Page 3119 - 3127 **DOI:** *https://doi.org/10.63108/IJLMH.13090*

INTERNATIONAL JOURNAL OF LAW MANAGEMENT & HUMANITIES

[ISSN 2581-5369]

Volume 9 | Issue 5

2026

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A Ramp Is Not Accessibility: What RTI Disclosures from Udaipur Banks Reveal About Disability Access in Indian Banking

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ABSTRACT

Accessibility in banking is often measured through the presence of isolated facilities such as ramps. A series of Right to Information (RTI) disclosures obtained from public-sector banks in Udaipur, Rajasthan, shows why this approach is inadequate. Replies from Punjab National Bank, Bank of India, Canara Bank and Bank of Baroda reveal substantial variation in the way banks record, classify and report accessibility. Some institutions report widespread ramp or wheelchair access while simultaneously acknowledging that branches are not classified as fully accessible, that reserved parking is absent, or that accessibility audits have not been undertaken in the form requested. Another bank disclosed no proper ramps, wheelchairs, tactile paths, fully accessible branches or accessible toilets across its five Udaipur branches, while also reporting remedial action initiated after the RTI applications. The article argues for a shift from facility-counting to whole-journey accessibility, standardised branch-wise audits and proactive public disclosure. The findings are local and based primarily on institutional self-reporting; they are not presented as a national prevalence estimate.

Keywords: *disability rights, banking accessibility, RPwD Act 2016, RTI Act 2005, universal accessibility, financial inclusion, Udaipur*

I. BANKING ACCESSIBILITY IS A RIGHTS ISSUE, NOT A CONVENIENCE

For a person with disability, access to a bank branch is inseparable from access to economic life. Banking enables receipt of pensions and benefits, operation of savings accounts, access to credit, payment of bills, business transactions and participation in increasingly formalised financial systems. A barrier at the entrance, counter, ATM or communication interface can therefore translate into dependence on another person for an activity that should ordinarily be private and autonomous.

The Rights of Persons with Disabilities Act, 2016 (RPwD Act) places accessibility within a statutory framework. Section 40 requires the Central Government to frame rules laying down standards of accessibility for the physical environment, transportation, information and

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communications, and other facilities and services provided to the public. Section 44 makes adherence to those rules a condition of permission to build and of a completion certificate; section 45 requires all existing public buildings to be made accessible in accordance with the rules within five years of their notification; and section 46 requires service providers, whether Government or private, to provide their services in accordance with the rules within two years.[1] The Act names banking expressly among "public facilities and services", and its definition of "public building" includes buildings used for commercial activities and public utilities.[2] The rules were notified on 15 June 2017. The Supreme Court has since observed that the statutory timelines "have long passed", while holding rule 15(1) ultra vires to the extent that it reduced the prescribed standards to recommendatory guidelines, and directing the Union Government to delineate mandatory rules.[3] Since July 2024, rule 15(1) has also listed sector-specific Accessibility Standards and Guidelines for the Banking Sector, notified by the Department of Financial Services on 2 February 2024.[4] The Harmonised Guidelines and Standards for Universal Accessibility in India 2021, now the standard for public buildings under rule 15(1)(a), further provide a technical framework for accessible built environments.[5]

Banking regulation has also recognised the issue. Reserve Bank of India (RBI) directions require banks to provide ramps at ATMs and, wherever feasible, at branch entrances so that wheelchair users can enter and conduct business, and to report progress periodically to the Customer Service Committee of the Board.[6] The legal and regulatory question, therefore, is no longer whether accessibility matters. The more difficult question is how institutions measure and demonstrate it in practice.

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[1] The Rights of Persons with Disabilities Act, No. 49 of 2016, INDIA CODE (2016), §§ 40, 44–46 [hereinafter RPwD Act].

[2] *Id.* § 2(w) ("public building"), (x) ("public facilities and services", including "banking, finance and insurance").

[3] The Rights of Persons with Disabilities Rules, 2017, G.S.R. 591(E), r. 15(1) (India) (in force June 15, 2017); *Rajive Raturi v. Union of India*, 2024 INSC 858, ¶¶ 60, 66, 75–76 (India).

[4] The Rights of Persons with Disabilities (Amendment) Rules, 2024 (India) (notified July 2, 2024), inserting r. 15(1)(p), which adopts the Accessibility Standards and Guidelines for Banking Sector specified in DEPARTMENT OF FINANCIAL SERVICES, MINISTRY OF FINANCE (Feb. 2, 2024); *see Rajive Raturi*, *supra* note 3, ¶ 63 n.74.

[5] MINISTRY OF HOUSING & URBAN AFFAIRS, HARMONISED GUIDELINES AND STANDARDS FOR UNIVERSAL ACCESSIBILITY IN INDIA 2021 (2021), adopted as the standard for public buildings by r. 15(1)(a) of the Rights of Persons with Disabilities Rules, 2017; *see Rajive Raturi*, *supra* note 3, ¶ 63.

[6] Reserve Bank of India (Commercial Banks – Responsible Business Conduct) Directions, 2025, RBI/DOR/2025-26/170, DOR.MCS.REC.No.89/01-01-032/2025-26, ¶¶ 94–95 (Nov. 28, 2025) (updated as on Oct. 1, 2026) [hereinafter RBC Directions], https://www.rbi.org.in/Scripts/BS_ViewMasDirections.aspx?id=13140. These paragraphs carry forward RESERVE BANK OF INDIA, *Need for Bank Branches / ATMs to Be Made Accessible to Persons with Disabilities*, RBI/2013-14/598, DBOD.No.Leg.BC.113/09.07.005/2013-14 (May 21, 2014), https://www.rbi.org.in/Scripts/NotificationUser.aspx?Id=8891 (building on DBOD.No.Leg.BC.123/09.07.005/2008-09 (Apr. 13, 2009)), as consolidated in RESERVE BANK OF INDIA, *Master Circular on Customer Service in Banks*, RBI/2015-16/59, DBR No.Leg.BC.21/09.07.006/2015-16, ¶ 10.2 (July 1, 2015), https://www.rbi.org.in/Scripts/BS_ViewMasCirculardetails.aspx?id=9862; both have since been withdrawn, the RBC Directions repealing the instructions they consolidate (¶ 464).

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II. What the RTI exercise examined

During 2026, a series of RTI applications sought branch-level information from banks operating in and around Udaipur. The questions included the number of branches with ramps, wheelchair-accessible entry, tactile paths, accessible toilets, reserved parking, accessibility audits and branches classified as completely accessible. The present article draws on replies from Punjab National Bank (PNB), Bank of India (BOI), Canara Bank and Bank of Baroda (BoB). The exercise was designed as an accountability and transparency inquiry rather than a representative epidemiological survey of Indian banking.

This distinction is important. RTI responses are institutional disclosures based on records held by the responding authority. They are not substitutes for an independent technical accessibility audit. Where a bank reports that a facility exists, the RTI reply establishes what the institution has stated; it does not by itself verify ramp gradient, doorway width, manoeuvring space, signage quality, toilet dimensions or real-world usability. That limitation is itself relevant because accessibility governance depends not only on facilities but also on the quality of institutional records.

III. PNB: ramps in 51 branches, yet no branch declared fully accessible

PNB's Udaipur Circle Office responded on 15 July 2026 to a series of RTI applications dated 16 June 2026. One reply stated that all 51 branches under the Udaipur Mandal had ramp facilities for persons with disabilities and wheelchair-accessible entry.[7] A separate reply stated that Udaipur city had 13 PNB branches.[8]

The apparently positive ramp figure becomes more revealing when read with the bank's other replies. When asked how many branches in Udaipur district had been declared completely accessible, PNB replied that none of the branches under its Mandal had been declared completely accessible. It also stated that construction of new branches would be undertaken in accordance with Universal Accessibility Norms.[9]

[7] RTI reply of Punjab National Bank, Circle Office, Udaipur, dated July 15, 2026, to application dated June 16, 2026 (on file with the author) (stating that all 51 branches under the Udaipur Mandal had ramp facilities and wheelchair-accessible entry).

[8] RTI reply of Punjab National Bank, Circle Office, Udaipur, dated July 15, 2026, to application dated June 16, 2026 (on file with the author) (stating that Udaipur city had 13 PNB branches).

[9] RTI reply of Punjab National Bank, Circle Office, Udaipur, dated July 15, 2026, to application dated June 16, 2026 (on file with the author) (stating that none of the branches under the Mandal had been declared completely accessible and that new branches would be constructed in accordance with Universal Accessibility Norms).

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Another PNB reply stated that no branch in Udaipur city currently had reserved parking for persons with disabilities, while indicating that work was being undertaken to provide the facility.[10] In response to questions about accessibility audits during the preceding five years, the bank stated that the desired information was not available and that an accessibility audit of branches in Udaipur district had not been conducted.[11]

Taken together, these disclosures illustrate the central problem with using a single facility as a proxy for accessibility. A branch may have a ramp and still not satisfy a broader accessibility standard. The RTI record does not establish that PNB's ramps were non-compliant; rather, it shows that the existence of ramps and the status of being "completely accessible" were not equivalent in the bank's own disclosures.

Read against the RPwD Act, the replies matter in two ways. The undertaking that new branches will follow accessibility norms restates what section 44 already requires of any new structure. For the existing branches, which are public buildings, section 45 contemplates accessibility in accordance with the notified rules, not the presence of a ramp alone, and section 46 requires the bank's services to conform to those rules.[12] A record in which no branch has been declared completely accessible and no accessibility audit has been conducted cannot, on the bank's own showing, demonstrate compliance with either provision.

IV. Bank of India: A Much Sharper Accessibility Deficit, and Evidence of Corrective Action

The BOI disclosure is particularly significant because it provides both a baseline and a reported response to the RTI intervention. In Ref No JZO/RTI/CPIO/2026-27/11 dated 20 August 2026, the Jodhpur Zonal Office responded to six RTI applications dated 13 July 2026, bearing reference numbers BKOIN/R/E/26/01075, /01076, /01133, /01134, /01135 and /01139.[13]

The bank stated that it had five branches in Udaipur: Fatehpura Road, Hiran Magri, New Shobhagpura, Nyay Marg and Udaipur Main Branch. It further stated that these branches did not have proper ramps, that nil branches had wheelchair facilities, nil branches had tactile paths,

[10] RTI reply of Punjab National Bank, Circle Office, Udaipur, dated July 15, 2026, to application dated June 16, 2026 (on file with the author) (stating that no branch in Udaipur city then had reserved parking for persons with disabilities and that work was being undertaken to provide the facility).

[11] RTI reply of Punjab National Bank, Circle Office, Udaipur, dated July 15, 2026, to application dated June 16, 2026 (on file with the author) (stating that the requested information on accessibility audits was not available and that an accessibility audit of branches in Udaipur district had not been conducted).

[12] RPwD Act, *supra* note 1, §§ 2(w), 44–46.

[13] RTI reply of Bank of India, Zonal Office, Jodhpur, Ref. No. JZO/RTI/CPIO/2026-27/11, dated August 20, 2026, to RTI applications BKOIN/R/E/26/01075, /01076, /01133, /01134, /01135 and /01139, all dated July 13, 2026 (on file with the author).

nil branches had been declared completely accessible, and nil branches had disabled-friendly toilets.[14]

The same reply, however, recorded an important development: after receipt of the RTI applications, the matter had been taken up with the architect for the Udaipur region; the architect had visited the branches and construction or installation work for ramp and wheelchair access had been initiated wherever feasible.[15] This demonstrates a potentially under-recognised function of RTI in disability-rights work. RTI can do more than extract information. By requiring an institution to locate, verify and formally state its position, it can expose gaps that then enter the organisation's compliance workflow.

In statutory terms the BOI baseline is the clearest of the four. Section 45 allows a period not exceeding five years from the notification of the rules for existing public buildings to be made accessible, and the Supreme Court has observed that, the rules having come into force in June 2017, that timeline has long passed.[16] The BOI reply nonetheless describes, in 2026, branches without proper ramps, wheelchair facilities, tactile paths or accessible toilets. The disclosures cannot by themselves settle whether any particular branch falls short of section 45, but the remedial works the bank reported are the kind of retrofitting that section 45 contemplates; the RTI record does not show whether they will meet the standards notified under section 40.

V. Canara Bank: better facility counts, but a data-classification gap

Canara Bank's Regional Office, Udaipur, supplied a different pattern of information. In a reply dated 3 July 2026, it stated that 34 branches under the Udaipur region had the facilities referred to in questions concerning ramps, wheelchair-user access and suitable entrance doors.[17] Another reply of the same date stated that 14 branches in Udaipur district had tactile paths for persons with disabilities.[18]

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[14] *Id.* (stating that Udaipur had five branches, at Fatehpura Road, Hiran Magri, New Shobhagpura, Nyay Marg and Udaipur Main Branch, and disclosing no proper ramps, nil wheelchair facilities, nil tactile paths, nil branches declared completely accessible and nil disabled-friendly toilets).

[15] *Id.* (stating that, after receipt of the RTI applications, the matter was taken up with the architect for the Udaipur region, the architect visited the branches, and construction or installation work for ramp and wheelchair access was initiated wherever feasible).

[16] RPwD Act, *supra* note 1, § 45(1); *Rajive Raturi*, *supra* note 3, ¶¶ 60, 66.

[17] RTI reply of Canara Bank, Regional Office, Udaipur, Ref. GPR/RO-Udaipur/RTI/01156/2026-27, dated July 3, 2026 (on file with the author) (stating that 34 branches under the Udaipur region had the facilities referred to in the questions on ramps, wheelchair-user access and suitable entrance doors).

[18] RTI reply of Canara Bank, Regional Office, Udaipur, Ref. GPR/RO-Udaipur/RTI/01224/2026-27, dated July 3, 2026 (on file with the author) (stating that 14 branches in Udaipur district had tactile paths for persons with disabilities).

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However, when asked how many branches in Udaipur district had been declared fully "Accessible", the bank stated that no such branch-wise classification was available in its records and therefore the information could not be supplied. On a question regarding construction in accordance with Universal Accessibility Norms, the bank treated the request as seeking an opinion or clarification rather than information held on record.[19]

The parking response was more definite: Canara Bank stated that none of the branches under its Udaipur Regional Office had reserved parking for persons with disabilities.[20] These answers reveal a second governance problem beyond physical barriers: the absence of a standard institutional classification system capable of answering a simple branch-level question: "Is this branch fully accessible?"

The classification gap also has a legal dimension. Section 46 measures a service provider against the accessibility rules framed under section 40, and since 2024 those rules have included banking-sector standards.[21] A bank that holds no branch-wise record of which of its branches meet those standards is not in a position to show, to a regulator or to a customer, that its services comply with them.

VI. Bank of Baroda: accessible ATM claims and the need for independent verification

Bank of Baroda's Regional Office, Udaipur, in reply ROU:RTI:2026:10 dated 15 June 2026, stated that all 35 of its ATMs operating in Udaipur district were accessible to persons with disabilities and that all 35 had Braille keypads and audio guidance.[22] The bank also reported approximately ₹1.88 lakh of budget expenditure for accessibility improvement during the previous five years. When asked whether branches in Udaipur district had undergone an accessibility audit, it replied that an accessibility audit had not been conducted, while stating that regular audits had been carried out.[23]

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[19] RTI reply of Canara Bank, Regional Office, Udaipur, Ref. GPR/RO-Udaipur/RTI/01154/2026-27, dated July 3, 2026 (on file with the author) (stating that branch-wise classification as fully "Accessible" was not available in its records, and treating the request concerning construction according to Universal Accessibility Norms as seeking opinion or clarification beyond information held on record).

[20] RTI reply of Canara Bank, Regional Office, Udaipur, Ref. GPR/RO-Udaipur/RTI/01221/01222/2026-27, dated July 3, 2026 (on file with the author) (stating that no branch under the Udaipur Regional Office had reserved parking for persons with disabilities).

[21] RPwD Act, *supra* note 1, §§ 40, 46; The Rights of Persons with Disabilities (Amendment) Rules, 2024, *supra* note 4.

[22] RTI reply of Bank of Baroda, Regional Office, Udaipur, Ref. ROU:RTI:2026:10, dated June 15, 2026 (on file with the author) (stating that all 35 ATMs operated by Bank of Baroda in Udaipur district were accessible to persons with disabilities and that all 35 had Braille keypads and audio guidance).

[23] *Id.* (reporting approximately INR 1.88 lakh of budget expenditure for accessibility improvement during the previous five years, and stating that an accessibility audit had not been conducted, while regular audits had been carried out).

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These disclosures should be read carefully. They are useful evidence of the bank's recorded position, but a statement that all ATMs are "accessible" cannot reveal whether every element of the customer journey meets technical accessibility standards. For research purposes, such institutional claims are best treated as hypotheses for field verification rather than as the endpoint of the inquiry.

The statutory frame explains why the distinction matters. Section 46 carries the duty of accessibility from premises to services, and an ATM is a point of service. The RBI now requires every ATM of a commercial bank to be a talking ATM with a Braille keypad, and the BoB reply reports that position for the 35 ATMs it covers.[24] What the reply does not supply is the accessibility audit that would show whether those ATMs, and the branches around them, meet the standards notified under section 40; the bank stated that no accessibility audit of its branches in Udaipur district had been conducted.

VII. The central finding: facility, compliance and usability are different concepts

Across the four banks, three distinct concepts emerge. A facility means that an accessibility feature exists: for example, a ramp, tactile path or talking ATM. Compliance asks whether that feature meets the applicable technical and legal standard. Usability asks whether a person with disability can actually complete the banking journey independently, safely and with dignity.

A steep ramp may exist but be unusable without assistance. An accessible entrance may lead to an inaccessible counter. A wheelchair-accessible banking hall may still exclude a customer if the toilet is inaccessible. Reserved parking that is absent or obstructed may shift the barrier from the branch entrance to the street. For visually impaired customers, tactile guidance, accessible documents and talking ATMs may matter more than a ramp. For persons with hearing, intellectual or communication disabilities, yet other barriers arise.

This is why "How many branches have ramps?" is a necessary but insufficient question. The better question is: "How many customers with different disabilities can complete the full banking journey without avoidable dependence?"

VIII. What banks and regulators should do next

First, a stronger accountability model would use a standardised branch-wise accessibility matrix. At minimum, it should record the accessible route from public transport or parking to the entrance; reserved accessible parking; compliant ramps and handrails; doorway width and

[24] RBC Directions, *supra* note 6, ¶ 98; RPwD Act, *supra* note 1, § 46.

thresholds; internal circulation and wheelchair turning space; accessible service counters; seating; lifts where relevant; accessible toilets; tactile indicators; signage; ATM accessibility; assistance mechanisms; accessible communication; and emergency evacuation arrangements.

Second, banks should publish this information proactively. A customer with disability should not need to file an RTI application simply to know whether a branch can be used. Searchable branch locators could disclose accessibility features in the same way they already disclose opening hours, IFSC codes and service availability. Such transparency would also create a measurable compliance trail.

Third, accessibility audits should combine technical assessment with user experience. Persons with disabilities should participate in audits because a facility that satisfies a drawing or checklist can still fail in real use. Periodic audit results should be placed before the governance body already responsible for customer service and accessibility compliance, consistent with the RBI's expectation of Board-level monitoring.[25]

Finally, public authorities and banks should standardise the language of accessibility. The RTI responses show that one institution may count ramps, another may use an "accessible" label, and another may not maintain branch-wise classification at all. Without common definitions, cross-bank comparison remains difficult and institutional progress cannot be reliably measured.

IX. Limits of the Evidence

These findings must not be overgeneralised. They relate to specific RTI replies and different geographic scopes within the Udaipur region or district. The questions were not answered in a uniform template, and the banks' record-keeping systems appear to differ. Some figures relate to branches, some to ATMs, and some to regional offices. Most importantly, the information is primarily self-reported by the institutions and was not independently validated through a technical site audit for this article.

Those limitations do not make the exercise weak; they define the next research step. A rigorous cross-sectional study should pair RTI disclosures with on-site audits using the Harmonised Guidelines, document discrepancies between reported and observed accessibility, and examine whether corrective action follows formal disclosure. A larger multi-bank, multi-district dataset could then test whether the patterns seen in Udaipur are isolated or systemic.

[25] RBC Directions, *supra* note 6, ¶ 95 (requiring a bank to report the progress made on ramps at branch entrances periodically to its Customer Service Committee of the Board and to ensure compliance).

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X. Conclusion: A ramp is the beginning, not the measure

The Udaipur disclosures provide a useful snapshot of how banking institutions understand and record accessibility. PNB reported ramps and wheelchair access across 51 Mandal branches while reporting no branch as completely accessible and no reserved disability parking in Udaipur city. BOI disclosed multiple basic deficits across five branches, followed by remedial action after the RTI applications. Canara Bank reported substantial numbers of ramps, wheelchair access and tactile paths but lacked a branch-wise "fully accessible" classification and reported no reserved disability parking. Bank of Baroda reported universal accessibility of 35 ATMs in the district, while its reply also underscored the distinction between an institutional declaration and an independent accessibility audit.

The central lesson is therefore methodological as much as legal: accessibility cannot be reduced to a count of isolated features. It should be measured as a complete, verifiable customer journey. RTI can help expose what institutions know, what they do not record, and where disclosure itself can trigger change. The next stage must be to connect that documentary accountability with independent technical audits and the lived experience of persons with disabilities.

A ramp may be an important beginning. It should never be mistaken for the destination.

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