

Blind Citizens Australia
Submission to the Reserve Bank of Australia
ATM Regime
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Blind Citizens Australia (BCA) is the peak national advocacy organisation of and for people who are blind or vision impaired. Our mission is to achieve equity and equality by our empowerment, by promoting positive community attitudes, and by striving for high quality and accessible services which meet our needs.

Introduction

Automatic Teller Machines (ATMs) provide a readily convenient source of cash for the general public, allowing easy access regardless of the time of day, even if a person has very limited time in which to complete a transaction.

Blind Citizens Australia (BCA) agrees with the Reserve Bank of Australia (RBA) that ATM banking practices need to maintain transparency and promote competition within the sector. This is both healthy for the industry and informative for consumers. For example, offering lower charges to consumers using the ATMs of their bank gives most people a choice between convenient location and saving money, while at the same time encouraging banks to be more competitive in attracting customers to their accounts and placing their ATMs in convenient locations.

However, competition in the form of direct charging poses a problem for some members of the public who use ATMs as an integral part of their daily life. People who are blind and vision impaired face many difficulties when trying to access the same ATM facilities as their sighted counterparts. BCA maintains that direct charging in its current form will cause significant access issues for people who are blind or vision impaired, which will in turn create significant barriers to everyday living. This is because:

1. Location of ATMs

Regardless of where an ATM is located, people who are blind or vision impaired first need to know that it is there and then be able to reach it independently before it can be used.

2. The accessibility of ATMS

For people who are blind or vision impaired to access an ATM, it must have audio output. This means that the appropriate software must be installed, activated and maintained, and the public must be given clear information about where audio enabled ATMs are located.

3. Low Incomes

Many people who are blind or vision impaired have low incomes and any additional costs in their budget will be difficult to manage.

As a result of these factors, the introduction of direct charging without any modifications for people who are blind or vision impaired will cause widespread indirect discrimination. Under the Disability Discrimination Act 1992 (Cth) the provision of goods and services must be accessible to people with disabilities without causing them disadvantage. At this stage, changes can be planned and implemented with minimum disruption to the scheme. This may not be the case once the direct charging system has been in place for some time. For this reason, BCA urges the RBA to ensure that careful consideration is given to the recommendations at the end of this submission.

Location of ATMs

One of the goals of direct charging is to provide transparency and competition for consumers. If a member of the public wishing to use an ATM does not wish to pay the required fee the transaction, they can look for another ATM with a lower fee.

However, people who are blind and vision impaired do not have the luxury of being able to search for another ATM. This is because people who are blind or vision impaired are orientated to one or two machines they can use. This usually requires time spent with a specialist orientation and mobility instructor who will teach the person the route to and from the ATM so that the person can find it both safely and independently. Often the choice of ATM is limited by whether they are in accessible and safe location and if the ATM itself is audio enabled. It is

often not possible to find an ATM for the person's bank of choice which meets these criteria.

CASE STUDY

Gina is totally blind. She shops at the local shopping centre, and uses an ATM which is provided by a bank where she does not have an account. Each time she uses this ATM it costs her two dollars.

Across the road from the shopping centre is an ATM offered by her bank. At first, Gina is not even aware of this ATM. Although the bank lists it on their website, they do so by allowing viewers to click on a map to find an ATM. This function is not accessible to a person who is blind. When she is told about the ATM by family and friends, Gina decides she is not confident to cross the road on her own because it is a busy six lane highway. To be able to access her bank's ATM independently, Gina will need to get further orientation and mobility training. This process may take several months while she is on a waiting list and then receives training. In the meantime, she is denied access to an ATM which would save her a dollar per transaction.

The accessibility of ATMs

A number of ATMs are audio enabled. This means they are installed with features allowing the user to connect to the ATM via head phones so the machines functions are audio describe to them.

When most ATMs are upgraded they can be audio enabled if the financial institution buys and installs the appropriate software. At present, many ATMs are capable of being audio enabled but have not been set up to provide this feature. This forces people who are blind or vision impaired to use ATMs of other financial institutions. When the new charge system is introduced, it will be unfairly penalising people who are blind or vision impaired on the basis of their blindness alone.

Additionally, BCA is concerned that the upgrade of software for the active audio ATMs will not be in place at the time the direct charging begins so that what is described remains in sync with what is on-screen. People who are blind or vision impaired will not be able to

independently complete any transaction via an ATM until the upgrade is installed.

CASE STUDY

On the 4 March 2009 Sophie makes a routine stop at an ATM to withdraw some money. The new direct charging system began the day before.

Sophie knows there will be another screen during her transaction, but when she enters her card and starts her transaction the ATM provides exactly the same information as it had previously and says nothing about the new screen. She does not know when this screen will appear. Sophie is waiting for her transaction to be processed, but the ATM does not seem to be processing at all. After she has waited a period of time the machine starts to emit a beeping sound which she associates with not continuing with a transaction in the allocated time.

However, Sophie has entered everything she thinks the ATM requires. In fear and frustration Sophie removes her card. She can not complete her transaction because she is afraid of losing her card.

Low Incomes

A 2007 survey by Vision Australia found that 63% of people who are blind or vision impaired and eligible to work are unemployed. This means that the majority of income for a large number of people who are blind and vision impaired is social security benefits such as Disability Support Pension Blind (DSPB). If the DSPB is the only income a family receives the budget is extremely tight. In 2002, BCA conducted a cost of living survey which shows that the cost of living for people who are blind or vision impaired is higher than the amount received via the DSPB.

Spending more money to access an ATM will make the budget for people who are blind or vision impaired even tighter, and may mean that some have to make choices to do without critical everyday goods and services. Living on such a tight budget also means that the new fee

structure could effectively stop a person from withdrawing money if the direct charges take the total amount above the amount in their account.

CASE STUDY

Spencer and Karen need to withdraw to pay for their child's excursion at school two days before pension day. Their account currently stands at \$20.76c; the direct fee of the only ATMS they can access is \$1.75. This will mean they are unable to withdraw the money from their account, as the minimum withdrawal amount is \$20.00. Therefore their child will be excluded from the school excursion because the due date is before their next pay day. Karen and Spencer are unable to even pay the excursion cost in partial instalments.

Recommendations

To alleviate the significant disadvantage the new charging system will cause for people who are blind or vision impaired BCA recommends that:

1. A fee waiver is granted to all people who are blind and vision impaired on the grounds they are a low income group which is unable to locate a range of ATMs to find a competitive fee or an accessible machine;
2. Direct fees are not implemented until software is upgraded to reflect the visual screen of ATMs;
3. Financial institutions ensure that when all ATMs are replaced or upgraded they are made accessible with audio enabled functions;
4. A readily available list of the locations of all audio enabled ATMs is kept by each financial institution in an accessible format;
5. Regular maintenance checks are preformed on audio enabled ATMS to ensure they function effectively.