International Journal of Novel Trends and Innovation
IJNTI.ORG | ISSN : 2984-908X
An International Open Access, Peer-reviewed, Refereed Journal

ROLE OF THE RESERVE BANK OF INDIA IN PROMOTING ACCESSIBLE BANKING

From Financial Inclusion to Financial Independence: Strengthening Banking Rights for Persons with Disabilities in India

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ABSTRACT

Financial inclusion is an essential component of economic equality, individual independence and inclusive development. However, access to banking services remains challenging for many persons with disabilities because of inaccessible bank branches, unsuitable ATMs, discriminatory practices, inadequate customer assistance and digital platforms that are incompatible with assistive technologies.

The Reserve Bank of India (RBI), as India's central banking and regulatory institution, plays a significant role in shaping an accessible and equitable banking ecosystem. Through regulatory instructions, customer-service directions and accessibility-related initiatives, RBI has progressively addressed the banking requirements of persons with disabilities. Important developments include its instructions on banking facilities for visually impaired customers, accessibility of bank branches and ATMs, and the 2024 guidelines facilitating accessibility to digital payment systems. The Ministry of Finance's Accessibility Standards and Guidelines for the Banking Sector, notified on 2 February 2024, provide an additional framework for improving accessibility across banking infrastructure and services.

This article critically examines RBI's regulatory role in promoting accessible banking in India. It analyses the legal and institutional framework, identifies significant barriers in physical and digital banking, and evaluates the need for stronger implementation and monitoring mechanisms. It also proposes an RTI-based monitoring framework through which banking accessibility can be assessed using verifiable institutional information.

The article argues that financial inclusion must extend beyond account ownership and transaction availability. Genuine inclusion requires that persons with disabilities can independently, safely and equally access, understand and use banking services without discrimination.

IndexTerms - Reserve Bank of India; Accessible Banking; Financial Inclusion; Persons with Disabilities; RPwD Act 2016; Digital Accessibility; Banking Regulations; Reasonable Accommodation; Institutional Accountability.

I. INTRODUCTION

Banking is no longer merely a financial service. It is an essential gateway to economic participation, social security and individual independence.

Individuals depend on banking institutions to receive salaries, access government benefits, save money, obtain credit, make digital payments, manage businesses and participate in the modern economy.

For persons with disabilities, access to these services is directly connected with dignity, autonomy and equal citizenship.

Consider the following situations:

• A wheelchair user reaches a bank but cannot enter because the entrance has inaccessible steps.

• A visually impaired customer has a bank account but cannot independently operate the mobile banking application.

• A person with a hearing impairment cannot effectively communicate with bank personnel because appropriate communication support is unavailable.

• A customer with a disability is required to depend unnecessarily on another person to complete a routine financial transaction.

These are not merely inconveniences. They represent barriers to equal participation in the financial system.

India has made considerable progress in expanding financial inclusion through banking infrastructure, digital payment systems and financial literacy initiatives. Nevertheless, the expansion of banking services does not automatically ensure accessibility for everyone.

The fundamental question is therefore not simply whether persons with disabilities have bank accounts, but whether they can independently and equally use the services associated with those accounts.

This is where the regulatory and supervisory role of the Reserve Bank of India becomes particularly important.

RBI must be viewed not only as an institution responsible for banking regulation and financial stability, but also as an important contributor to the development of an equitable banking environment.

II. CONCEPTUALISING ACCESSIBLE BANKING

Accessible banking refers to the provision of banking infrastructure, products, services, communication systems and digital platforms in a manner that enables persons with different disabilities to access and use them on an equal basis with others.

It encompasses several interconnected dimensions.

2.1 Physical Accessibility

Physical accessibility concerns the ability to enter, move within and independently use banking premises. It includes accessible entrances, ramps, lifts, corridors, service counters, seating arrangements, toilets and ATMs.

2.2 Information and Communication Accessibility

Banking information must be available in formats that can be understood and accessed by customers with different disabilities. These may include Braille, large print, accessible electronic documents, audio information, captions and appropriate sign-language support.

2.3 Digital Accessibility

Mobile banking applications, internet banking platforms, websites, payment devices and authentication systems must be compatible with assistive technologies.

2.4 Service Accessibility

Customers with disabilities must have equal access to bank accounts, loans, credit cards, cheque books, lockers, cash withdrawals and other financial products.

2.5 Institutional Accessibility

Banks must develop policies, train employees, establish complaint mechanisms and monitor accessibility performance.

These dimensions demonstrate that accessibility is not a single infrastructure requirement. It is an institutional responsibility extending across the entire banking experience.

III. LEGAL AND REGULATORY FRAMEWORK

Accessible banking in India is supported by statutory provisions, regulatory instructions and sector-specific accessibility standards.

3.1 Rights of Persons with Disabilities Act, 2016

The Rights of Persons with Disabilities Act, 2016, provides the principal statutory foundation for protecting the rights of persons with disabilities. The following provisions are particularly relevant:

Section	Subject	Relevance to Banking
Section 3	Equality and non-discrimination	Equal access to banking services.
Section 40	Accessibility standards	Accessibility of physical infrastructure and facilities.
Section 42	Access to information and communication technology	Accessible banking websites, applications and digital services.
Section 43	Consumer goods	Promotion of accessibility in products and equipment.
Section 46	Accessibility of services	Accessibility of services provided to persons with disabilities.

These provisions establish an important legal foundation for moving towards an accessible financial ecosystem. Banking institutions must consider accessibility as part of their obligations towards equal treatment and non-discrimination.

3.2 RBI's Regulatory Instructions

RBI has progressively issued instructions addressing the banking requirements of persons with disabilities. Some important developments are presented below.

Year	Regulatory Development	Significance
2008	Banking facilities to visually challenged customers	Established that banking facilities should not be denied merely because of visual impairment.
2009	Accessibility of bank branches and ATMs	Addressed ramps, ATM height, talking ATMs and Braille keypads.
2012	Banking facilities for persons with disabilities	Reiterated non-discriminatory access to banking facilities.
2014	Accessibility of branches and ATMs	Reiterated talking ATM requirements and introduced further accessibility measures.
2024	Digital payment accessibility guidelines	Addressed accessibility of payment systems and devices.

These developments demonstrate that accessible banking is not a new regulatory concern. It has been recognised by RBI for several years.

3.3 Ministry of Finance Accessibility Standards, 2024

The Ministry of Finance notified the Accessibility Standards and Guidelines for the Banking Sector on 2 February 2024. These guidelines provide detailed accessibility requirements covering physical infrastructure, information counters, tactile guidance, ramps, communication facilities and customer support.

For example, the guidelines address:

- Accessible information and service counters.
- Tactile indicators for persons with visual impairments.
- Appropriate counter heights for wheelchair users.
- Hearing enhancement systems.
- Sign-language support.
- Clearly identifiable priority counters.
- Staff training in supporting customers with disabilities.

These standards provide an important framework for improving accessibility throughout banking premises.

3.4 RBI Guidelines on Digital Payment Accessibility, 2024

On 11 October 2024, RBI issued the circular titled "Facilitating Accessibility to Digital Payment Systems for Persons with Disabilities – Guidelines."

The circular, RBI/2024-25/83, is an important regulatory development. It advises payment system participants, including banks and authorised non-bank payment system providers, to review their payment systems and devices from an accessibility perspective.

It specifically includes Point-of-Sale machines and requires necessary modifications to improve accessibility.

Importantly, the circular also requires payment system participants to submit details of systems and devices requiring modification, along with time-bound action plans. It further clarifies that accessibility modifications should not compromise the security of payment systems.

This development reflects an important recognition: digital financial inclusion cannot be achieved without accessible payment infrastructure.

IV. RBI'S ROLE IN PROMOTING ACCESSIBLE BANKING

4.1 Ensuring Non-Discriminatory Banking Services

One of the most important responsibilities of RBI is to ensure that persons with disabilities are not denied banking facilities because of their disabilities.

RBI's circular dated 4 June 2008 concerning banking facilities for visually challenged customers clearly addressed this issue.

It recognised that visually impaired persons are legally competent to enter into contracts and should not be denied facilities such as cheque books, ATMs, lockers, internet banking, loans and credit cards.

The circular also emphasised that the possibility of operational risk cannot be used as a blanket justification for denying facilities to visually impaired customers.

This principle remains significant for the broader disability-rights framework. Banks should assess individual requirements and provide appropriate assistance rather than making assumptions about a customer's financial capacity.

4.2 Improving Physical Accessibility of Bank Branches

Physical accessibility is fundamental to independent banking.

RBI's 13 April 2009 circular advised scheduled commercial banks to provide ramps at ATMs and ensure that ATM height does not create difficulties for wheelchair users. It also addressed ramps at bank branch entrances.

The subsequent 21 May 2014 circular reiterated these requirements and strengthened provisions concerning talking ATMs with Braille keypads. The Ministry of Finance's 2024 accessibility guidelines further provide detailed requirements for banking infrastructure.

Banks should ensure that:

- Entrances are accessible.
- Ramps are properly designed and safe.
- Lifts and internal circulation routes are accessible.
- Service counters accommodate wheelchair users.
- Tactile guidance is available.
- Accessible toilets are provided.
- Appropriate signage is installed.
- Customers can reach and use essential banking facilities independently.

An accessible branch should not be defined merely by the presence of a ramp. The complete customer journey, from entering the building to completing a transaction, must be considered.

4.3 Accessible ATMs and Independent Cash Withdrawals

ATMs are important self-service banking facilities. However, conventional ATMs may not be usable independently by customers with different disabilities.

RBI's instructions concerning talking ATMs and Braille keypads represent important measures for customers with visual impairments. Accessibility should also consider wheelchair users and persons with other disabilities.

Banks should progressively ensure:

- Talking ATM facilities.
- Braille keypads.
- Appropriate ATM height.
- Accessible entry and approach routes.
- Screen visibility and usability.
- Clear audio instructions.
- Accessible transaction confirmation.
- Availability of information regarding accessible ATM locations.

The objective should be independent access rather than permanent dependence on another individual.

4.4 Accessible Digital Banking and UPI Payments

Digital banking has transformed India's financial landscape. UPI, mobile applications, internet banking and digital wallets have made financial transactions faster and more convenient.

However, digital services can become inaccessible when their design does not consider different disabilities.

For example, a visually impaired customer may encounter difficulty if an application is incompatible with screen readers. A person with a motor disability may struggle with small interactive buttons or complex navigation. A person with a hearing impairment may be unable to access important audio-only instructions.

Banks and payment system participants should therefore ensure:

- Compatibility with screen readers.
- Keyboard and alternative input accessibility.
- Clear navigation and understandable instructions.

• Appropriate colour contrast.
• Accessible transaction authentication.
• Accessible error messages.
• Accessible payment confirmation.
• Compatibility with assistive technologies.

The RBI circular of October 2024 provides an important foundation for addressing these concerns. Digital accessibility must become part of the design, testing and maintenance of banking applications rather than an issue addressed only after complaints arise.

4.5 Disability-Sensitive Customer Service

The quality of banking accessibility also depends on the knowledge and behaviour of employees.

Even an accessible building may fail to provide an inclusive experience if staff members do not understand the requirements of customers with disabilities.

Banks should regularly train their employees in:

• Disability awareness and respectful communication.
• Assisting customers with visual impairments.
• Basic understanding of sign-language communication.
• Supporting wheelchair users.
• Providing accessible information.
• Maintaining customer privacy and independence.
• Understanding reasonable accommodation.

The Ministry of Finance's 2024 guidelines recognise staff preparedness and communication support as important accessibility components. Priority service arrangements should also be implemented effectively.

4.6 Accessible Banking Products and Financial Services

Accessibility must extend beyond account opening and cash withdrawals.

Persons with disabilities should have equal access to savings and current accounts, fixed deposits, cheque books, credit and debit cards, loans and advances, locker facilities, insurance-linked banking products, digital payment services and financial literacy programmes.

A bank cannot claim to be fully inclusive if customers with disabilities can open accounts but encounter unnecessary restrictions when accessing other financial products.

V. THE IMPLEMENTATION GAP: REGULATIONS VERSUS BANKING REALITY

The existence of regulatory instructions and accessibility standards is an important achievement. However, their effectiveness ultimately depends on implementation.

A distinction must be maintained between institutional policy declarations and actual accessibility at the customer-service level.

5.1 Physical Infrastructure Deficiencies

A branch may officially report having a ramp, but its gradient, width, surface or location may make it difficult to use. Similarly, a branch may have an accessible entrance but inaccessible service counters or toilets. Accessibility must be assessed through functional usability rather than the mere existence of facilities.

5.2 Limited Availability of Talking ATMs

The availability of talking ATMs and Braille keypads should be assessed across banking networks. It is important to examine not only the number of accessible ATMs but also their operational status, geographical distribution and public availability.

5.3 Digital Accessibility Deficiencies

A banking application may offer multiple services but still remain inaccessible to customers using assistive technologies. Periodic testing by users with different disabilities is therefore necessary.

5.4 Inadequate Staff Training

Accessibility-related instructions may exist at the head-office level without being adequately communicated to branch employees. Banks must ensure that disability sensitisation reaches all relevant personnel.

5.5 Weak Monitoring and Reporting

Accessibility information is often most useful when available at branch level. General institutional statements cannot establish whether individual branches and ATMs are accessible. A stronger reporting mechanism is required to identify deficiencies, monitor improvements and establish accountability.

The central challenge is no longer simply the absence of accessibility policies. It is ensuring that existing commitments produce measurable improvements in banking services.

VI. RIGHT TO INFORMATION AS A TOOL FOR MONITORING BANKING ACCESSIBILITY

One important mechanism for strengthening institutional accountability is the Right to Information Act, 2005.

RTI can help citizens, researchers and disability-rights organisations obtain verifiable information concerning the implementation of banking accessibility requirements.

It can help transform general institutional commitments into measurable information.

For example, information can be sought concerning:

Monitoring Area	Information That Can Be Sought
Physical accessibility	Number of accessible branches and details of accessibility audits.
Ramps and lifts	Branch-wise availability and functional status.
Accessible ATMs	Number of talking ATMs and ATMs with Braille keypads.
Digital accessibility	Accessibility audit reports of mobile banking and internet banking platforms.
Employee training	Number of employees trained in disability awareness.
Priority services	Details of priority counters and assistance arrangements.
Accessibility expenditure	Budget allocated and expenditure incurred.
Complaints	Number of disability-related complaints and action taken.
Institutional policies	Copies of accessibility policies and implementation instructions.
Corrective action	Time-bound plans for addressing identified deficiencies.

6.1 Proposed RTI-Based Monitoring Model

Stage 1: Information Collection

Obtain branch-wise and institution-level information through appropriate RTI applications and other lawful information channels.

Stage 2: Verification

Examine official responses, accessibility audit reports, policies and supporting records.

Stage 3: Identification of Deficiencies

Compare the information received with applicable accessibility standards and regulatory instructions.

Stage 4: Institutional Representation

Submit evidence-based representations to the concerned banks, their higher authorities and appropriate regulatory or statutory bodies.

Stage 5: Follow-up and Accountability

Seek action-taken information and monitor whether identified deficiencies have been corrected.

This approach can help strengthen transparency and encourage evidence-based institutional reforms.

It is particularly important to distinguish between obtaining information and establishing compliance. An RTI response may reveal what a bank has reported, but physical verification and appropriate technical assessment may still be necessary to establish actual accessibility.

VII. A PROPOSED ACCESSIBLE BANKING COMPLIANCE FRAMEWORK

To improve implementation, RBI could encourage a standardised monitoring framework for banking institutions.

The proposed framework may include six dimensions.

Dimension	Suggested Performance Indicators
Physical accessibility	Accessible entrances, ramps, lifts, toilets and service counters.
ATM accessibility	Talking ATMs, Braille keypads, wheelchair usability and operational status.
Digital accessibility	Screen-reader compatibility, accessible UPI and mobile banking.
Service accessibility	Equal access to accounts, loans, cards and other banking products.
Human resource preparedness	Disability-awareness training and customer assistance.
Accountability	Accessibility audits, complaints, corrective action and public reporting.

Proposed Institutional Performance Mechanism

Banks could periodically assess their accessibility performance and submit structured reports to appropriate internal oversight committees and regulatory authorities.

The reports should distinguish between:

- Facilities available.
- Facilities operational.
- Facilities independently usable.
- Deficiencies identified.
- Corrective measures completed.
- Corrective measures pending.

This distinction is essential because the existence of an accessibility facility does not necessarily establish that it is functional or independently usable.

An independent assessment involving persons with disabilities would further strengthen the credibility of the monitoring process.

VIII. RECOMMENDATIONS FOR RBI AND BANKING INSTITUTIONS

8.1 Recommendations for RBI

1. Strengthen Accessibility Supervision

Accessibility should receive systematic attention in the supervisory and customer-service review of regulated banking institutions.

2. Promote Standardised Reporting

Banks should maintain comparable information concerning branch, ATM and digital accessibility.

3. Encourage Periodic Accessibility Audits

Independent accessibility audits should be undertaken with participation from persons with disabilities and qualified accessibility professionals.

4. Strengthen Digital Accessibility Monitoring

Digital payment systems and banking applications should be periodically evaluated for compatibility with assistive technologies.

5. Monitor Corrective Action

Banks should prepare time-bound plans to address deficiencies identified through audits and customer complaints.

6. Strengthen Customer Grievance Redressal

Accessibility-related complaints should be appropriately classified, monitored and resolved.

8.2 Recommendations for Individual Banks

- Appoint designated accessibility officers or nodal officials.
- Prepare institution-wide accessibility action plans.
- Maintain branch-wise accessibility records.
- Ensure regular disability-sensitisation training.
- Test digital platforms with users with different disabilities.
- Provide accessible customer information.
- Review accessibility complaints periodically.
- Publish meaningful accessibility information.

8.3 Recommendations for Disability-Rights Organisations

- Conduct lawful accessibility assessments.
- Use RTI to obtain institutional information.
- Document accessibility deficiencies.
- Engage with bank management.
- Submit evidence-based representations.
- Promote financial literacy among persons with disabilities.
- Encourage the participation of persons with disabilities in banking reforms.

IX. DISCUSSION: FROM ACCOUNT OWNERSHIP TO FINANCIAL AUTONOMY

India's financial inclusion initiatives have expanded access to formal banking services. However, account ownership alone is an incomplete measure of financial inclusion.

A person may possess a bank account but remain dependent on others to withdraw money, complete transactions or access financial information.

Similarly, the availability of digital banking does not guarantee meaningful access if the platform is incompatible with assistive technologies.

This suggests that financial inclusion should be evaluated through three interconnected dimensions:

Access

Can a person with a disability reach and enter the banking system?

Usability

Can the person independently understand and use banking products and services?

Autonomy

Can the person exercise financial choices without unnecessary restrictions or dependence?

These dimensions provide a more meaningful understanding of accessible banking. Financial autonomy must become a central objective of banking accessibility policies.

X. CONCLUSION

Accessible banking is not merely an issue of infrastructure or customer convenience. It is fundamentally connected with equality, economic independence, dignity and the effective exercise of rights.

The Reserve Bank of India has played an important role in recognising the banking requirements of persons with disabilities through regulatory instructions concerning non-discrimination, branch accessibility, talking ATMs, Braille facilities and digital payment accessibility.

The Rights of Persons with Disabilities Act, 2016, and the Ministry of Finance's Accessibility Standards and Guidelines for the Banking Sector, 2024, further strengthen the legal and institutional framework.

However, the real success of these measures must be evaluated through their implementation.

A wheelchair-accessible entrance, an operational talking ATM, a screen-reader-compatible banking application, trained employees and an effective grievance mechanism are not isolated facilities. Together, they determine whether a person with a disability can participate equally in the financial system.

RBI, banking institutions and other stakeholders must therefore move towards a more systematic, transparent and accountable approach to accessibility.

The participation of persons with disabilities in accessibility audits, policy development and institutional monitoring is equally essential.

Financial inclusion is incomplete when a person can open a bank account but cannot independently use it.

A truly inclusive banking system is one in which disability does not become a barrier to saving, borrowing, investing, making payments or exercising financial choices.

NOT MERELY BANKING ACCESS, BUT BANKING INDEPENDENCE.
NOT MERELY FINANCIAL INCLUSION, BUT FINANCIAL EQUALITY.

REFERENCES

1. Government of India. (2016). The Rights of Persons with Disabilities Act, 2016.
2. Reserve Bank of India. (2008). Banking Facilities to the Visually Challenged. Circular RBI/2007-08/358, 4 June 2008.
3. Reserve Bank of India. (2009). Need for Bank Branches/ATMs to be Made Accessible to Persons with Disabilities. Circular RBI/2008-09/431, 13 April 2009.
4. Reserve Bank of India. (2012). Banking Facilities to Visually Challenged/Persons with Disabilities. Circular RBI/2012-13/191, 5 September 2012.
5. Reserve Bank of India. (2014). Need for Bank Branches/ATMs to be Made Accessible to Persons with Disabilities. Circular RBI/2013-14/598, 21 May 2014.
6. Ministry of Finance, Government of India. (2024). Accessibility Standards and Guidelines for the Banking Sector. 2 February 2024.
7. Reserve Bank of India. (2024). Facilitating Accessibility to Digital Payment Systems for Persons with Disabilities – Guidelines. Circular RBI/2024-25/83, 11 October 2024.
8. Government of India. (2005). The Right to Information Act, 2005.

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