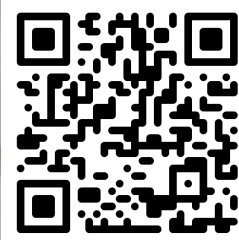


# Access for d/Deaf customers in banking & credit



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# Foreword

**'Financial services impact all areas of life. That's why it is so important that we in the UK do all we can to have a fully inclusive financial services industry that works for everyone, regardless of access need.'**



**Tom Pursglove MP, Minister of State for Disabled People, Health and Work**

Last year saw the Government come together to introduce the BSL Act 2022. This Act ensures that British Sign Language (BSL) is a recognised language of England, Scotland and Wales. Work on the Act and its implementation, together with the tireless work of d/Deaf advocates and organisations, has shone a spotlight on the needs of BSL users. I am pleased to see a further spotlight shone on these issues through this report, which uses insights obtained by listening first-hand to the lived experiences of d/Deaf people and their families to further evidence people's needs in a banking context.

The UK's financial services sector is world leading. In many ways, it has been a leader in offering new services that enable d/Deaf people to communicate more easily. However, as this report shows, there is still more to do. The findings highlight both the risks and barriers still facing d/Deaf customers and opportunities for best practice. I'm sure that this report will prove an invaluable tool to help the financial services industry address remaining areas of inaccessibility for d/Deaf people. As such, it is an important step towards the shared goal of ensuring that all consumers can bank in a way which is accessible for them.

I am grateful to Kathryn Townsend of Nationwide, Disability and Access Ambassador for Banking, for making accessibility for d/Deaf customers and those with hearing loss one of her priorities whilst in post. Leaders like Kathryn support and enable others to make their services more accessible and encourage initiatives such as this. And when organisations like the Lending Standards Board sit up, take notice and act, we really see important improvements that can transform the day to day lived experiences of d/Deaf people.'

# Executive summary

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'Putting accessibility at the heart of design and delivery helps ensure that every customer can have full and independent access to banking and credit. d/Deaf customers and those with hearing loss need products and services which reflect their circumstances, and they should be offered support that is suitable for them. By using this report to consider how they currently treat d/Deaf customers and those with hearing loss, firms can continue to improve to deliver better outcomes for all.'



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## Emma Lovell, Chief Executive of the Lending Standards Board

It is vital that banking and lending products are inclusive for the different types of customers across the UK. If not, some people will be left behind, unable to access the products and services they need. For d/Deaf customers and those with hearing loss, there is such a risk of financial exclusion. Within this report, we look at key considerations to deliver the tailored and responsive support required. This is applicable to those firms registered to the Standards of Lending Practice (the Standards), along with currently non-registered firms.<sup>1</sup>

There is a need for an understanding of d/Deaf cultures and the different ways d/Deafness and hearing loss can affect people. This is not currently thought to be well understood and can lead to inaccessible and inappropriate communication options for some customers. For example, the reliance on written communication, such as through letters or digital channels, is unsuitable for some d/Deaf customers.

Because of challenges faced when accessing banking and credit, many d/Deaf customers rely on the support of third-parties. Firms need to be confident that their processes and practices relating to third-parties are effective, especially in relation to d/Deaf customers. They also need to

be aware that having a third-party representative in place does not necessarily resolve or mitigate any access needs the customer may have.

*d/Deaf customers want parity of service and outcome with hearing customers. Being driven to use third-parties to access their banking and lending does not achieve this – support services that assist independence does.*

There are a number of areas that firms should consider in relation to d/Deaf customers and those with hearing loss. These include raising the awareness of staff as to how d/Deaf customers may require support and how a tailored approach should be taken. Relatively simple steps can be greatly beneficial, for example, allowing d/Deaf customers the time and space to communicate their way. Equally, appointing champions within firms who can educate and advise colleagues on specific access needs, including for d/Deafness and hearing loss, could help raise standards and contribute to an inclusive culture.

<sup>1</sup> LSB, Registered firms

# Background

'The assumption from bank staff is that you can write down a message to a BSL user and they will understand it. The awareness that this is not the case is not there.'

## Eva Newberry – Expert by experience

For this report, we engaged with a number of individuals who are experts either by profession or experience, but usually both. We conducted interviews to understand their experience of banking and credit in relation to accessibility, and we sought to understand how firms may improve in this area. We are grateful to all the participants for their involvement and insight.

Within this report we refer to d/Deaf customers and those with hearing loss. The RNID describes how 'British Sign Language (BSL) is the language of the Deaf community in Great Britain, which has its own set of social beliefs, behaviours, art, history, and values. People in the Deaf community describe themselves as 'Deaf' with a capital 'D' to express their pride in their Deaf identity.'<sup>2</sup> We have also used the lower case d and 'those with hearing loss' to describe all other customers who may require additional support due to hearing loss, but who may not think of themselves as part of the Deaf community.<sup>3</sup> Because of these different communities and cultures, it is important that customers are treated as individuals rather than as a homogenous group.

Hearing loss can impact people in a number of different ways. This is affected by a variety of factors, for example, when the hearing loss occurred (whether from birth or later in life), the support the person may have, their ability to communicate with others (for example, use of BSL), and more. From a banking and financial services perspective, there is not a single type of approach that will always work for every d/Deaf customer or those with hearing loss.

The RNID produce figures that demonstrate the impact of deafness and hearing loss across the UK.<sup>4</sup>

## Personal experience from the LSB

I can find bank branches a little intimidating. I am profoundly deaf and find the make-up of branches can include physical and environmental barriers to my being able to communicate. This includes things like the security glass the bank staff may sit behind, which can muffle conversation, to the ambient noise on a Saturday afternoon which I can find overpowering.

I find it second nature to assess situations and environments I am in, to gauge if I'm likely to be comfortable and, if not, to work out any strategies which might help. But it can feel as though, no matter what I do, it's never enough to make my experience in branches as smooth as it could be.

For example, I have waited in line to be served, working out and rehearsing in my head what the first thing I am going to say will be, so that I'm being as clear as possible. And once I had been called to a window, I am then asked follow-up questions whilst the member of staff looks at their keyboard and monitor. When I told the member of staff I relied on lipreading and asked them to look at me when speaking, they did so, but so much more slowly and loudly. This also made it difficult for me to understand them.

Some recent changes have made a positive difference for me, for example, I've noticed an increase in the number of branches that are 'windowless,' where you can interact directly with staff members. Changes like these in the architecture of branches can make such a positive difference for accessibility.

## Hugh Webster – Insight Manager

It is possible that some banks and lenders underestimate the number of customers who have hearing loss. For example, in the UK, it affects more than 40% of people over 50 years old and 70% of people over 70.

<sup>2</sup> RNID, [British Sign Language](#)

<sup>3</sup> Inclusion London, [The Cultural Model of Deafness](#)

<sup>4</sup> RNID, [Facts and figures](#)

# 12

**million adults** - estimated number of adults with hearing loss greater than 25 dBHL. Hearing loss at this level is described as 'mild hearing loss' and it can 'sometimes make following speech difficult, particularly in noisy situations or for long periods of time. People start avoiding social situations.'

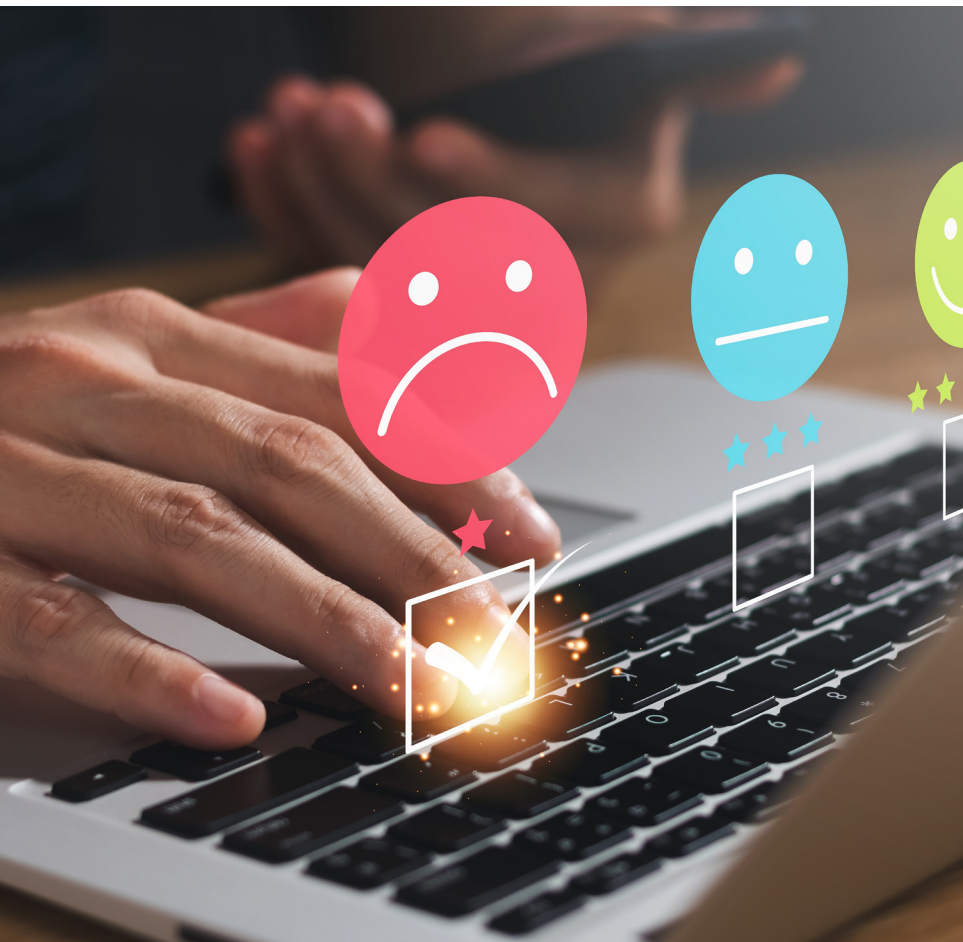
# 14.2

**million adults** – estimated number of adults with hearing loss in the UK by 2035.

# 1.2

**million people** – approximate number of people with hearing loss greater than 65 dBHL. For context, hearing loss ranging from 40-69dB can result in 'difficulty following speech without hearing aids.' For hearing loss between 70-94dB, people 'usually need to lipread or use sign language, even with hearing aids. May be eligible for cochlear implants.'





- Customers may rely on third-party support to facilitate access without disclosing the reason for it.

- Information relating to accessibility needs is not collated due to concerns relating to privacy.

- Legacy systems and/or mixed customer relationship management platforms result in information being recorded inconsistently.

This can make it difficult for firms to get a clear picture of how many customers may require additional support. Without this information, it is hard to say how those customers are being treated. For example, firms cannot conduct journey reviews for d/Deaf customers if they cannot first identify those customers.

Assessing the level and themes of complaints is a regularly used way to identify where things are going wrong.<sup>5</sup> If there is a low level of complaints relating to accessibility, it may be tempting for firms to think that there is not an issue. However, this risks painting an inaccurate picture, especially if the complaints process is itself inaccessible. Similarly, if the whole journey is inaccessible, it is unlikely that those people requiring additional support will be able to become customers in the first place.

During its wider Insight work, the LSB has heard that some firms do not always believe there is a problem with accessibility because there are low numbers of complaints relating to it. Firms should be cautious of relying on complaint volumes as an indicator of good customer outcomes when it comes to accessibility. Firms should also check that complaints processes are themselves accessible.

<sup>5</sup> FCA, [DISP – 1.3.3](#)

## A hidden problem?

‘When it comes to complaints, I think the process is harder than it would be for a hearing person, and you would think that the process should be easier.’

**Rob Heaton - Family of d/Deaf adults**

Firms use a variety of metrics and methodologies to understand their customer base and how products and services are working. For example, by using management information (MI) on customers falling into arrears, firms can gain insight on the effectiveness of their underwriting practices and/or any external factors impacting customers. When MI relates to data around certain transactions or customer histories, such as those relating to keeping up with payments, firms can get a clear picture of what is going on due to the breadth of available data. However, when looking at an area such as accessibility, this may be more complex.

There are a number of reasons for this, some of which may include:

- Firms may not have a method to record accessibility needs.

# Tailored support

d/Deaf customers are individuals and need to be treated as such. Their particular needs will differ and so any policy to support d/Deaf customers should take this into account. For example, some d/Deaf customers will use BSL, while others will not. This could be for various reasons, from their age or how they were educated as children, to when they acquired their hearing loss, or personal preference.<sup>6</sup> Some d/Deaf customers will have a deep sense of belonging to the wider Deaf community, for example, by socialising with or learning from other d/Deaf people. The Deaf community has its own culture, one that is profoundly different from those shared by hearing people.<sup>7</sup> For banks and lenders, understanding this could help deliver products and services that are more targeted and appropriate for d/Deaf customers.

It was raised during the interviews that there is often an overreliance on written English to communicate with d/Deaf customers. There was a strong feeling that firms do not recognise that this can be inaccessible. This is because some d/Deaf customers, for example, those who have been d/Deaf since birth, use BSL as their first language. Because of this, English may be inaccessible for them and they could be excluded by not having communications in BSL. BSL is its own language and is recognised as a language of England, Wales, and Scotland.<sup>8</sup>

Various things can contribute to bad outcomes for those d/Deaf customers who cannot read or communicate comfortably via written English. Firstly, there is the potential for firms to think that written communications are automatically accessible for d/Deaf customers – leaving some customers adrift. Secondly, customers need to rely on friends, family or other third-party support to read and potentially translate the written communications for them. This can lead to delays between receiving firm communications and knowing their content. If communications are time sensitive, such as relating to fraud or late payments, this could contribute to a poor customer outcome. Lastly, it creates a reliance on third-parties and means that, when compared to a hearing person, d/Deaf customers are not truly independent and equal in how they interact with their bank or lender.

For this report, the LSB reviewed the websites of every firm registered to the personal Standards to look at the support options available for d/Deaf customers and those with hearing loss.

The table on page 9 shows the prevalence of different types of support options.<sup>9</sup>

During our interviews, there was a widespread perception that even when there are options that may be suitable for customers, staff often do not know about them or how they work. It is important to note that without adequate training to ensure staff are aware of any options for d/Deaf customers, it is unlikely the available alternatives will be offered or provided in an adequate manner.

d/Deaf customers differ in their needs and preferences and so firms should consider whether their support options are suitable for their customers. For example, induction loops are the most prevalent support tool across firms. Induction loops can be extremely helpful for certain customers who use hearing aids or cochlear implants.<sup>10</sup> However, they are not suitable for certain d/Deaf customers, for example, those who were born d/Deaf and communicate using BSL. Staff should understand what options are appropriate for which type of customers, and when unsure, should have clear escalation channels to find the best solution for the customer.

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'I am an intelligent lady, I have my own professional career in management, and yet I can't effectively deal with my own bank account because a lot of it is telephone based.'

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**Lesley-Anne Harris – Expert by experience**

<sup>6</sup> UCL, [DCAL Sign Language Facts](#)

<sup>7</sup> British Deaf Association, [What is Deaf culture?](#)

<sup>8</sup> Gov.uk, [British Sign Language Act 2022](#)

<sup>9</sup> Of firms registered to the personal Standards – March 2023

<sup>10</sup> Hearing Link Services, [What is a hearing loop?](#)



Option	Prevalence	Considerations
Induction loop	88%	<ul style="list-style-type: none"> <li>• Only suitable for those with hearing aids or cochlear implants.</li> <li>• Designed to reduce background noise for users in places like bank branches.</li> <li>• The sound received is customised to the user's own equipment.</li> </ul>
Text relay	87%	<ul style="list-style-type: none"> <li>• Usable without needing specialist equipment.</li> <li>• Not suitable for those wishing to converse in BSL or who are less confident using English.</li> <li>• Not necessarily suitable for explaining detailed information like terms &amp; conditions.</li> </ul>
BSL branch	65%	<ul style="list-style-type: none"> <li>• Not necessarily suitable without additional support, such as note-takers.</li> <li>• Suitable for those wishing to converse in BSL.</li> <li>• Often has to be pre-booked some time in advance, making it less helpful for day-to-day use.</li> </ul>
BSL remote	59%	<ul style="list-style-type: none"> <li>• Relies on video interpreters being available immediately.</li> <li>• Allows users to see visual and verbal cues others exhibit.</li> <li>• Can enable those who wish to converse using BSL to do so with little to no prior notice.</li> </ul>
Lip speaker	37%	<ul style="list-style-type: none"> <li>• Suitable for those who rely on lipreading to communicate.</li> <li>• Can be silent or verbal, and can sign whilst lipspeaking, depending on the user's preferences.</li> <li>• Requires the user's first language to be English.</li> </ul>
Note taker	12%	<ul style="list-style-type: none"> <li>• Allows users to focus on the conversation, without relying on their memory to recall information.</li> <li>• Less likely to be useful by itself than in conjunction with other options, such as a live interpreter.</li> <li>• The type of notes taken will need to be agreed in advance, which can limit interactions.</li> </ul>
Text to BSL webpage translation	6%	<ul style="list-style-type: none"> <li>• Usable on demand.</li> <li>• Suitable for native BSL users.</li> <li>• Suitable for explaining detailed information like terms &amp; conditions.</li> </ul>

# Third-parties

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'I feel like banks treat us like second-class citizens. We're almost like an afterthought.'

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**Lesley-Anne Harris – Expert by experience**

d/Deaf customers and those with hearing loss may have to use third-parties to interact with banks and lenders. This support may be required for a variety of reasons, for example, to understand certain communications (such as for those for whom BSL is their first language), or to contact firms (such as for d/Deaf customers who cannot use the phone). Within the interviews, it was raised how this can create a number of barriers to access and was viewed as a stumbling block for customers trying to manage their money.

It was stressed throughout our interviews that d/Deaf customers want parity with hearing customers in how they are treated and how they can interact with firms. However, in cases of inaccessible banking and lending services, customers can feel 'forced' to use third-parties. Someone else, whether it be a friend, family member, or interpreter, needs to be involved and this creates a lack of privacy.

It was also raised how firms relying on third-parties to



support d/Deaf customers creates pressure on family members and friends. As a child of deaf adults (CODA), one interviewee explained that she had to go through all the written correspondence sent by the bank for her BSL using mother. Alongside her own life and professional career, she would then have to contact the bank for anything relating to her mother's finances. This is not because her mother does not want to do it herself. Instead, it is because the lack of BSL friendly communications means she has no choice but to have her daughter do it for her.

For any d/Deaf customers without family or friends to help them, this compounds the problem of inaccessibility and risks leaving certain customers financially excluded.

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'A bank might say "can't you bring a family friend? Can't they act as an interpreter?" But that isn't appropriate at all. It's my banking. It's my business.'

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**Tim Scannell – Expert by experience and Signly ambassador**

## Fraud and scams

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'If I disclose on the telephone that I am profoundly deaf and wear cochlear implants, it unfortunately doesn't make any difference to that person or how they interact with me.'

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**Eva Newberry – Expert by experience**

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'I cannot say awareness too loud. You don't need to know everything; you just need to be aware.'

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**Treana Noakes – Expert by experience**

The reliance on third-parties to help d/Deaf customers and those with hearing loss was said to lead to a higher potential for fraud and scams. This is because as d/Deaf customers often need to rely on another person to interact with firms, they have to share their personal information and/or give sight of their accounts to others. Alongside fraud and scams, d/Deaf customers could also be at a higher risk of financial abuse. This is due to the potential reliance on partners for access to their banking and lending services, with the potential to be 'cut out of the loop' regarding what is happening with their accounts.

When considering information provided on scams, fraud, and financial abuse, firms should think about whether this information is accessible to those with additional needs. It could be that a d/Deaf customer has concerns about what is happening on their account but is unable to find information about what to do about it.

Firms need to strike a balance between having services that are accessible, that allow for third-party support when required, but that are also secure. When considering accessibility, as well as looking at the ways customers access products and services, firms should include reviewing their security measures. For example, if one-time passcodes or other verification measures are inclusive and suitable for d/Deaf customers and those with hearing loss.

If d/Deaf customers are victims of fraud, scams, or financial abuse, any investigation and remediation process should take into account their particular circumstances. For example, within the Contingent Reimbursement Model Code (CRM Code)<sup>11</sup>, a customer being d/Deaf could have a material effect on the decision to reimburse, especially if their accessibility need made them particularly vulnerable to a scam. All fraud or scam staff should be trained to identify and support customers with additional needs, including those relating to accessibility, and it should be accessible for a scam or fraud to be reported by d/Deaf customers.

<sup>11</sup> LSB, [Contingent Reimbursement Model Code \(CRM Code\)](#)



needs they may encounter. This means that staff can recognise instances that may require additional support or a more tailored journey, whilst also understanding the options available to the customer. For example, there is little use in a firm offering BSL interpreters but not training their first line staff on how to access that support. First line teams also need to be updated when technology and support systems improve or are adopted by firms.

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'From what I have seen with my parents, marketing is not aimed at deaf people; it's not written by deaf people or BSL users. It needs to be about understanding the culture of the people you are trying to reach.'

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**Rachel Vann – Child of deaf adults**

<sup>12</sup> RNID, [Deaf Awareness](#)

<sup>13</sup> NIDCD, [American Sign Language](#)

## Awareness

Firms should think of raising awareness across two elements – staff awareness and customer awareness. Staff awareness relates to increasing staff knowledge of the challenges d/Deaf customers and those with hearing loss face and how they can support those customers.<sup>12</sup> Customer awareness relates to telling customers that staff have received training and are equipped to help d/Deaf customers.

Customer awareness could be achieved in a number of ways – a 'kitemark' system or similar was suggested as a possibility, or communications and adverts to tell customers that staff are willing and able to help. The 'kitemark' suggestion would involve a logo or other type of sign to customers that relates to d/Deafness. It was suggested

that such a move could improve d/Deaf customer confidence and remove some of the anxiety or worry that accompany dealing with financial matters.

Any imagery relating to d/Deaf customers should be reviewed to confirm they are appropriate. An example was provided of a bank's accessibility page which showed someone using sign language. Presumably, the intention was to raise customer awareness and promote d/Deaf inclusion. However, on this UK website, the image showed someone using American Sign Language (ASL).<sup>13</sup> ASL is a different language to BSL and this would have been immediately apparent to any BSL user, potentially creating a feeling of disconnect or inauthenticity.

Within the LSB's previous report on accessibility and [inclusion in business banking](#), we discussed the importance of raising staff awareness of the various access

# Timing

Access needs of any type, including deafness and hearing loss, can mean that certain tasks take longer to achieve. For d/Deaf customers and those with hearing loss, there may be many reasons why additional time is needed. For example, if an interpreter is required for a branch visit, this could take two weeks to arrange. There should be flexibility built into processes and products to allow more time for the completion of certain tasks (for example, applications) when required.

During our interviews, it was mentioned that having staff slow down in how they communicate can make a great difference for some customers with hearing loss. This could be the case where, for example, a customer wants to lipread and a slower pace with greater enunciation is beneficial for the lipreader. It was recognised that the busy nature of branches and the pressures on staff, such as if a queue is forming, means that services can sometimes be rushed. This is especially detrimental to those customers who may require a more bespoke service due to a support need.

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'For me, time is a big impact and often a negative impact because everyone's in a rush. I need people to not be in a rush when I'm talking about finances, I need them to be present for me and my situation. Not looking at the customer in the queue tutting because I'm taking too long.'

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**Treana Noakes – Expert by experience**



# Champions

Having internal 'champions' – colleagues representing certain customer groups or access needs – can be a good way of increasing awareness and promoting best practice. For example, 'hearing loss champions' could be those with lived experience of hearing loss or those who receive further training on hearing loss and its implications. These champions could be a point of contact for others with questions, conduct training, or deliver awareness sessions.

One interviewee, who is a BSL user, raised how when she previously worked in a firm's branch network, she wanted to make others around the firm aware that she had that skill and knowledge. This was in order to be a point of contact and to help colleagues and customers who may require support with BSL. There was no clear way of flagging this within the firm, nor of sharing her knowledge beyond those within her direct network. Firms should consider whether staff are able to share skills and experience to benefit others.

Champions can also be used within the design stage for products and services. Early involvement allows accessibility to be a focal point from the beginning, rather than discovering an issue with accessibility post-launch. Having champions or other experts by experience involved in the design process brings a different point of view and expert knowledge that can spot risks others may not. For example, a d/Deaf person's knowledge of their culture may highlight risks about providing customer help in a written format because of some d/Deaf customers lower levels of literacy.

Champions can review processes and products to provide feedback and points for continuous development. Measuring success when it comes to accessibility may be challenging for firms, for example, if they do not currently have a good measure of the number of d/Deaf customers they have. One method suggested for measuring success was using d/Deaf customers, CODAs, champions, and other experts to feed back on new initiatives brought in to improve access. Such a review system can give firms confidence when they are getting it right and highlight further areas for development when needed.

Firms should look to utilise the skills and experience of colleagues who have other access needs. This can be achieved by promoting a culture where

colleagues are invited and encouraged to discuss their personal experiences or provide feedback on what works for them when accessing products. Some colleagues will not wish to promote or discuss personal issues such as a disability or an additional need, and their wishes must be respected. However, some staff may be willing to share insight on their situations, especially if they feel it is listened to and utilised to deliver better products and services for customers.

During our interviews, it became clear that one potential impact of inaccessible products and services across the industry was the limiting of choice. d/Deaf customers may be attracted to a particular bank or lender because their services are more accessible than others. Whereas a hearing person could shop around for better rates or the best product for them, d/Deaf customers were said to often be limited by which products they could comfortably access.

By continuing to review how all customers access banking and credit, firms can continually develop so no one is left behind. This is particularly important at this time, as the pace of innovation and change in the digital space brings both opportunities and risks. The opportunities include that more customers may be able to access the right products and services for them, in a way that most suits their needs. The risks are that there are groups of customers who are forgotten during the design and delivery stage, with exclusion occurring as a result. The LSB will continue its work on accessibility and engage with our firms to promote better outcomes for all customers, regardless of need.

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'The tools available can be very useful, but whatever they are, tools are not a silver bullet solution.'

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**Rob Heaton - Family of d/Deaf adults**



We would like to thank Nationwide for its support in hosting the launch event for this report. We would also like to thank Kathryn Townsend and her team for their insight during the writing of it. If you have any comments about this piece, please contact us using the details below or by emailing [insight@lstdb.org.uk](mailto:insight@lstdb.org.uk). We are keen to receive feedback on this piece and you can provide it by using the QR code at the end of this document.

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