



# Finance for All: A practical guide to Disability Inclusion for Financial Services Providers in Cambodia



A teller in a microfinance branch greets a customer with disabilities who is a wheelchair user.

**MARCH 2023**

**PREPARED BY:**





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Acronym	Meaning
ABC	Association of Banks in Cambodia
ACCESS	Australia-Cambodia Cooperation for Equitable Sustainable Services
ADA	Americans with Disabilities Act
ADG	Agile Development Group
ATM	Automated Teller Machine
BFI	Banking and Financial Institution
CDPO	Cambodian Disabled People's Organization (Cambodia)
CFI	Center for Financial Inclusion at Accion International
CMA	Cambodia Microfinance Association
DAC	Disability Action Council (Cambodia)
DDP	Deaf Development Programme (Cambodia)
DSO	Disability Support Organisation
DWPD	Department of Welfare for Persons with Disabilities of MoSVY
EN	English
FS	Financial Services
FSP	Financial Services Provider
G3ict	Global Initiative for Inclusive Information and Communication Technologies
GAATES	The Global Alliance on Accessible Technologies and Environments
HI	Humanity & Inclusion
INGO	International Non-governmental Organisation
KH	Khmer
KPI	Key Performance Indicator
LPPRPD	Law on the Protection and Promotion of the Rights of Persons with Disabilities in Cambodia
LFTW	Light for the World
MEF	Ministry of Economy and Finance (Cambodia)
MFI	Microfinance Institution
MoSVY	Ministry of Social Affairs, Veterans and Youth Rehabilitation (Cambodia)
NBC	National Bank of Cambodia
NGO	Non-governmental Organisation
OIC	Organization to Improve Communication and Swallowing Therapy Services in Cambodia
OPD	Organisation of Persons with Disabilities
PAfid	People's Action for Inclusive Development (Cambodia)
PPCIL	Phnom Penh Center for Independent Living (Cambodia)
PWDF	Persons with Disabilities Foundation (Cambodia)
RGC	Royal Government of Cambodia
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
W3C	World Wide Web Consortium
WCAG	Web Content Accessibility Guidelines



The Royal Government of Cambodia has a clear vision to enhance the wellbeing of persons with disabilities and build an inclusive society where they can participate fully in all areas. The second National Disability Strategic Plan (NDSP II) 2019-2023 focuses on poverty reduction through enhanced livelihoods and access to services, including strategies to increase employment and entrepreneurship opportunities for persons with disabilities.

To achieve these goals, persons with disabilities need access to loan capital to invest in business activities, and other financial products such as deposits, payments and insurance, which contribute to economic security and independence. They also need information and education to understand how to access regulated financial services and use financial products safely. This requires collaboration between government, regulators, persons with disabilities and support organisations to create an enabling environment. At the same time, individual financial services providers can take action to make their own products and services accessible to persons with disabilities.

With support from the Australia-Cambodia Cooperation for Equitable Sustainable Services (ACCESS) program, Good Return and Chamroeun Microfinance Plc built a model of financial education and inclusive finance for persons with disabilities. This manual uses learnings from this project to outline a process for disability inclusion that other banks and microfinance institutions can follow. It includes case studies and practical guidance, with contact details for disability organisations in Cambodia, links to resources created by the DAC and other ACCESS partners, and international standards and guidelines.

I encourage banks and microfinance institutions in Cambodia to use this manual and take action to make their services accessible to persons with disabilities. By making this commitment, they will attract more clients with disabilities, and help to challenge negative stereotypes of persons with disabilities in society. I also urge all stakeholders in the financial services sector to ensure the needs of persons with disabilities are taken into account in financial inclusion strategies. In this way, they can help to realise the rights of persons with disabilities to carry out economic activities and participate in Cambodia's development.



**H.E. EM Chan Makara**

Secretary of State of Ministry of Social Affairs  
Veterans and Youth Rehabilitation (MoSVY)  
and Secretary-General of Disability Action  
Council

### ABOUT THIS MANUAL

This manual is designed to help financial services providers (FSPs) to ensure their products and services are inclusive and accessible for customers with disabilities. It was co-created by Shashaank Awasthi (consultant), Alison Thornburn (Good Return) and Paul Surreaux (Chamroeun Microfinance Plc), with support from Australia-Cambodia Cooperation for Equitable Sustainable Services (ACCESS).

As part of the ACCESS Program, Chamroeun and Good Return are implementing the “Education and Access: Responsible Finance for Persons with Disabilities” project from 2019-2023, to create a pilot model of disability inclusive financial services in five provinces in Cambodia (See "Case Study" on page 5).

This manual draws on the learnings from the “Education and Access” project, the experiences of other FSPs in Cambodia, and the wider experience of Shashaank Awasthi in implementing disability inclusion with FSPs in India as co-founder of the impact enterprise v-shesh. It incorporates tools and guidelines for disability inclusion created by other implementing partners with support from ACCESS, and other external resources.



Good Return is an INGO focused on empowering people to break the cycle of poverty by making sure they can access responsible financial services as well as financial education and business skills. Good Return provides accessible financial capability coaching through its Financial Capability and Consumer Empowerment (CAFE) initiative.



Chamroeun Microfinance Plc (Chamroeun) is a leading Cambodian social microfinance institution working to achieve positive and lasting changes in the livelihoods of economically active poor families in a socially responsible manner.

### ACKNOWLEDGEMENTS

The inspiration for this manual came from helping persons with disabilities to achieve their entrepreneurial goals through financial inclusion through the ‘Education and Access’ project, part of the Australia-Cambodia Cooperation for Equitable and Sustainable Services (ACCESS) program. We acknowledge and thank the Royal Government of Cambodia and the Department of Foreign Affairs and Trade (DFAT) of the Australian Government for supporting the ACCESS program, and our partners who participated in the project, including Cambodian Disabled People’s Organization (CDPO), the Persons with Disabilities Foundation (PWDF), Phnom Penh Center for Independent Living (PPCIL), the Association of Music for People with Disabilities, Samrong Tong Disabled Persons Federation and the Women and Children Disabled Persons Forum Kampong Cham.

This manual brings together many existing resources that financial services providers can use to implement strategies for disability inclusion. We gratefully acknowledge all the individuals and organisations who produced these resources to advance the inclusion of persons with

disabilities. It is particularly useful to be able to use many disability inclusion guidelines produced in Cambodia in Khmer and English language, which were also created with support from the ACCESS program. We extend our thanks to the Disability Action Council (DAC) of Cambodia, Humanity and Inclusion, Agile Development Group, and People’s Action for Inclusive Development for allowing us to sharing their work.

We would like to give special acknowledgement to H.E. Em Chan Makara, Secretary-General of the DAC and Secretary of State for the Ministry of Social Affairs, Veterans and Youth Rehabilitation (MoSVY), for his leadership in championing the rights of persons with disabilities, and for writing the foreword to this manual. Finally, we thank the ACCESS program team for their invaluable guidance and practical support throughout.

## DISCLAIMER



*This publication has been funded by the Australian Government through the Department of Foreign Affairs and Trade. The views expressed in this publication are the author’s alone and are not necessarily the views of the Australian Government.*





### Case Study: 'Responsible Inclusive Finance for Persons with Disabilities': Chamroeun and Good Return

Chamroeun promotes ethical micro-finance practices in the Cambodian MFI sector. Chamroeun's core products and services are designed to meet the needs of its target customer base of low-income entrepreneurial individuals and families. In addition, through its Credit Plus department, Chamroeun works with partners to develop tailored products and services for groups excluded from general financial services markets. In 2019, Chamroeun received the client protection principle certification (CPP) from Smart Campaign following an independent evaluation<sup>1</sup>.

- In 2019, Chamroeun partnered with Good Return to embark on a disability inclusion journey, implementing a pilot model of responsible disability inclusive finance in five provinces in Cambodia, supported by the ACCESS Program.
  - Chamroeun and Good Return carried out a needs assessment survey with organisations of persons with disabilities (OPDs) to inform the project design.
  - Good Return partnered with the impact enterprise Agile Development Group to adapt its CAFE financial coaching program to be accessible to persons with different disabilities, and trained coaches from Chamroeun, OPDs and the disability organisation PWDF. The CAFE coaching contributed to building the financial literacy of persons with disabilities and their awareness of potential risks associated with loans.
  - Chamroeun developed a tailored business loan aimed at persons with disabilities without access to credit, with features including accessible servicing at the client's home or through electronic transfers, subsidised pricing, no collateral requirement and enhanced consumer protection. The implementation of this pilot was accompanied by strong risk mitigation measures including the involvement of OPDs at all stages in order to protect clients from any potential negative impact.
  - Chamroeun collaborated with the NGOs Humanity & Inclusion (HI) to adapt its branches in the five provinces for accessibility, and People's Action for Inclusive Development (PAfID) (formerly Light for the World (LFTW)) to provide disability awareness training to key staff.
- Since the initial pilot, Good Return has expanded to partner with three additional OPDs to provide the CAFE coaching to their members.
- Chamroeun is now using the learnings from the pilot to scale up this activity, and mainstream disability inclusion as part of its standard product and service offerings, using a disability scorecard approach facilitated by Light for the World (LFTW) to create a disability inclusion plan for the organisation.
- This includes operational changes to replace the tailored product by making its standard product range available to persons with disabilities, with accommodations available

<sup>1</sup> From 2009 to 2020, the Smart Campaign was a global initiative for client protection led by Accion Center for Financial Inclusion (CFI) to promote client protection in financial service delivery to low-income clients (CFI, <https://www.centerforfinancialinclusion.org/about/what-we-do/the-smart-campaign>)

such as accessible servicing options. In addition, Chamroeun is extending its branch adaptation program, developing an e-learning course to roll out disability awareness training to all staff, and providing more In-depth training for branch staff.

- Chamroeun and Good Return are also collaborating with the Disability Action Council and Department of Welfare of Persons with Disabilities to promote disability inclusion by other FSPs in Cambodia.

**A series of videos outlining the key steps of the project and the experiences of persons with disabilities and Good Return and Chamroeun staff who participated can be accessed from <https://www.rifacademy.org/disability-inclusion>**

## USING THE MANUAL

The manual provides a practical guide to disability inclusion using a 3-step process. It is laid out in sections which can be used by FSPs at any stage of their journey towards disability inclusion, as explained below:

Section	Purpose and target users:
A. An Introduction to disability inclusive financial services	<ul style="list-style-type: none"> <li>● <b>Purpose:</b> To gain an understanding of disability and the importance of disability inclusion, in the financial services context.</li> <li>● <b>Designed for:</b> All users, in particular organisations starting out on the journey towards disability inclusion, or who have little experience of disability inclusion.</li> </ul>
B. A 3-step process for disability inclusion	<ul style="list-style-type: none"> <li>● <b>Purpose:</b> To provide a high-level roadmap for the journey towards disability inclusion.</li> <li>● <b>Designed for:</b> Decision makers and project managers, as a guide to planning for disability inclusion .</li> </ul>
C. Disability inclusion through the customer experience journey	<ul style="list-style-type: none"> <li>● <b>Purpose:</b> To identify the customer touch-points and considerations for disability inclusion at each point in the customer lifecycle.</li> <li>● <b>Designed for:</b> Project managers and functional managers, to identify priorities for implementation.</li> </ul>
D. Toolkits	<ul style="list-style-type: none"> <li>● <b>Purpose:</b> To provide detailed guidance and links to resources and standards for implementation of disability inclusion plans.</li> <li>● <b>Designed for:</b> Functional managers implementing specific areas of the overall disability inclusion plan.</li> </ul>

Each section summarises key information to give an initial understanding of the topic, and links to resources to help you with implementation. We have used resources developed in Cambodia (in Khmer and English) where possible, and other resources where international standards apply or there is no local source. Look for the following symbols on each page:



## CASE STUDY



## INFORMATION



## LINKS TO RESOURCES



## CONTACTS IN CAMBODIA

A summary of resources is also provided on page 39, and a list of contacts referenced in this manual is given on page 38.

## A1) THE CASE FOR DISABILITY INCLUSIVE FINANCIAL SERVICES

- Financial services play an important role in social development, providing a route to economic independence, as well as access to other products and services. The commitment to leave no-one behind from the benefits of development is an overarching principle of the United Nations 2030 Agenda for Sustainable Development, which includes access to financial services as an enabler or target for eight of the seventeen Sustainable Development Goals (SDGs)<sup>2</sup>.
- By implementing disability inclusion, FSPs can support national strategies to increase overall financial inclusion and fulfill the rights of persons with disabilities, as well as advancing their business goals.
- Globally, it is estimated that 15% of the population experiences some form of disability. In Cambodia, different surveys have given different estimates of the number of persons with disabilities, but is believed to be up to 10% of the population aged 5 and over<sup>3</sup>.
- This represents a significant sub-section of the population which is currently under-served by FSPs. Taking steps to make their products and services more accessible gives FSPs the opportunity to build relationships with new customers with disabilities, and also with other groups, in particular older people.
- The proportion of persons with disabilities increases dramatically amongst older age groups (rising to 44% of those aged 60 or over in Cambodia<sup>3</sup>), and many older people may experience some difficulties with mobility or accessing information, in particular through digital channels. As populations age in many countries, including Cambodia, the number of older people will increase over time.
- The actions required for disability inclusion can also translate to increased satisfaction and loyalty from the FSP's wider customer base. Measures to improve accessibility of physical locations, websites, digital banking platforms, forms and other documents often make these more convenient and usable for all customers.

## A2) UNDERSTANDING DISABILITY AND INCLUSION

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) says that: "Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others". Based on the social model of disability, this Convention highlights that disability is caused by barriers in the environment and that persons with disabilities have rights to a barrier free environment for them to participate as equals. The convention also places the responsibility on states to ensure that these rights are protected.

In their daily living, persons with disabilities face a variety of barriers to participation, in the forms of:

- 1) Lack of physical accessibility (presence of steps with no ramps or elevators, inaccessible toilets, inadequate width of doors, lack of grab bars, inaccessible signage etc.).
- 2) Communication in inaccessible forms (inaccessible formats such as small fonts or insufficient contrast in printed materials, lack of audio or visual alternatives, absence of

<sup>2</sup> 'Financial Inclusion and the SDGs' UN Capital Development Fund (UNCDF), <https://www.uncdf.org/financial-inclusion-and-the-sdgs>, accessed 9 April 2022

<sup>3</sup> Cambodia Demographic and Health Survey (CDHS) 2014, <https://dhsprogram.com/pubs/pdf/fr312/fr312.pdf>, accessed 21 September 2021



sign language interpreters, etc.).

- 3) Attitudes that exclude (For example: employees are fearful of dealing with persons with disabilities or don't know how to meet their specific needs; beliefs that persons with disabilities are better supported by grants or charity, or they are not capable of running a business or may not pay back loans) and
- 4) Inadequate political/ institutional responses (provisions which overtly or otherwise exclude persons with disabilities).

Principles of inclusion require that persons with disabilities should have access to an environment that is barrier-free with inclusive communications, and that they be treated with respect and dignity with equal access to opportunities for active involvement in all areas of society. Light for the World identifies four main principles of inclusion<sup>4</sup>:

- Attitude: respect and dignity for persons with disabilities
- Communication: that is inclusive of persons with all types of disability
- Accessibility: a barrier-free environment
- Participation: active involvement of persons with disabilities

These principles are central to the model of disability inclusive financial services implemented by Chamroeun and Good Return, and the process for disability inclusion outlined in this manual.

### A3) RIGHTS OF PERSONS WITH DISABILITIES

- In the past, disability was often seen as a medical problem, with the focus on trying to 'cure' the person with a disability (the 'medical model'). Another common view was that persons with disabilities were dependent on charity from others (the 'charity model').
- Nowadays, we realise persons with disabilities are equal members of society, who face barriers to accessing their rights and freedoms because societies fail to take adequate measures to include them (the 'social model' of disability).
- The UNCRPD documents the obligations of governments to eliminate any barriers that prevent persons with disabilities from accessing their rights. This includes:
  - Taking all appropriate measures to eliminate discrimination on the basis of disability by individuals, organisations or private companies;
  - Promoting social awareness of the rights of persons with disabilities and their skills and contributions;
  - Making reasonable accommodations to the needs of individual persons with disabilities to ensure they can access the physical environment, the justice system, communications and information, education, employment, healthcare and other key services.
- With regard to financial services, the UNCRPD recognises that persons with disabilities have legal capacity, and the right to control their own financial affairs and access bank loans, mortgages and other forms of credit on an equal basis with others.

<sup>4</sup>Light for the World (LFTW), 'Disability Inclusion Training Manual', [https://www.rifacademy.org/s/9LFTW-Disability-Inclusion-Training-Manual\\_EN.pdf](https://www.rifacademy.org/s/9LFTW-Disability-Inclusion-Training-Manual_EN.pdf)

## A4) BARRIERS TO ACCESSING FINANCIAL SERVICES

Persons with disabilities are one of the most excluded segments of the population in accessing financial services. Globally there is very little data, research or examples of formal efforts for making financial services accessible for persons with disabilities. Even in instances where service providers claim to be accessible/ inclusive, staff on the ground are rarely trained or equipped with tools to assist persons with disabilities as consumers.

Most FSPs have yet to recognise the business opportunity in serving persons with disabilities as customers. It is therefore no surprise that FSPs in general do not have any plans for actively engaging with this large and underserved segment. Due to limited interactions with persons with disabilities, FSPs have few opportunities to understand the needs of this customer group and remove barriers that hold back persons with disabilities from accessing financial services.

In engaging with FSPs, persons with disabilities face barriers from interactions with marketing channels (to learn about products and services) through application and documentation, and finally in transactional interactions as a customer (deposits, withdrawals, statements etc.).

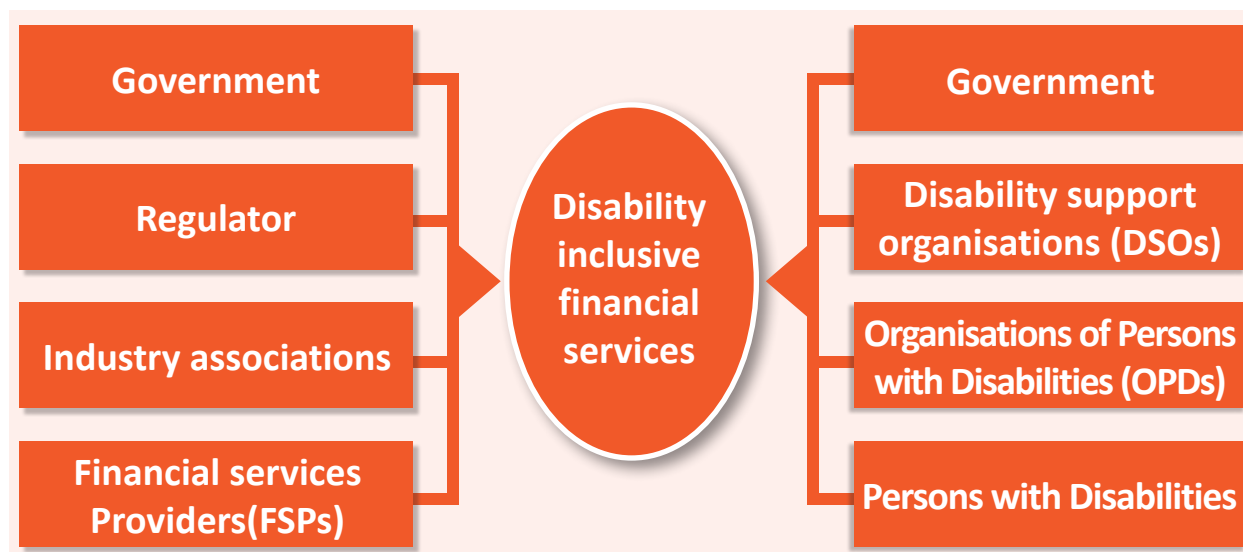
A highly underappreciated aspect about financial services relates to privacy which is central to the relationship between any customer and an FSP. Considering the barriers in engaging with FSPs, persons with disabilities often have to depend on others to assist them during the application process, as well as for completing transactions, which compromises their privacy and security. This behavioural aspect holds back persons with disabilities from fully accessing services even when they have a well-defined need and desire to seek banking services.


## A5) AN ECOSYSTEM APPROACH TO DISABILITY INCLUSIVE FINANCIAL SERVICES

Persons with disabilities remain excluded from accessing financial services due to societal, physical and informational barriers. Lack of engagement amongst both the communities (persons with disabilities and FSPs) holds back well-intentioned FSPs from making changes due to their lack of understanding of both barriers and tools to address gaps in accessibility. This lack of engagement as well as societal barriers (flawed perception of persons with disabilities as being dependent or a burden, lack of understanding of the need for privacy etc.) also need to be addressed. FSPs are responsible for addressing barriers in their organisation's physical, digital and social environment, and building engagement between communities. However, for persons with disabilities and FSPs to overcome societal barriers will require efforts from more than just one or a few FSPs.

This can be possible if efforts of FSPs are part of a larger effort to build an ecosystem of disability inclusive financial services. The foundation for such an ecosystem would be a supportive Government outlook and policies as well as regulatory environment that facilitates regular engagement between all stakeholders. Such an ecosystem approach for disability inclusive financial services will align efforts of all stakeholders (government, regulators, industry associations, FSPs, persons with disabilities and OPDs) pursuing common goals and linkages, to put in place the building blocks for disability inclusion.

Figure 1: Main actors in the disability inclusive financial services ecosystem



 <b>Information: Main actors in the disability inclusive financial services ecosystem in Cambodia</b>	
Role	In Cambodia:
<b>Government</b>	
Formulates national social, economic and financial policy frameworks, and passes legislation to enforce these, including strategies and laws to promote the rights of persons with disabilities. These can include general regulation on non-discrimination and accessibility, as well as specific measures to promote financial inclusion of persons with disabilities.	The <b>Ministry of Economy and Finance (MEF)</b> is responsible for preparing, implementing and monitoring the economic and financial policies of the RGC, managing and monitoring the development of the financial sector, and overseeing financial industry affairs. The <b>Ministry of Social Affairs, Veterans and Youth Rehabilitation (MoSVY)</b> is responsible for preparing, implementing and monitoring policies to protect and promote the rights of persons with disabilities.
<b>Regulatory authorities (e.g. Central Banks)</b>	
Regulators pass and oversee regulations governing the operation of FSPs, including both prudential regulation, and consumer protection. From a disability inclusion perspective, this can include incentivising and enforcing measures for non-discrimination and accessibility, including access to channels for consumer complaints.	The <b>National Bank of Cambodia (NBC)</b> is the central bank and monetary and supervisory authority. The NBC is responsible for determining and directing monetary policy within the framework of the RGC's economic and financial policy. As the supervisory body, the NBC has authority to license, delicense, regulate and supervise banks and financial institutions.

Industry Associations	
<p>Membership associations of FSPs can play a number of roles in the disability inclusion financial services ecosystem. These include incorporating disability inclusion in industry codes of conduct and standards, dissemination of relevant policies, guidelines and information, and providing training and capacity building for FSPs.</p>	<p>There are three main industry associations: <b>The Association of Banks in Cambodia (ABC), The Cambodia Microfinance Association (CMA) and the Cambodian Association of Finance &amp; Technology (CAFT).</b></p>
Financial service providers (FSPs)	
<p>As the providers of products and services to customers, FSPs are pivotal in the delivery of disability inclusive financial services. This requires not only compliance with existing regulations and standards, but also active commitment to understand and serve the needs of customers with disabilities. This is best achieved by building relationships with OPDs and DSOs, as well as their existing customers with disabilities.</p>	<p>The main FSPs in the formal sector (regulated by NBC) are banks and microfinance organisations (MFIs), rural credit operators and leasing companies.</p>
Organisations of persons with disabilities (OPDs) (also known as disabled person's organisations, or DPOs)	
<p>OPDs are groups controlled by a majority of persons with disabilities at board, staff and membership levels. A primary aim of OPDs is empowerment and self-advocacy of persons with disabilities to achieve their rights. They play a key role in representing the views of persons with disabilities to government bodies as part of the policy process. They can also engage actively with FSPs to promote the needs of persons with disabilities for accessible and inclusive services.</p>	<p>There are many OPDs in Cambodia. <b>Cambodian Disabled People's Organization (CDPO)</b> is an umbrella body with a membership of OPDs across the country.</p>
Disability support organisations (DSOs)	
<p>Other organisations that provide services for persons with disabilities and / or advocate for disability inclusion. These may be bodies established by governments, non-government organisations (NGOs), charities or social enterprises. They often have specific expertise and can provide advice or consulting services to FSPs to implement disability inclusion plans.</p>	<p>There are many DSOs in Cambodia. DSOs referenced in this report include:</p> <ul style="list-style-type: none"> <li>• The Disability Action Council (DAC) is the national coordination and advisory mechanism on disability issues</li> <li>• NGOs: Humanity &amp; Inclusion (HI), People's Action for Inclusive Development (PAfID), and Action on Disability and Development (ADD)</li> <li>• Impact enterprise: Agile Development Group (ADG)</li> </ul>



The ecosystem is governed by frameworks established by Government and regulators. The extent to which these frameworks facilitate the inclusion of persons with disabilities may be guided by Government policies for socio-economic inclusion, or by advocacy and lobbying by OPDs with or without support from FSPs and Industry Associations. The goal is to have a legal and regulatory framework that enables and incentivizes FSPs to include a large number of persons with disabilities as customers sustainably, while ensuring adequate customer protection measures at both institutional and sectoral levels.



### **Case Study: Government, Regulators and Industry Associations in India**

The Indian Banks’ Association (IBA) has compiled a ‘Bankers’ Guide for Customers with Special Needs and Persons with Disabilities’ (2017), which is a compilation of rules and regulations that need to be complied with to ensure effective implementation of legislations related to inclusive banking for customers with special needs and persons with disabilities in India.

This includes Government legislation on the rights of persons with disabilities, related Reserve Bank of India (RBI) rules and guidelines, Indian Banks’ Association (IBA) procedural guidelines and the Banking Codes and Standards Board of India (BCSBI)’s Code of Bank’s Commitment to Customers, as well as international Web and Mobile Accessibility Standards.

A similar initiative would support the development of disability inclusive financial services ecosystems in other countries, including Cambodia. This includes both development of common standards for accessibility which apply across all FSPs, and creation of a document that includes all relevant guidelines as well as best practices and experience of FSPs.

An ecosystem approach would create building blocks that support active and consistent engagement, so that FSPs get an insight into barriers faced by persons with disabilities, and persons with disabilities learn about products and services that are relevant for them. Over time such an approach would lead to an inclusive environment and tangible benefits (such as lower costs of outreach and servicing customers), spurring FSPs to include a large number of persons with disabilities as customers.



## Information: Cambodian legal and policy frameworks and industry guidelines

- The Royal Government of Cambodia (RGC) has ratified the **UN Convention on the Rights of Persons with Disabilities (UNCPRD)**, and is party to the **Incheon Strategy** to ‘make the rights real’ as part of the **Asia and Pacific Decade of Persons with Disabilities 2013-2022**.
- In 2009, the RGC passed the **Law on the Protection and Promotion of the Rights of Persons with Disabilities (LPPRPD)**, outlining its commitment to the promoting the disability sector, respecting the rights and dignity of persons with disabilities, and ensuring equal opportunities for their participation in all spheres of life. This Law has a specific number of provisions applicable to private sector companies, as follows:
  - The LPPRPD stipulates all public places and parking facilities should be accessible for persons with all types of disabilities (Articles 21 and 26). Inter-ministerial Prakas No. 248 dated 28 November 2018, and Letter No. 540 dated 24 March 2016 and Letter No. 1169 dated 18 May 2022 by the Ministry of Interior mandate compliance with technical standards for physical infrastructure accessibility (See Section D1 In this manual).
  - Prakas No. 108 dated 30 August 2010 and Circular 005 from the Ministry of Social Affairs, Veterans and Youth Rehabilitation dated 20 September 2012 state that all employers must make reasonable accommodations to appoint suitably qualified persons with disabilities without discrimination, and specify quotas for employment of persons with disabilities (2% of workforce for public sector and 1% for private sector employers).
- The LPPRPD is being updated in 2022 to clarify and enhance the protection of the rights of persons with disabilities in Cambodia.
- The National Disability Strategic Plan 2019-2023 details the prioritised goals and plans to achieve the objectives of the UNCPRD and the LPPRPD.
- In 2022, the Association of Banks in Cambodia (ABC), Cambodia Microfinance Association (CMA), and Cambodia Association Fintech & Technology (CAFT) jointly issued the **Banking and Financial Institutions Codes of Conduct**, applicable to all financial Institutions licensed by the National Bank of Cambodia (NBC).
  - This sets out professional standards for relationships between FSPs and all customers, based on the principles of equity and equality, including service standards, providing clear information, communication channels and dispute resolution.
  - The Code states that FSPs should not discriminate unfairly against customers based on characteristics including disability, and that staff should be trained to understand diversity and respond to specific needs.

In order to fully implement the Code, FSPs therefore need to ensure their services, their delivery and communication channels, the information they provide and their dispute resolution mechanisms are accessible and fair for all customers, including customers with disabilities. Sections B, C and D of this manual outline the steps FSPs can take to work towards this goal.

## A6) ENGAGEMENT BETWEEN FSPS AND OPDS

The key contribution FSPs can play in working towards a disability inclusive financial services ecosystem is to engage with persons with disabilities as customers, through open and regular dialogue with OPDs.

The first and most important step is to start a dialogue, which involves both FSPs and OPDs understanding each other's perspective. Due to societal conditioning, FSPs and their staff often believe that persons with disabilities are a riskier category of customer (particularly for credit) who are better served by grants or charity. This deep-seated bias is visible both in lack of targeted efforts in reaching persons with disabilities and their limited number as a proportion of total customers. Unable to access credit from regulated entities, persons with disabilities are left with no choice but to get loans from unregulated money lenders. Over time persons with disabilities (and hence OPDs) can start to view all credit grantors with the same lens of suspicion which could lead to a sense of unease in working with FSPs.

Conversations about customer protection, responsible lending practices and barriers faced by persons with disabilities in accessing credit and other services will help develop a common understanding of needs and challenges. These conversations will identify how persons with disabilities can get access to credit as well as their responsibilities as borrowers. As this conversation progresses, FSPs and OPDs can develop frameworks for regular engagement so that both sides can gain and provide confidence to the other. As OPDs get a better sense of the work being done by regulated FSPs, they can help create awareness among their members about benefits of financial inclusion, and also support them with training on financial literacy, financial products, and their rights and responsibilities as borrowers or customers of FSPs.

As barriers at FSPs (through misplaced ideas about persons with disabilities as customers, or barriers in the operating environment) start to reduce and persons with disabilities get more comfortable with the idea of engaging with FSPs, a genuinely disability inclusive ecosystem will start to develop. Evidence of this ecosystem would be reflected in a substantially higher number of persons with disabilities doing business with regulated FSPs and regular conversations around customer protection backed by improved access to service, but also a shared understanding of responsibilities of FSPs and borrowers.



## Case Study: Engagement between FSPs and OPDs - CFI and v-shesh

v-shesh is an India-based impact enterprise working on disability inclusion by assisting persons with disabilities to build financial literacy and access training and jobs, and supporting organisations to include persons with disabilities as employees and customers.

In 2014, Center for Financial Inclusion (CFI) at Accion International partnered with v-shesh and three MFIs in India in a project for inclusion of persons with disabilities as borrowers. A key learning was that, while FSPs and OPDs agreed persons with disabilities remained deeply excluded from access to financial services, they had had virtually no engagement or dialogue with each other. Similar feedback about lack of engagement between FSPs and OPDs contributing to the exclusion of persons with disabilities was received in a project on financial literacy training by v-shesh and CRISIL Foundation.

With limited access to financial literacy training and services from regulated FSPs, persons with disabilities are forced to share their private financial information with people who assist them or work with unregulated lenders, exposing them to risks and unfair practices. Such experiences erode their confidence in financial services and FSPs. In this context, OPDs have an important role in building trust between persons with disabilities and regulated FSPs, as well as counselling FSPs about the physical and other barriers that hold back persons with disabilities from accessing financial services.

By focusing on building relationships of mutual trust with OPDs, as well as making accommodations for accessibility, the MFI partners in the project have included almost 100,000 new customers with disabilities as borrowers.



### B1) PROCESS OUTLINE

As participants of the disability inclusive financial services ecosystem, FSPs should commit to and undertake concrete measures not only to create a barrier-free environment, but also for the inclusion of persons with disabilities as customers with full access to all services and products.

Figure 2: Three-Step process for disability inclusion



FSPs should adopt a 3-step approach to building a genuinely disability inclusive financial services organisation and operating environment across the entire customer lifecycle. These steps are:

1. **Commit** to building a disability inclusive financial services (FS) ecosystem by:
  - a. Engaging with stakeholders in the disability sector, in particular OPDs (see case study below).
  - b. Engaging with other actors in financial services sector (regulator, industry associations, other lenders, payment services providers etc.) to share best practices and consider developing standards that can be adopted by regulated FSPs.
  - c. Committing to an actionable plan for this engagement.
  - d. Making disability inclusion at organisational level a Key Performance Indicator (KPI) for the executive committee or a designated senior executive, with contributing KPIs by division or function for all members of the leadership team.



## Case Study: Collaboration with OPDs: Chamroeun and Good Return

A key principle for Chamroeun and Good Return's 'Education and Access: Responsible Finance for Persons with Disabilities' project, was inclusive design, working closely with persons with disabilities at every stage. The first step of the project was to collaborate with OPDs to create a Needs Assessment survey, and train members of OPDs as enumerators to administer the survey with 513 persons with disabilities in five provinces.

The findings from the Needs Assessment survey highlighted the widespread exclusion of persons with disabilities from financial services, and an unmet need for financial products and services, in particular loans for business purposes. At the same time, respondents showed low levels of financial literacy and low confidence to use financial products and approach FSPs, coupled with a lack of access to financial literacy training.

These findings were used to shape the project design. Good Return adapted its CAFE financial coaching curriculum for accessibility, seeking feedback from members of OPDs throughout the process. Good Return also trained coaches from Chamroeun, the OPD Phnom Penh Center for Independent Living (PPCIL), and the disability organisation Persons with Disability Foundation (PWDF) to deliver the CAFE coaching to persons with different disabilities. Based on the needs assessment, Chamroeun developed a loan product which was offered to persons with disabilities who had completed the CAFE coaching and wanted to finance their business activities.

On average, the persons with disabilities who completed the CAFE financial coaching achieved similar improvements in financial capability scores to persons without disabilities in Cambodia who completed the same program. Those who took the loan from Chamroeun gave feedback that the financial coaching helped them to decide whether to take a loan and to manage the repayments. The majority were able to use the loan to support their business activities, although some experienced challenges due to the COVID-19 pandemic, and none experienced negative financial impacts as a result of the loan.

The report on the Needs Assessment carried out by Chamroeun and Good Return can be accessed at: <https://www.findevgateway.org/paper/2020/12/needs-assessment-people-disabilities-access-financial-education-and-finance-cambodia>



## Contacts in Cambodia:

- **Cambodian Disabled People's Organization (CDPO)** has a membership of OPDs across all provinces in Cambodia <https://www.facebook.com/cdpo.org>
- **The Department of Welfare for Persons with Disabilities (DWPD):** can provide advice on issues relating to disability through a hotline number 1270

## 2. Develop a plan to

### a. Improve accessibility and inclusion by:

- i. Making services and informational materials accessible & providing adaptations, not just from the standpoint of compliance but spirit of genuine inclusion;
- ii. Creating accessible channels for persons with disabilities to communicate feedback and complaints to the FSP;
- iii. Sensitising all staff members about disability inclusion (See Information box below);
- iv. Hiring persons with disabilities as staff members, as lived experience of staff members can help develop robust systems and responses;
- v. Tracking number of customers with disabilities.

### b. Communicate externally and internally:

- i. That all services and products will be accessible;
- ii. That the FSP understands that disability inclusion is a journey and they intend to continue to build on their efforts;
- iii. The protocols for easy access to services and adaptations, including feedback and complaints mechanisms.

### c. Appoint a senior executive to receive and address feedback and complaints from Persons with disabilities.

### d. Specify clear targets, accountabilities and monitoring mechanisms to track progress.



## Information: Sensitisation for staff

The objective is to ensure FSP staff understand that inclusion of persons with disabilities is a business goal and not charity, understand basic concepts relating to disability inclusion, and have access to tools that make them confident in assisting persons with disabilities as customers.

This can be achieved by training covering:

- Social model of disability and rights-based approach towards disability;
- Impact of lack of access to financial services in lives of persons with disabilities;
- Barriers that persons with disabilities face in accessing financial services;
- Etiquette in interacting with persons with disabilities;
- Accessibility and inclusion related features for services and products (addressing also the tendency to focus on needs of persons with locomotor disabilities more than others).

Initial training can be carried out using digital tools for efficiency and effectiveness where required, with reinforcement through face-to-face, interactive sessions, particularly for customer facing staff.



## Resources:

<https://www.rifacademy.org/disability-inclusion#resources>

- **'Ensuring Disability Inclusive Training'** (EN), Agile Development Group, [https://www.rifacademy.org/s/2Agile-Development-Group\\_Ensuring-Disability-Inclusive-Training\\_EN.pdf](https://www.rifacademy.org/s/2Agile-Development-Group_Ensuring-Disability-Inclusive-Training_EN.pdf)
- **'Disability Inclusion Training Manual'** (KH/EN), Light for the World (LFTW), [https://www.rifacademy.org/s/9LFTW-Disability-Inclusion-Training-Manual\\_EN.pdf](https://www.rifacademy.org/s/9LFTW-Disability-Inclusion-Training-Manual_EN.pdf)
- **'Introductory Guides to Inclusive Banking'** (KH/EN), Agile Development Group, [https://www.rifacademy.org/s/3Agile-Development-Group-Introductory-Guides-to-Inclusive-Banking\\_EN.pdf](https://www.rifacademy.org/s/3Agile-Development-Group-Introductory-Guides-to-Inclusive-Banking_EN.pdf)



## Contacts in Cambodia:

- ADD International can provide resources for disability inclusion <https://add.org.uk/countries/cambodia>
- Agile Development Group can provide training for FSP staff based on its 'Guide to Inclusive Banking' <https://agiledg.com/>
- People's Action for Inclusive Development (PAfID) (formerly Light for the World Cambodia) can provide disability inclusion training and advice for organisations <https://www.facebook.com/PAfID.org>

3. **Take action** to create a genuinely inclusive operating environment across the entire customer lifecycle, following principles of universal design (see Information box) by:
  - a. Identifying customer touch-points, or 'moments of truth'
  - b. Assessing and removing barriers for persons with disabilities at each of these points to improve accessibility
  - c. Implementing protocols for accessibility and adaptations

These steps are described in more detail in the following sections. Section C outlines the key customer touchpoints and considerations for accessibility across the customer lifecycle. Section D provides 'Toolkits' giving further guidance for implementation, with links to external standards and protocols, and contacts who can provide expert advice.



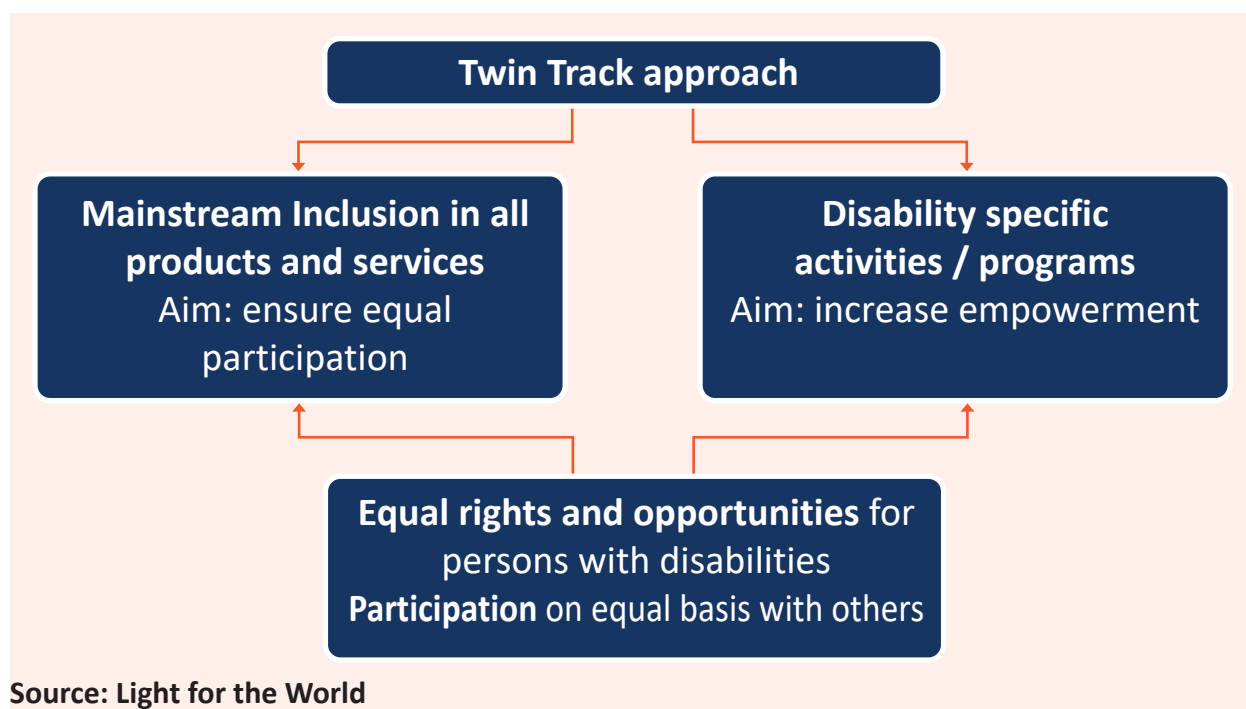
## Information: Universal design

- Universal design means designing buildings, products, programs and services so that as far as possible they are usable by all people without needing any special adaptations.
- It covers seven key design principles: equitable access by persons with different abilities, flexibility in use, simple and intuitive use, perceptible information, tolerance for user error, low physical effort, and space for access and use.
- A design process which starts from the perspective of users with disabilities (including physical, visual, hearing, cognitive and communication impairments) can often be relatively inexpensive, and much cheaper than making adaptations later in the process.
- Applying universal design principles makes products and services more accessible and usable for a broad range of people. For example, improving physical accessibility of service points also benefits older people, pregnant women and parents with children in strollers, and providing information in simple language and accessible formats is helpful people with low literacy, non-native speakers and older people.
- For the financial services provider, this can translate into a broader customer base, and increased customer satisfaction, loyalty and retention.

## B2) TWIN TRACK APPROACH TO DISABILITY INCLUSION

Even as FSPs focus on building an environment that is barrier-free and accessible for all customers, there may be a need to introduce disability specific activities and programs for groups that require specific attention or customisations, in order to reach this goal.

Figure 3: The twin track approach to disability inclusion



Source: Light for the World

One of the most successful strategies may be to apply a ‘twin-track’<sup>5</sup> approach to disability inclusion with two parallel work streams:

- Facilitating the inclusion of persons with disabilities in the mainstream products and services of FSPs, as the most sustainable, cost-efficient solution and rights-based solution in the long term.
- Implementing specific initiatives to empower persons with disabilities as customers of FSPs, for instance by outreach programs, financial literacy training or products tailored for persons with disabilities.

<sup>5</sup> HI (2006), ‘Good Practices for the Economic Inclusion of People with Disabilities in Developing Countries’, available at <https://ecommons.cornell.edu/handle/1813/76549>





## Case Study: Twin track approach to disability inclusion: Chamroeun and Good Return

- Before 2019, Chamroeun had no explicit disability inclusion strategy. While a proportion of the customers of its standard loan products were flagged as having a disability, this had never been accurately monitored or reported, and no specific accommodations had been made for customers with disabilities.
- In 2019, Chamroeun partnered with Good Return to implement a pilot model of disability inclusive financial services, in collaboration with OPDs.
  - This included a tailored product for persons with disabilities who completed Good Return's adapted financial literacy coaching program.
  - In addition, key staff received disability inclusion training, branches in the target provinces were adapted for accessibility, and key policies were reviewed to ensure inclusion of persons with disabilities.
- The pilot demonstrated that Chamroeun could provide loans to new customers with disabilities who would not previously have been able to access its services, to support their business activities.
- Chamroeun is now using the learnings from the pilot to scale up and extend its branch accessibility program, and roll out disability training to all staff. In addition, it is also mainstreaming disability inclusion by replacing the tailored product to extend access for PWD to its standard product range, with accommodations for accessible servicing.

### C1) OUTREACH AND ENGAGEMENT

Staff responsible for each engagement channel (advertising, agents, branches, direct calls/ messages etc) should ensure that each activity planned by that channel includes steps to:

- Reach out to and engage with persons with diverse disabilities
- Understand the needs of persons with disabilities: their needs for financial products, their experience and understanding of these, and needs for financial literacy education
- Update OPDs to ensure that they have information about new products/ services/ features (not limited to features about accessibility)
- Consult with OPDs to get their input when planning adaptations for persons with disabilities at each stage of the customer journey

All promotional materials in each channel should:

- Be developed in multiple formats (print, digital, voice, sign language, picture cards) so that they are accessible to all persons with disabilities (See D4. Toolkit: Accessible and alternative formats)
- Be readily available in various formats at a physically accessible central point (for printed materials)
- Be obtainable by contacting a toll-free phone number (for both customers and employees)
- Mention all features relevant to persons with disabilities (waiver of service fee as an example) in all product related materials
- Mention that alternate formats are available

Customer servicing locations (branches, call centres and digital channels such as websites or apps) should:

- Explicitly communicate (i) that all information is available in a range of accessible formats and (ii) how information in different formats can be accessed
- Provide support in response to in-bound queries in accessible formats (a central phone number manned by sign language users could be maintained).

Tracking:

- FSPs should create a mechanism to document and report outreach to and response from persons with disabilities (along with types of disabilities).

### C2) APPLICATION AND ON-BOARDING

- Application, documentation and disbursement related processes should be barrier-free and assistance should be available at each step (for example, a toll-free phone number to seek support, that can be accessed by customers and employees).
- Identify all points of interaction with customers during the process through each channel (branches and offices, telephone, internet and mobile banking), and ensure they are accessible:
  - Staff should be trained to ensure that there is no denial of services to persons legally competent to contract (sometimes persons with mental illness may be denied services).

- Application forms and documentation required should be in formats that are accessible to all persons with disabilities (See D4. Toolkit: Accessible and Alternative Formats).
- Doorstep service should be available in case branches and offices are not barrier-free and/ or customers have severe disabilities.
- Processes for application and disbursement should include provision of accommodations for persons with all types of disabilities, for example guidelines for signatures on documentation for persons without the use of their upper limbs, and process for disbursing cash to persons with vision impairment.
- These provisions are most effective when common standards are adopted at sector level, through initiatives by Government, regulators and / or industry associations (See example Case Study on page 13).
- Tracking mechanisms should be instituted to capture data on disability in the application form and account systems, to allow tracking of the number of applications from persons with disabilities, and acceptance rates.

### C3) CUSTOMER SERVICES AND TRANSACTIONS

- All customer servicing channels (Branches, Agent offices, Telephones, ATMs, Internet and Mobile device-based channels) should be assessed to ensure they are accessible and usable for persons with different types of impairment as far as possible. This includes the following areas:
  - Accessible physical locations and service points (see D1. Toolkit: Branches, offices and ATMs).
  - Providing information about transactions and transaction documents (deposit slips, receipts, passbooks) in accessible formats (see D4. Toolkit: Accessible and Alternative Formats).
  - Training customer-facing staff to serve persons with disabilities, with access to a help-line for support where required.
- Doorstep service should be available in case offices are not barrier free and/ or customers have severe disabilities.
- Provide and communicate information on accessible channels for complaints and escalation.



#### Information: Doorstep banking

‘Door Step basic banking’ is the provision of basic banking facilities (e.g. submission of application documents, disbursement of loans or withdrawals, and collections of payments or deposits) at the customer’s home or business.

This can be provided as an option where branches cannot be made accessible, and / or for customers with severe disabilities. Microfinance institutions in particular may have operating models which facilitate this service, for instance village banking or community banking. Home base service will adhere to strong client protection safeguarding and ensure that no harmful practices is directed to the client.

### D1) TOOLKIT: PHYSICAL LOCATIONS: BRANCHES, OFFICES AND ATMS



- Branches are key points of interface between customers and the FSP at many points in the customer lifecycle, including finding information, application, loan disbursement and customer servicing
- Other physical locations used for customer services and transactions include ATMs and agent offices.
- All these locations should be physically accessible and usable for all customers, including persons with different impairments, and other groups such as the elderly, pregnant women, and parents with children in strollers.

#### Key Principles:

- ✔ Follow **Universal Design** principles to make your branch and ATM locations safe and accessible to all customers (See **Information** on page 21)
- ✔ If you use **agents**, inform them about your plans and standards, and collaborate with them to make their service points accessible.
- ✔ Use **technical standards** to develop protocols for accessibility, and **non-technical guidelines** to guide your staff to implement these standards to carry out accessibility audits and plan new locations or refurbishments (see **Resources**).
- ✔ Seek support and advice from **disability organisations with specific expertise** to help your staff build their knowledge to develop and implement protocols (See **Contacts**).
- ✔ Start with **simple and low-cost adaptations**.
- ✔ **Provide information** in accessible formats about the location of accessible branches and ATMs, if they do not all yet meet accessibility standards.

#### Accessibility for all physical locations:

- ✔ **Dedicated parking spaces** for persons with disabilities
- ✔ **Enable access to buildings and ATMs** with ramps, handrails, automated door opening, non-slip floor surfaces and clear pathways with no clutter
- ✔ **Textured floor surfaces** for persons with visual impairments
- ✔ **Accessible bathrooms**, where provided
- ✔ **Elevators** to access other floors if needed
- ✔ Branch counters and access points of ATMs (keypad, touch screen and display, card or cash insertion slots) at **ergonomic heights** for people using wheelchairs
- ✔ Signage in accessible and alternative formats such as symbols, large print, tactile signs and Braille lettering (See D4. **Toolkit**: Accessible and alternative formats)

### Accessing services in branches or offices:

- ✓ **Sensitise branch staff** to interact and communicate respectfully with persons with different disabilities.
- ✓ Where possible, provide a **clearly identifiable counter** in branches that gives priority to older people and persons with disabilities, including those with difficulty seeing, hearing or communicating.
- ✓ **Announcements of token numbers** for service queues should be made in both visual and audio formats
- ✓ Make branch staff aware of how to access resources including:
  - Access to **sign language interpretation** – for instance, by providing a centralised number for access
  - **Information, forms and documents** in alternative formats (See D4. Toolkit: Accessible and alternative formats)

### Accessibility services through ATMs:

- ✓ **Good lighting** in ATM area, including shading the screen from glare from the sun
- ✓ **Screen display:** high contrast between text and background, accessible fonts and large print (See D4. Toolkit: Accessible and alternative formats)
- ✓ **Keypad:** Universal keyboard layout, Braille symbols on number keys, special raised symbols for ENTER, CLEAR and CANCEL keys.
- ✓ **Audio output:** audible prompts, confirmations and error messages for all key transactions.
- ✓ **Talking ATMs:** using voice guidance systems, with a headphone jack users can plug into for privacy



### Resources: Cambodian Standards for Physical Infrastructure Accessibility

<https://www.rifacademy.org/disability-inclusion#resources>

- The **Technical Standards for Physical Infrastructure Accessibility** (KH/EN) <https://www.rifacademy.org/s/41-DACHITechnical-Standards-for-Physical-Infrastructure-Accessibility-Manual.pdf> produced by the Disability Action Council (DAC) and Humanity & Inclusion (HI) give detailed technical specifications for accessible infrastructure for all public buildings in Cambodia. There are also factsheets and **six video animations** to guide you <https://accesscambodia.org/video-content/>
- The **Non-technical Accessibility Guidelines** (KH/EN) from the Disability Action Council (DAC) and Humanity & Inclusion (HI) provide guidance for implementation for non-technical staff, including an **assessment tool**, **training manual for staff**, and a **training facilitator's guide** at <https://www.rifacademy.org/disability-inclusion#resources>.



## Other resources:

- Americans with Disabilities Act (ADA) Standards for Accessible Design (2010): Accessibility standards for ATMs is Chapter 7 Communication Elements and Features (EN)  
[https://www.ada.gov/2010ADASTandards\\_index.htm](https://www.ada.gov/2010ADASTandards_index.htm)
- G3ict: Inclusive Financial Services For Seniors and Persons with Disabilities: Global Trends in Accessibility Requirements (2015) (EN) <https://g3ict.org/publication/inclusive-financial-services-for-seniors-and-persons-with-disabilities-global-trends-in-accessibility-requirements>



## Contacts in Cambodia:

- **Disability Action Council (DAC)** for advice on implementing technical standards  
<https://www.facebook.com/DACCambodia>
- **Humanity & Inclusion:** INGO with expertise in physical accessibility requirements  
<https://www.facebook.com/HandicapInternationalCambodia/>



## D2) TOOLKIT: DIGITAL CHANNELS



- Digital channels (websites, social media sites e.g. Facebook / Twitter, and internet and mobile banking applications) have the potential to dramatically increase financial inclusion, by overcoming the barriers of location and physical access for people in remote and rural areas, and persons with impaired mobility.
- However, digitalisation can create new barriers, in particular for persons with disabilities and older people who experience visual impairments or reduced motor skills. If digital channels are not accessible, these customers may be excluded from financial services or seek support from others to access them, which may compromise their security.
- Making digital channels simple and user-friendly for people of all abilities provides benefits for all customers, including persons with disabilities, and can be a source of competitive advantage for the FSP.

### Key points for design and development of digital interfaces:

- ✓ The goal is to ensure each page or function is accessible to all users as far as possible, by building in options which can be used by persons with particular accessibility needs, for example:
  - **Visual:** include accessible and adjustable fonts and contrasts, options for keyboard navigation, text descriptions for all images. Ensure the structure and order of text and objectives on the screen are compatible with screen reading tools.
  - **Hearing:** include captions or other visual formats for all audio information. Use non-visual cues (sounds or vibrations) as well as visual prompts.
  - **Motor skills:** ensure that all content can be accessed without using a mouse, through keyboard commands (tab or arrow keys). Buttons should be large, easy to see and not too close to each other, with only a simple swipe or key-stroke needed to complete a transaction.
- ✓ As with physical accessibility adaptations, it is usually cheaper and easier to **build in inclusion from the start** when designing or upgrading interfaces, rather than making later adaptations.
- ✓ Follow accessibility guidelines when developing or updating websites, internet banking and mobile applications, such as the **Web Content Accessibility Guidelines (WCAG) 2.1** (See information and resources below)
- ✓ Appoint an **internal champion** for accessibility in your IT department and support them to develop their knowledge of these standards and train other staff
- ✓ Specify requirements to **outsourced developers** of websites and mobile applications, and any associated interfaces such as apps enabling photos of cheques to be uploaded for deposits.

- ✔ **Consult** with OPDs as users and disability support organisations with specific expertise to help prioritise the most important and achievable technological enhancements.
- ✔ Create a **multi-year plan** for accessibility enhancements, taking into account existing technology strategies and work plans. Implement more straightforward and less costly improvements first.
- ✔ Test all mobile applications and websites on **different mobile platforms** for accessibility.
- ✔ Develop partnerships with OPDs to carry out **accessibility testing** of new or upgraded websites and applications before launch.
- ✔ Provide accessible channels for persons with disabilities and other customers to **give feedback** on any accessibility barriers.
- ✔ Use **consistent approaches** for accessibility across different channels and interfaces.
- ✔ Use **native controls** over custom controls wherever possible for standard approaches which incorporate automatic accessibility features of platforms.
- ✔ Use **simple language and design** to avoid confusion and improve the experience for all users.

#### **Additional points for internet and mobile banking platforms**

- ✔ Provide **information, guides and tutorials** in accessible text and alternative formats, to explain how to navigate sites and carry out transactions, and how to use the accessibility options that are available.
- ✔ To enable **secure independent access**, ensure login processes can be accessed without using a mouse, and through devices compatible with assistive technology such as screen readers and voice recognition software.
- ✔ Offer **alternatives to visual CAPTCHA applications** (such as audio codes or mathematics questions) as security verification methods.
- ✔ When sending One Time Passwords (OTPs) or other authentication codes by email, **allow sufficient time** for customers with disabilities to access and enter the codes online
- ✔ Provide error messages, prompts to enter information, and confirmation of transaction success or failure through **visual and audio formats**.
- ✔ Ensure statements and other documentation are available in **print as well as digital formats**, so that they can easily be read by screen readers. Offer accessible and alternative formats such as audio, large size fonts, and printable in Braille (see D4. Toolkit: Accessible and alternative formats).
- ✔ Offer **real-time access to customer service representatives** through a range of channels such as instant chat, video conferencing with captions, or SMS and text messaging.

#### **Additional points for digital interfaces, websites and social media**

- ✔ Provide accessible images by using alternative text (**'alt texts'** or **'alt tags'**) to provide an alternative for screen reader users. Alt texts should describe the image without being too long. They must also follow guidelines for accessible fonts and contrasts (See Section D4 in this manual).
- ✔ **Headings** need to be identified (that is as H1, H2) to help with screen reader compatibility.
- ✔ Use **accessible links** that guide the user by describing the content they link to. For instance: 'Find out more about **accessible social media**', rather than '**Click here** to read more about accessible social media'
- ✔ For users with visual impairment, use **accessible fonts** for text and ensure there is **high contrast** between the text and the background (see Resources box below, and Section D4 in this manual)

- ✔ Mark up **tables** in HTML with tags 'TH' for table header and 'TD' for table data, so that they are recognised by screen readers.
- ✔ For **document attachments**, HTML is the most accessible format. PDF files can be compliant with WAGC accessibility guidelines, if they are tagged correctly (see guidance in the Resources box below). For Microsoft Word documents, use the in-built accessibility checker feature, and for all Microsoft 365 programs use the 'Edit Alt Text' function to add alt texts to any shape, picture, chart, diagram or object.
- ✔ For **video and multimedia**, provide a plain text equivalent as a minimum, ideally **captions** and / or a downloadable transcript. Subtitles are written transcripts of the speech in a video, usually to **translate** it to different language. Captions are intended for users who can't hear the audio, and include transcription of the dialogue and other information such as the names of speakers, and description of other sound effects. You can also incorporate **sign language interpretation** within videos, but note that different countries have different sign languages.
- ✔ Capitalize the first letter of every word in **hashtags**, so that they can be read out loud by screen readers – e.g. #DisabilityInclusiveFinance, not #disabilityinclusivefinance.
- ✔ Search for **accessibility features** on the help-centre pages of social media channels, e.g. Facebook and YouTube can automatically generate captions, and Twitter has an option to include image descriptions.
- ✔ You can purchase an **accessibility tool** such as 'UserWay' to make your website accessible on any device and compliant with WCAG standards (see Resources box below).



### Information: Technical standards for web content accessibility <https://www.w3.org/WAI/standards-guidelines/wcag/glance/>

The **Web Content Accessibility Guidelines (WCAG)** <https://www.w3.org/WAI/standards-guidelines/wcag/> provide international technical standards for web design and development practitioners to make web content more accessible to persons with disabilities. The standards also make web content more usable by older people, and often for users in general.

The current version of the standards (WCAG 2.1) include **thirteen guidelines** organised around four accessibility principles for web content: perceivable, operable, understandable, and robust. <https://www.w3.org/TR/WCAG21/>

Each guideline includes **testable success criteria** at three levels (A, AA and AAA). <https://www.w3.org/WAI/WCAG21/quickref/>. Specific guidance is provided for developers on **techniques** to develop accessible web content, including include code examples, resources, and tests. <https://www.w3.org/WAI/WCAG21/Techniques/about>

The resources include **Authoring Tool Accessibility Guidelines (ATAG 2.0)** <https://www.w3.org/WAI/standards-guidelines/atag/> and guidance on applying the standards to mobile web content <https://www.w3.org/WAI/standards-guidelines/mobile>.



## Resources

- G3ict, 'Inclusive Financial Services For Seniors and Persons with Disabilities: Global Trends in Accessibility Requirements' (2015) (EN)  
<https://g3ict.org/publication/inclusive-financial-services-for-seniors-and-persons-with-disabilities-global-trends-in-accessibility-requirements>
- W3C: Web Content Accessibility Guidelines (WCAG) 2.1 (EN)  
<https://www.w3.org/WAI/standards-guidelines/wcag> (See information box above)
- W3C: Tips for getting started (EN) <https://www.w3.org/WAI/tips/>
- GAATES: resources for ICT (including guides for hiring contractors to develop accessible web content, developing accessibility policy, and creating accessible electronic documents) (EN) <http://gaates.org/resources/>
- European Disability Forum (EDF), Toolkit Accessible Social Media(2021) (EN),  
<https://www.edf-feph.org/content/uploads/2021/07/Toolkit-Accessible-Social-Media.pdf>
- WebAim: Online colour contrast checker (EN)  
<https://webaim.org/resources/contrastchecker/>
- UserWay accessibility tool (EN) <https://userway.org/>
- Vision Australia 'PDFs and common accessibility misconception' (EN),  
<https://www.visionaustralia.org/news/2022-03-09/pdfs-and-common-accessibility-misconception>

## D3) TOOLKIT: IN-PERSON COMMUNICATION



- The foundation for providing services to customers is the ability of the FSP staff to communicate with customers so that they can understand and respond to their individual needs.
- In-person communications with customers can occur in branches, by telephone and when providing doorstep banking services.
- It is important for customer servicing staff to be confident and respectful in communicating with persons with disabilities, and to know who to contact for specialised services such as sign language interpretation.

### Principles for inclusion:

- ✔ The first step is to sensitise all staff so that they understand how to communicate respectfully with persons with disabilities.
- ✔ Customer-facing staff should receive additional training on how to communicate with persons with visual, hearing, speech or cognitive impairments which can lead to difficulties in communicating
- ✔ Provide a helpline number for staff to contact for more information or support, and to access sign language interpretation services.

### Etiquette for interacting with persons with disabilities:

- ✔ **Talk directly to the person with disabilities**, not to his or her assistant, and refer to them by name rather than terms such as ‘the woman in the wheelchair’.
- ✔ **Use respectful language** when speaking to or about persons with disabilities.
  - Use “People first” language, for instance “woman with a disability” instead of “disabled woman”, or “man with a hearing impairment” instead of “deaf man”.
  - Avoid terms which can be seen as disrespectful or insulting, such as “cripple” or “retarded”
- ✔ **Avoid asking personal questions** about a person’s disability unless it is related to the matter you are talking about.
- ✔ **Do not stare or point** at persons with disabilities – this makes any person feel uncomfortable.
- ✔ **Don’t make assumptions** about individuals with disabilities – ask the person about their needs and preferences, and respect these.
  - Don’t assume that persons with one type of disability also have other types of disability.
  - Use your normal speaking voice when talking to a person with a disability, unless they ask you to speak louder or more slowly.

- ✔ **Ask before giving assistance:** Don't be offended or take it personally if your offer to help is turned down, they may not need or want any help. If they do ask for assistance, don't assume you know how best to provide it, instead ask for their guidance.
- ✔ **Don't patronise** or talk down to persons with disabilities, treat them with respect and dignity
- ✔ **Be patient and considerate** of the extra time persons with disabilities may need to do or say something, and give them your undivided attention.
- ✔ **Never pretend to understand** what a person is saying if you don't. Ask them to repeat or rephrase, or if necessary offer alternative communication methods (see below).
- ✔ **Relax and don't worry** - anyone can make a mistake when communicating with another person. If you feel you have embarrassed someone, just apologise.

For further guidelines on etiquette for interactions and respectful language, see Resources below.

#### **Alternative methods of in-person communication:**

- ✔ **Pen and paper** can be offered to assist in communications with persons with hearing or speech impairments
- ✔ Staff should have access to **printed information** in accessible and alternative formats which can be used to assist in interactions with persons with difficulties in seeing, hearing or communicating, including picture boards using simple graphics to show the steps involved in transactions and processes (see also D4. **Toolkit: Accessible and Alternative Formats**).
- ✔ **Sign language** can be used for communication by persons with hearing impairments
  - It is unlikely to be possible to train all your staff to use sign language. However, make sure all customer-facing staff know how to access sign language interpreter services.
  - Access to sign language interpretation can be provided by a number of specially trained customer services staff, and made available to other staff and customers through a centralised number.
  - Alternatively, arrange for services to be provided by external experts, and provide contact details to staff.





Resources: <https://www.rifacademy.org/disability-inclusion#resources>

The following sources include more detailed guidelines about person-first language, respectful terms related to disability, and communicating with persons with disabilities, which can be used for sensitisation and training of staff:

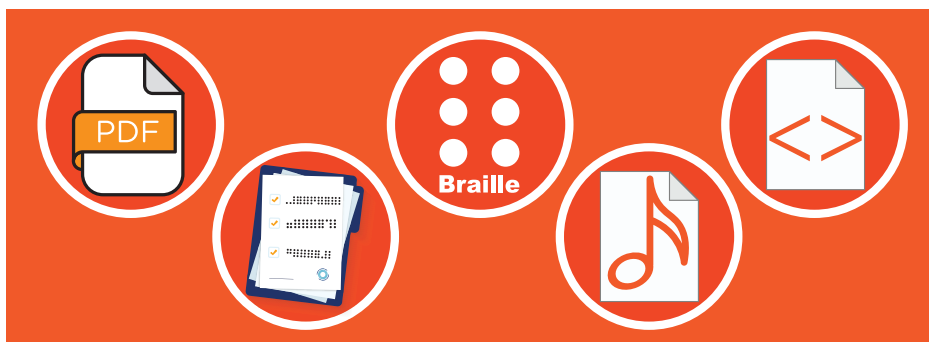
- **'Disability Inclusion Guide for Chamroeun Microfinance'** (EN), Light for the World (LFTW), <https://www.rifacademy.org/s/8LFTW-Disability-Inclusion-Guide-for-Chamroeun.pdf>
- **'Ensuring Disability Inclusive Training'** (EN), Agile Development Group, [https://www.rifacademy.org/s/2Agile-Development-Group\\_Ensuring-Disability-Inclusive-Training\\_EN.pdf](https://www.rifacademy.org/s/2Agile-Development-Group_Ensuring-Disability-Inclusive-Training_EN.pdf)
- **'Disability Inclusion Training Manual'** (KH/EN), Light for the World (LFTW), [https://www.rifacademy.org/s/9LFTW-Disability-Inclusion-Training-Manual\\_EN.pdf](https://www.rifacademy.org/s/9LFTW-Disability-Inclusion-Training-Manual_EN.pdf)



### Contacts in Cambodia:

- Organisations in Cambodia that can provide sign language interpretation include:
  - **Deaf Development Programme (DDP)** <https://www.ddp-cambodia.org>
  - **Krousar Thmey Foundation** <https://www.krousar-thmey.org/en>
- **OIC Cambodia** can provide information about communicating with persons with speech or other communication impairments, including use of picture boards <https://www.oiccambodia.org>
- **People's Action for Inclusive Development (PAfID)** (formerly Light for the World Cambodia) can provide information and training on communicating with persons with disabilities <https://www.facebook.com/PAfID.org>

## D4) TOOLKIT: ACCESSIBLE AND ALTERNATIVE FORMATS FOR DOCUMENTS



- Customers of FSPs seek and receive various kinds of information from FSPs. These range from publicity materials about FSPs, information relating to products/ services, information about operations (locations of branches/ ATMs or change in terms or conditions or fee).
- Communication by way of documents may be in either of the 2 forms:
  - Documents with transactional information (account statements, bills and invoices, trade confirmations). These could be relating to a transaction (deposit/ withdrawal) or periodical (monthly statement). These are specific to customers and contain information which is intended only for the customer
  - Documents that contain identical information for all customers of a certain type: there is usually no personal information (except addresses in case it is part of the document). These could be information about services, changes in interest rates or fees, or brochures about the FSP or products and services

### Principles for inclusion:

- ✓ Follow guidelines to make all print documents as accessible as possible to users with impaired vision (See Resources below).
- ✓ In addition, FSPs must ensure that all documents are created and made available in alternative accessible formats such as:
  - Braille
  - large fonts (for low vision)
  - simple language
  - picture boards
  - audio formats.
- ✓ A central repository of key documents in accessible formats should be created, and staff should be made aware of how to access these.
- ✓ Information should be shared with customers in all locations channels on how to obtain information in accessible formats.
- ✓ Many users prefer visual formats, and FSPs may create posters (particularly in branch) in such formats. These should be available in accessible formats including voice, which is recently gaining popularity due to ease of use on messaging apps.
- ✓ Accessibility of transactional documents (such as deposit slips) and procedures for transactions should be in line with a written policy adopted by the FSP.
- ✓ Regulators may suggest policies or encourage FSPs to design and adopt a common code of conduct which can then be adopted by all regulated FSPs.
- ✓ For electronic documents provided as attachments to emails or on websites, see guidance in Section D3 of this manual



Resources: <https://www.rifacademy.org/disability-inclusion#resources>

- 'Accessible Print Guidelines' (EN), Agile Development Group, [https://www.rifacademy.org/s/1Agile-Development-Group\\_Accessible-Print-Guidelines.pdf](https://www.rifacademy.org/s/1Agile-Development-Group_Accessible-Print-Guidelines.pdf)
- 'Accessible Design' (EN), v-shesh, [https://www.rifacademy.org/s/10-V-shesh\\_Accessible-design.pdf](https://www.rifacademy.org/s/10-V-shesh_Accessible-design.pdf)



### Contacts in Cambodia:

- Agile Development Group for information and services related to accessible materials <https://agiledg.com>

## CONTACTS

### National Disability Organisations in Cambodia

Acronym	Organisation	Contact details
DWPD	Department of Welfare for Persons with Disabilities of the Ministry of Social Affairs, Veterans and Youth Rehabilitation (MoSVY)	Hotline number for disability issues <b>1270</b>
DAC	Disability Action Council	<a href="https://www.facebook.com/DACCambodia">https://www.facebook.com/DACCambodia</a>
PWDF	Persons with Disabilities Foundation	<a href="https://www.facebook.com/pwdf.pagelike">https://www.facebook.com/pwdf.pagelike</a>
CDPO	Cambodian Disabled People's Organization	<a href="https://www.facebook.com/cdpo.org">https://www.facebook.com/cdpo.org</a>

### Other Contacts

Acronym	Organisation	Contact details
ABC	Association of Banks in Cambodia	<a href="https://www.abc.org.kh">https://www.abc.org.kh</a>
ADD	Action on Disability and Development International	<a href="https://add.org.uk/countries/cambodia">https://add.org.uk/countries/cambodia</a>
ADG	Agile Development Group	<a href="https://agiledg.com">https://agiledg.com</a>
CFI	Center for Financial Inclusion at Accion International	<a href="https://www.accion.org/program_teams/center-for-financial-inclusion">https://www.accion.org/program_teams/center-for-financial-inclusion</a>
CMA	Cambodia Microfinance Association	<a href="http://cma-network.org">http://cma-network.org</a>
-	Chamroeun Microfinance Plc	<a href="https://www.chamroeun.com">https://www.chamroeun.com</a>
DDP	Deaf Development Programme	<a href="https://www.ddp-cambodia.org">https://www.ddp-cambodia.org</a>
-	Good Return	<a href="https://www.goodreturn.org.au">https://www.goodreturn.org.au</a>
HI	Humanity & Inclusion	<a href="https://www.hi-us.org/cambodia">https://www.hi-us.org/cambodia</a>
-	Krousar Thmey Foundation	<a href="https://www.krousar-thmey.org/en">https://www.krousar-thmey.org/en</a>
LFTW	Light for the World	<a href="https://www.light-for-the-world.org">https://www.light-for-the-world.org</a>
OIC	Organization to Improve Communication and Swallowing Therapy Services in Cambodia	<a href="https://www.oiccambodia.org">https://www.oiccambodia.org</a>
PAfID	People's Action for Inclusive Development (formerly Light for the World (LFTW) Cambodia)	<a href="http://www.facebook.com/PAfID.org">www.facebook.com/PAfID.org</a>
PPCIL	Phnom Penh Center for Independent Living	<a href="https://www.ppcil.org">https://www.ppcil.org</a>
-	V-shesh	<a href="https://v-shesh.com_">https://v-shesh.com_</a>

## REFERENCES AND RESOURCES

[Note: this summary lists all external references and resources used to compile this document. Links to resources are also provided in the section of the manual to which they relate].

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