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# **VULNERABILITY OF DEAF CUSTOMERS**

An Exploration

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# Vulnerability factors for d/Deaf consumers of financial services:

**A)** It is normal for many people when dealing with banks to have high levels of stress due to difficult or different personal circumstances that may cause misunderstandings. D/Deaf customers may experience greater levels of stress and reduced mental health than the average customer. High-stress levels may limit personal management capacity in the face of complex procedures and time pressures and complicated steps to follow. This can be difficult for any person when dealing with financial entities and can be an increased reality for d/Deaf people.

**B)** Processing capacity and power decrease due to competing pressures, for example understanding information and concentrating on sign language at the same time. Banking language is very complex, and it has to be taken into account that translations into sign language cause some of the information to be lost. Sign language is very simplified for this kind of topic and does not reflect the totality of what is meant to be expressed in a professional conversation. Deaf people who have BSL as their primary language often have a much more limited comprehension of written or spoken English. This causes that d/Deaf person to make an extra effort to understand the conversation or written text in its entirety while maintaining attention in order to be able to use that information.

**C)** Lack of perspective, especially when experiencing something for the first time, might mean not fully understanding the broader implications; not being able to make comparisons or see the "big picture", which increases the risks of making poor decisions. It is normal for a d/Deaf person not to have to deal with day-to-day life procedures on their own, they rely on families growing up, and may not have the experience to handle new information or challenging information in a formal setting. This can cause them to react without true comprehension of inference or impact. They need to be empowered to be self-reliant.

**D)** People tend to be more "reckless" and/or careless when they are stressed. It is normal to feel stress when going through formal procedures, such as signing documents, and if we add to that the fact that the related communication may not be fully accessible, there may be disorientation or discomfort. This can cause that, because of the urgency to get the paperwork out of the way quickly, decisions are made in haste and without thinking them through.

**E)** The most vulnerable consumers tend to cling to what they already have or what they already know, so they miss many opportunities to improve their situation. This is very true of d/Deaf customers, who tend to follow the precedents of families and friends because confidence is generated that what is already secured is the best option even though it may not be the most beneficial option for that individual.

# Vulnerability factors for d/Deaf consumers of financial services:

(Cont)

**F)** d/Deaf consumers may have a fear that the paperwork involved in financial products is misrepresented and that the end result may be unfavourable, so they tend to stick with what they already have.

**G)** Frustration with overzealous consumer protection and safeguard policies that effectively prevent people from accessing and using services and products. It is very difficult for deaf people to communicate remotely with financial institutions as they often cannot communicate by telephone and, if they do communicate by means of a telematic interpreter, they may be required to give advance notice, or go through additional security. Relatives of deaf people cannot easily communicate in their place either, as the identity of the person must be verified, which leads to numerous problems.

**H)** Technological innovation can empower vulnerable consumers, but it also leads to digital exclusion and "workarounds". As in all areas, technology can be both a solution and an added problem depending on the very accessibility of that technology as well as the person's training in the subject. This advance in technology can mean that a person who is not accustomed to doing things on his or her own may require the help of a third party who understands the new technology.

**I)** Problems to face any inconvenience or unforeseen setback to which they must react quickly and correctly. This may require personal contact in branch. This then may necessitate an interpreter. It is very difficult to solve a problem instantly because of the difficulty in communicating and the lack of preparation of the banks to deal with such situations by not normally having staff capable of interpreting and speaking sign language. Some banks do use technology solutions such as SignVideo, but this still requires some arrangements and front desk staff being aware of that facility.

**J)** Poor front-line interaction e.g. not knowing how to deal with a vulnerable person. The customer experiences frustration and anger which exacerbates a poor interaction that can occur both by not knowing how to correctly identify such vulnerability and by not being able to offer an adequate service. Banks wish to protect staff and this can lead to exclusion.

# Consequences or impact of vulnerability in related to financial services:

**Lack of awareness of these vulnerability factors can cause or exacerbate the financial problems experienced by vulnerable consumers.**

**A)** The lack of clear explanations and easily understandable communication can lead to a vulnerable person, ignoring a problem or selecting the wrong approach. To avoid this, things should be made as clear as possible. Plain language is key and an ability to communicate 'in person' is essential.

**B)** Rigid product design and service structures that can easily exclude a multitude of people from contracting that product because it does not meet their needs or does not do so in a way that is appropriate to their reality and individual characteristics.

**C)** Vulnerable d/Deaf consumers are being more at risk of being directed towards inappropriate products and services, or even withdrawing or being forced out of the mainstream personal finance market altogether.

**D)** Financial exclusion: vulnerable d/Deaf consumers are less likely than average to have savings, insurance or protection, pension or investments, as many of them do not have the confidence or sufficient means to contract these services.

**E)** Market disengagement: Vulnerable consumers may have difficulty linking to markets and sourcing products and services effectively. As a result, vulnerable consumers may be more likely to pay a higher price than other consumers because, due to distrust or misinformation, they do not switch suppliers. They may also forego products and services because they are not fully confident and informed.

**F)** Inability to manage a product or service: Consumers with vulnerability characteristics may be less likely to understand how to manage their use of a product or service on an ongoing basis and therefore not get the most out of their use. They are less likely to know their rights, including the ability to obtain redress or compensation if things go wrong.

**G)** Over-indebtedness: consumers with characteristics of vulnerability are more likely to fall behind on key household bills or credit commitments causing payment amounts to increase.

**H)** Purchase of inappropriate products or services and exposure to mis-selling: vulnerable consumers may be more likely to have mistakenly purchased an inappropriate product or service because they misunderstood the features or terms and conditions. This is a vulnerability of the entire population when dealing with banks, since financial language is difficult to understand, coupled with the fact that the interpretation of sign language is not literal, can generate many misunderstandings.

# Reported Lived Experience

## Quotes from a Deaflink Access Forum (2013)

"A deaf couple experienced difficulties in communication with a bank said: "We have changed my bank to Virgin, went to see representative, said I wanted to withdraw money and there was a young chap behind counter – I tried to explain to him, and he wrote something down, I didn't understand, it he kept talking and I kept gesturing I am deaf, again and again - he did not know how to respond, so I asked another person to help and he said sorry, he was new and I think I was used to other cashier – it is so difficult to try and explain if the person is not experienced".

"Recently what happened to me - I don't have family, but I have a friend, same experience, I got letter, asked friend to ring, I trusted friend, they said no. Because the friend of mine not good enough for them, I had to physically go into the bank myself."

"I received a letter recently, didn't understand it, and complicated English. My daughter came, showed it to her, and she phoned up, they said NO, need to speak to me - is he hearing? No he is deaf ! She had to explain, I am ringing on his behalf, he can't use the phone well – it is such a frustrating experience for us."

Experience of a d/Deaf woman with UK bank accessibility:

<https://www.britishdeafnews.co.uk/accessible-banking-for-deaf-people-my-experience-p1/>

One consumer was unable to read large print and did not know braille. He wanted his bank to communicate by email as he can turn emails into speech, but the bank did not offer this option. The bank continued to send consumer communications on paper.

One bank offers access to British Sign Language interpreters in-branch, via an app on branch tablets, and on its website, giving consumers access from the comfort of their own home. As we can observe, this service increases accessibility and effectively meets the communication needs of certain consumer groups in the firm's target market.

(Source: Financial Conduct Authority; Guidance for firms on the fair treatment of vulnerable customers)

## Research into Provision of Accessible Services by Financial Institutions – the Experience of the d/Deaf Community - Signing Banks

## Lending Standards Board report on Access-for-dDeaf-customers-in-banking-and-credit