Financial Inclusion for Persons with Disabilities in Kenya: A Rapid Review and Qualitative Study Report













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List of abbreviations

AGPO: Access to Government Procurement Opportunities

AMFI-K: Association of Microfinance Institutions Kenya

ATM: Automated teller machine

CASP: Critical Appraisal Skills Programme

FGD: Focus Group Discussion

FICP Survey: World Bank Global Financial Inclusion and Consumer Protection survey

ICT: Information, Communications and Technology

IDI: In-depth Interview

KBA: Kenya Bankers Association

KRA: Kenya Revenue Authority

LPO: Local Purchase Order

MFI: Microfinance Institution

NACOSTI: National Commission for Science, Technology and Innovation

NCPWD: National Council for Persons with Disabilities

OPDs: Organisations for Persons with Disabilities

PIN: Personal Identification Number

SACCO: Savings and Credit Cooperative Organisation

SDGs: Sustainable Development Goals

SSA: Sub-Saharan Africa

UDPK: United Disabled Persons of Kenya

UNCPRD: United Nations Convention on the Rights of Persons with Disabilities

USSD: Unstructured Supplementary Service Data

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Executive summary

Globally, little data exists on how persons with disabilities access financial services and products. The relationship between disability and poverty is strong and persons with disabilities have low access to credit and are perceived to be a high credit risk. Furthermore, persons with disabilities are at high risk of discrimination, product features may not accommodate their needs, and some face barriers to accessing information in appropriate formats. This is despite the fact that their rights are well articulated in the United National Convention on the Rights of Persons with Disabilities (1) to which Kenya is a signatory, as well as the Persons with Disability Act of 2003 (2).

Sightsavers, in collaboration with Kenyatta University, UDPK, and the AMFI-K, conducted research with the following key objectives:

- 1. To assess the extent and quality of the existing literature on how persons with disabilities access or are excluded from various aspects of the formal financial sector in sub-Saharan Africa (SSA).
- 2. To understand how formal financial institutions perceive the design and use of their services and products by persons with disabilities in Kenya.
- 3. To understand how persons with disabilities, with and without experience of accessing the formal banking sector, have experienced or perceive the accessibility of different services and products available in the Kenyan market.

The research took place between April and October 2022 in three phases. The first phase addressed the first objective through a rapid review of literature that provided the scope of evidence and informed the design of the second phase, the qualitative field research. The search terms in the rapid review yielded 22,653 documents, out of which 12 met the eligibility criteria and were included in the study.

The second phase, which ended in September 2022, addressed the subsequent two objectives using empirical qualitative data collection that involved 10 focus group discussions (FGDs) with 81 persons with disabilities and 26 in-depth interviews (IDIs) with participants from 17 financial institutions in Migori and Nairobi Counties in Kenya.

The third phase involved follow-up workshops where a research data validation and a cocreation workshop were held in October 2022.

The final research dissemination meeting was held in Nairobi in February 2023.

Key findings:

- Persons with disabilities are often unable to access the full benefits of existing financial products and services offered by financial institutions.
- Persons with disabilities experience many barriers to accessing financial services and products. These include barriers in infrastructure and physical location, communication and information packaging, technology, systems and services, lack of



- policies, lack of awareness or willingness to support them, attitudinal and personal economic factors.
- Persons with disabilities often report digital channels as a key enabler to access to financial services and products, however, much needs to be done to improve their accessibility for all.
- Financial institutions face barriers in designing and providing products and services for persons with disabilities because of the lack of official statistics on persons with disabilities both in literature and at institutional level, absence of accessible infrastructure, technology and communication channels, lack of institution-level policies, lack of awareness of how to support persons with disabilities, attitudinal and economic factors (potential high costs associated with modifying forms or mobile applications to make them more accessible and to collect data on disability status, training staff on disability inclusion, modification of buildings and infrastructures to improve accessibility).
- The government, associations representing people with disabilities and those representing financial institutions have a critical role to play in ensuring that the requisite oversight mechanisms are in place to support as well as enforce compliance by financial institutions in ascertaining that their services are available and accessible to persons with disabilities.

Introduction

Financial inclusion, defined as "individuals and businesses having access to useful and affordable financial products and services that meet their needs – transactions, payments, savings, credit, and insurance – delivered in a responsible and sustainable way", has been identified as an enabler of seven of the 17 Sustainable Development Goals (SDGs) (3). It allows individuals and firms to take advantage of business opportunities, invest in education, save for retirement, insure against risks, and is a key driver for development (4). While there has been progress towards greater financial inclusion in the recent past, globally about 1.4 billion adults remain unbanked, that is, they do not have an account at a financial institution or through a mobile money provider. Nearly all of the world's unbanked adults are from lowand middle-income countries with the majority of them being women, people from lowincome households and those, who are less educated (5).

There is limited evidence on the proportion of this unbanked population who are persons with disabilities. Disability has been defined by the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), as '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' (1). Evidence has shown that persons with disabilities are more likely to experience adverse socioeconomic outcomes, such as less education, poorer health outcomes, lower levels of employment and higher poverty rates (3).

It can be argued that a significant percentage of the unbanked are persons with disabilities who find themselves excluded from the global and national economies even though many are capable of working and contributing to the economic wellbeing of their families. For example, estimates in 2010 showed that only 0.5 per cent of all microfinance clients worldwide were persons with disabilities (6).

Evidence also shows that discrimination of persons with disabilities plays an important role in their financial exclusion. A short report by Sarkar, 2020, for example categorises ways in which discrimination occurs in microfinance lending with some examples referring to i) perceptual discrimination where financial institution staff have pre-existing prejudice in dealing with persons with disabilities, ii) institutional discrimination where persons with disabilities are believed to be too risky to lend to, as they are unable to save; and iii) verbal and physical mistreatment of clients with disabilities (7). The CBM and ACCION International report also suggests that some persons with disabilities are subjected to higher interest rates or lower credit amounts, as they are believed to be unable to understand the risk associated with credit (6). Other barriers to financial inclusion of persons with disabilities reported in the literature include inaccessible physical environments and transportation, limited access to assistive devices and technologies, inaccessible means of communication and disability stigma in society.

The exclusion of persons with disabilities from financial services has individual and systemic level implications. It can limit individual purchasing power and has a negative impact on economic growth and government revenue generation (6).



An estimated 1.3 billion people globally experience significant disability, representing 16 per cent of the world's population (8). More specifically in Kenya, the 2019 Population and Housing census estimated that 918,270 people aged 5 years and above had a disability, with women accounting for 57 per cent of this population (9, 10). However, data on access of Kenyans with disabilities to financial services remains limited. The 2021 FinAccess Household Survey estimated that 11.6 per cent of the adult population in the country was excluded from accessing financial products and services, but the data was not disaggregated by disability status (11).

These data are important in monitoring the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public which is requirement under Article 9 of the UNCRPD to which Kenya is a signatory (1). The Kenyan government has also committed to the equal rights of persons with disabilities through Article 27 of the 2010 Constitution (12) and through the Persons with Disabilities Act of 2003 (2).

This report synthesises the state of evidence on financial accessibility for persons with disabilities in Sub-Saharan Africa. It also explores access of persons with disabilities to financial products and services based on the perspectives of financial institutions and persons with disabilities themselves in selected urban and rural areas of Kenya.

This study helps to generate robust and solution-oriented evidence to inform appropriate policy interventions, development of products and services aimed at improving financial inclusion of persons with disabilities in Kenya and beyond.

Study objectives

The objectives of this study were to:

- 1. Assess the extent and quality of the existing literature on how persons with disabilities access or are excluded from various aspects of the formal financial sector in sub-Saharan Africa using a rapid review approach.
- 2. Understand how formal financial institutions perceive the design and use of their services and products by persons with disabilities in Kenya.
- 3. Understand how persons with disabilities, with and without experiences of accessing the formal banking sector, perceive the accessibility of different services and products available on the Kenyan market.

Methods

Study design

This was a study with two connected components:

- A rapid review of literature on financial accessibility for persons with disabilities in SSA; and
- 2. A qualitative exploratory study comprising of in-depth interviews with financial institutions and focus group discussions with persons with disabilities in urban (Nairobi) and rural (Migori) areas in Kenya.

The rapid review provided useful insights into the development of the data collection tools, as well as how to organise and plan the qualitative field research.

Useful definitions

For the purpose of this report, it is important to note these definitions and terminologies:

Formal financial products and services: These are financial products and services that are provided by formal financial institutions, such as banks and microfinance institutions, that have a legal basis and are subject to government regulations. Products include accounts, loans, credit, mortgages, insurance, cheques, credit and debit cards. Services include actions that relate to the products, including product application processes, deposits and withdrawals, money transfers and account management, among others. In this report, we focus particularly on accounts ownership, the fundamental measure of financial inclusion (5) and access to credit or loans as well as services associated with these.

Access to financial products and services: There are various dimensions used in reference to access to financial products and services. These include persons with disabilities: i) who have access to and use formal financial products and services; ii) who have access to these products and services and do not use them.

Channels: In this report, these refer to avenues through which financial products and services are delivered. They include in-person visits to financial institutions, automated teller machines (ATMs), mobile banking, internet banking, use of field agents (staff who visit clients/potential clients at their residences or places of work/businesses), agent-banking (agents who conduct transactions on behalf of financial institutions and brand themselves accordingly). In this report, we focus particularly on channels through which savings and credit/loan transactions are conducted.

Component 1: Rapid review of literature

Rapid review is a form of knowledge synthesis that accelerates the process of conducting a traditional systematic review through streamlining or omitting various methods to produce evidence for stakeholders in a resource-efficient manner. It is driven by the need for timely evidence for decision-making purposes to address questions deemed to be of high priority. The rapid review approach used in this report was informed by the recommendations from the Cochrane Rapid Review Methods Group (13). A key point to note is that due to the

nature of this review, references of included documents were not screened, and expert individuals or organisations were not contacted for additional eligible documents.

The rapid review aimed to answer the following research questions:

- 1. What proportion or number of persons with disabilities living in SSA access different formal financial products and services?
- 2. How does access to different formal financial products and services differ between people with and without disabilities in SSA?
- 3. What channels are used by persons with disabilities living in SSA to access financial services?
- 4. What are the factors (barriers and enablers) influencing access to formal financial products and services for persons with disabilities in SSA?

Search strategy and eligibility criteria

Comprehensive literature searches were conducted on targeted databases and websites, between 7 and 28 April 2022. See Appendices A, B and C for the full list of databases and websites, the search terms used, as well as a summary flow chart of search results, respectively.

A document was included if:

- It reported on empirical/primary data.
- Data was collected in SSA.
- It was written in English, Portuguese or French.
- It was published from 2007 onwards (as this was the year after the UNCRPD was signed in 2006).

Two reviewers independently screened all titles and abstracts for potentially eligible studies. One reviewer conducted full-text screening while the second reviewer screened all excluded studies as a verification check.

Data extraction and quality assessment

A data extraction form was developed by the authors and formatted according to the research questions. The form was piloted on 33 per cent of the included studies by one reviewer to ensure that extracted data reflected the rapid review questions.

To assess the methodological quality of qualitative research studies, an appraisal form was customised by the reviewers based on two validated tools: the SIGN50 checklist (14) and Critical Appraisal Skills Programme (CASP) tool (15). Quantitative survey documents were assessed using an adapted version of the CASP checklist. The quality assessment form to assess grey literature was developed based on three validated tools: the Confidence in Evidence from Reviews of Qualitative research (CERQual) approach (16), CASP tool (Critical Appraisal Skills Programme, 2018), and Authority, Accuracy, Coverage, Objectivity, Date, Significance (AACODS) tool (17). Methodological quality assessment of all studies was based on the following criteria: appropriateness, adequate description of methods (ethics, recruitment, data collection and analysis), relevance and coherence.



A study was attributed 'high quality' if authors reported details of all the criteria mentioned above, meaning it was highly likely that the findings were valid, given that the methods were clearly described and the findings were a good representation of the phenomenon of interest. 'Medium quality' was attributed to studies that 'partially' reported the methods used to research, if the findings were applicable to the study context and if the authors discussed how findings compared to other research findings from other studies in the same field. Here it is likely that the review finding was a reasonable representation of the phenomenon of interest. 'Low quality' was attributed to a study where the authors did not report most of the criteria noted above, implying that it was not clear whether study findings were a reasonable representation of the phenomenon of interest.

Data synthesis

To synthesise the evidence identified, we used a narrative approach stratified by research question. All data extraction, quality assessments and data synthesis were completed at the end of June 2022.

Component 2: Qualitative study

Study location

The study was conducted in the counties of Nairobi and Migori. We chose these two counties because the results of the 2021 FinAccess Household Survey had shown marked differences in access to financial services in rural areas, with 14.7 per cent of the population excluded from financial services compared to 6.7 per cent in urban areas (11). Hence, the two counties were purposively selected to allow for comparison of experiences in urban (Nairobi) and rural (Migori) settings.

Study population

In-depth interviews targeted financial institution representatives in senior management (for example, branch managers and heads of business) who were knowledgeable about financial products/services offered by their institution. Focus group discussions were conducted with a group of participants with different types of disabilities, both male and female, aged between 18 and 60 years, with and without accounts in financial institutions. Study participants were grouped into two age categories; those aged between 18 and 35 years, referred to as the younger participants and those aged between 36 and 60, referred to as the older participants.

Sampling

Persons with disabilities were purposively selected and contacted through UDPK that works closely with OPDs in both Nairobi and Migori. Selection took into consideration types of disabilities, age and place of residence.

All 54 financial institutions which were members of AMFI-K were invited to participate in the interviews, with the aim of conducting a total of 26 interviews. This was done in collaboration with AMFI-K who have a wealth of experience in conducting surveys among their members. Specifically, communication detailing the research as well as the characteristics of the



research participants required were sent out and followed by phone calls. Based on their availability and interest, 26 key informants representing 17 financial institutions agreed to participate in the study.

Data collection

Data collection was guided by semi-structured guides that were developed during the rapid review process based on the relevant documents encountered that helped formulate questions that addressed a broad range of topics. The IDIs were mostly conducted at offices of the participants while FGDs were carried out at central venues accessible to all participants. Interviews lasted for approximately one hour while FGDs lasted for approximately one and a half hours. The IDIs were conducted in English while FGDs were conducted in Swahili, English or both depending on preferences of the participants. Inclusive approaches to data collection were observed. For instance, venues were accessible to people with mobility challenges and sign language interpreters were present to facilitate communication with participants with hearing impairments. Data were collected between July and September 2022.

Interview and FGD guides broadly explored: types of financial products and services available on the Kenyan market, and those accessed by persons with disabilities; channels used to access financial products and services, and perceptions of products, services and channels accessed by persons with disabilities; positive and negative experiences with these products and services and recommendations for improving financial inclusion of persons with disabilities.

Data analysis

Interviews and group discussions were audio-recorded and later transcribed verbatim. A coding framework was developed based on the study research questions, topic guides, and emergent findings. Data were analysed using a thematic approach and managed in QSR Software NVivo 12 (18).

Follow-up workshops

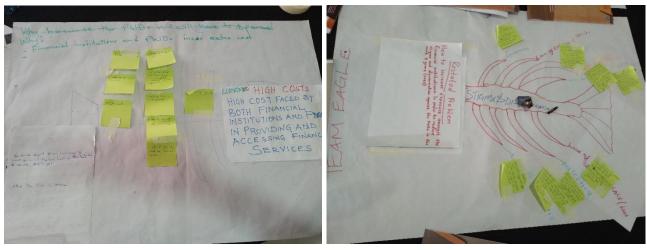
Three follow-up workshops were held in Nairobi after completion of data collection. The workshops provided additional insights into the topics, confirmed and clarified the IDI and FGD data, and helped to develop themes for further data collection and analysis.

A **research data validation workshop** was held in Nairobi on 14 October 2022 with the aim of confirming and validating the rapid review and qualitative research findings. Representatives of financial institutions and persons with disabilities from Nairobi and Migori who participated in the research attended the workshop. There was also representation from UDPK, AMFI-K, Kenyatta University and Sightsavers, totalling 55 participants. A summary of findings from both the rapid review and qualitative field research was presented to the attendees and productive discussions were held which provided input into the data analysis process.



A **co-creation workshop** was held in Nairobi on 27 and 28 October 2022 to identify and agree upon key barriers that emerged from the research and co-creatively come up with prototype solutions to those barriers. The types of attendees were similar to those that attended the validation workshop of 30 participants. Persons with disabilities and financial institutions participated in group activities, including fishbone analysis, as shown in Figure 1.

Figure 1: Fishbone analysis diagrams from two groups



A research dissemination workshop with 44 delegates was held on 3 February 2023 in Nairobi where research findings were shared and well received by all the relevant stakeholders. Stakeholders in this workshop made recommendations which are included at the end of this report.

Ethical considerations

Ethical clearance was granted by the Kenyatta University Centre for Research Ethics and Safety (approval number PKU/2454/E1585) and a research license obtained from the National Commission for Science, Technology & Innovation (NACOSTI) with the license no. NACOSTI/P22/17185. Written informed consent was obtained from all participants prior to participating in the study.

Results

Rapid review results

Summary of included documents

A total of 578 records were identified through the search of databases and an additional 22,075 records were identified through websites. After removal of duplicates, screening for eligibility through the titles and abstracts, and subsequent full text reading, 12 documents met the eligibility criteria and were included in the review.

Geographically, the included documents covered countries in East, West and Southern Africa. Three documents presented studies from Uganda (19-21); four from Kenya (22-25) and one each from Malawi (26), Ghana (27), and South Africa (28). There were also two reports based on a large multi-country survey, the GSMA Intelligence Consumer Survey 2019, conducted in Kenya, Uganda, Nigeria and other low- and middle-income countries in Asia and South America (29, 30).

Studies presented in the documents used different data collection techniques: five documents were quantitative studies, five were qualitative studies, and two used mixed methods techniques. Regarding the quality of documents reviewed, five were rated high quality (low risk of bias), two were medium quality (medium risk of bias), and five were low quality (high risk of bias) The documents are summarised in Table 1.

Table 1: Number and quality of documents

Research question addressed	Number of documents	Quality level
Number of persons with disabilities accessing formal financial services in sub-Saharan Africa	0	Not applicable
How access differs between people with and without disabilities	4	2 high quality 2 low quality
Channels used by persons with disabilities	5	3 high quality 2 medium quality
Factors influencing access to formal financial products and services (barriers and enablers)	8	3 high quality 2 medium quality 3 low quality

In the following sections, we summarise the results based on the research questions.

Proportion or number of persons with disabilities in sub-Saharan Africa accessing formal financial products and services

Among the 12 reviewed studies, none explicitly provided statistics on the proportion or number of persons with disabilities accessing formal financial services and/or products in SSA. Data from the Global Findex Database 2021 report, which showed that 55 per cent of adults living in SSA had an account in 2021 was not disaggregated by disability status (5).

Differences in access to financial products and services between people with and without disabilities

Four studies compared how people with and without disabilities accessed different formal financial services and products (23, 24, 29, 30). One of the two multi-country reports that investigated digital channels accessed by persons with disabilities found that whereas mobile money account ownership was not very different among people with and without disabilities (87 per cent and 91 per cent, respectively) in Kenya, the differences were almost two-fold (46 per cent and 79 per cent, respectively) in Uganda (29). The other multi-country report further highlighted a gender gap, whereby women with disabilities were more disadvantaged in phone ownership than men with disabilities in all the surveyed countries except Kenya. It also reported that in Uganda, mobile-based financial transactions differed among men with disabilities (6 per cent) and men without disabilities (12 per cent). Factors attributed to the gender and disability divide were largely associated with affordability of mobile phones and airtime, digital literacy, relevance (perception of the value of mobile phones and safety/security concerns) (30).

A 2020 report by AMFI-K showed that only two microfinance banks reported that they served people with disability. Here the number of active savers and borrowers with disabilities was reported to be very small at 5 and 4 clients, respectively, while the figures for those without disabilities were 1,181,418 and 433,438 clients, respectively (24). In the 2021 report, only one microfinance bank reported that they served people with disability and the number of savers and borrowers with disabilities were three and two clients, respectively, compared to 346,238 and 257,757 clients without disability (23). However, it was possible that other MFIs served persons with disabilities but lacked data on their clients' disability status. It was also likely that the low numbers of people with disabilities from the report MFIs were due to the fact that these institutions did not collect data on the number of people with disabilities or that they only focused on visible categories of disabilities.

Channels used to access financial services by persons with disabilities

Five studies attempted to understand the channels used by persons with disabilities to access formal financial products and services. A study involving Kenyan citizens and refugees with visual and hearing impairments reported mobile money transfer service was the preferred method for basic banking services (22). The 2020 KBA survey among 135 clients with physical, visual and hearing impairments reported 92 per cent accessed bank services through in-person visits, 72 per cent used ATMs, and 34 per cent used bank mobile applications. The report further highlighted variations in access by impairment type; for instance, clients with visual impairments were less likely to use ATMs (53 per cent) and mostly accessed services through in-person visits to banks (97 per cent) (25).

Factors influencing access to formal financial products and services

Eight studies described factors that were either barriers or enablers to financial access by persons with disabilities. Another two studies reported barriers only, and one study reported enablers only.

Factors reported to be either barriers or enablers of access to financial services by persons with disabilities were grouped in the following categories: i) infrastructure and physical



location; ii) communication format and information packaging iii) technology; and iv) services, systems and policies. In addition, attitudinal and economic factors were reported to be a barrier, while training was reported to be an important enabler of financial access.

Factors acting as either barriers or enablers for access to financial products and services

Infrastructure and physical location

Infrastructural barriers were reported to affect people with different types of disabilities in different ways. For example, in Kenya, 97 per cent of clients with hearing impairments said they were able to enter bank premises easily compared to 81 per cent of clients with visual impairments and 65 per cent of clients with mobility impairments (25). Three studies from Uganda found the lack of ramps, location of services on higher-level floors and lack of lower counters in financial institutions hindered accessibility for people with physical disabilities (19-21). In Ghana, clients with visual and hearing impairments were concerned that the ramps were steep, located in obscure places or were obstructed by objects. Additional infrastructural barriers reported included the lack of designated parking spaces for persons with disabilities, presence of manual entrance doors and slippery tiled floors (27).

In South Africa, persons with disabilities residing in remote locations reported having to travel long distances to the nearest banks or ATMs located in town centres, as a barrier imposing an additional burden of organising for transport to access these services (28). Of the surveyed clients who banked in-person in Kenya, 77 per cent felt the location of their bank was convenient to them and 30 per cent of customers with visual impairments and 27 per cent of clients with mobility impairments found the locations inconvenient (25). In Uganda, a study participant with physical disabilities reported being denied a loan due to the fact that he lived very far from the institution that required close monitoring of borrowers (21).

Two studies in Uganda and Malawi, respectively, reported that accessibility improvements to the banking premises facilitated access to services for persons with disabilities (20, 26). In Uganda, union members reported constructing ramps to ease access to bank establishments (20). In Ghana, the location of financial institutions on the ground made access for people with physical, visual and hearing impairments easier (27). In Kenya, 70 per cent of clients with disabilities reported ATMs to be conveniently located (25). In Malawi, however, physical accessibility was reported to be a challenge despite some physical improvements made, although no details on which improvements worked and which ones did not were provided in the paper (26).

Communication format and information packaging

Studies reviewed reported that persons with disabilities encountered challenges communicating with staff in financial institutions about the difficulties they experienced. For instance, Kenyan clients with hearing and visual impairments experienced difficulties engaging customer care support via phone to discuss banking services and troubleshoot problems encountered. People with hearing impairments reported that they were unable to independently seek support since call centres were predominantly voice-based (22). A notable concern by clients with hearing impairments was the unavailability of sign language



interpreters, which made communication with financial institution staff a challenge (21, 25, 26).

Studies reviewed revealed a gap in the availability of accessible information about financial products and services. For example, in Uganda, financial institutions lacked documents in soft copies that could be provided to clients with disabilities in the comfort of their homes, and there was no information in braille (21). In Ghana, people with visual impairments reported having difficulties reading the terms and conditions of agreements, as well as flyers, due to small print, while television advertisements lacked subtitles or sign language interpretation (27). In Malawi, inaccessible marketing and awareness-raising media platforms were noted by people with visual and hearing impairments (26).

Some documents reported how communication and information challenges were mitigated. In Ghana, financial service providers reported reading out the terms and conditions to people with visual impairments, encouraged persons with disabilities to be accompanied by a trusted carer or allowed persons with disabilities to take documents home (27). In many settings, disability-inclusive adaptations worked well. In Uganda, for example, the majority (85 per cent) of clients with physical, hearing and visual impairments reported effective communication with MFI staff in resolving their banking issues and meeting their needs through text or phone calls (21).

Technology

In Uganda, challenges in using technology-based banking channels were reported by people with hearing, visual and physical impairments. For instance, the Unstructured Supplementary Service Data (USSD) code feature placed demands on clients with visual impairments to remember too much information, such as number codes, while mobile applications and websites were noted as inaccessible due to the absence of screen reader features (22). In Ghana, it was reported that the fully audio electronic queue management system created difficulties for people with hearing impairments (27). A study with senior managers of commercial banks in Malawi found that persons with disabilities were often unaware of adaptive technology, and financial institutions failed to take into account persons with disabilities during their service planning processes (26).

Services, systems and policies

In Kenya and Ghana, queuing in banking halls was reported as a barrier, causing pain and discomfort, especially for clients with physical impairments, despite the existence of a banking policy on prioritising services for persons with disabilities in queues (25, 27). In Kenya, persons with disabilities reported to feel uncertain of the right location of different services within the building, while those with visual impairments were denied ATM cards due to bank precautionary security policies. These clients ended up using alternative payment methods that attracted higher transaction fees. Complaints were also raised about screen reader functions being non-functional, while reconfiguration and ATM menu updates made clients with visual impairments struggle to operate ATM machines independently (25). Other ATM-related challenges reported by persons with disabilities in Kenya and Ghana were the height of ATM machines for wheelchair users, lack of braille, talk back services, and earphones for visually impaired clients (25, 27).



With respect to policies, a study in Ghana reported that most financial service providers surveyed lacked policies and procedures on the provision of products and services to persons with disabilities, yet there was an existing financial inclusion strategy and several policies and regulatory frameworks that focused on persons with disabilities, which financial service providers had to follow (27). In a Kenyan study, despite the presence of directives on priority services for persons with disabilities, staff were not fully aware of them and implementing these directives was a challenge (25).

In Uganda, long time to apply for and acquire loans were perceived to be significant impediments that made the loan administrative processes more burdensome for persons with disabilities than those without disabilities (21).

Additional barriers

Attitudinal factors

a) Stigma and stereotyping of persons with disabilities

In Ghana, persons with disabilities reported being perceived as beggars and treated with contempt by security guards (27). In Malawi, four out of 10 participants in managerial positions of various banks acknowledged perceiving persons with disabilities as not profitable and incapable of making loan repayments (26). In a survey among 731 economically active people with physical disabilities in Uganda, 22 per cent feared being rejected or discriminated against by staff of financial institutions because of their disability and 30 per cent worried about being discriminated against by their fellow group members (loan or credit societies) more than by financial institutions staff (20).

Service providers interviewed admitted to staff having very little awareness or willingness in ensuring that the needs of clients with hearing and visual impairments were met (21).

b) Self-stigma

This was reported in Uganda where persons with disabilities felt embarrassed and shy in approaching microfinance institutions because of their disability. This was particularly typical a challenge for farmers and people with low-educational achievement. There were also differences observed by type of impairment, for example, people with hearing impairments were more likely to feel embarrassed (22 per cent) compared to those with physical and visual impairments (i.e. 9 per cent and 11 per cent, respectively) (19). These findings were consistent with the results of another study conducted in Uganda, where persons with disabilities reported lack of self-belief which often undermined their ability to work intensely to be able to do timely repayment of their loans (21).

Economic factors

In South Africa, persons with disabilities reported extra costs associated with travel, such as taxi hire to access financial services (28). Communication and travel costs were also reported as an obstacle for persons with disabilities in Uganda (21). In Ghana, there were costs associated for engaging a helper or a sign language interpreter (27).



A study in Uganda that explored experiences of persons with disabilities in accessing microfinance loans, highlighted the lack of assets or formal businesses that formed part of the loan guarantees, short repayment periods, high interest rates, high transactions costs and lack of flexibility in loan terms and conditions as barriers for persons with disabilities (21). In another study in Uganda, nearly half (46 per cent) of the surveyed clients with physical impairments were worried about high interest rates although over two-thirds of the study participants were willing to pay the same interest rates on credit facilities as those people without disabilities (20).

Enablers only

Training and advocacy

One of the approaches used was creating awareness and financial literacy training among persons with disabilities and OPDs on aspects related to business, microfinance and savings. In Uganda, there was targeted training of financial institution staff which covered: i) definitions of disability, its causes and mechanisms hindering inclusion of persons with disabilities; ii) market opportunities that MFIs were missing out on, iii) equitable approaches in serving persons with disabilities and those without disabilities; and iv) practical tips on serving persons with disabilities. Accompanying the training, there were other marketing and advocacy strategies involved including advertisement of projects through radio and television shows; lobbying with government and industry officials; promoting the involvement of persons with disabilities in the design of new products tailored for their needs; and motivating MFIs to independently make their premises more accessible and carry out outreach efforts in the communities to reach persons with disabilities. Collectively, the impact of these initiatives led to the increase of a financial institution client base of persons with disabilities across different branches within a two-year period (i.e. range of 57 per cent to 350 per cent) This is the only study in the review that measured the impact of training on the accessibility of financial services and products among persons with disabilities (19).

In Ghana, however only one of the 22 financial institution managers surveyed reported staff having received training on equality and innovative ways on how to serve persons with disabilities (27). Another study in Uganda reported that only four out 10 participants in managerial positions across different banks reported providing financial literacy training for persons with disabilities accessing credit/loans (20).

Qualitative study results

Participant characteristics

Ten focus group discussions (six in Nairobi and four in Migori) were conducted with a total of 81 persons with disabilities. Each FGD had six to nine participants. The characteristics of FGD participants are outlined in Table 2.



Table 2: FGD participant characteristics

Characteristics	Frequency (N=81)	Per cent (%)
Age		
18-35	40	49.4
36 and above	40	49.4
Missing	1	1.2
Gender		
Female	46	56.8
Male	35	43.2
County		
Nairobi	46	56.8
Migori	31	37.8
Missing	4	4.9
Impairment category		
Physical	32	39.5
Missing*	19	23.5
Visual	11	13.6
Hearing	10	12.4
Albinism	4	4.9
Psychosocial	2	2.5
Intellectual	1	1.2
Multiple (epilepsy & psychosocial)	1	1.2
Multiple (hearing & mobility)	1	1.2

^{*}Some participants preferred not to disclose their impairment.

A total of 26 IDIs were conducted with representatives from 17 financial institutions. These comprised one bank and 16 microfinance institutions (MFIs) which were either microfinance banks (n=9) or credit-only microfinance institutions (n=7). One of the microfinance banks was a fully digital institution with no physical offices. Out of these 17 institutions, nine had a branch in Migori from which a representative was interviewed. Characteristics of the IDI participants are summarised in Table 3.

Table 3: IDI participant characteristics

Characteristics	Frequency (N=26)	Per cent (%)
Sex		
Male	18	69.2
Female	8	30.8
Overall duration of work experience (years)		
11 and above	13	50.0
0-10 years	10	38.5
Missing	3	11.5
Employment duration at current institution (years)		
0-5	12	46.2
6 and above	11	42.3
Missing	3	11.5

Themes that emerged from the analysed data include:

- 1. Experiences and perceptions of financial institutions on the design and use of products and services by persons with disabilities.
- 2. Experiences and perceptions of persons with disabilities on access to and use of products and services offered by financial institutions.
- 3. Channels used by persons with disabilities to access financial products and services.
- 4. Role of data and recognition of disability status in access and design of financial products and services.
- 5. Recommendations to overcome barriers and to facilitate access of financial products and services to persons with disabilities.

The next section explores each theme in detail.

Theme 1: Experiences and perceptions of financial institutions on the design and use of products and services by persons with disabilities

This theme draws on perspectives from financial institutions about the available financial products, services and channels, requirements for opening an account and loan/credit facility, as well as marketing and communication strategies. For each of these, we also focused on products and services designed for or considerate of persons with disabilities, those that persons with disabilities were perceived to utilise while highlighting positive and negative experiences.

Financial institutions products and services design

Available products, services and channels in financial institutions

Representatives from financial institutions explained the various products, services and channels available in their institutions for the general public. These are summarised in Table 4 and further described in Appendix D. As highlighted earlier, the main focus of this research were accounts and credit/loans which were the most commonly identified financial products.

Table 4: Available products and services

Accounts	Loans/credit facilities	Other financial services	Channels
Individual, joint and group accounts	Local Purchase Order (LPO) financing	Insurance (e.g., personal, property, car)	In-person visits to FI offices/banking halls
Current, fixed and savings accounts	Trade guarantees	Money transfer services	Visits by field agents
Special accounts e.g., for children and students	Group loans	Foreign exchange	Agency banking
Group accounts	Construction financing	Financial literacy training	ATM services
	Asset financing		Digital services including: USSD, mobile applications, institutional websites
	Agricultural-related loans		
	Small and medium enterprise investment loans		
	Social products		
	School fees loans		

Financial products and services for persons with disabilities

Most financial institutions acknowledged they did not have products and services explicitly designed for persons with disabilities. However, a few MFIs described attempts to customise their products and services to accommodate the needs of persons with disabilities:

- Allowing for flexible collateral arrangements for small and medium enterprise (SME)
 investment loans which was reported by one MFI that aimed to facilitate the uptake of
 products and services by persons with disabilities who were often perceived as 'high-risk'
 clients.
- Provision of group loans for persons with disabilities in business, members of Savings and Credit Cooperative Societies (SACCOs) and chamas (informal cooperative societies used to accumulate and invest savings. Chamas are also referred to as micro-savings or investment clubs and are common in Kenya (31)).
- Financial literacy training for persons with disabilities to raise their awareness on savings and loan management.

"... we are mostly popular on LPO [Local Purchase Order] financing; that is a product tailored mainly for the contractors...we also have other supporting products...that facilitate the clients [with disabilities] towards getting the main product...As a requirement, before getting the tender, they need to have a bid bond...a letter of credit and other documents so we also assist the clients [with disabilities] to have such." (Credit only microfinance, rural)

Accounts and loan application requirements for people with disabilities

Financial institution representatives summarised requirements for applying for the different accounts and loan products (Table 5). It is worth noting that this is not an exhaustive list as respondents indicated that a lot of the details could be found on their websites.

Table 5: Financial institutions' product application requirements

Individual accounts

National identification card, passport size photos, Kenya Revenue Authority (KRA)
 Personal Identification Number (PIN), biometric data (requiring physical presence of
 client), filled enrolment form which captured clients' demographic details, contacts and
 next of kin details, minimum deposit amount which varied by institution

Company/current accounts

 Name of company, details of company directors, company KRA PIN, certificate of incorporation, signed memorandum of understanding

Group and chama accounts

 Names of the group members, minutes of meetings, group constitution or signed memorandum of understanding

Individual loans

• KRA PIN, national identification card, collateral, completion of an online form to assess credit score which determined the loan limit a client qualified for.

Group loans (chamas, SACCOs)

 Members' share contribution which allowed members to request loans against their shares, loan security based on a co-guarantee system by other group members

Business loans/credit facilities

 Financial statements to inspect company cash flow, company brochure, credit report from the Credit Revenue Bureau (CRB), collateral

In addition to these requirements, a handful of financial institutions mentioned some specific requirements for persons with disabilities. For example some institutions requested for the tax exemption certificates from persons with disabilities obtainable through the Kenya Revenue Authority (KRA) which exempts them from paying tax with respect to salary, self-employment income from business or rental income (32).



Persons with disabilities corroborated this information and added that a few institutions asked for their disability cards which they get through the National Council for Persons with disabilities (NCPWD), a state corporation established through the Persons with Disabilities Act of 2003 (2). The card helps to identify persons with disabilities, helps them acquire the tax exemption certificate and allows them to be considered for products eligible to them as reported by one MFI.

"If they [persons with disabilities] provide everything that we have captured in our data showing that they are disabled, then anybody with disability you don't tax at that moment when they are doing the transactions. That's the part we normally remit to the government." (Microfinance bank, rural)

During the account opening process, some people with visual impairments were requested to provide details of their aides who would support them in conducting financial transactions. This was seen as introducing another layer of requirements which was not a requirement for people without disabilities. It also meant that they were at risk of being taking advantage of by untrustworthy aides who could transact on their behalf.

A few financial institution representatives mentioned that persons with disabilities were at increased risk of being targeted by fraudsters, and they recounted incidents where persons with disabilities signed off loan documents, which later got into the wrong hands. Hence, some financial institutions took extra precautions to vet and check that persons with disabilities were not taken advantage of.

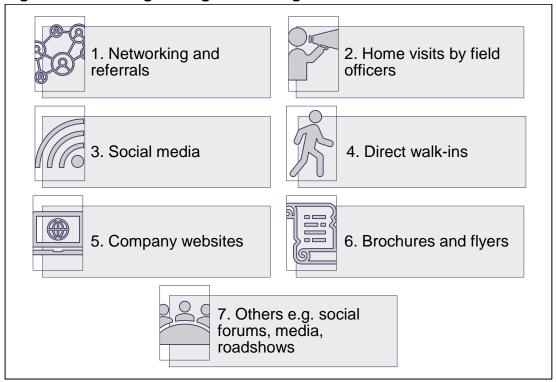
"They [fraudsters] are given funds for the particular contract but they disappear with the funds...When you go back to collection and recovery and trying to get back the money, it is when you find those details of what happened. When you call the persons with disabilities to ask what happened, they tell you that they know nothing and that they were only asked to sign something." (Credit only microfinance, rural)

Marketing and communication strategies targeting persons with disabilities

The study sought to understand the marketing and communication strategies used by financial institutions and what strategies they perceived reached persons with disabilities. The marketing strategies for the general market are shown in Figure 2. They are organised hierarchically, based on popularity and frequency of mention by financial institution representatives and additional details shown in Appendix F.



Figure 2: Marketing strategies for the general market



Financial institution representatives noted that most marketing and communication strategies did not have any special adjustments made for persons with disabilities. Some respondents however, reported that a number of strategies were used to reach specifically persons with disabilities:

a) Networking and signposting

The most common strategy mentioned was to reach persons with disabilities through their networks and signposting where members of microfinance groups and associations were asked to reach out to fellow members who were persons with disabilities. For example. One MFI found that an effective strategy to market their loan products was through registered business association networks and databases. Another MFI marketed their products through an existing client membership network and capitalised on their clients' positive appraisal of their products.

"Some members within a group that you had already given loans to belong to other groups. ...after you find them in these groups, they will give you referrals. They will tell you about a group at home and ask you to go and see them...they are usually the best because the moment someone refers a group to you, it means he or she has knowledge about the members and the kind of activities they are doing." (Credit only microfinance, rural)

b) Home visits by field officers

This was perceived to be helpful for persons with disabilities since it was convenient and minimised the need to physically visit offices. A few participants financial institutions representatives mentioned that their field agents at times went along with a sign language interpreter to communicate with clients with hearing impairments.

"Our way of marketing is very personal...we meet with them [persons with disabilities] and talk to them... if there is need for sign language, I bring in a sign language interpreter...I speak three or four languages...if there is need to change the language." (Credit only microfinance, urban)

Other marketing strategies mentioned included use of social media, sharing information about their products and services to walk-in clients, through company websites, brochures and flyers as well as social fora, mainstream media (television, newspapers, radio) and roadshows.

Perceptions and experiences of financial institution representatives in their engagement with people with disabilities

Positive experiences

Infrastructure and physical location

Some financial institution representatives highlighted physical infrastructure adjustments that their institutions have put in place to facilitate physical access for persons with disabilities. These included:

- 1. Locating offices on lower-level floors of a building.
- 2. Installing ramps to allow wheelchair users' access to banking halls and ATMs, and wide alleys to allow ease of mobility.
- 3. Installing lifts to access offices located on higher-level floors, with two MFIs customizing their lifts with voice-enabled features and/or braille imprinted on the lift keys to accommodate people with visual impairments.
- 4. Lowering counter levels for wheelchair users to transact with ease.
- 5. Having amenities such as toilets designed for persons with disabilities as mentioned by only one participant.

"...we basically made our ATMs accessible, banking halls accessible, we have also made sure that there are counters that are sunken to a level that you can actually work comfortably from your wheelchair or any instruments that are aiding you to navigate... we have 19 branches, they are all friendly to persons with disabilities." (Microfinance bank, urban)

Communication formats and information packaging

Nearly half of the MFIs reported some form of accommodation to ensure accessible communication formats for persons with disabilities. One MFI had a savings and borrowing mobile application which had voice-enabled features to accommodate clients with visual impairments. Another MFI reported that their website was accessible for those with visual impairments. An additional approach included staff reading out the documents, recording conversations and encouraging persons with disabilities to be accompanied by a guide for additional communication support.



"...usually for the visually impaired, we read for you out loud and tell you that what you want, you can write in big numbers...You can also record your conversations, like I know of one that prefers that I read, he records and I write." (Credit only microfinance, urban)

Microfinance institutions used different approaches to communicate with clients who had hearing impairments. Those mentioned included:

- Communicating through an interpreter, who could be a family member or group member (if they were members of a group) accompanying the client.
- Writing down notes and exchanging with the client.
- Exchanging short messaging services (SMS) with clients during their meetings.

Attitudinal factors and training on disability awareness

Financial institutions perceived their staff to be very helpful and accommodating of clients with disabilities, ensuring that they were served with dignity and respect. They specifically mentioned the supportive role security guards played, from the warm reception of clients on arrival at the premises, to providing directions to guide where clients with disabilities could be served. It was noted that the financial institution staff they helped to prioritise clients with a disability in queues, support persons with disabilities with filling forms, and to operate the ATM machines. Similarly, some institutions mentioned the presence of a customer service desk and training their staff to attend to clients with additional needs.

Another MFI emphasised the value of understanding lived experiences and challenges faced by persons with disabilities while serving them and being responsive, especially during loan repayment. Another example was by an MFI that worked with persons with disabilities as 'field agents', and identified this as a unique model that allowed persons with disabilities reach out to other group members and extend financial services to group members in nonformal settings, such as in a church set-up.

"... We have agents, but our form of agency banking is not your normal agency banking, because we have appointed some [persons with disabilities] from those groups... people who support them, people they can relate with." (Microfinance bank, urban)

Very few MFIs reported training on disability inclusion for staff in direct contact with the clients, like customer service officers, cashiers or bank tellers, managers, and support staff such as security personnel. One MFI mentioned that their institution had two training sessions on basic sign language as well as disability awareness and etiquette organised in partnership with the NCPWD and the Association for the Physically Disabled of Kenya (APDK).

"Yes, that's where these partnerships come in because all of our staff have gone through training ...we have also done accessibility training and all that. It is in partnership with these bodies that we are partners with NCPWD and APDK." (Credit only microfinance, urban)

Some MFIs reported that staff had general training on working with diverse client populations, including persons with disabilities. In one MFI, a bi-weekly meeting was organised with staff across their branch networks locally and in other countries to discuss issues of equity and inclusion, where issues of disabilities featured.



"...we have had two training (sessions) where the staff learnt some basic alphabet and communication in sign language. I think now that we are engaging the oversight institutions themselves... and I think we will be more exposed...and maybe the management will see the need to incorporate those training to our staff." (Credit only microfinance, rural)

Negative experiences

Infrastructure and physical location

Respondents noted that most of their offices were rental properties, hence they were limited with the choice of setting up their offices on lower-level floors. They added some of these rental premises did not meet disability accessibility standards and that there were cost implications to redesign or make adjustments. In rural areas, getting office spaces with adjustments for persons with disabilities was also problematic. There was little knowledge of policies requiring firms to ensure building standards were disability friendly.

"We prefer most of our branches to be on ground floors but [in] some places it is difficult to get good spaces." (Credit only microfinance, urban)

Communication format and information packaging

Narratives from respondents centred around inaccessible communication formats surrounding channels and marketing media. For instance, they agreed on the difficulty that clients with visual impairments face with using USSD codes which would require phones with audio-enabled features.

"...if we say that somebody is visually impaired then yes, we have a USSD code but they can't dial it because they can't see." (Credit only microfinance, urban)

An MFI representative acknowledged that mainstream marketing strategies through social media and websites did not take account of communication options for people with visual and hearing impairments. Communication and product application formats, such as loan application forms in paper format with no braille options, prevented clients with visual impairments from applying independently.

"...you see as a marketing guy our business is...visibility and branding outside there.... we are expected that anytime we post in prints it also goes on social media...the question that we need to ask ourselves is...out of the guys that are blind and those that are generally having issues physically, do they have that opportunity of reading it? Can they access these newspapers? Do they have mobile phones?" (Microfinance bank, urban)

Most MFIs reported that their staff were not trained in Kenyan sign language. They depended on the interpreter accompanying the client for communication. One MFI representative mentioned having basic conversational sign language. Another MFI



contracted an external sign language interpreter who was on stand-by whenever there was a client in need.

"We have contact persons who we call in when such a customer comes in. We are unable to keep a full time one because it does not happen daily, just once in a while but we have that person that in case they are needed, they are on call." (Credit only microfinance, urban)

Policies and guidelines

There was minimal information about disability-related polices or guidelines. Few participants spoke of relying on the institutional human resource broader policies on non-discrimination towards clients and staff. Others mentioned that they relied on charters and customer service policies on how to handle clients in general. Only one MFI mentioned that their operational policy on loan procedures spelt out terms and conditions for working with persons with disabilities, however, the specifics were not disclosed. Another financial institution described how they had to adjust their terms of service when one of their clients developed a physical disability due to a terminal illness.

Further, a few respondents reported that there was a disciplinary system in place to handle any reported cases of discrimination or poor handling of clients in general. This system, they emphasised, encompassed clients or potential clients with disabilities.

Lack of knowledge on disability

Financial institution representatives felt there were blurred boundaries between being respectful towards persons with disabilities and appearing to be unintentionally discriminating. For instance, when a respondent politely asked a client with a disability to move ahead of the queue, the client was unhappy as he/she did not wish to be treated differently. Financial institution staff felt they needed more guidance in such situations and how to communicate and be sensitive towards persons with disabilities.

Theme 2: Experiences and perceptions of persons with disabilities on access to and use of products and services offered by financial institutions

This theme explores how persons with disabilities experienced or perceived the accessibility of different financial products, services and channels. It highlights their knowledge of various preferences and experiences of use.

Knowledge on financial institutions, products and services

Persons with disabilities had varied knowledge of existing financial institutions in the Kenyan market. The most commonly mentioned were the Kenya Commercial Bank, Cooperative Bank of Kenya, Equity Bank, Family Bank, Faulu, NCBA Bank, ABSA (formerly Barclays Bank), Stanbic, National Bank, and Ecobank. These represent some of the most common mainstream banks in the Kenyan banking sector. On the other hand, there was generally low



levels of awareness of MFIs as many did not know the differences between the two types of institutions. In only one FGD, one respondent had extensive knowledge on the types of MFIs. The MFIs that were mentioned included Kenya Women Finance Trust (KWFT), Faulu, SMEP and ASA.

The most common financial products used by study participants with disabilities were bank accounts including savings, current and fixed accounts. Other services mentioned included loans/credit services such as asset financing, LPO financing and loans for school fees.

Participants described other popular avenues where they saved money or accessed loans from. These were the SACCOs and chamas which attracted membership due to various reasons:

- Registration was easier to complete, and less documentation was required at enrolment.
- Low loan interest rate.
- Faster loan processing time.
- Flexibility in repayment period.
- Co-guarantee system where members serve as loan guarantors unlike other collateral required by most financial institutions.

"One doesn't need to provide a lot of requirements because the group members know each other. So as long as you have two guarantors, you'll get your money." (Older participant, with account, rural)

"...the interest rate. You will find that it is higher in the banks and lower in the chama so someone prefers the chamas to the banks." (Older participant with no account, urban)

Persons with disabilities who had no accounts mentioned alternatives where they saved their money and the reasons for doing this. Some kept cash obtained from proceeds from sales of small businesses or wages from low-income jobs at home. Cash was stored under a mattress, a savings tin or another safe place within the house. Table 6 summarises reasons why persons with disabilities preferred to have accounts and reasons why some did not have these accounts.

Table 6: Reasons for having or not having an account in a financial institution

Reasons for having accounts	Reasons for not having accounts
For savings and withdrawal	Financial constraints due to: - lack of money/income - no surplus income to save - travel costs to financial institutions - loss of income/business closure. - insufficient minimum required to deposit requirement
For safety reasons (prevent theft)	Time associated with travel to financial institutions
To avoid misappropriation from family members	Lack of awareness and misinformation on available financial service
To receive payments e.g., cash transfer disbursement and salaries	High bank transaction charges

It was clear that many persons with disabilities had limited knowledge of the existence of different financial institutions, products, services and channels that were available in the Kenyan market.

Persons with disabilities' perspectives on financial accessibility

Positive experiences

A. Infrastructure and physical location

Persons with disabilities reported that some institutions were either within walking distance or they could use public transport such as motorcycles to access them, although this did not apply for clients with physical disabilities who had to pay for taxis especially if they were wheelchair users.

Within financial institution premises, participants with disabilities described positive experiences where their needs were accommodated in the following ways:

- Ramps were made available for wheelchair users and clients with crutches.
- Lower counter tops or clients with disabilities being served in a separate room.
- In a few institutions, ATMs were lower and could be accessed by wheelchair users and were installed with voice prompts for clients with visual impairments.
- Fast-track services for persons with disabilities, in instances where they did not have to queue or were given priority to be served in banking halls.

[&]quot;...most of the banks nowadays are trying to be considerate of persons with disabilities and especially when it comes to ramps ...for the deaf and someone that is visually impaired will have to ask someone to help them." (Younger participant with account, rural)



B. Information materials and communication formats

For clients with visual impairments, some institutions allowed them to record phone conversations and have a guardian present to assist with communication. Most institutions did not have sign language interpreters. To communicate with clients with hearing impairments, they exchanged written notes. Through digital platforms, participants with visual impairments mentioned they appreciated the audio-enabled features, though this depended on phone type. They also described appreciating adaptations such as automated counter labels in large font size and a queuing system with audio features within banking halls.

C. Attitude and awareness

Participants with disabilities described their experiences with financial institution staff in terms of how they were handled and supported to carry out their financial transactions. Security guards were commonly cited as aides who assisted persons with disabilities within banking halls and even at ATMs. These guards usually assisted those who could not reach ATM machines.

"...when I got to XX bank...I have vision impairment. As you know, a person with albinism usually has a problem with their vision...so, when I got to the bank, there was someone by the door ready to assist me. The services are very quick." (Older participant with account, rural)

Negative perceptions and experiences

A. Infrastructure and physical location

Some persons with disabilities reported they experienced challenges accessing financial institutions that were distant from their location. Hence, they would incur transport costs which would include costs for caregivers or interpreters. Within institution premises, the length of time to access services made their banking experience a tedious process. Other infrastructural barriers cited included:

- Counter glass made it hard for those were hard of hearing to communicate with tellers.
- Absence of ramps and location of banking halls on higher-level floors accessible via stairs were a problem for clients with physical impairments.
- Slippery floors were a potential hazard for clients who used crutches and those with visual impairment.
- High-level counters and ATMs sometimes required physically lifting clients with physical impairments or those of short stature, which was uncomfortable and less dignified.
- "...people who are deaf-blind or who are partially deaf and are also blind, you see that glass at the cashier...makes it hard for you to hear what the people inside are saying." (Younger participant with account, urban)



"...for some of us to access the ATM...you have to rely on someone else to enter for you the PIN and it is sensitive sharing a PIN...So, I don't benefit...if it was placed on a level that I can do my transactions then I wouldn't need help with PIN." (Younger participant with no account, urban)

B. Information materials and communication formats

Most of the written documents and counter numbers were reported to be in small fonts, which made it difficult for those with visual impairments to read. They had to depend on their guides to read and explain, and also found that language used was too technical to comprehend.

"...some of us are visually impaired and you find that those forms have small fonts, so it becomes very strenuous and at times you go there and you need their attention... I think persons with disabilities should be given the attention." (Younger participant with account, urban)

Clients with hearing impairments found the written exchange with financial institution representatives strenuous, and they are constantly expected to carry a pen and paper with them. They perceived the staff did not understand their written communication, associated with differences in sign language and standard language expression. Some financial institution staff were perceived to find this time consuming and were impatient with persons with disabilities.

"When you get there, the forms that are supposed to be filled, the English used is not simple and direct because of our grammar structure...unless we get someone to help us...at the bank because sometimes when we write to them, they think we are stupid because we are using the incorrect English but that is what our grammar is based on." (Younger participant with account, urban)

C. Staff attitudes and awareness

Participants reported that bank staff often displayed negative attitudes towards people with disabilities and tended to ignore or dismiss them while they were seeking services at the bank. There was a general perception that financial institution staff questioned their financial capacity. This was corroborated by one financial institution representative:

"I had a woman [client] who wanted a loan, but the husband was disabled, and he was supposed to be the guarantor. So, questions on whether the guarantor can repay the loan in case she defaults arose... it is not easy to give them [persons with disabilities] loan as compared to the others because you wonder if they can conduct any business."

(Microfinance bank, rural)

Participants with disabilities reported having been addressed using stigmatising names and labels e.g., "sick people", or "thieves". Furthermore, participants believed that financial institutions had no guidelines on how to make services more disability friendly and as a



result people with disabilities felt lost and abandoned; and many would go back home without receiving services they needed.

Some people with disabilities were unhappy about not being prioritized; they had to wait in queues for a long time, which was very tiring. In some cases, people with disabilities were sent out to make copies of documents, which was very difficult, particularly if they did not have anyone to accompany them.

"...I went to XXX [bank] several years ago...the first thing they asked me was where I would get the money to keep in the account. Then they started attending to people who didn't have disability. I waited for a while but then got tired of waiting so I left." (Older participant with account, rural)

"It is high time they [bank staff] changed their attitude towards disabilities so that they don't look at us as people who are coming to beg or take their money and run away but as potential business people who can do business with them." (Older participant with account, urban)

Participants with disabilities felt that one of the factors contributing to their negative experiences, was the fact that financial institutions themselves did not have employees with disabilities, as reported below.

"I feel that most of the times banks don't understand persons with disabilities because one, they don't employ us. It is very hard to see someone in crutches walking around the bank as a cashier. Have you seen them? "(Younger participant with account, urban).

Theme 3: Channels used by persons with disabilities to access financial products and services

This section highlights the different channels that financial institutions perceive to be used by persons with disabilities and those that were actually being used or preferred from the perspectives of persons with disabilities. It also brings out positive and negative experiences encountered in the use of these channels.

Financial institutions' perceptions

Financial institution representatives stated that financial channels were designed for everyone in the market and not specifically for persons with disabilities. They reported that the most common channel that persons with disabilities used was in-person visits, since these were mandatory, especially for some financial institutions that required physical presence for loan applications and account opening. Visits by field officers to clients' homes were also perceived to be common, especially for credit-only MFIs. They reported that this eased the need for movement and through one-on-one interactions, persons with disabilities were able to express their financial needs and challenges better. The presence of outsourced field-based banking agents enabled persons with disabilities to perform financial



transactions near their homes, which particularly favoured clients with disabilities in rural settings.

Digital channels were perceived to be convenient for persons with disabilities, since services were easily accessible through mobile phones and they did not require clients with disabilities to travel to institutions. The most common ones mentioned were USSD codes and M-Pesa, a mobile phone-based system that enables users to deposit, send and withdraw funds provided by Safaricom, a leading Kenyan telecommunications company.

"We have made everything simple for customers. You can pay your loan [through mobile money], you can send money to your account at any time at the comfort of your home. So as long as you have your ID number, you can access your account and once you send any money to your loan account, it gives you the balance immediately." (Credit only microfinance, rural).

"...all of our loan disbursements are strictly digital...so you get your loan disbursed directly into your M-Pesa...We have the app interface where the clients can access their information...view their statement or loan account via the app." (Credit only microfinance, rural)

Financial institutions' perceptions of accessibility of channels

Some financial institution representatives admitted that a few channels were not accessible for people with certain impairments. These included:

Institutional websites: Almost all financial institutions reported that their websites lacked audio-enabled features or were in formats that could not support screen readers for visually impaired clients. Only one MFI had an accessibility menu to facilitate access for people with visual impairments.

ATMs: Almost all financial institutions, except credit-only MFIs (that did not have ATMs), mentioned that their clients were entitled to ATM cards, but it appeared there were reservations in issuing clients with disabilities with ATM cards for safety concerns. For clients with disabilities who wished to possess ATM cards, financial institutions advised they get support from their trusted aides for ATM transactions. Security guards were reported to be on stand-by to offer assistance at the ATM machines.

"...we offer [ATM] cards but it is for somebody who feels they can apply for a card... it would be very hard for someone who is visually impaired to come and request a card...but we would expect for others with physical disabilities to fill in and get cards ..." (Microfinance bank, urban).

Channels utilised by persons with disabilities to access financial services

From the FGDs, the most commonly reported channels in accessing financial services by persons with disabilities included:



a) Digital banking: Persons with disabilities expressed a high awareness and utility of digital services/lenders, which was identified as the preferred channel for financial transactions. Examples included 'M-Pesa', 'M-Shwari' (a savings and loan service), and 'Fuliza' (an overdraft service) provided by Safaricom. Other digital lending platforms mentioned included Tala, Zenka and Branch, which were accessible through mobile applications or USSD codes. These were especially popular with the youthful urban clients with disabilities.

"...microfinance institutions have digital lending platforms...you download the app, register and apply for a loan without having to be there in person." (Younger participant with account, rural).

- b) In-person visits: Persons with disabilities also made in-person visits to financial institutions. The main services accessed were initial account opening, deposits, withdrawals, loan applications and collecting financial statements.
- c) ATMs: Narratives on ATM availability were varied. Some persons with disabilities claimed they were not made aware they could opt to have an ATM card at enrolment. Some claimed they were denied ATM cards by the financial institution due to their disability and potential security concerns.

"I don't use an ATM because they [bank] told me that because of my condition [visual impairment] they cannot give me an ATM [card] so I just use my savings account." (Younger participant with account, urban)

We further explored both positive and negative experiences of persons with disabilities with the different channels highlighted above.

Table 7: Persons with disabilities experiences with various channels for accessing financial services

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Negative experiences

Digital channels and digital lenders

- Convenient and easily accessible compared to going to a physical institution.
- Short loan processing time.
- Flexible repayment plan with reminders.
- User control no one can control the product or service except the user.
- Relatively lower loan interest rates of some products compared to bank loans.
- Low chances of discrimination due to 'invisibility' of their disabilities.
- Saves dignity and avoids embarrassments from borrowing money from family/friends.
- Voices features were advantageous for people with visual impairments.

- Safety concerns clients with visual impairments were concerned about phone access breaches and having loans (using their details) requested without their consent.
- Credit worthiness people with defaulted loans risked being registered in the credit reference bureau leading to denial of subsequent loan applications.
- Unfriendly loan repayment reminders:
 - i) frequents calls and SMS near loan deadline.
 - ii) family/ friends in their phone list contacted concerns about data privacy and third-party access to information.
 - iii) persons listed as guarantors burdened with offsetting loans.
- Being in continuous debt cycle due to the ease of getting loans digitally.
- High interest rates of some loan product.
- Short loan repayment period.
- Loan amount found to be little and based on savings.

In-person and physical visit to financial institutions

- Staff and security guard positive reception towards persons with disabilities.
- Priority services and minimal queuing.
- Being understood and ability to communicate their needs.
- High over-the-counter transaction fees.
- Poor reception and judgemental attitude by staff
- Communication challenges.

ATM

- Flexibility and convenient access to money, including non-banking hours.
- Relatively low transaction fees compared to over-the-counter transactions.
- Denial of ATM cards due to security concerns, especially for people with visual impairments.
- Additional requirements in order to be issued ATM cards e.g., letter from advocate.



- "...I would rather go to these mobile banking than ask someone for money. You borrow money from someone and in the evening, they are on your neck...they will tell the whole village how he gave me 6000 and I have refused to pay. Nowadays, you will even see such on Facebook. He can expose you everywhere." (Younger participant with account, urban).
- "...when you borrow from M-Shwari, they tell me that I can pay in bits, or I can pay it all at once but they don't push me so much." (Younger participant with no account, urban)

"Before I got a talk phone, there was a person I didn't know he had my PIN, I don't know how he accessed it, so there was a time the loan people called me and asked if I was aware that I had a loan of 1542 shillings...I told them that I am a visually impaired person but ...that person that I used to stay with was the one that borrowed..." (Younger participant with no account, urban)

"If you borrow 10,000 and they [digital lenders] ask you to pay after one month it will be hard because 10,000 attracts an interest of 3000 or 4000...that is why you find that some people don't pay because someone borrows but the interest, they are required to pay is too much for them." (Older participant with account, urban)

In addition to these channels, both IDI and FGD participants reported additional strategies used by persons with disabilities to access financial products and services. This was through the support of their aides, family or group members as listed below:

- Persons with disabilities were often accompanied by aides to financial institutions, often
 to support with written and verbal communication with staff. Financial institutions required
 these aides to be formally introduced, consented and their details captured at enrolment.
- They sent a trusted designee (family member) to perform their transactions on their behalf, for example, for ATM withdrawals, or collection of hard copies of bank statements.
- Financial institutions worked with other members in the groups (chamas) to provide support to their members with disabilities to carry out financial transactions, for example, support with documentation, making deposits and withdrawals.

"I live in the village. So, I usually send my family members ...I give them my ATM card... I stopped going to the bank in 2011." (Older participant with no account, rural)

"...those who are intellectually challenged must have someone assisting them... so, the support person can explain to the person with disability how much money is in his or her account and also direct him or her on what to do and how to do it." (Older participant with no account, urban)

Theme 4: Role of data and recognition of disability status in access and design of financial products and services

This theme focuses on whether this mainstreaming of disability data collection has reached financial institutions and how data is a factor in determining the extent to which persons with disabilities are recognised by financial institutions, as well as its implications.



Availability of data on persons with disabilities

Most financial institution representatives were unaware of the proportion of their clientele with disabilities. This stemmed from the fact that they did not have a formalised approach to collecting data on disability status.

"...I have seen in other areas, even in job applications, they ask whether you have a physical disability or not. You tick yes or no. In account opening it doesn't. I have already discussed with the operation manager because from our system, I can't tell how many people are disabled out of the 5000 accounts that we have." (Microfinance bank, urban)

Some, however, speculated that this proportion of clients with disabilities may range between 1 per cent and 30 per cent. They reported discovering clients had disabilities at the point of service, which in most instances were clients with visible impairments.

"...every month, we do customer interviews. By the time we are doing the customer interviews, that's the time we'll be able to pick out either someone has a particular disability or not. But it's a very small group of people that we talk to." (Microfinance bank, urban)

A few institutions illustrated various strategies they employed to identify persons with disabilities and how these were used, which included:

- At the point of application for loans and LPOs where disability documentation, such as a disability card or tax exemption certificate, was captured as proof of disability status.
- During one-on-one sessions with clients or while filling in appraisal forms where loan
 officers capture a client's information about their disability, followed by verification by
 confirming possession of a disability card.
- During loan application by potential clients, where financial institution staff sometimes encountered groups that had members with disabilities and those whose membership was comprised entirely of persons with disabilities.
- Attempting to use available client data to estimate those with disabilities, for example, checking retirement ages (with the assumption that elderly clients were more likely to have disabilities) and those that received tax exemption.
- One institution involved in LPO financing used existing databases such as those from Access to Government Procurement Opportunities (AGPO)¹, which contained information on pre-qualified bidders registered as persons with disabilities.

"These guys [persons with disabilities] are registered with AGPO...you will find a list of companies that have been registered under disabilities. So how we identify, we don't have to look at you and look for a disability in you, but your AGPO certification." (Credit only microfinance, urban)

¹ A government programme that supports enterprises owned by women, youth and persons with disabilities to be able to participate in government opportunities, with the legal requirement that 30 per cent of government procurement opportunities be set aside specifically for enterprises owned by these groups. https://agpo.go.ke/pages/about-agpo



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"In the [loan] appraisal reports, we indicate whether one is a person with disabilities or a woman...we usually categorise them in those categories to see how we are faring on and if we are going away from our mandate. I think that is how we discovered that we are not serving the people that we intended to serve." (Credit only microfinance, rural)

Participants explained why their institutions did not collect data on disability status. The most cited reason was that institutions worked from the premise that their products and services were designed for everyone, where disability status did not matter. Another reason was that financial institutions felt that the proportion of clients with disabilities was not significant enough to warrant collection of this data.

"From my finance perspective, convincing me to undertake those ventures [improving access to financial products and services for people with disabilities] yet you can't show me numbers will not work." (Microfinance bank, urban)

- They viewed that asking people about their disability could be perceived as discriminatory and raise stigma, hence they preferred to prioritise services for them and check if they required any assistance.
- "...we don't categorise clients like that but if someone has eye problems, some have leg problems and they are involved in business, they get support from us...You know when you collect that [information] discrimination may occur, so we don't that is why we are unique. We don't segregate them [persons with disabilities] and that is why we don't keep such information." (Credit only microfinance, urban)
- The account-joining or loan registration forms did not have a section to capture disability status.
- Digital lenders did not interact physically with clients, so they were not able to identify clients with disabilities.
- The few that had products designed for persons with disabilities had clear requirements for joining (one had to prove they have disabilities), therefore there was no need to keep a record of their status.

Most participants understood the argument made by banks and financial institutions that their products were available for all, however, many described this as ignoring the fact that many individuals require additional support to access services. Without acknowledging these additional needs, they described feeling excluded and that financial institutions discriminated against them, even if unintentionally.

"Whatever rules the banks have, have been kind of 'one shoe fits all'. We [persons with disabilities] are not discriminated because we are persons with disabilities; it is only that they [financial institutions] are not disability sensitive...there are no extra efforts to support this group of people...in terms of accessibility...they are in business, and it is open to all." (Older participant with no account, urban)

Implications of collecting data on persons with disabilities

Many financial institution representatives recognised that the interviews provoked them for the first time to think about persons with disabilities. Some of them felt motivated by the interviews to later have discussions with their teams and management regarding these issues. These representatives acknowledged that the absence of data on persons with disabilities was pivotal in how financial institutions determined product availability and design in the following ways:

- The absence of data on disability status implied that the numbers of clients with disabilities were unknown, which made it difficult for financial institutions to plan for them.
- It also made it difficult to justify having tailored products and services for persons with disabilities. Having data on persons with disabilities would enable financial institution representatives present a business case for persons with disabilities, which will help in product development, marketing strategy and resource allocation.
- There was also recognition of the need to have data on persons with disabilities in the
 first instance; it led to an appreciation that there was a gap and that products and
 services were not reaching persons with disabilities.

"We usually need to add it [disability information] to the system for them to be exempted from tax...we were not doing it before but at the beginning of the year, we came up with a list of persons with disabilities and included their details in the system...We get more information on them through one-on-one interviews with them." (Microfinance bank, rural)

Persons with disabilities reported that having their status formally acknowledged could be used by financial institutions to develop products and services for them, for example, having loans with lowered or waived interests.

While the majority of financial institution representatives agreed that having data on persons with disabilities was important, they pointed out challenges with the practicality of integrating data on persons with disabilities in their system. Chief among these were the cost implications associated with attempts to make their services inclusive and accessible for clients with disabilities. Examples included:

- Redesigning office premises to meet standard requirements had huge financial implications. Rental premises present additional challenges where institutions did not have autonomy in decisions around structural adjustments and office location preference, which need to be negotiated with landlords.
- Diversification of communication formats was a costly venture; for example, printing forms with large fonts would increase volume of documents, there was limited capacity to print documents in braille and provide sign language interpreters.

There were also reservations from a few persons with disabilities on collecting data on disability status. There was fear that people without disabilities may falsify information to get products and services meant for those with disabilities.



"I don't think it's necessary because one might pretend to have a disability, like they might pretend to be visually impaired just so they be given a loan." (Younger participant with no account, urban)

Theme 5: Recommendations to overcome barriers to facilitate access of financial products and services to persons with disabilities

This section summarises barriers faced by persons with disabilities while accessing financial products and services as well as possible mitigation measures to be considered by financial institutions to deal with these barriers (Table 8). It also summarises barriers that financial institutions face when designing products and services for persons with disabilities, as well as the proposed enablers or mitigation measures (Table 9). All these data came from both the IDIs and FGDs, the rapid review findings as well as discussions from follow-up data validation and co-creation workshops.

Table 8: Barriers faced by persons with disabilities and proposed mitigation measures

Barriers	Possible mitigation measures to be implemented by financial institutions		
Infrastructure and physical location			
Lack of accessible ramps (located in obscured places, obstructed ramps, steep ramps)	 Construction of accessible ramps following recommended ramp construction guidelines. Make digital channels accessible and encourage their use by people with disabilities. Be more targeted with sending field agents to support persons with disabilities. 		
Location of services on higher-level floors accessible only using stairs.	 Locate services on accessible ground floors to support people with visual and mobility impairments. Install accessible lifts (with voice announcing floors and braille enabled buttons to select floors). Train staff to be available to serve clients at ground level when called upon. Make digital channels accessible and encourage their use by people with disabilities. Be more targeted with sending field agents to support persons with disabilities. 		
Lack of accessible counters or ATMs.	 Have lowered counters and ATMs for wheelchair users and people of short stature. Have audio-enabled ATMs to support people with visual impairments. Allocate specific service desks to serve persons with disabilities. 		

Security guards and customer service staff (trained on disability-inclusion) to be on stand-by to offer assistance when requested, including at ATMs. Make digital channels accessible and encourage their use by people with disabilities. Be more targeted with sending field agents to support persons with disabilities. Have accessible designated parking spaces for Lack of designated persons with disabilities. parking spaces for Make digital channels accessible and encourage their persons with disabilities. use by people with disabilities. Be more targeted with sending field agents to support persons with disabilities. Install accessible doors, pathways and corridors Presence of (including automatic doors where possible and have inaccessible doors, sufficiently wide doors, pathways and corridors to pathways and corridors allow movement of wheelchair users). (including narrow ones which impede Designate trained security guards to facilitate entry and exit of persons with disabilities as they move movement of wheelchair towards the goal of ensuring independent movement users). of persons with disabilities. Avoid construction of slippery floors and steep stairs. Slippery floors and Use necessary signs and elements to designate wet steep stairs or slippery floor or on-going washing activity. Consider adding number of branches or ATMs. Long distance to financial institutions or Make digital channels accessible and encourage their use by people with disabilities in areas with no ATMs. branches or ATMs. Be more targeted with sending field agents to support persons with disabilities in areas with no branches or ATMs. Communication format and information packaging Financial institutions to develop accessible Difficulty in engaging communication alternatives i.e. use of messaging customer care support services for persons with hearing impairment or via phone calls. include audio or text to speech capabilities in their communication channels for persons with visual impairments. Make digital channels accessible and encourage their use by people with disabilities. Be more targeted with sending field agents to support persons with disabilities. Recommend people with hearing impairments to use Unavailability of sign digital channels. language interpreters for

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people with hearing impairments.	 Leverage on technology for provision of sign language interpretation services such as existing software applications. Hire sign language interpreters (even on a temporary basis when required for example during field visits). Install hearing loops on their counters for persons who are hard of hearing. Train staff on sign language.
Documents available in inaccessible format e.g., hard copy only, in small print.	 Have all documents in accessible screen reader friendly soft copies on websites or those that can be sent to persons with disabilities when required. Have some copies of documents with larger font sizes readily available to support people with visual impairments. Staff to be trained to support people with visual impairments in reading and understanding the documents e.g., by reading out documents for them.
Inaccessible marketing and awareness-raising media platforms.	Ensure all marketing strategies are accessible and messages in accessible formats for example: Television advertisements should have closed captioning, brochures/flyers should have large print and be available in screen-reader friendly soft copies, websites should be accessible and created following Web Content Accessibility Guidelines(33).
Technology	
 Lack of awareness of adaptive technology/digital channels by persons with disabilities. 	 Disseminate information on existing adaptive technology widely to their clients with disabilities. Persons with disabilities to seek financial literacy, including use of digital channels.
 USSD code feature required one to remember too much information (such as number codes). 	 Work with mobile service providers to develop simpler USSD sequences. Share/advertise alternative digital channels to their clients.
Inaccessible mobile applications and websites.	 Mobile applications and websites to meet Web Content Accessibility Guidelines (33) as well as the Kenya Accessibility Standards for ICT products and services (34).
Fully audio electronic queue management system.	Ensure queue management systems have provision for visuals to support people with hearing impairments and intellectual challenges.
Services and systems	



 Queuing in financial institution halls causes pain and discomfort. 	 Prioritise serving persons with disabilities. Install queue management systems with audio-visual capabilities. Financial institutions to designate reserved serving desk for persons with disabilities.
 Persons with disabilities uncertain of the right service point once inside banking halls. 	 Provide accessible signage designating various service points. Train staff to guide people to the correct service points. Appoint focal persons to serve persons with disabilities.
Denial of ATM cards.	 Provide ATM cards to people with visual impairments and provide security guidance to prevent data breaches.
 Reconfiguration and ATM menu updates made clients with visual impairments struggle to operate ATM machines independently. 	 Minimise frequent ATM menu updates, and where this happens provide supplementary support to persons with disabilities to get acquainted with the updates. Updates to be communicated clearly to persons with disabilities.
Long time to apply for and acquire loans.	 Reduce loan processing times. Develop products and services specifically for persons with disabilities. Avail staff to support persons with disabilities loan application processes.
Policies	
 Lack of institutional-level policies and procedures supporting persons with disabilities. 	 Develop policies for supporting persons with disabilities. Involve OPDs and persons with disabilities in developing these polices
Lack of inclusive institutional culture and practices in the financial institutions.	 Create and develop culture of inclusion across its structures. Institution governance documents to include inclusive practices and pronouncements.
Lack of implementation of the country's policies and regulations for persons with disabilities.	 Train staff on the country's legal framework supporting persons with disabilities and enforce them within institutions (potentially through support from OPDs). Enforce of the country's legal framework supporting people with disabilities.
Attitudinal factors	
Stereotyping, discriminating, stigmatising attitudes	 Train staff on disability inclusion, equality and etiquette. Employ staff with disabilities.



against persons with disabilities.

Lack of awareness or willingness to support persons with disabilities

- Financial institutions had very little awareness of how to meet the needs of persons with disabilities.
- Lack of willingness in ensuring that the needs of clients with disabilities were met.
- Partner with OPDs to train their staff on how to support persons with disabilities.
- Raise awareness and sensitize staff on importance of including persons with disabilities in all aspects of society including in financial aspect.
- Institutions to involve persons with disabilities and OPDs in designing solutions to meet their needs.
- Staff to abide by Institutions Inclusive polices or guidelines.

Economic factors

- Extra costs incurred due to being a person with disability e.g., double fees charged to wheelchair users on public transport, costs associated with hiring an aide or paying for a family member to get to an institution.
- Financial institutions to decentralize their services.
- Encourage persons with disabilities to use digital platforms.
- Leverage on the use of field agents to visit people with disabilities.
- Train staff on sign language, hire sign language interpreters or use sign language interpretation software.
- Unfriendly loan
 application requirements
 (high interest rates, the
 lack of assets or
 registered businesses
 that formed part of the
 loan application
 requirements).
- Partner with other organisations to create specific loan products for persons with disabilities with friendlier terms such as reduced interest rates, increased loan repayment periods, offer collateral free loans to persons with disabilities.
- Burdensome loan application processes.
- Training financial institution staff to support persons with disabilities in application processes.
- Make loan application processes accessible e.g., having loan application forms on accessible websites.

Table 9: Barriers and enablers in designing products and services for persons with disabilities by financial institutions

Barriers	Enablers or possible mitigation measures
Lack of data on persons with disabilities.	 Modification of account opening requirements and loan application forms to capture disability status as an option. Conduct voluntary client surveys to identify clients with disabilities to support them. Work with OPDs who have some data on persons with disabilities to be able to target marketing strategies. Government to make it compulsory to collect this data and provide guidelines on how to do it.
Absence of accessible infrastructure, technology and communication channels, which discourages persons with disabilities from seeking services from financial institutions.	 Training financial institution staff on regulations of designing buildings, digital platforms, communication channels and marketing strategies for persons with disabilities. Ensuring that any new branches being opened should be considerate of persons with disabilities. Staff to always be available to support and answer queries from persons with disabilities.
Attitudinal factors: Stereotyping, stigmatising, discriminating attitude towards persons with disabilities.	 Training staff on how to handle persons with disabilities. Developing and enforcing institutional-specific polices or guidelines that guide this. Implementing disciplinary measures for staff who go against policies or guidelines.
 Lack of awareness of how to support persons with disabilities, e.g. Lack of awareness on how to design buildings for persons with disabilities. Lack of awareness on how address and support persons with disabilities. 	 Training on how to handle persons with disabilities. Work with OPDs to gain insights on how to support persons with disabilities. Implement strategies to ensure that digital platforms are accessible to persons with disabilities. Remain available to answer queries regarding digital platforms from persons with disabilities.

- Lack of awareness of how to reach (market products and services to) persons with disabilities.
- Lack of awareness of how to improve existing digital channels and communication channels for persons with disabilities.

Economic factors

- Costs associated with modifying forms/applications to collect data on disability status.
- Costs associated with training staff on disability etiquette or sign language.
- High costs involved in modification of buildings.

 Potential losses may be incurred in developing loans with lower interest rates, longer repayment period.

Lack of national and institutional policies and procedures to support the participation of persons with disabilities in financial systems.

- If the government is able to make this a requirement, financial institutions will be obliged to abide.
- Partner with organisations that can support training of staff.
- Government to enforce building regulations that are conducive for persons with disabilities.
- Use of alternative methods to support persons with disabilities, e.g.
 - Serving them on ground floor level.
- Targeting persons with disabilities for training on digital channels and how to work with field agents.
- Partnering with not-for-profit organisations to develop loans for persons with disabilities.
- Develop policies or guidelines to govern how clients with disabilities will be supported.

Discussion

Findings from both the rapid review and field research confirm that persons with disabilities are still being excluded from fully maximising benefits from existing products and services offered by financial institutions. One of the major contributing factors was found to be the absence of data on the proportion of persons with disabilities accessing financial institutions or accessing the different products and services within these institutions. Absence of this data undermines the possibility for financial institutions to justify having customised financial products, services and channels, as well as infrastructure that is disability friendly. From a human rights perspective, failure to include and acknowledge the rights and privileges of



persons with disabilities, through, for instance, inclusion of disability card details, further diminishes access to services such as tax exemptions and other state programmes.

Other that what has been mentioned previously in this report (signing of the UNCRPD, Persons with Disability Act of 2003, formation of the NCPWD), it is important to recognise that Kenya has taken some steps towards disability inclusion. For example, following advocacy efforts by OPDs, the government for the first time included the Washington Group short questions on disability in the 2019 national census, in an attempt to collect population-level disability data (10). Further considerations are however needed to ensure that this is included in other surveys, such as the Kenyan FinAccess Household survey.

Another national initiative is by becoming a signatory to the Inclusive Data Charter (IDC), a global mechanism that was launched at the High-Level Political Forum in 2018 that galvanises the commitment of governments, non-governmental organisations, philanthropists and businesses to work to improve the quality, quantity, financing and availability of inclusive and disaggregated data, as well as the capacity and capability to produce and use it, in accordance with internationally accepted standards. Signed at the 2018 Global Disability Summit, Kenya committed to promote collection of accurate data on persons with disabilities, routinely disaggregated by gender, age, disability status and geographical location for use in planning and programming, to ensure no one is left behind, and consistent with the transformative pledge of the 2030 Agenda for Sustainable Development and the Sustainable Development Goals (35). The country has since developed its 2021-2025 IDC action plan that sets outs its intention to mainstream disability data collection into national planning processes, including financial systems (36).

Alongside the need to fill in the data gap, it is important to pay attention to how financial institutions design, communicate and disseminate information about their products and services. This study highlights the need for a shift from the traditional strategies for a general market, to adopting strategies that are more effective and focused on persons with disabilities. The importance of this is emphasized in the Information, Communications and Technology (ICT) space, where the first ever standard on digital accessibility for ICT products and services for persons with disabilities in Africa (Kenya Standard S 2952-2:2022) was launched by the Kenya Bureaus of Standards (KEBS) in partnership with inABLE in 2022 (34). The standards are aimed at ensuring that public and private sector digital products and services are accessible to persons with disabilities and to the elderly who are largely disconnected from most e-government services and business-owned digital platforms (37). This is crucial because participants with disabilities expressed high preference for digital channels for their financial transactions. Digital channels should therefore be embraced by financial institutions while ensuring that the accessibility concerns raised by persons with disabilities are dealt with, for example, by following the aforementioned standards and implementing the internationally recognised, Web Content Accessibility Guidelines for their websites (38).



This research also highlights the persistent knowledge gap in both persons with disabilities and representatives from financial institutions. Persons with disabilities had limited knowledge of the existence of different financial institutions, specifically the MFIs, as well as the different products, services and channels that were available in the Kenyan market which limits their financial growth. On the other hand, many financial institution representatives were unaware of how to approach, market, communicate and interact with, support and even design products, services and channels for persons with disabilities. They were also unaware of the prominence of digital channels for persons with disabilities highlighting the need for data through research and engagement with persons with disabilities as well as OPDs. It was, however, encouraging to find that a few institutions tried to address these gaps by making buildings, channels and marketing strategies accessible, as well as training staff on areas such as disability etiquette, despite challenges raised, such as the high cost of making such adjustments.

Financial institutions should therefore consider setting aside funds for staff training and prioritise disability mainstreaming efforts within their institutions. It should be recognised that transforming financial staff attitude is a long and continuous process, hence the need for a long-term plan and implementation strategy that seeks to address these bottlenecks. This initiative is not without promise because a study in Uganda showed that targeted training of financial institution staff increased the number of clients with disabilities in accessing financial services by a huge margin (i.e. range of 57 per cent to 350 per cent) within the two-year period of implementing this training (19).

The difference in experiences between rural and urban settings was not very pronounced in this study. Only two issues emerged. The first was that financial institutions found it more challenging to identify rental buildings that were accessible for persons with disabilities (to establish branches) in rural areas. However, they mentioned that most branch offices in rural areas were on ground floors and that they capitalised on the use of field agents who were well appreciated by people with disabilities. Another issue was that some trainings or discussions especially those on disability issues were held mostly at headquarter level (in Nairobi) and these sometimes did not cascade to their levels therefore they did not benefit from them. Similar factors probably contributed to the gaps in accessing financial products between rural and urban settings that were highlighted in the Kenyan FinAccess Household survey (11) and the Global Findex Database (5).

Policy implications

An aspect with great potential of improving the situation for persons with disabilities is the development and implementation of institution-specific policies or guidelines governing how to engage with and improve accessibility for persons with disabilities to enable them to live independently and participate fully in all aspects of life. This should be accompanied by the enforcement of national and international policies by Government as it follows its UNCRPD mandate of disseminating and monitoring the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public (1).

Physical accessibility, found to be a key barrier, needs consideration against global and national legal and regulatory frameworks. The Kenyan Persons with Disability Act of 2003



requires all public buildings to comply with Universal Design by retrofitting ramps to ease access to services offered to people with physical disability and the elderly (2). Despite this directive, it was clear that many of the financial institutions either did not have ramps or these ramps were not constructed following proper recommended guidelines. A study conducted in Kisumu to investigate the factors that hindered or impeded the retrofit of efficient ramps identified inadequate guides on inclusive design, space requirements, strength of existing buildings and inadequate building inspection (39).

Further, microfinance banks operate under the Microfinance Act 2006 and are regulated by the Central Bank of Kenya (40). However, oversight on whether these institutions comply with infrastructural and building designs that promote accessibility for persons with disabilities was largely absent. Individual financial institutions are expected to bear the responsibilities of implementing policies and regulations, and the delivery of accessible services and products, although rebates are available for institutions that make such accommodations.

The World Bank Global Financial Inclusion and Consumer Protection (FICP) Survey provides a global data source to benchmark efforts by financial sector authorities to provide an enabling environment for financial inclusion and consumer protection. It tracks the prevalence of key policy, legal, regulatory and supervisory efforts to advance financial inclusion and consumer protection including national financial inclusion strategies, non-bank e-money issuers, agent-based delivery models, simplified customer due diligence, legal frameworks and institutional arrangements for financial consumer protection, disclosure and transparency, fair treatment of consumers, dispute resolution and financial capability. While a key enforcement mechanism for financial inclusion, as recommended by the FICP survey, is the development of a national financial inclusion strategy, this is not currently available in Kenya (41). Countries in the region, such as Uganda, Malawi and Tanzania, are further ahead in enforcing this and have collaborated with persons with disabilities (through their umbrella organisations) to design the strategies. The Government of Kenya should support financial institutions to safeguard the rights of persons with disabilities by providing relevant guidelines and monitoring frameworks.

Recommendations

This report maps out recommendations for improving access to financial products and services for persons with disabilities for various actors. These were compiled throughout the data collection period as well as during the follow-up workshops. We believe that these, combined with the proposed mitigation measures listed under Theme 5, could go a long way to improving financial inclusion for persons with disabilities in Kenya.

Persons with disabilities should:

- Endeavour to actively seek financial literacy either individually or collectively in groups to gain information on financial products, services and channels that are available to them.
- Continuously engage with financial institutions that they belong to on how they can be supported to access the different products and services that they are interested in.



- Raise awareness among other persons with disabilities on the importance of financial literacy, and available financial service and products adapted to their needs.
- Join and be active participants of OPDs and use these to advocate for financial inclusion within financial institutions.
- Register with the NCPWD to obtain the disability identification card, a critical legal
 instrument that accords them the rights, privileges and access to disability-related
 services and state programmes channelled through the Council. These may include cash
 transfer programmes, disability grants, tools for trade financing for persons with
 disabilities among others. At group level, registered groups for persons with disabilities
 can apply for economic empowerment grants and LPO financing funds.

Financial institutions should:

- Consider collection of data on disability status, especially during application for different products and services, such as during account opening or loan registration. An additional avenue of capturing this data is by including disability status as a variable during research surveys carried out within institutions, locally and internationally.
- Strive to have physically accessible facilities in order to promote inclusive spaces or environments for persons with disabilities. These may be borrowed from the proposed mitigation measures listed under Theme 5.
- Customise products and services to meet the needs of persons with disabilities:
 - Lengthen loan repayment periods by extending grace periods for delayed payments.
 - Shorten the turnaround times for loan processing.
 - Make digital channels disability friendly.
- Partner with other organisations to develop products specifically targeting persons with disabilities, similar to other special groups being supported by financial institutions, such as women, people in low-income settings, farmers, refugees, and others.
- Regularly provide budgetary allocations on staff training and prioritise disability mainstreaming efforts within their institutions.
- Provide training for staff in direct contact with clients with disabilities, including
 management, customer service officers, security guards, loan officers and cashiers. This
 could be done in partnership with OPDs.
- Conduct knowledge sharing sessions where staff are made conversant with existing legal
 instruments, policies and guidelines on disability, such as the Kenya Constitution section
 27 (12); the Persons with Disability Act 2003 articles 16 and 27 (2); Kenya Banking
 Sector Charter 2019 on responsible banking (42); the NCPWD mainstreaming resources;
 county-specific disability laws; and other disability resources in existence. This is
 important to emphasise that inclusion of persons with disabilities is important and
 favoured by law.
- Develop, disseminate, train and enforce policies and operational guidelines on disabilityfriendly services among staff members.
- Provide clients with disabilities with full knowledge of the financial products and services available and allow them access whenever they need them without discrimination. This includes ATM cards for clients with visual impairments who could also be supplied with additional information on how to prevent security breaches.



- Work with OPDs to conduct targeted marketing for clients with disabilities through use of existing networks and referrals, personal visits and using persons with disabilities champions as field agents.
- Employ persons with disabilities and involve them in product development, testing digital channels and in developing marketing strategies.
- Consider conducting corporate social responsibility activities that could be a potential
 avenue to promote inclusion by reaching out and serving persons with disabilities. Here,
 they could finance projects led by persons with disabilities, partner in supporting
 registration of persons with disabilities with NCPWD, conduct financial and digital literacy
 clinics during international days of disabilities, and more.
- Learn and share learnings with other financial institutions that are active in the disability space.
- Work with regulators and umbrella financial associations in improving the situation for persons with disabilities in the financial sector, such as Central Bank, AMFI-K, KBA, the Kenya Business Disability Network and others.
- In the long-term, FIs should strive to promote and implement the employment quota of persons with disabilities within their institution as part of inclusion and equity for PWD, which will help increase staff exposure, awareness, and create a disability-friendly work environment.

Organisations for persons with disabilities should:

- Raise awareness on the importance of financial literacy, financial independence and available financial service and products among their members with disabilities.
- Raise awareness and promote active registration with the NCPWD to increase the number of persons with disabilities with a disability card so that they can reap its benefits.
- Support financial institutions in developing and disability-inclusive polices and offering disability training to their staff.
- Champion financial inclusion for persons with disabilities within financial institutions. This
 could be by championing for collection of data on disability status, improvement of
 physical accessibility within buildings, development of new products/customising existing
 products for persons with disabilities, among other issues.
- Advocate for disaggregation of data from larger surveys, such as the FinAccess
 Household Survey by disability status. This could also help financial institutions target
 marketing strategies for persons with disabilities appropriately.

Government should:

- In consultation with OPDs, financial institutions as well as their umbrella associations, develop a guiding framework that will enforce financial inclusion for persons with disabilities, such as through a national financial inclusion strategy.
- Through the relevant government agencies, conduct key information sharing and education sessions with players in the financial sector to enhance their understanding of their responsibility to ensure financial inclusion for persons with disabilities.
- Enforce compliance of building regulations by ensuring contractors adhere to guidelines that ensure physical accessibility for persons with disabilities.



- Initiate and get involved in discussions involving disaggregation of nationwide data by disability status as well those that promote collection of these disability data within financial institutions.
- Recognise and/or incentivise financial institutions that promote disability inclusive environments, for instance, through extending partnership to disburse special grants/programmes for persons with disabilities, like the Uwezo fund, and other flagship programmes.
- Encourage partnership between national bodies such as NCPWD and financial associations like AMFI-K and KBA to work together to improve financial inclusion for persons with disabilities.
- Partner with agencies to offer training and education to persons with disabilities on financial services and economic opportunities for persons with disabilities.

Researchers should:

- Conduct research involving the larger and more mainstream banks to understand how they deal with persons with disabilities. These institutions have more presence in and outside Kenya and therefore the scope would be wider.
- Include a gender focus to further understand the different experiences faced by both men and women with disabilities in accessing financial services, as observed in rapid review findings. There have been some previously reported marked differences which need to be explored.
- Conduct additional research solely focused on digital accessibility for persons with disabilities regarding this aspect. Use of digital channels featured prominently in the FGDs compared to the IDIs and the rapid review. It is clear that further exploration is needed in this area.

Study limitations

The study had some limitations. First, the possibility of social desirability bias cannot be ignored. Even though financial institution representatives were assured of data confidentiality, it was possible that some responses provided were 'socially desired' as opposed to the actual truth. This was probably not helped by the fact that most of these interviews took place in offices within the financial institutions themselves, which was at the convenience of the staff members. Second, after several attempts to involve them, the study ended up not including larger and more mainstream banks due to their lengthy institutional-specific approval processes. This was a major limitation since we believe that a number of these institutions have made some good strides with respect to supporting persons with disabilities.

Conclusion

Findings from both the rapid review and field research confirm that persons with disabilities are often unable to access the full benefits of existing financial products and services offered by financial institutions, despite available global provisions that secure their rights to access such services. The absence of data on persons with disabilities as well as the persistent



knowledge gap among persons with disabilities and representatives from financial institutions hugely contribute towards this exclusion and could stagger the Vision 2030 goal of ensuring no one is left behind. It is believed that the information collected, along with the proposed recommendations, will go a long way in improving financial inclusion for persons with disabilities.

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Appendices

Appendix A: Rapid review search databases and websites

Websites
https://aercafrica.org/
https://guides.library.upenn.edu/c.php?g=1035991&p=7509983
https://asksource.info/
https://www.africaportal.org/
https://www.centerforfinancialinclusion.org/
https://IFC.org
https://Unctad.org
https://data.worldbank.org/
https://scholar.google.com/
https://www.worldbank.org/en/topic/financialinclusion
https://sightsavers.org
https://www.fsdkenya.org/
www.findevgateway.org
www.gsma.com
https://cfi-blog.org/
http://www.dpi.org/
http://www.disabilityworld.org/
https://www.afdb.org/en
https://microinsurancecentre.milliman.com/en/
https://climate-insurance.org/
https://microinsurancenetwork.org/
https://amfikenya.com/

Appendix B: Rapid review search terms

Websites

The website searches used the following terms: "financial inclusion" and "persons with disabilities".

Databases

#1 ("Persons with disabilities" OR "Persons with disabilities" OR "Disabled people" "Women with disabilities" OR "Men with disabilities" OR "Boys with disabilities" OR "girls with disabilities" "Older persons with disabilities" OR "Disabled older people" OR "Elderly disabled people" OR "Disabled young women" OR "Disabled middle aged women" OR "Disabled women" OR "Disabled men" OR "Multiply disabled women" OR "Low income disabled people" OR "Multiply disabled people" OR "Disabled young people" OR "Sensory impaired young people" OR "Disabled young adults" OR "Visually impaired people" OR "Visually impaired young people" OR "Back injured people" OR "Blind people" OR "Blind-deaf people" OR "Deaf people" OR "Disfigured people" OR "Facially disfigured people" OR "Hearing impaired people" OR "Housebound people" OR "Amputees" OR "Blindness" OR "Eye diseases" OR "Eye injuries" OR "River blindness" OR "Visual impairment" OR "Deafness" OR "Occupational deafness" OR "Hearing impairment" OR "Occupational hearing impairment" OR "Functional impairment" OR "Impairment" OR "Sensory impairment" OR "Limb deficiencies" OR "Amputation" OR "Chronic back pain" OR "Long term back pain" OR "Chronic pain" OR "Industrial injuries" OR "Injuries" OR "Chronic sickness" OR "Long term sickness" OR "Physical sickness" OR "albinism" "disabled children" OR "children with disabilities" OR "persons with disabilities" OR "special needs" OR "special educational needs" OR "differently abled" OR "people living with disability" OR "handicapped" OR "crippled" OR "girls with disabilities" OR "deafblind" OR "deaf blindness" OR "dwarfism" OR "dwarf" OR "little person" OR "little people" OR "physical impairment" OR "physical disability" OR "mental impairment" OR "mental disability" OR "intellectual impairment" OR "intellectual disability" OR "cognitive impairment" OR "cognitive disability" OR "learning disability" OR "learning difficulty" OR "mental health" OR "mental illness" OR "mentally ill" OR "psychiatric disability" OR "depression" OR "bipolar" OR "schizophrenia" OR "PTSD" OR "OCD" OR "ADHD" OR "mental retardation" OR "neurodiversity" OR "autism" OR "autistic" OR "dyslexia" OR "dyspraxia" OR "dyscalculia" OR "cerebral palsy" OR "spastic" OR "epilepsy" OR "down syndrome" OR "cleft lip" OR "macrocephaly" OR "microcephaly" OR "hydrocephalus" OR "spina bifida" OR "brain injury" OR "muscular dystrophy" OR "multiple sclerosis" OR "dementia" OR "spinal cord injury" OR "wheelchair user" OR "paralysis" OR "paraplegia" OR "quadriplegia" OR "hemiplegia")

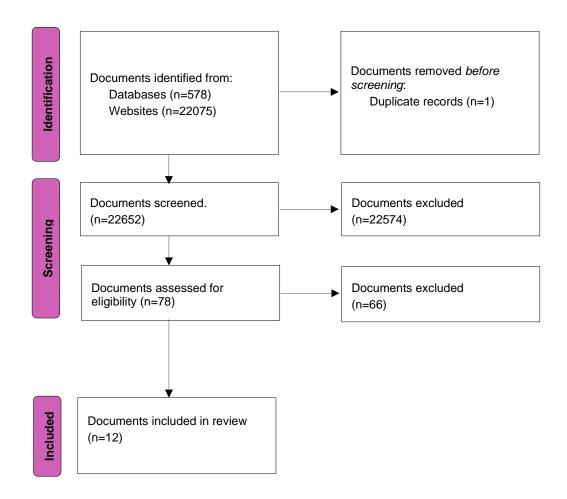
#2 "sub-Saharan Africa" OR "Angola" OR "Benin" OR "Botswana" OR "Burundi" OR "Cameroon" OR "Cape Verde" OR "Central African republic" OR "Chad" OR "Comoros" OR "Congo" OR "Cote d'Ivoire" OR "Djibouti" OR "Equatorial Guinea" OR "Guinea" OR "Guinea" OR "Guinea" OR "Eritrea" OR "Ethiopia" OR "Gabon" OR "The Gambia" OR "Ghana" OR "Kenya" OR "Lesotho" OR "Liberia" OR "Madagascar" OR "Malawi" OR "Mauritania" OR "Mauritius" OR "Mozambique" OR "Namibia" OR "Niger" OR "Nigeria" OR "Reunion" OR "Rwanda" OR "Sao Tome and Principe" OR "Senegal" OR "Seychelles" OR "Sierra Leone" OR "Somalia"

OR "South Africa" OR "Swaziland" OR "Tanzania" OR "Togo" OR "Uganda" OR "Western Sahara" OR "Zambia" OR "Zimbabwe"

#3 "formal financial services" OR "microfinancing" OR "banking" OR "insurance" OR "bank accounts" OR "bank" OR "savings" OR "credit" OR "investment" OR "asset" OR "consumption" OR "financial inclusion" OR "financial literacy" OR "loan" OR "lending" OR "lending institutions" OR "withdrawals" OR "deposits" OR "payments"

Searches combined the terms #1, #2 and #3.

Appendix C: Rapid review search results flowchart



Appendix D: Financial institution loan/credit facilities reported in the qualitative study

- LPO financing: Target clients offering contractual services to government agencies.
- Trade guarantees: These also target clients engaging with government agencies.
- Group loans: requires formation of groups and joint loan application for a business project. The rationale and approach to dispensing these loans were varied. Typically, individuals are grouped together to reach a specified limit, invited to make a group application, and the loan processed and disbursed.
- Construction financing: Available to clients who wanted to purchase land for construction or for home improvements and required financial services to pursue such projects. One MFI focused this loan product on upgrading the housing situation for the low income, earning clients.
- Asset financing: Loans to business-owning clients to purchase assets or equipment.
- Agriculture-related loans/services: Over one-third of the digital and microfinance
 institutions had a wide range of agricultural related services/products. These included
 training farmers on agribusiness (modern farming technologies); providing loans for
 purchase of farm inputs, such as water tanks, solar panels, crop/seed and livestock
 loans; farm assets, such as buying a tractor or motor bike; and loan products targeting
 agripreneurs or value chain actors, such as transporters and farmers themselves.
- Small and medium enterprise investment loans: These were working capital loans targeting clients with businesses. The loan type was either secured or unsecured.
- Social products: Two MFIs had categories of products called social products. These
 included WASH (water sanitation and hygiene) projects where they supported
 communities by providing loans to buy modern toilet seat covers for their pit latrines;
 tanks for sustained water storage, and purifiers to ensure access to safe drinking water.
 Other examples included mobile phone loans to increase phone ownership, especially
 among those living in rural areas. One MFI described their payment modalities, where
 they engage subcontracted vendors to provide the equipment to clients and thereafter
 settle payment with vendors.
- School fees loans



Appendix E: Channels for the general market segment

In-person visits to offices/banking halls: Identified as the prominent mode of interaction. First-time clients visited banking halls to open accounts and process loans. Most financial institutions preferred meeting their clients physically to conduct interviews and appraisals for loan eligibility.

Field agents' visits: Financial institutions expressed flexibility in meeting clients at their location for convenience and to assess the client's business viability. Some financial institutions were fully digital; hence their office premises were mainly used for administrative purposes (like staff meetings).

Agency banking: The majority of financial institutions offered agency banking services, by contracting accredited third-party agencies to extend banking services, thereby bringing services closer to their clients. These were located as units in retail outlets or market centres. These outlets offered services on behalf of several financial institutions, making them one-stop centres for banking services, such as cash deposits, cash withdrawals, financial statements, utility payments and school fees payments.

Automated Teller Machine (ATM) services: The majority of financial institutions (excluding credit-only MFIs) mentioned they had ATM cards that clients could be issued. However, not all had their institutional ATM machines, hence some financial institutions partnered with other ATM providers, so that clients could conduct their transactions. Some financial institutions also used agency banking outlets, where their clients could present their ATM cards and transact.

Digital services: Financial institutions offered their services through mobile banking applications (only a few MFIs had operational downloadable applications), while the majority of the institutions interviewed had a USSD feature that clients could have configured to their mobile phones.

- USSD: Commonly mentioned by financial institutions and the feature was compatible
 with all phone types, by partnering with telecommunication service providers such
 Safaricom[©] and Airtel. USSD services were similar to those available in the mobile
 applications, for things like withdrawals, funds transfers, financial statements, loan
 applications and bill payments.
- Mobile applications: Services accessed were similar to those mentioned above.
 Financial institutions reported their apps could be downloaded through Google Play Store and use smart phones.
- Company websites: All financial institutions interviewed had active websites and
 representatives mentioned their web content included information of all their financial
 services/products. Some loan application forms were available online. In efforts to extend
 client support services, some institutions had an online chat where clients could make
 inquiries. Only one MFI's website had an accessibility menu for persons with disabilities,
 especially for those with visual impairments.



Appendix F: Communication and marketing strategies for the general market segment

Networking and referrals: Financial institutions received referrals from their existing
clients and considered this an effective strategy, since there was proof and goodwill of
the FI product, such as loans. Referred clients were mostly close friends, family, relatives
and people in the client's inner circle. One MFI rewarded their clients for referral of new
clients. Another MFI used the institutional database of their clients to send messages
about their loan products.

Field officers: Financial institutions used their staff to market their products and offer a variety of services, such as account opening through door-to-door visits to people's homes/office locations or group forums with potential clients.

- Social media: For the digital platforms, financial institutions target the youthful generation through social media in the online chats in their websites, mobile applications, and through short text messaging. Marketing is also done using social media platforms.
- Walk-ins at the FI offices: Financial institutions mentioned that, based on the marketing
 efforts to scout for clients, at their branch offices, the staff share about new or existing
 products and services to clients who have walk in for inquiries or other services to market
 their products.
- Company websites: All financial institutions mentioned their product information is included on their websites, with some MFIs also including downloadable loan application forms. However, there is a lack of data on how clients experience their websites.
- Brochures and flyers: These were items for product information that were mostly carried along by the sales representative teams and were included on the websites.
- Social forums: Financial institutions staff used opportunities of forums like church gatherings, local community meetings (for example, chief's barazas) to market their products.
- Mainstream media (advertisements on television, radio, newspaper): Narratives showed this was not very common. Product marketing was done in local media stations, on radio shows, and in advertisement segments.
- Roadshows and outreaches: These were least mentioned, perhaps due to their resource-intensive nature. These were done occasionally and were supported mostly by the head office teams.

