

## Circulars/Notifications - Banking Conduct & Consumer Protection Department

### BC&CPD Circular No. 05 of 2021

June 21, 2021

The Presidents/Chief Executives,  
All Banks/ DFIs/ MFBs

Dear Sir/Madam,

#### **Policy for Financial Inclusion of Persons with Disabilities (PWDs)**

Persons with Disabilities (PWDs) normally face severe limitations while accessing financial services offered by financial institutions because of a combination of physical constraints and perceptions about their abilities to handle financial matters. There is a need to make banking easy and convenient for them through supportive physical infrastructure, accessible products and services, assistive technologies, and supportive staff interactions. Further, provincial and federal laws prescribe a minimum percentage of PWDs to be employed which need to be properly implemented in financial institutions.

Keeping in view the above, State Bank of Pakistan (SBP) has been issuing instructions from time to time to make financial services accessible to PWDs. However, in order to better facilitate PWDs and to provide detailed regulatory guidance, a comprehensive policy framework has been developed to promote financial inclusion of PWDs. Accordingly, banks are advised to ensure the following:

1. Each bank shall put in place a comprehensive policy framework and strategy document, duly approved by their Board of Directors (BOD), demonstrating their strong commitment to the inclusion of PWDs as customers, and employees. The policy framework and strategy document shall set clear measures to increase financial inclusion of all categories of PWDs including female with disabilities i.e. physically handicapped, visually impaired/ blind, people with hearing and speech disabilities. The policy framework and strategy document shall, at minimum, cover the following:
  - i. **Availability of accessibility infrastructure** - Including stationery forms/ documents in braille script (minimum required list of documents as mentioned at **Annexure-A**) at the controlling offices i.e. Area Office, Regional Office, etc, sign language interpretation services including through digital/ virtual means and ramps at the entrances of branch premises and ATM cabins.
  - ii. **Accessibility audits** of premises (entrance of branches, washrooms, ATM cabins, counters, lockers) as part of branch audit to ensure that proper accessibility infrastructure for all kinds of PWDs is available.
  - iii. **Accessibility of banking products and services** - Giving PWDs priority, special assistance, and due care (e.g. preferential treatment/ out of queue assistance) and recognizing their specific requirements. Considering special needs of PWDs while:
    - a. Developing and delivering banking products and services including provision of financing.
    - b. Conducting marketing activities.
    - c. **Providing access to internal and external Information Communication Technology (ICT), websites etc.**
    - d. Ensuring efficient flow of banking facilities to female PWDs by engaging a female PWD in development of policies, procedures, products and services relevant to them.
  - iv. **Capacity building of staff to facilitate PWDs**
    - a. Ensuring awareness of all employees about the organization's inclusion policy for PWDs.
    - b. Conducting mandatory awareness/ sensitization programs and practical training for branch staff on ways to interact and accommodate PWDs providing them with special assistance and due care.
    - c. Conducting specialized training of the staff on the State Bank's concessionary financing scheme for PWDs.
  - v. **Employment, Retention, and Career Development of PWDs**
    - a. Alignment of HR policies with bank's policy framework to ensure inclusion of PWDs in all HR-related activities.
    - b. Measures for ensuring compliance with the government prescribed job quota for PWDs with at least 25% representation of female PWDs.
    - c. Adequate training to the recruitment staff/ teams to undertake special recruitment drives with less stringent selection/ eligibility criteria for PWDs.
    - d. Alignment of job requirements and skills of PWDs through role-mapping exercises.
    - e. Policies of work-from-home/ Flexi timing for relevant PWDs with adequate facilities and equipment to support performance.
    - f. Programs of internship for PWDs to help them acclimatized to social and communal settings in a workplace environment.
    - g. The HR department shall develop a well-defined, structured and time bound capacity building and career development plan for PWDs. The plan shall at each level of the career progression ladder inter alia cover the training and development needs of PWDs, identify specialized programs/ courses/ workshops along with their duration, list of training centers/ resources persons etc. Provision of adequate training and resources to managers/ supervisors to help them provide support and career development to PWDs shall also be ensured. A periodic progress report about implementation status of the plan shall be submitted to the senior level

management committee mentioned at para 2, below.

h. Further, each bank's gender champion will also look into the matters related to women with disabilities.

**vi. Capacity building of PWDs for their Financial Inclusion**

- a. Financial literacy and awareness sessions through education and experiential learning interventions including account opening, account operation, and timely processing of their financing requests.
  - b. Orientation sessions on the usage of accessible digital banking platforms such as mobile banking, internet banking, and telephone banking.
2. The banks are required to submit their BOD's approved policy framework and strategy document to SBP for information latest by September 30, 2021. The senior-level management committee already constituted under BC&CPD Circular No. 01 dated November 30, 2020, shall also be responsible for the implementation of the policy and strategy and shall present a detailed progress report to the BOD on a half-yearly basis.
  3. The banking industry through the platform of the Pakistan Banks Association (PBA) shall collaborate to designate some branches as Model Branches specialized in serving the PWDs while also catering to the needs of the general public. In this regard, each bank shall designate and establish the Model Branches in each province by March 31, 2022 under the following criterion:
    - i. 01 model branch in each province if total number of branches of a bank are 25 to 200.
    - ii. 02 model branches in each province if total number of branches of a bank are 201 to 500.
    - iii. 04 model branches in each province if total number of branches of a bank are 501 to 1000.
    - iv. 06 model branches in each province if total number of branches of a bank are above 1000.
  4. In the first phase, no big city will have more than three (3) model branches to diversify and to optimally utilize the Model Branch network. Banks shall, at the PBA level, decide to establish at least two model branches each in AJK and GB area in the first phase by March 31, 2022. If deemed necessary, SBP in consultation with the industry may also develop criteria based on which some banks may be required to establish more than two model branches each in GB and AJK. Each Model Branch shall at minimum ensure the following:
    - a. Entrances at branches and ATM cabins are accessible for PWDs (e.g. for wheelchair users via ramps and railings, and people with visual disabilities via tactile flooring, etc.).
    - b. ATMs are height adjusted for wheelchair users and have voice command options.
    - c. ATMs are retrofitted with light notification options for hearing and speech affected customers to draw their attention towards any important notifications.
    - d. Counters are height adjusted for wheelchair users.
    - e. Separate token system, dedicated counters and help desks are available for PWDs.
    - f. Lockers areas are wheelchair friendly.
    - g. Sign language interpretation services through digital/ in-person interpreters are provided.
    - h. A video calling option is available with sign language facilitation for people with hearing and speech disabilities for troubleshooting, card activation, and day-to-day queries on customer support platforms.
    - i. All related stationery, forms/ documents, etc. include braille script.
    - j. Dedicated parking spaces are allocated for PWDs.
    - k. Financing products specially designed for PWDs are available.
    - l. Staff is well qualified/ well trained on etiquettes of dealing with PWDs.
    - m. Account-opening officers are well versed with accommodations required by PWDs.
    - n. Awareness and training of basic sign language is provided to at least one branch staff.
    - o. A few PWDs are employed as a regular staff with following arrangements:
      - i. Accessibility of all office space through ramps and railings
      - ii. Accessibility of cubicles through wheelchair
      - iii. Wheelchair suitable door designs, door handles and hallways/ corridors
      - iv. Tactile flooring and signage throughout office spaces and accessible washrooms
      - v. Documentation printed in braille for employees with visual disabilities
      - vi. Availability of screen reading software on bank laptops/ computer systems
      - vii. Employment of sign language interpreters for supporting communication of deaf employees within teams and departments
  5. Banks shall take necessary measures for creating awareness amongst PWDs and the general public through various means including notice boards outside the branch, print and electronic media, **websites**, etc. about the availability of Model Branches in different cities.
  6. In addition to the above, all banks/ MFBs/ DFIs shall mandatorily construct ramps at all newly opened and existing place of business (excluding Mobile Banking Units) to make them accessible for PWDs and wheelchair users. The quarterly implementation report on the two-year time-bound action plan (**Annexure-B**) to construct ramps at all the existing places of business shall continue to be submitted to this department within 15 days after the end of each quarter on the formats placed at **Annexure-C** and **Annexure-D**. Till the completion of two-year time bound action plan, the banks shall inform the PWDs through **website/notice boards** about the availability of nearby branches that have ramps. The banks shall also

maintain an updated list of addresses of such branches on their websites.

7. For providing visually impaired/ blind persons with equitable access to banking and financial services through banks/ MFBs, general guidelines have been placed at [Annexure-E](#). The guidelines inter-alia contain instructions about opening and operation of bank account, cash withdrawal/cheque book facility, Credit Cards, ATM/ Debit Cards, phone/ internet banking, lockers, and extension of loans. Further, MFBs are also required to ensure availability of stationery forms/ documents in braille script (minimum required list of documents as at [Annexure-A](#)) at the controlling offices i.e. Area Office, Regional Office.
8. Furthermore, the banks/ MFBs shall keep on collaborating to ensure that in an area/ vicinity where various banks/ MFBs are operating, at least one branch is having a Talking ATM for the facilitation of visually challenged persons and shall take measures to inform the general public about the availability of the same.
9. These instructions shall be applicable with immediate effect and supersede all earlier issued regulatory instructions notified vide various circulars issued by BC&CPD and BPRD from time to time. Failure to comply with these instructions will invoke penal action under the provisions of Banking Companies Ordinance 1962.
10. Please acknowledge receipt.

Encl:

[Annexure- A](#)  
[Annexure- B](#)  
[Annexure- C](#)  
[Annexure- D](#)  
[Annexure- E](#)

Yours truly,

Sd/-

**(Asif Mahmood)**  
 Director

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