all approaches may be able to meet all concerns.

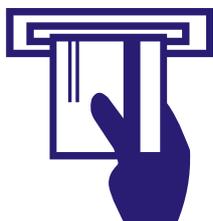
There are other aspects of accessibility not defined in the EAA that concern retail payments and need to be considered as well, but these are beyond the scope of this report. The Working Group identified these issues as follows:

- **Geographical accessibility** is an essential factor in achieving accessibility and in retail payments usually means the physical distance to a bank office, an ATM or another facility where people can access cash, as well as to the ability to physically reach these locations to withdraw cash.
- **Technical accessibility** ensures that products and services are accessible to persons with functional limitations. In retail payments, this means that payment products and services are technically functioning, i.e. the payments devices (ATMs, POS terminals, ticketing machines) as well as the (telecom) connections needed to process a payment are working.

3 Identified accessibility issues and solutions found across countries participating in the informal ERPB WG

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EAA requirements: Annex 1 Section II provides specific accessibility requirements for the design and production, and user interface and functionality design of ATMs, self-service terminals and banking services (Section VI)



ATM's

Issues: Many ATMs are difficult to use by persons with visual impairments and older persons, and – in some cases – wheelchair users. People may find it difficult to see the numbers on the screen or keypad, to hear sounds (especially

in a noisy environment), to press the keys (cf. Pay-Able campaign video) or to access the terminal (e.g. because it is installed too high). Some terminal designs have small screens, small PIN code buttons, poor background light etc.

The lack of harmonization in keypads, screen layouts and transaction processes within and between EU countries is another issue reported as creating barriers both within countries and in a cross-border context. People should be able to follow consistent patterns when using ATMs and POS terminals, which is particularly important for more vulnerable groups.

Solutions that can help solve the above-mentioned issues:

Physical surroundings (e.g. shops, PSP offices)

- An app detects nearby ATMs and gives information on the services it offers (withdrawals, payments, disability-friendly access, withdrawal system for visually impaired people). (1)

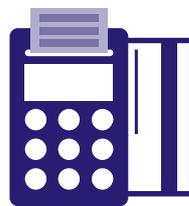
- During working hours in many bank branches staff are available to help persons with special needs to withdraw money from their bank account. (2)
- Some banks offer home delivery of cash, although often at a charge. Moreover, having large amounts of cash at home may increase people's risk of being robbed or burgled. (3) Also, home delivery of cash by bank employees also increases bank staff's risk of physical harm.
- Some terminals are equipped with voice technology to guide persons with visual impairments. Talking ATM services include cash withdrawals, real-time cash deposits, balance enquiries, PIN changes and the option to change the language. (4)



Devices (e.g. physical terminals, tokens)

- Cardless withdrawals: An app allows the customer to access an ATM without cards or PIN, using the QR code on the ATM screen instead. (5)
- Wheelchair accessible ATMs. (6)
- In 2013, the Austrian Association of Blind and Visually Disabled together with major Austrian banks, operators and software developers established a working group which defined harmonized criteria for barrier-free ATMs (https://host23.ssl-gesichert.at/bank4all_at/sites/default/files/Geldausgabeautomaten_Anforderungskriterien.pdf). The ultimate goal is to harmonize the handling of ATMs so that blind or visually impaired people do not need an accompanying person. (7)

EAA requirements: Annex 1 Section II provides specific accessibility requirements for the design and production, and user interface and functionality design of ATMs and self-service terminals. The Pay-Able movement – which includes organizations of persons with disabilities and older persons – has successfully campaigned for user-friendly payment terminals for all EU citizens, and the European Parliament has included payment terminals in the scope of the European Accessibility Act (EAA) (www.pay-able.eu).



POS and ticketing machines

POS and ticketing machines

Issues: The issues regarding POS terminals and ticketing machines are similar to the issues mentioned for ATMs.

Solutions that can help solve the above-mentioned issues:

Physical surroundings (e.g. shops, PSP offices)

- Magnifying glasses available at POS in supermarkets (8)

Devices (e.g. physical terminals, tokens)

- Mobile POS terminals (9)
- The possibility to pay contactless at the POS for transactions below EUR 25; this can be a solution for people who have difficulty remembering their PIN. (10)

EAA requirements: Annex 1, Section VI provides requirements for banking services, websites used for the provision of banking services, mobile device-based banking services, self-service terminals, including ATMs used for the provision of banking services.



Internet payment facilities

eCommerce payment facilities

Issues: As highlighted by the Central Bank of Ireland in a discussion paper published in June 2017¹, 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, the paper highlights that there is an "increased difficulty for firms to identify vulnerable consumers and engage with them accordingly due to the loss of direct, human interaction". (p.28). This challenge is also faced by other public authorities and institutions.

Older people and persons with certain disabilities may experience difficulty in using payment facilities and payment codes; more generally, they may also face problems with the lack of accessibility of payment software.

Solutions that can help solve the above-mentioned issues:

Physical surroundings (e.g. shops, PSP offices)

- Accessible bank offices (11)
- Trained staff: employees who are trained to help persons with disabilities pay their bills, transfer money, etc. (12)
- Training sessions to teach older people how to use electronic banking, mobile banking and

paying online; banks can offer such training on a regular basis, also in cooperation with national senior citizen organizations. (12a)

- Online banking manuals targeted specifically at vulnerable groups (for example in simple language and in large font) (12b)
- At some banks persons with disabilities and older persons can ask for a bank employee to come to their home to help with internet banking. (13)
- A disabled-friendly shuttle service so that frail and disabled people can get to appointments with their banking consultants. If needed, the shuttle service picks customers up, drives them to their branch bank and takes them home afterwards. (14)

Devices (e.g. physical terminals, tokens)

Special tokens to log on to internet banking (with larger and tactile buttons and a voice function). It is also possible to apply a sticker on a token, giving it more grip. (15)

- Some banks also provide the possibility to receive bank statements in braille. (16)
- Special templates for people with visual or motor impairments who wish to make a paper-based credit transfer to make it easier for them to fill in the form. (17)

¹ 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>

Digital environments (e.g. online shops, internet banking)

- Internet banking can be made more accessible by explaining the use in brochures or courses in simple and easy language. (18)
- Involvement of older people and persons with disabilities in creating a website to help make a website more accessible. (19)
- Some banks offer additional communication channels, e.g. the possibility of video calls with advisors or to conduct bank transfers via telephone call (no smartphone required). In addition, some banks offer also the option for deaf people to communicate in sign language with a specially trained staff member. (20)
- Screen reader-compatible websites, so that text can be converted into voice output or braille². In addition, options in Windows and on iPhones or iPads make it possible to adjust font sizes. (21)
- Services which ask users for a phone password and then allow them to make transfers or check their balance by calling their bank. In addition, audio induction loop systems can be offered to customers with reduced hearing ability to help keep confidential talks at a standard sound level and also reduce acoustic misunderstandings. Customers who do not own a hearing aid with a tele coil can borrow a special receiver which amplifies the sound acoustically. (22)

EAA requirements: Annex 1 Section II provides specific accessibility requirements for the design and production, and user interface and functionality design of ATMs, self-service terminals and banking services (Section VI).



Mobile payment facilities

Mobile retail payment facilities

Issues: Mobile banking and payment apps do not always accommodate the needs of people with disabilities. Furthermore, the cost of smartphones can be prohibitive for some social groups

(especially those with upgraded functionalities to address specific problems such as blindness are often expensive and have high subscription fees). Additionally, not all mobile banking and payment apps are easy to use and to navigate for vulnerable groups (e.g. because of small letters or poor colour selections). Apps do not always work well with the built-in accessibility options in smartphones because they are not designed to accommodate sufficiently large fonts and accessible colour schemes. E-wallets tend to lack interaction options for older people and persons with a disability. Often people do not know how e-authentication works and cannot access support services to verify if a transaction has been completed successfully.

² See for more information: W3C on accessibility: <https://www.w3.org/standards/webdesign/accessibility> and Web Content Accessibility Guidelines: https://www.w3.org/standards/techs/wcag#w3c_all.

This – in combination with a feeling of insecurity – is the reason why e-wallets are not widely used among vulnerable groups. There are not many e-wallet apps that are barrier-free.

Solutions that can help solve the above-mentioned issues:

Devices (e.g. physical terminals, tokens)

- Smart authentication methods via apps (such as through the use of biometrics) eliminate the necessity of using a physical token. (23)
- A “document scanning” function captures data with the phone camera simply by framing it. This functionality is very useful to blind people because they do not have to fill in a payment form manually. (24)
- Several banks have introduced voice-controlled mobile banking apps. (25)

Digital environments (e.g. online shops, internet banking)

- Involve older people and persons with disabilities in creating apps. (26)
- By signing up to a “channel access agreement”, customers can link up their smartphone with their digital identity on the internet banking website and use it to generate an access token/easy access. This process can be automated if there is a network connection or generated at the user’s request. This feature has been particularly appreciated by blind users, as it eliminates the need for a physical token. (27)

EAA requirements: Annex 1 Section I provides specific accessibility requirements for general purpose hardware and operating systems.



Cards

Cards

Issues: Some persons with disabilities, and older people, experience difficulty entering the

PIN code required to authorize payments with debit and credit cards, which is a legal requirement to reduce risks for consumers and banks (see also the issues mentioned at POS terminals).

Solutions that can help solve the above-mentioned issues:

Devices (e.g. physical terminals, tokens)

- For low-value payments, contactless cards may reduce barriers, but they still require a PIN from time to time. (28)
- Cards with large print and braille (29)
- Cards with a special crop to help persons with visual impairments insert them in the ATM more easily and faster. However, these cards are sometimes identified as defective and rejected by ATMs. (30)
- A tool to help people with visual impairments and people with limited fine motor skills (for example because of rheumatism) to easily remove a card from an ATM. (31)

4 Other initiatives

Physical surroundings (e.g. shops, PSP offices)

Digital environments (e.g. online shops, internet banking)

Austria:

- The Austrian Federal Act on the Equal Treatment of Persons with Disabilities was adopted by parliament in 2005 and entered into force in January 2006. It also covers banks and prohibits discrimination against disabled persons in public services. (32)
- The principle of equality is enshrined in Article 7 of the Austrian Federal Constitution, which also prohibits discrimination against disabled people. Government web services have to comply with the E-Government Act, which demands barrier-free access possibilities. (33)

Physical surroundings (e.g. shops, PSP offices)

Devices (e.g. physical terminals, tokens)

EuroCommerce:

- Choice and availability of low-cost payment means to all customers is important to retailers. EuroCommerce has written a report on accepting contactless payments and best practices for contactless payments for retailers.³ (34)
- Larger companies, such as Sainsbury's in the UK, have launched their own initiatives. Sainsbury's recently announced a specific pilot shopping

initiative specifically aimed at older persons and persons with disabilities:

<http://www.express.co.uk/news/uk/704934/Sainsburys-start-slow-shopping-trials-help-elderly-vulnerable-customers> (35)

- Many other retailers (e.g. Metro) also recognize their social responsibilities: <https://www.real.de/unternehmen/unternehmensverantwortung/kunde-gesellschaft/> (36)
- In other cases, companies of all profiles are working together; in the Netherlands, for instance, Detailhandel Nederland is actively involved in helping older persons and persons with disabilities by participating in round table discussions about the Accessibility Act with ministries. They are currently developing a project plan, with an emphasis on improving the overall retail environment (including websites). (37)

Devices (e.g. physical terminals, tokens)

Digital environments (e.g. online shops, internet banking)

Italy:

- In the past few years, **ABI Lab**, ABI's Innovation Research Center (www.abilab.it) has been working on the topic of accessibility and technology, in particular with regard to the use of online banking services. In 2003 ABI Lab produced a guideline document for the accessibility of home-banking services. To this end, a special working group with representatives of banks

³ EuroCommerce (2017), "Accepting contactless payments: a guide for retailers"

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and associations for people with disabilities had been set up. ABI Lab has meanwhile updated its previous work, creating new guidelines for the accessibility and usability of mobile banking. Today, several banks take into account accessibility criteria in designing apps so that people with disabilities can also use them. (38)

- In addition BANCORMAT S.p.A., together with ABI and in collaboration with the UICI (Italian Union of the blind and visually impaired) and the FIABA (Italian Association against architectural barriers), has developed guidelines for adapting ATMs to accommodate the needs of both blind and partially sighted people and also people with limited mobility. (39)

Physical surroundings (e.g. shops, PSP offices)

Devices (e.g. physical terminals, tokens)

Netherlands:

- In the Netherlands, three large banks have launched a project to white-label ATMs with the aim of merging their individual networks into one single-brand national ATM network across the country. While coverage will be ensured also in rural areas, the participating banks can save money by reducing the number of ATMs they operate each. In due course, the ATMs in this network will have the same functionalities and offer the same user experience. Other banks and nonbanks active in the Netherlands who did not join the white-label ATM initiative will continue to operate their own ATMs. (40)

Devices (e.g. physical terminals, tokens)

Pay-Able:

- Pay-Able is an initiative started by Eye Association Netherlands as part of the working group on Accessibility of the Dutch National Forum on the Payment System. Pay-Able is committed to striving for user-friendly payment terminals for all EU citizens and has been advocating the inclusion of payment terminals in the European Accessibility Act (EAA). Furthermore, Pay-Able has started a dialogue with payment terminal providers to convince them to design payment terminals which are accessible to everyone. More about Pay-Able: www.pay-able.eu (41)

5 Conclusions and proposed way forward

Conclusions

The analyses conducted by the Working Group show that the retail payment actors represented in the Working Group are aware accessibility is an important issue for consumers with special needs⁴ and are already working on targeted solutions in their constituencies. However, the Working Group is conscious that a few key actors are missing around the table, such as an umbrella organization representing fintechs, bigtechs, telecoms, ATMs and POS terminal manufacturers. Moreover, not all EU Member States are represented in the Working Group. Consequently, this report may not cover all relevant issues and best practices.

While various good practices are already in place across the EU to solve different accessibility issues, these solutions are using different approaches; are often not interoperable with each other; are not available across the EU and difficult to use in a cross-border context.

Furthermore, the Working Group has identified some accessibility issues for which no solution has yet been found.⁵ This is especially the case for mobile payment facilities.⁶

For internet banking facilities, there are various initiatives that facilitate access for persons with disabilities, but some are not easy to use for older persons with multiple disabling conditions or frailty, or require extra support from a trained bank staff which can become increasingly costly to organize for a rapidly growing pool of ageing customers in a context of streamlining of banks' branch presence.

The above-mentioned approaches could lead to additional costs for service providers and may not deliver perfectly interoperable solutions for consumers with special needs. It is also recognised that different forms of disabilities and age-related impairments may require different kinds of solutions and that full harmonisation and interoperability may not be achievable. Indeed, there will always be cases that require something more personalised and do not lend themselves to one-size-fits-all solutions.

What is important, however, is to continue raising awareness of the need for adapted solutions to cater for persons with special needs, in particular in the area of mobile payment facilities and with the involvement of all market players.

⁴ There is no exact data on the number of persons with disabilities in Europe. According to the EAA, due to demographic ageing, in 2020 some 120 million persons in the EU will have multiple and/or minor disabilities. Eurostat uses two sources for the collection of data of persons with disabilities: the LFS ad hoc module on employment of disabled people (which does not cover data on persons over 65) and the EHSIS, which is a database of people facing barriers to participation owing to a long-standing health problem and/or a basic activity difficulty. This database only covers persons with long-term acknowledged health problems.

⁵ See Annex 1 for a detailed analysis of which best practices solve which issues.

⁶ It should be noted that the conclusions drawn in this report are based on the experiences in the countries or the constituencies of the members of the Working Group.

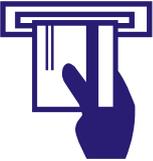
Way forward

The Working Group thanks the ERPB for the opportunity it was granted to work on accessibility issues and is pleased to hand over the final report to the ERPB for its meeting on the 28th of November 2018. The Working Group considers it has fulfilled its mandate as agreed and would like to make the following suggestions for the way forward:

- Accessibility is a relevant issue for the coming years that merits attention from the ERPB.
- All relevant working groups and topics covered by the ERPB should be asked to take accessibility aspects into consideration as part of their assignment.
- Accessibility of mobile payments in particular will become more relevant in the coming years due to the increasing importance of mobile payments and the current lack of good practices, as the analysis conducted by the Working Group shows.
- The ERPB should revisit the accessibility of retail payments two years after the implementation of the EAA.

Annex 1

Analysis of best practices related to the issues described

Payment segment/channel	Issue	Best practices
 <p>ATM's</p>	Difficulty seeing the numbers on the screen	Help from bank branch staff (2); home delivery of cash (3)
	Difficulty hearing sounds in a noisy environment	Voice technology (4); help from bank branch staff (2); home delivery of cash (3)
	Difficulty pressing keys	Cardless withdrawal (5); help from bank branch staff (2); home delivery of cash (3)
	Difficulty physically accessing terminals (e.g. for wheelchair users)	Wheelchair accessible ATMs (6); help from bank branch staff (2); home delivery of cash (3)
	Difficulty using touch screens for users with visual impairments or older persons	Help from bank branch staff (2); home delivery of cash (3)
	Lack of harmonization of terminal interfaces	Pay-Able initiative (41); initiative of Austrian organizations (7)
 <p>POS and ticketing machines</p>	Difficulty seeing the numbers on the screen	Magnifying glasses (8); help from shop employees
	Difficult hearing sounds in a noisy environment	Voice technology (4); help from shop employees; home delivery of groceries
	Difficulty pressing keys	Help from shop employees, that does not affect individuals' payment security; contactless payments (10)
	Difficulty physically accessing the terminal (e.g. for wheelchair users)	Mobile POS terminals (9); help from shop employees
	Difficulty using touch screens for visually impaired users or older persons	Help from shop employees;
	Lack of harmonization of terminal interfaces	Pay-Able initiative (41); initiative of Austrian organizations (7)

 <p>Internet payment facilities</p>	<p>Reduced access to financial products and services for consumers who lack the digital skills necessary for the digitalized financial services environment. Older people and persons with certain disabilities may experience difficulties in using payment facilities to make payments, to use a payment code and more generally face problems with the lack of accessibility of payment software.</p>	<p>Special tokens to log on to internet-banking (with larger and tactile buttons and a voice function) (15); bank statements in braille (16); brochures and courses in simple and easy language (18); involving older people and persons with disabilities in creating websites (19); additional communication channels (e.g. video calls) (20); screenreader-compatible websites (21); services which enable people to make transfers or check their balance by phone after entering a phone password (22).</p>
	<p>Consumers who lack the technology to use digital financial services</p>	<p>Accessible bank offices (11); specially trained staff (12); training sessions (12a); manuals (12b); help from bank employee at home (13); shuttle services to take customers with disabilities to their bank. (14); special templates for people with visual or motor impairments who wish to make a paper-based credit transfer (17);</p>
 <p>Mobile payment facilities</p>	<p>Difficulty in using and navigating apps; compatibility of apps and built-in accessibility options</p>	<p>Involving older people and persons with disabilities in designing apps (26); accessible apps (25)</p>
	<p>Cost of mobile phones</p>	<p>Bank employee coming to customers' homes (13); shuttle services for customers with disabilities (14); banking services by phone (which do not require a smartphone) (22).</p>
	<p>Lack of availability of interaction options with e-wallets</p>	
	<p>Lack of knowledge how e-authentication works</p>	
	<p>E-wallets do not offer support to verify if a transaction has been completed successfully</p>	
 <p>Cards</p>	<p>Difficulty using cards</p>	<p>Cards with large print and braille (29); Special crop (30); a tool to easily remove a card from the ATM (31)</p>
	<p>Difficulty remembering the PIN</p>	<p>Contactless payments (10)</p>

Best practices	Physical surroundings	Devices	Digital surroundings
ATMs	1,2,3	4,5,6,7	
POS terminals and ticketing machines	8	9,10	
Internet retail payment facilities	11,12 (a+b),13,14	15,16,17	18,19,20,21,22
Mobile payment facilities		23,24,25	26,27
Cards	28,29,30,31		
Other initiatives	32,35,36,37	34, 39,40,41	33,38

Annex 2

Mandate of the informal ERPB Working Group on broader accessibility

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

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 actors of retail payments will analyse 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.

The Working Group's goal, objective and task

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.

Even though the Working 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 Working 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 Working Group will be to work further on broader accessibility issues for retail payment users. In conducting its work, the Working 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.

Deliverables and time horizon

The Working Group is expected to start working in May 2017. The Working 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 Working 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.

Participants and chairmanship

ERPB members are invited to participate in the Working Group as active participants. The Working 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 Working Group based on consultation with the members of the Working Group.

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 Working Group on Accessibility.

The Working Group takes positions on a $\frac{3}{4}$ majority basis; dissenting opinions are mentioned in any relevant documents prepared by the Working Group. The members of the Working 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 3

ERPB informal Working Group on Accessibility - work plan

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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.
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.

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.

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 actors of retail payments will analyse 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.

The Working 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 Working 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 Working 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 Working 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 Working Group members will also consult their grass roots members for other relevant papers and examples of barriers and best practice.

The Working 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 Working 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 collect 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

Deliverables	Date	Action
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
Draft report with short-term deliverables (issues and best practices)	Mid-October 2017	Chair and secretariat
Second meeting in Brussels	October 19, 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	February 8, 2018	All members
Fourth meeting in Amsterdam	May 8, 2018	All members
Fifth meeting in Brussels	September 18, 2018	All members
Presentation final report to the ERPB	November 28, 2018	Chair

Resources

The Working 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 Working Group themselves. (For the current members and observers of the Working Group see Annex 4.)

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 Working Group does not limit its work to analysing 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 Working 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.

Annex 4 Composition of the Working Group

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This report is the result of all contributions by the following organizations:

	Name	Organization	Country
1	Ms. Anne-Sophie Parent	AGE Platform Europe (chair)	Belgium (Europe)
2	Mr. Michiel van Doeveren	NCB - De Nederlandsche Bank (co-chair)	The Netherlands
3	Ms. Judith Looman Mr. Dennis Dondergoor	NCB - De Nederlandsche Bank (secretariat)	The Netherlands
4	Ms. Ana Fernández Mr. Pedro Nieto Echeverría	NCB - Banco de España	Spain
5	Ms. Christiane Dorfmeister	NCB - Oesterreichische Nationalbank	Austria
6	Ms. Chiara Dell'Oro	European Association of Co-operative Banks	Belgium (Europe)
7	Mr. Graham Austin	EuroCommerce	Belgium (Europe)
8	Mr. Jean Allix	BEUC	Belgium (Europe)
9	Mr. Volkmar Manns	Deutscher Sparkassen- und Giroverband	Germany
10	Mr. Dirk Stein Mr. Albrecht Wallraf	Association of German Banks (EPC)	Germany (Europe)
11	Ms. Pauline Azzopardi	AGE Platform Europe	Malta (Europe)
12	Mr. Arturo Quiñone Porqueras	CaixaBank	Spain
13	Ms. Nives Coppari	Banca d'Italia	Italy
14	Ms. Roxanne Romme Mr. Jens van Straalen	European Commission, DG FISMA	Belgium (Europe)

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