

The Rt.Hon. Nicky Morgan MP  
Chair of the Treasury Committee  
House of Commons  
London  
SW1A0AA

Date: 12<sup>th</sup> June 2018

Email: [treascom@parliament.uk](mailto:treascom@parliament.uk)

Dear Chair

## **Access to financial services for consumers with visual impairments**

Thank you for your letter of 23 May regarding access to financial services for consumers with visual impairments.

You asked me to set out what the Commission has done to ensure that financial services firms provide information in an accessible format, and what we intend to do where such firms are failing to meet their obligations under equality legislation.

In 2015, the Commission entered into two agreements with high street banks under section 23 of the Equality Act 2006. The agreements are confidential and the Commission is unable to provide the names of the organizations involved. These agreements arose out of complaints that hearing-impaired customers were unable to communicate with their banks and struggled to access certain services. The agreements were entered into in lieu of the Commission taking enforcement action against the banks concerned and were concluded last year. The Commission was content with the progress the banks had demonstrated.

The agreements required the banks to comply with a detailed action plan to remedy the systemic failings in the design and access of the services. In addition to the provision of staff training, the plan also required banks to develop systems to enable staff to identify and serve disabled customers in compliance with their duties under the Equality Act 2010 and to monitor complaints. There was also a requirement to liaise with disability groups about systems and processes and in the design of new services and products, in order to ensure that banking services take account of the needs of disabled people in the future.

In the course of this work, the Commission received two further complaints about information not being provided in the correct font size or format. Broader concerns as to the various communication and access needs of disabled customers were raised during discussions with both banks.

We are not aware of the specific complaints you refer to in your letter. If you are able to provide us with details of the complaints, we will consider them in accordance with our strategic priorities and our enforcement and compliance policy.

Finally, we note that whilst the FCA does not have statutory powers to enforce the Equality Act 2010, it can nevertheless set the standard on accessibility for banks and it can proactively raise expectations that banks comply with those standards. This could involve hosting events and disseminating information about equality in service provision on a regular basis.

The Financial Ombudsman Service, whilst unable to make a finding of discrimination, can penalise those banks which cannot demonstrate regard for their duties under the Equality Act 2010. This could arise, for example, where there is no clear and easily accessible process for obtaining reasonable adjustments, or where there is persistent difficulty in being granted a particular adjustment that should be readily available. The Commission considers the FOS provides an effective alternative to costly and risky court action for customers, especially if a systematic and strategic approach to dealing with complaints is taken.

Yours sincerely

**Rebecca Hilsenrath**

Chief Executive

---

**Tel:** 020 7832 7800 | **Email:** [correspondence@equalityhumanrights.com](mailto:correspondence@equalityhumanrights.com)

Fleetbank House, 2-6 Salisbury Square, London, EC4Y 8JX

 @ehrc   [www.equalityhumanrights.com](http://www.equalityhumanrights.com)