

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

Industry Comments		
General Comments:	Ref	CBB's Response
<p><b>A Bank</b> recommends that the branches of foreign banks in Bahrain with single branch with small operations and having only onsite ATMs be exempted from offering the products and services mentioned in clauses BC-10.1.3, BC-10.1.7, BC-10.1.8, BC-10.1.13, BC-10.2.1 - BC-10.2.6, BC-10.3.1 and BC-10.3.2 for visually and hearing impaired customers.</p>	<b>GR-1</b>	The rules will not be applicable for foreign branches and financing companies.
<p><b>A Bank</b> stated that it has a small retail customer base in Bahrain, it does not maintain any account for people with special needs at the moment. In addition, in the Bank's view, considering the resources required, meeting the proposed requirements should be optional and up to each bank's business decision and services offered. It further stated that the CBB might even think of making the new proposed requirements compulsory to <u>banks with a certain size of retail business and considering their Branch and ATM network</u>, as for example it will not be feasible nor cost-effective for a bank like us having only the Head Office and one Branch with two ATMs.</p>	<b>GR-2</b>	The rules will be applicable for locally incorporated banks only.
<p><b>A Bank</b> stated that it primarily serves expat customers who are working in Kingdom of Bahrain, and given the fact that majority of its customers are non-Bahraini, expat workers in the Kingdom, in all probability they would not come under the definition of disabled customers. In addition the size of the Bank's operation in Bahrain is very small and has a very limited number of ATMs (only 4 on-site). In this connection, the Bank kindly asks the CBB to exempt banks who are having less than 10 ATMs from the new proposed technology.</p>	<b>GR-3</b>	Please refer to GR1 & GR2 above
<p><b>A Bank</b> suggests that all guidelines relating to provision of banking and financial services to the Disabled customers be consolidated under a single section in the CBB Rule Book in order to enable banks and financial institutions to address the requirements in a holistic manner.</p>	<b>GR-4</b>	Noted. The new requirements incorporated in one section under BC10.

## Specific Comments:

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

Reference to the draft Directive:	Comments	REF	CBB's Response
<p><b>Glossary:</b> <b>Definition of the disabled:</b></p> <p>For the purpose of the CBB Rulebook “disabled” means: all those who suffer from permanent total or partial physical or sensory impairments as a result of illness, accident, congenital or hereditary factor that may prevent them from accessing banking and financial services on an equal basis with others. These are the customers who have the ability to make their own decisions but they need assistance to do so due to their circumstances. Disabled includes visual impairments and blind, hearing impairments and physical impairments.</p> <p>People who have limited ability to take their own decisions (mental impairment) do not fall within this definition.</p>	<p><b>A Bank</b> requested the CBB to confirm if the individuals/customers should be allowed to classify themselves as disabled while specifying the disability faced, and should be required to provide a registered medical practitioner’s certificate to substantiate such claim. To avoid any unpleasant situation and also to prevent abuse of the benefits, banks must neither classify on its own nor simply accept such a claim without an authentic documentation from a professional. It is unclear from <b>the CBB’s definition of ‘disabled’ whether ‘incompetent and disqualified persons’</b> as defined in the Law on the Trusteeship of Minors Funds are included. Request that the CBB clarify this point.</p> <p><b>A Bank</b> requests further clarity on how to identify disabled as per this definition and which customer is not. Will there be any certificate or documents issued to these individuals by the government since bank staff may not be in position to apply right judgment since the definition is broad and staff may fail to identify all kinds of disabilities.</p> <p><b>A Bank</b> stated that the current definition of the term is generic and hence would result in subjective treatment by different banks. Particularly, since it is proposed to provide several facilities including waiver of fees and charges, it is recommended that the “disabled” customers are identified based on the Certificate issued by the Ministry of Social Affairs to ensure equal treatment across banks and a clear understanding from customers of the banks.</p>	<p><b>SP1</b></p> <p><b>SP2</b></p> <p><b>SP3</b></p>	<p>BC-10.1.1 will be amended as follows:</p> <p><u>Disabled customers</u> must be identified based on the certificate issued by the Ministry of Labour and Social Development or a medical certificate issued by a qualified doctor.</p> <p>Please refer to SP1 regarding disabled customer identifications.</p> <p>Please refer to SP1 regarding customer identifications.</p>
<p><b>BC-10.1.1 All retail bank licensees must develop special measures and procedures when providing financial and</b></p>	<p><b>A Bank</b> suggested setting a postdated effective date (i.e. 1 year) to comply with the new regulations once it comes into force.</p>	<p><b>SP4</b></p>	<p>A transitional period of 9 months will be implemented. Please refer to April updates letter.</p>

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

<p>banking services and transactions for disabled customers to safeguard their rights in requesting, receiving and transferring information to ensure equal treatment amongst all customers.</p>	<p><b>A Bank</b> stated that it agree with the proposal however, there are certain limitations towards meeting some of the below requirements and these will require significant amount of work, resources, system enhancements and cost in order to comply with the proposed amendments. The Bank also requests that CBB provide it with the implementation date.</p>	<p><b>SP5</b></p>	<p><b>Please refer to SP4</b></p>
	<p>Below is <b>a Bank's</b> current list of services / facilities provided to the special needs customers;</p> <ol style="list-style-type: none"> <li>1. The Bank's staffs are trained to handle the special needs customers on priority and with care.</li> <li>2. Security team are trained to handle the special needs customers on priority and with care.</li> <li>3. No waiting time, as they will be attended to by our staff on priority basis.</li> <li>4. Ramp for Wheel chairs facilitated in Seef Branch.</li> <li>5. Wheel chairs available in Seef Branch.</li> <li>6. Customers categorised as "Potentially Vulnerable Customers (PVC)" (e.g. customers aged 65 and above) are given additional support by way of offering certain litigant's like "Accompaniment and Reflection" period.</li> </ol>	<p><b>SP6</b></p>	<p><b>Noted</b></p>
<p><b>BC-10.1.2</b> All retail <u>bank licensees</u> must have in place appropriate methods to communicate with the disabled to address their specific needs.</p>	<p><b>A Bank</b> requests the CBB to elaborate on the expectations on the methods of communication as well as minimum information that is required to be included as part of such communications.</p>	<p><b>SP7</b></p>	<p>This is a general rule. The required communication methods for each type of disability are elaborated in details in section BC10.2 for visually impaired customers and BC10.3 for hearing impaired customers.</p>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

	<p><b>A Bank</b> stated that it would require clarity on the expression “appropriate methods” which is generic and hence require clear definition.</p>	SP8	Please refer to SP7 above.
<p><b>BC-10.1.3</b> All retail <u>bank licensees</u> must ensure that disabled customers are provided full access to all banking and financial services offered by the bank, including the provision of ATM cards on the same basis as for all other bank customers.</p>	<p><b>A Bank</b> stated that this is currently in place.</p>	SP9	Noted
	<p><b>A Bank</b> stated that some large branches may have ramp for wheel chairs. It requests the CBB to advise if it is mandatory to have this in all branches.</p> <p><b>A Bank</b> stated that as the CBB have required 1 ATM equipped to serve disabled customers for every 10 ATMs, we suggest the same approach for the branches such as 1 branch serving disabled customers for every 3 branches or as an alternative 1 branch in each Governorate.</p>	SP10	<p>BC-10.1.9 will be amended as follows:</p> <p>All Bahraini retail banks that operate 10 or more branches in the Kingdom of Bahrain must provide at least one branch for serving the <u>disabled customers</u> in line with the requirements in this Module, in addition to the normal branch activities. At least one ATM machine must be provided in the branch to serve the <u>disabled customers</u>.</p>
	<p><b>A Bank</b> stated that this para mandates provision of “all banking and financial services including ATM cards” to the disabled customers. Certain banking services, by their nature would result in significant operational risk not only to the banks but also to the disabled customers (e.g. e-banking services, such as mobile banking, internet banking etc.). Therefore, it is strongly recommended that the services that are to be provided to this customer segment are duly defined, in consultation with the banks.</p>	SP11	The proposed requirements aim at ensuring that disabled customers in the Kingdom of Bahrain are provided with full access to all banking and financial industry services equally with all other customers.

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

<p><b>BC-10.1.4</b> All retail <u>bank licensees</u> must provide fast track and/or priority services for disabled customers to address their banking needs.</p>	<p><b>A Bank</b> would like the CBB to set the implementation date.</p>	<b>SP12</b>	Please refer to SP4 on transitional arrangement.
	<p><b>A Bank</b> stated that the current practice followed by the bank is that any identified disabled / special needs customers are handled on priority basis and with care. The Bank believes that the arrangements currently maintained should suffice the requirement without the need to dedicate a specific fast track.</p>	<b>SP13</b>	<p>The rule states <b>track <u>and/or</u> priority services.</b></p> <p>Priority treatment is considered “priority service” and therefore meets the requirement of this rule.</p>
	<p><b>A Bank</b> stated that it can apply the same by modifying the existing queue system to have an option for disabled customers; meanwhile branch staff (help desk) would be informed to prioritize the customers with special needs.</p>	<b>SP14</b>	noted
	<p><b>A Bank</b> recommends the CBB to include elderly citizens and pregnant women to the fast track and priority services in addition to disabled customers.</p>	<b>SP15</b>	Disagree
<p><b>Fees and Charges</b> <b>BC-10.1.5</b> Fees and charges on withdrawals, done through bank counters or ATM machines must be waived for all disabled customers.</p>	<p><b>A Bank</b> requests the CBB to elaborate on the requirement if it is only for new bank customers or if this is also applicable to the existing customers as this may pose a challenge to identify which customers from the Bank’s existing banking relationship fall under the disabled category.</p> <p>On the automatic waiver of fees and charges, the Bank requests the CBB’s advice on how to manage as the disabled individuals need not necessarily mean underprivileged &amp; poor, who cannot afford the fee and charges commonly levied. This manner of discrimination can hurt the dignity and self-esteem of disabled customers who are</p>	<b>SP16</b>	<p>It should be applicable to all;</p> <p>Please refer to SP4 for the transitional period.</p> <p>Please refer to SP1 regarding customer identifications.</p> <p>Most GCC regulators do waive such fees. Disabled customers in developed countries do receive special</p>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

	otherwise not discriminated by financial institutions. In addition is the Bank allowed to provide an option to disabled individuals either to choose to continue to pay such fee and charges, or inform the bank that they choose to benefit from the other option.		treatments and free services regardless of their financial conditions.
	<b>A Bank</b> stated that currently there is no such database for the existing customers. The Bank believes that such requirement will require customers with special needs / disabled provide their ID to proof the disability. The Bank understands that this will be for the new customers only. It is difficult to flag the disabled customers (if any) in the Bank's existing database. Technically no feature available to identify the disabled customers in the current banking system.	<b>SP16A</b>	Please refer to SP1, SP4 and SP39
	<b>A Bank</b> is of the opinion that fees and charges should remain the same as those applicable to other customers. Disabled person does not necessary mean that their financial status are lower than those who are not disabled.	<b>SP17</b>	<b>Disagree-</b> most GCC regulators do waive such fees. Disabled customers in developed countries do receive special treatments and free services regardless of their financial conditions.
	<b>A Bank</b> stated that in order to waive the fees the following steps will be required and may take time to implement:  <ol style="list-style-type: none"> <li>1. A new product code will have to be developed to recognize disabled clients.</li> <li>2. For existing customers the Bank will place a communication in the branches informing disabled customer to identify themselves to change their segment in the system.</li> </ol>	<b>SP18</b>	Noted- please refer to SP4 re the transitional arrangement.
	<b>A Bank</b> stated that the availability of statistics for the number of the disabled persons who will be able to benefit/use the service will be beneficial for the banks.	<b>SP19</b>	Noted

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

	<p><b>A Bank</b> stated that extending preferential financial terms (namely waiver of fees and charges including ATM charges) does not fall within the ambition of the disabled which strive to be treated as equal members of society. Hence, the Bank recommends not offering preferential financial terms to the disabled unless they fall within the special categories currently defined in the CBB rule book and for the waiver to be limited to minimum balance requirement as is the case today.</p>	<b>SP20</b>	Please refer to SP17.
	<p><b>A Bank</b> expects that Benefit fees and charges would be waived in turn as well. (100 fils).</p>	<b>SP21</b>	<p>As part of April 2016 Rulebook updates BC Module have been amended to waive some of the ATM charges including the (100 fils) charge on withdrawals made through other banks' ATM machines, as follows:</p> <p><b>Local ATM Network Charges BC-6.3.1</b></p> <p>Retail bank licensees are prohibited from charging any fees for transactions/enquiries made locally through their own ATMs or the Benefit Company ATM network.</p> <p>Refer to BC-10.1.7 &amp; BC-10.1.8.</p>
	<p><b>A Bank</b> stated that for waiver of ATM charges (referred to in the discussion paper under the BC 10 module), a central data base of customers</p>	<b>SP22</b>	Refer to SP21

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

	will need to be maintained across banks in order to enable banks reverse charges relating to their customer transactions on other bank ATMs.		
	<b>A Bank</b> stated that it supports the recommendation to waive fees and charges to disabled customers. However, currently the disabled customers are not identified or flagged in the respective systems (core banking, cards system etc.). Therefore, it is recommended to follow a phased approach duly providing adequate time for the disabled customer to approach the banks with Certificate issued by the Ministry to have them flagged in the system for waiver of fees and charges.	<b>SP23</b>	Please refer to SP21 & SP1 & SP4
<b>BC-10.1.6 Monthly fees and charges on current and savings account, including minimum balance charges, must be waived for all disabled customers.</b>	<b>A Bank</b> requests the CBB to elaborate on the requirement if this is only for new bank customers or if this is also applicable to the existing customers as this may pose a challenge to identify which customers from our existing banking relationship fall under the disabled category.	<b>SP24</b>	It should be applicable to all. Please refer to SP1 regarding customer identification.
<b>ATM Requirements</b> <b>BC-10.1.7 All retail bank licensees must provide ATM devices equipped with technology specially adapted for customers with disabilities where ATMs must:</b>	<b>A Bank</b> stated that there are certain limitations towards meeting some of these requirements that will involve significant amount of work, resources, system/hardware enhancements and cost in order to comply with the proposed amendments.	<b>SP25</b>	Please refer to SP4 on transitional arrangement.
<b>(a) Be wheelchair accessible, ensuring that the ATM is set at an appropriate height and track for movement; and</b>	<b>A Bank</b> stated the bank require some time to comply with the requirement as it needs to modify its machine to have these features.	<b>SP26</b>	Please refer to SP4 on transitional arrangement.
	<b>A Bank</b> stated that enhancements to the ATM devices along with the technology adaption will require a budget, software upgrade and	<b>SP27</b>	Please refer to SP4 on transitional arrangement.

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

<p>(b) Provide Braille alphabet and voice software technology (talking ATM) for the visually impaired and blind customers;</p>	<p>time. Banks will need to provide for such requirements in their budgets and action plans.</p>		
<p>BC-10.1.8 All retail <u>bank licensees</u> must provide at least one specialised ATM, meeting the requirements outlined in Paragraph BC-10.1.7 for every 10 ATMs owned by the bank.</p>	<p><b>A Bank</b> stated that the proposed directive does not consider small banks situation where they are having less than 10 ATMs.</p>	<p><b>SP28</b></p>	<p>Please refer to GR-1 &amp;2.</p>
	<p><b>A Bank</b> stated that as the CBB have required 1 ATM equipped to serve disabled customers for every 10 ATMs, we suggest the same approach for the branches such as 1 branch serving disabled customers for every 3 branches or as an alternative 1 branch in each Governorate.</p>	<p><b>SP29</b></p>	<p>Please refer to SP10</p>
<p>BC-10.1.9 The specialised ATMs provided for disabled customers must be located in frequently and easily accessible locations such as in shopping malls, airports, hospitals and other service locations.</p>	<p><b>A Bank</b> stated that there are certain limitations towards meeting some of these requirements that will involve significant amount of work, resources, system/hardware enhancements and cost in order to comply with the proposed amendments. Also request CBB to clarify whether the Bank's branches would be classified as 'easily accessible locations.</p>	<p><b>SP30</b></p>	<p>Please refer to SP4 on transitional arrangement.</p> <p>Please refer to SP10 on the applicability to branches.</p>
	<p><b>A Bank</b> inquired: does this mean all banks maintains ATMs in the mentioned locations (i.e. airports, shopping malls) will have to meet the requirement? Or would CBB through the approval process help with the selection of such equipped ATMS to avoid having all ATMS concentrated in specific locations such as shopping malls only.</p>	<p><b>SP31</b></p>	<p>Valid Point. Please refer to SP10 on the applicability to branches.</p> <p>BC-10.1.10 will be amended as follows: To ensure an adequate geographical distribution within the Kingdom of Bahrain, the CBB will expect two specially equipped branches within each governorate of the Kingdom. The</p>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

			geographical distribution will be coordinated by the CBB.
	<b>A Bank</b> recommends to have these machines in branches rather than offsite. The Bank will have a better control as bank staff will be available whenever the disabled customers require any help.	<b>SP32</b>	BC-10.1.9 will address this matter:  All Bahraini retail banks that operate 10 or more branches in the Kingdom of Bahrain must provide at least one branch for serving the <u>disabled customers</u> in line with the requirements in this Module, in addition to the normal branch activities. At least one ATM machine must be provided in the branch to serve the <u>disabled customers</u> .
	<b>A Bank</b> stated that drive through cannot be part of the accessible locations.	<b>SP33</b>	Noted.
	<b>A Bank</b> stated that the provision of specialized ATMs with Braille alphabet and voice software and with wheelchair accessibility etc. (section 10.1.7 to 9) requires feasibility study on locations and supply of hardware and software by the vendors, testing and installation. Hence, it is recommended to have a phased implementation approach, in consultation with the Banks.	<b>SP34</b>	Please refer to SP4

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

<p><b>Customer Account Numbers</b></p> <p><b>BC-10.1.10 Customer account numbers provided for accounts of disabled customers must be identifiable among other customer accounts to ensure that the disabled customers are offered the specialised services as outlined in this Chapter and that all bank staff offers the bank's services accordingly, whether in person or by phone.</b></p>	<p><b>A Bank</b> requests the CBB to elaborate on the requirement if it is only for new bank customers or if this is also applicable to the existing customers as this may pose a challenge to identify which customers from our existing banking relationship fall under the disabled category.</p>	<b>SP35</b>	<p>It should be applicable to all; Please refer to SP4 on transitional arrangement.</p> <p>Please refer to SP1 regarding customer identifications.</p>
	<p><b>A Bank</b> inquired can the bank have other alternatives ways/solutions to flag such customers? Are the expectations to amend the existing disabled customer database? Currently these types of customers (if any) are not identified or flagged in the Bank's systems. In addition, Is there a plan to publicly announce such arrangements, facilities, features to the public, this will enable individuals to identify themselves as disabled and make them aware of their rights.</p>	<b>SP36</b>	<p>Please refer to SP1 regarding customer identifications.</p>
	<p><b>A Bank</b> does not recommend having separate account numbers for disabled persons, other means of identification may be more practical considering situations where a normal existing customer suffers from illness or accident which leads to disability or vice-versa when disabled customer recovers from his disability.</p>	<b>SP37</b>	<p>Please refer to SP1 regarding customer identifications.</p>
	<p><b>A Bank</b> stated that a special category code can be created for such customers in the core banking system.</p>	<b>SP38</b>	<p>Noted.</p>
	<p><b>A Bank</b> inquired if the bank uses a flag to identify disabled customers rather than the actual account number would it be fine?</p>	<b>SP39</b>	<p>The rule has not stated a special account number. The rule requires customers account numbers provided for accounts of disabled customers <u>must be identifiable</u></p>

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

			<p><u>among other customer accounts</u> to ensure that the disabled customers are offered the specialized.</p> <p>Therefore using a flag would be considered a special identification of such customers and acceptable mean.</p>
<p><b>In Branch Services</b></p> <p>BC-10.1.11 All retail bank licensees must provide specially designed service counters for disabled customers, clearly designated with a special logo. In addition parking facilities and easy access entrances must also be provided.</p>	<p><b>A Bank</b> recommends a minor change to this clause as follows: Banks present in rented premises without any own parking facility may be exempted from offering designated parking space for disabled customers.</p>	<b>SP40</b>	<p>Most parking spaces have designated area for disabled.</p>
	<p><b>A Bank</b> stated that this can be implemented and the Bank would therefore appreciate if the CBB can provide it with the implementation date.</p>	<b>SP41</b>	<p>Please refer to SP4 on the transitional period.</p>
	<p><b>A Bank</b> stated “the requirements of the OM module OM-6.1.8 Teller counters must be screened off from customers by a glass screen of no less than 1 meter in height from the counter work surface or 1.4 meters from the floor.” The Bank requests further clarity to understand the expectations on teller counters. All identified customers with special needs are prioritized without the need to dedicate a special service desk, please note that all teller counters are designed as per the requirement.</p>	<b>SP42</b>	<p>The rule is amended to “special Priority desk”. Refer to BC-10.1.13.</p>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

	<p>The Bank stated that BC-10.1.11 contradicts with OM-6.1.8 on the height of the counters. i.e. OM requires high counters while the consultation requires low counters.</p>		
	<p><b>A Bank</b> stated that designated counter for disabled customer with special logo, parking facility and special elevator for older and wheelchairs customers are available in main branch. The bank will need to engage landlords for approval before making similar changes in premises which do not belong to the bank. These challenges must be recognized by the CBB and factored in the final rules.</p>	<p><b>SP43</b></p>	<p>Noted. Most parking spaces have designated area for disabled.</p> <p>Please refer to SP10</p>
	<p><b>A Bank</b> stated that parking facilities will be provided subject to availability and branch location.</p>	<p><b>SP44</b></p>	<p>Please refer to SP10</p>
	<p><b>A Bank</b> stated that designated parking facilities at times can be impossible since some branch locations do not have dedicated parking. i.e. Branch in Car Park Building in Manama.</p>	<p><b>SP45</b></p>	<p>Please refer to SP10</p>
	<p><b>A Bank</b> inquired can we specify specific branches that will offer this? For example, we will identify few branches in some geographical locations within Bahrain that will be fully equipped for all disabled services and for any other branches that do not have the low teller counters we will ensure that there is priority service provided without the need to Queue or wait. Moreover, not all the bank branches have parking locations dedicated to the bank.</p>	<p><b>SP46</b></p>	<p>Please refer to SP10</p>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

<p><b>BC-10.1.12</b> Within the branch itself, special layout and signage must be used to facilitate the movement of disabled customers, including the use of any escalators, should this be the case.</p>	<p><b>A Bank</b> stated that this can be implemented and the Bank would therefore appreciate if the CBB can provide it with the implementation date.</p>	<b>SP47</b>	Please refer to SP4 on transitional arrangement.
	<p><b>A Bank</b> believes since these customers are handled on Priority basis as and when they are identified, dedicated counter and special signs are not required, taking into consideration the limited number of disabled customers (based on the retail bank feedback).</p>	<b>SP48</b>	Disagree- there should be special layout and signage must be used to facilitate the movement of disabled customers.
	<p><b>A Bank</b> stated that it needs clarification on the use of escalators. In most of its two story branches the bank has elevators. However, customer service is done on the ground floor only.</p>	<b>SP49</b>	Valid point, to replace the word “escalators” with “elevators”.
	<p><b>A Bank</b> stated that facilities such as specially designed counters, parking facility, easy access entrance, provision of escalators etc. mandated by section BC-10.1.11 &amp; 12 would require a detailed feasibility study. Since the bank has the largest branch network in the country, depending on the location of the branches, distance and height from the road, availability of car park etc. may pose significant challenges in many locations to implement these requirements. Hence, it is strongly recommended to follow a feasibility-based, phased approach in implementing such structural changes, in consultation with the banks.</p>	<b>SP50</b>	Please refer to SP4 on transitional arrangement and SP10 on the minimum number of branches
<p><b>BC-10.1.13</b> All retail bank licensees must ensure that their staff dealing with disabled customers are enrolled in specialised training to ensure that they are qualified and fully familiar with the use of any specialised technology adapted for such customers and to address any other special requirements in dealing with these</p>	<p><b>A Bank</b> would appreciate further guidance from the CBB in terms of the minimum expectations of the required training standards. The Bank would therefore also appreciate if the CBB can provide it with the implementation date.</p>	<b>SP51</b>	<p>The CBB intends to coordinate between the Ministry of Labor and Social Development and societies and BIBF to deliver specialized courses on dealing with disabled customers.</p> <p>Please refer to SP4 on transitional arrangement.</p>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

customers. Such training must be part of the staff's overall training requirements.	<p><b>A Bank</b> inquired does the CBB require the banks to have all the front line staff trained? Any guidance which will be provided to banks on type of training and the institute which will provide such training? Does the CBB expect such trained employees in all branches or just in the head quarter?</p>	<b>SP52</b>	<p>The CBB intends to coordinate between the Ministry of Labor and Social Development and societies and BIBF to deliver specialized courses on dealing with disabled customers.</p> <p>please refer to SP10 on the minimum number of branches</p>
	<p><b>A Bank</b> stated that specialised Training Institutes providing such training, if available locally would enable the Bank to identify a few of its staff to get adequately trained.</p>	<b>SP53</b>	<p>Please refer to SP52 above.</p>
	<p><b>A Bank</b> stated that Sections BC-10.1.13 and 10.3.1 require development of specialized training programs for the staff members in sign-language and use of specialized technology. Since banks do not have the required expertise to develop such specialized training programmes it is recommended the CBB in coordination with the BIBF develop such specialized training programs and materials so that they are standardized across all banks in the country.</p>	<b>SP54</b>	<p>Please refer to SP52</p>
<p><b>Personal Banking</b>  <b>BC-10.1.14 All retail bank licensees must provide special doorstep financial services to service the needs of the disabled customers to facilitate the offering of financial services in a convenient location.</b></p>	<p><b>A Bank</b> stated that currently banking services are offered at the branch and sales centers. The Bank appreciates if the CBB could elaborate on the expectations.</p>	<b>SP55</b>	<p>This requirement is relating to providing services to disabled customers by sending the bank employee to their houses to finalize (non-cash) transactions.</p>
	<p><b>A Bank</b> requests the CBB to clarify this requirement.</p>	<b>SP56</b>	<p>See SP55 above.</p>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

	<p><b>A Bank</b> stated that this will be a challenge to implement as some of the financial services require CCTV coverage. Moreover, from security point of view sending our staff to outside location could be risky.</p>	<p><b>SP57</b></p>	<p>See SP55 above.</p>
	<p><b>A Bank</b> stated that it needs clarification on the type of services that the Bank will need to provide as special doorstep? If the CBB is referring to CASH TRANSACTIONS the Bank has some reservations.</p>	<p><b>SP58</b></p>	<p>Any transaction other than cash. See SP55 above.</p>
	<p><b>A Bank</b> stated that more clarity is required on the “doorstep” financial services referred to here and the types of services that can be provided by banks in this mode.</p>	<p><b>SP59</b></p>	<p>Please refer to SP55 above</p>
<p><b>BC-10.2.1 All retail bank licensees must provide the following customer information in Braille format:</b></p> <ul style="list-style-type: none"> <li>(a) Account opening forms;</li> <li>(b) Facilities contracts;</li> <li>(c) Investment and transactions documents;</li> <li>(d) Instructions manuals; and</li> <li>(e) Customer notifications.</li> </ul>	<p><b>A Bank</b> inquired if CBB could advise if banks can deal with overseas centers specialized in developing forms in Braille format. Further, to advise if there is any approved centers (local / overseas) by the CBB.</p>	<p><b>SP60</b></p>	<p>Banks need to do their own RFP to get proposals from specialized vendors. No approved centers by the CBB.</p> <p>New guidance paragraph will be added in the BC Module (BC-10.1.2) as follows:</p> <p>BC-10.1.2 All Bahraini retail banks are encouraged to enhance the <u>disabled customers</u>' access to their ranges of banking services by:</p> <ul style="list-style-type: none"> <li>(a) Liaising with organisations representing <u>disabled customers</u> to provide assistance; and</li> </ul>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

			(b) Keeping pace with changing technologies involving ATMs, electronic and internet banking.
	<b>A Bank</b> stated that there are certain limitations towards meeting these requirements (including the cost impact and including the fact that the Bank would not be able to confirm that the translation of the documents into braille is accurate). We would appreciate the CBB's guidance in terms of identifying a suitable provider of such services.	SP61	Refer to SP60
	<b>A bank</b> stated that due to the small operations and limited cases of special needs customers who are known to the Bank. It is not feasible to implement the proposed changes. There are no capabilities to implement such requirement and validate the accuracy of the content of these documents.	<b>SP62</b>	The Rules will only apply to locally incorporated banks. Please refer to GR-1 & 2. Banks with small operations and branches won't be subject to the new requirements.
	<b>A Bank</b> stated that given the fact that majority of our customers are non-Bahraini, expat workers in the Kingdom, in all probability they would not come under definition of disabled customers. Hence, we request exemption from these technology requirements.	<b>SP63</b>	Please refer to SP62 above.
	<b>A Bank</b> stated that translation of terms & conditions, forms, etc. to braille format is associated with some degree of discrepancy risk from the written Arabic text and it will be difficult for the banks (and external parties such as CBB inspectors) to confirm the translated text.	<b>SP64</b>	Banks have the flexibility to have different types of techniques that serve the same purpose such as Braille, screen readers, voice records or any other advanced and secured means.

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

	<p><b>A Bank</b> stated that customer information in Braille format is difficult to have for all forms, contracts, transaction documents, manuals &amp; notifications as some of these documents are large in size.</p> <p>In addition, it will be advantageous for the local banks to see such similar equipment in other developed countries (also valid for BC-10.2.2 and BC-10.2.6).</p>	<p><b>SP65</b></p>	<p>Please refer to SP64 above.</p>
	<p><b>A Bank</b> suggests addressing this concern by having the documents read to the customer or by having an audio file which the customer can listen to through speakers or headsets.</p>	<p><b>SP66</b></p>	<p>Banks have the flexibility to have different types of techniques that serve the same purpose such as Braille, screen readers, voice records or any other advanced and secured means.</p> <p>BC-10.2.1 and BC-10.2.6 were merged and amended as follows:</p> <p><b>BC-10.2.1</b>  <b>All Bahraini retail banks must provide the following application forms along with the terms and conditions of contracts signed by visually impaired customers for all conducted transactions in Braille format or voice records or screen readers or any other advanced and secured means:</b></p> <ul style="list-style-type: none"> <li>(a) Account opening forms;</li> <li>(b) Facilities contracts;</li> <li>(c) Investment and transactions documents;</li> </ul>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

			(d) Instructions manuals; and (e) Customer notifications.
	<b>A Bank</b> do not support this point because it believes that the percentage of customers that would utilize Braille forms is minimal; since all the information will be made available through screen readers, the Bank does not think it is feasible for it to make all forms available in braille.	<b>SP67</b>	Please refer to SP66 above.
	<b>A Bank</b> stated that with the advent of audio & video capability in the branches, traditional methods such as braille are being replaced by newer technology options to facilitate visually impaired clients. Accordingly, choice of media to facilitate Disabled customers should be determined by banks based on their respective capabilities.	<b>SP68</b>	Please refer to SP66 above
	<b>A Bank</b> stated that this paragraph requires banks to provide many of the customer forms (such as Account Opening Forms, Contracts, Transaction Documents, Instruction Manuals and Customer Notifications) in Braille format. Converting all these documents into Braille format will have significant challenges in terms of skill sets, cost, storage and periodic updates and maintenance. More than this, many of the visually impaired customers may not be Braille-literate (i.e. may not have learnt to read documents in Braille language). In addition, to expect customers to read long documents (e.g. terms & conditions) in Braille format would cause significant hardship to them. Hence, we recommend replacing this requirement with alternative methods, in consultation with banks and legal experts.	<b>SP69</b>	Please refer to SP66 above

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

<p><b>BC-10.2.2</b> All retail bank licensees must provide voice records to illustrate the terms and conditions of contracts signed by visually impaired customers for all conducted transactions.</p>	<p><b>A Bank</b> stated that the documents like terms and conditions can be more than 40 pages in size and therefore the bank would appreciate the CBB's guidance in this regards.</p>	<b>SP70</b>	Please refer to SP66
	<p><b>A Bank</b> stated that due to the small operations it is not feasible to implement the proposed changes.</p>	<b>SP71</b>	Please refer to GR-1 and GR-2. The rules will be applicable for locally incorporated banks only.
	<p><b>A Bank</b> stated that the banks have to agree on the extent of available data for providing on the voice records to illustrate the terms &amp; conditions for each product(s).</p>	<b>SP72</b>	Noted.
	<p><b>A Bank</b> requests the CBB to clarify if this request is to evidence the acceptance of the agreement by the customer.</p>	<b>SP73</b>	This is a way of communicating the content of the terms and condition to the blind customer in order for him to agree or disagree (disclosure tool).
	<p><b>A Bank</b> inquired is it fine to substitute screen readers with voice recordings?</p>	<b>SP74</b>	Both accomplishing the same purpose. Please refer to SP66.
<p><b>BC-10.2.3</b> All retail <u>conventional bank licensees</u> must review all legal documents provided to ensure that the identity of any agent representing the customer is proven without any doubt. Banks must also ensure that witnesses are present for the signature of any transaction documents</p>	<p><b>A Bank</b> stated that the Bank do not solicit the Power of attorney accounts. However in case of Court order or CBB requests the Bank is obliged to acknowledge such Powers of Attorney. The Bank would appreciate the CBB's guidance in this regards.</p>	<b>SP75</b>	<p>The rules amended as follows:</p> <p>BC-10.2.2 All Bahraini retail banks may accept electronic signatures and electronic finger print as a satisfactory form of signature to meet the needs of the <u>disabled customers</u>. Banks should refer to Royal Decree No. 28 issuing</p>

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

<p>particularly in case of visually and hearing impaired customers.</p>			<p>“Electronic Transactions Law” for the Year 2002. Banks may determine the terms and conditions on which the facilities of biometric identification can be extended to the <u>disabled customers</u>.</p> <p><b>BC-10.2.3</b></p> <p>All Bahraini retail banks must ensure that two bank employees witness when transactions undertaken by visually impaired customers. In case of customers with visual as well as hearing impairments, Bahraini retail banks must ensure that witnesses (other than bank staff) are present for the signature of any transaction and that documents providing the identity of such witnesses are submitted.</p>
	<p><b>A Bank</b> stated that the rule must clarify if the witness is required to be bank staff or client's family.</p>	<p><b>SP76</b></p>	<p>Please refer to SP75</p>
	<p><b>A Bank</b> stated that it needs clarification on this point. The Bank needs to know if the 'witness' can be a bank staff.</p>	<p><b>SP77</b></p>	<p>Please refer to SP75</p>

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

	<b>A Bank</b> stated that the expression “agent” needs to be clearly defined to specify power of attorney holders.	<b>SP78</b>	Please refer to SP75
<b>BC-10.2.4</b> All retail <u>bank licensees</u> must not require educated visually impaired customers having no hearing impairment to have a witness to undertake any transaction. Customer signatures must be adapted to meet their needs by either using the customer’s stamp, electronic fingerprint and their ID card to prove their identity in the presence of two bank employees when transactions are undertaken.	<b>A Bank</b> requests the CBB to elaborate further on this point, whether a visually impaired customer is required to have a witness to undertake a transaction.	<b>SP79</b>	Please refer to SP75
	<b>A Bank</b> stated that is subject to the bank other procedures and availability of such devices.	<b>SP80</b>	Banks must comply with this rule.
	<b>A Bank</b> requested clarification on this point. It stated that point 10.2.3 mentioned that a witness is needed and this point mentions that the Bank do not need to have one. The Bank needs guidance on all Bahrain's legal procedures for disabled customers to build its procedures around it to protect the safeguard of the bank and its customers, and to be in compliance with local laws.	<b>SP81</b>	Please refer to SP75
	<b>A Bank</b> stated that this paragraph mandates adoption of electronic fingerprint and customer’s stamp etc. for customer transactions. As these require changes to system, integration with third party solutions as well as legal review, we recommend including manual finger print (i.e. physical finger print on paper documents) as the accepted methodology until this advanced technology can be implemented by banks in a phased manner.	<b>SP82</b>	Please refer to SP75.  Please refer to SP4 on transitional arrangement.
<b>BC-10.2.5</b> All retail <u>bank licensees</u> must provide speaking screens for the priority	<b>A Bank</b> stated that it does not intend to have a dedicated waiting area for visually impaired.	<b>SP84</b>	Not dedicated waiting area per say but they need to have available waiting area where priority is to be given to the visually impaired customers.

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

waiting area of banks for visually impaired customers.	<b>A Bank</b> would appreciate the CBB's guidance on the minimum requirements in terms of content to be included on the screens.	<b>SP85</b>	This is an operational aspect
	<b>A Bank</b> stated that given that other measures will be taken by the bank to facilitate disabled clients, is this required? The Bank suggests this to be kept as optional.	<b>SP86</b>	This is the minimum required.
BC-10.2.6 All retail bank licensees must develop bank account opening procedures through computers using screen readers in order for visually impaired customers to interact with and fill in the necessary data independently.	<b>A Bank</b> inquires “does the CBB expect all banks to implement such requirements? Is this requirement mandatory or subject to the volume of disabled customers within the bank database? Section BC 10.2.1 requires banks to provide forms in Braille format, while this section mandated banks to develop electronic forms with audio output and braille input.	<b>SP87</b>	Please refer to SP66.
	<b>A Bank</b> stated that this development will require cost and time for implementation as explained in BC10.1.7 above.	<b>SP88</b>	Please refer to SP4 on transitional arrangement.
	<b>A Bank</b> is of the view the same is not required given the plan to make available all forms in Braille language as per BD 10.2.1, especially given the fact, the visually disabled will still require assistance in filling the data and will not do so independently.	<b>SP89</b>	Please refer to SP66.
	<b>A Bank</b> suggests addressing this concern by having the documents read to the customer or by having an audio file which the customer can listen to through speakers or headsets.	<b>SP90</b>	Please refer to SP66.
	<b>A Bank</b> stated that the technology of “screen readers” explained in this section requires clarity. Also, it is not clear how visually	<b>SP91</b>	Please refer to SP66.

# Offering banking and financial services to the disabled

## Industry and other party comments

May 2016

	impaired customers will interact with screen readers and fill in the data “independently” as mandated by this section.		
<p><b>BC-10.3.1</b> All retail <u>bank licensees</u> must ensure that their staff dealing with hearing impaired customers are enrolled in specialised training on sign language or provide a full time translator/interpreter in the bank’s premises, dedicated to communicate with such customers.</p>	<p><b>A Bank</b> suggests the CBB to advise if overseas conventional banks can deal with a part time translator/interpreter specialized in interacting with hearing impaired customers.</p>	<b>SP92</b>	Please refer to GR1 & GR2
	<p><b>A Bank</b> would appreciate further guidance from the CBB in terms of the minimum expectations of the required training standards. We would therefore also appreciate if the CBB can provide us the implementation date.</p>	<b>SP93</b>	<p>The CBB intends to coordinate between the Ministry of Labour and Social Development and societies and BIBF to deliver specialized courses on dealing with disabled customers.</p> <p>Please refer to SP4 on transitional arrangement.</p>
	<p><b>A Bank</b> stated that it is not clear whether CBB expect all front line staff to be enrolled in this specialized training? Who will be providing such training to the staff? Is this mandatory requirement or the Bank can have internal alternative solutions to handle such cases?</p>	<b>SP94</b>	<p>Please refer to-SP93.</p> <p>The banks staff need to be trained as per the rules.</p>
	<p><b>A Bank</b> recommends allowing banks to outsource translators on a case by case basis and upon customers’ request.</p>	<b>SP95</b>	<p>Refer to SP60</p> <p>The banks staff need to be trained as per the rules.</p>
	<p><b>A Bank</b> stated that it needs to know if this is required in all outlets or specific outlets as per the Bank’s comment in point 10.1.11.</p>	<b>SP96</b>	Refer to SP10 on branches.

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

<p>BC-10.3.2 To facilitate the implementation of Paragraph BC-10.3.1, all retail bank licensees must provide a banking dictionary designed to address banking vocabulary by way of sign language through video clips and pictures to enable such customers to have a clear understanding of the banking terminology being used.</p>	<p><b>A Bank</b> suggests the CBB to advise if banks can deal with overseas centers specialized in developing banking dictionary designed to address banking vocabulary by way of sign language through video clips and pictures. Further, to advise if there is any approved centers (local / overseas).</p>	<b>SP97</b>	Refer to SP60. The CBB will liaise with the Ministry of Labour and Social Development to deliver specialized dictionary for sign language.
	<p><b>A Bank</b> would appreciate further guidance from the CBB in terms of the minimum expectations of such banking dictionary. The Bank would therefore appreciate if the CBB can provide it with the implementation date.</p>	<b>SP98</b>	Refer to SP97  Refer to SP4 on the transitional arrangement.
	<p><b>A bank</b> inquires will the CBB provide additional guidance on how to implement this requirement? And it is not clear how the bank will be in a position to validate these documents. The Bank believes that its Account Opening T/C is detailed to explain various terminology and clarification. It is recommended that a single dictionary is introduced and rolled out to be used by all banks.</p> <p>The Bank inquires whether the CBB will issue a uniform dictionary for all licensees or each bank would need to do so?</p>	<b>SP99</b>	Please refer to SP97.
	<p><b>A Bank</b> stated that it understands that this entails translation of the product brochures and flyers in braille. There should be clear directions on what is the minimum information that would constitute the banking dictionary.</p>	<b>SP100</b>	Please refer to SP97
	<p><b>A Bank</b> agree with the point and request that all banks coordinate for the bulk implementation of such services.</p>	<b>SP101</b>	Noted. Please refer to SP97

## Offering banking and financial services to the disabled

### Industry and other party comments

May 2016

	<p><b>A Bank</b> stated that to ensure consistency, it is best the dictionary content is provided by the CBB and banks role is limited to customizing the same with their branding.</p>	<b>SP102</b>	Please refer to SP97
	<p><b>A Bank</b> recommends delaying this regulation as currently there is no industry standard Islamic Banking dictionary available that supports sign language. We also recommend that the industry itself comes up with a standard for sign language.</p>	<b>SP103</b>	Please refer to SP97
	<p><b>A Bank</b> stated that to ensure consistency of terminology and to avoid ambiguity between other banks – the Bank would like to request the CBB to provide it with marketing material for this.</p>	<b>SP104</b>	Please refer to SP97
	<p><b>A bank</b> stated that section BC-10.3.2 requires banks to develop a specialized banking dictionary for sign language through video clips and pictures. Since banks do not have the required expertise to develop such dictionary it is recommended the CBB in coordination with the BIBF develop such specialized training programs and materials so that they are standardized across all banks in the country.</p>	<b>SP105</b>	Please refer to SP97