HIMPUNAN WANITA DISABILITAS INDONESIA

INDONESIAN ASSOCIATION OF WOMEN WITH DISABILITIES

A POLICY BRIEF

Digital Financial Inclusion for Women with Disabilities in Indonesia

Indonesian Association of Women with Disabilities

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HIMPUNAN WANITA DISABILITAS INDONESIA
INDONESIAN ASSOCIATION OF WOMEN WITH DISABILITIES

Women's World Banking

Foreword

The Indonesian Association of Women with Disabilities (HWDI) views the importance of digital financial inclusion in the globalization era by looking at the intersectionality among gender issues, issues of persons with disabilities (GEDSI) and financial issues.

It is expected that this policy brief will become a reference for related parties to adjust their policies and actions to increase understanding of women with disabilities about digital financial products and services, both as customers and business owners. This policy brief can also be the first step in the creation of multi-stakeholder collaboration in supporting access to inclusive financial services for women with disabilities. As a result, women with disabilities will be able to experience equal opportunity and gender equality in the economy and improvement of women's welfare. It is therefore important for the Government, Women's World Banking (WWB), and Civil Society Organizations (CSOs) to collaborate in implementing the Women's Digital Financial Inclusion Coalition (IKDP)

We would like to express our deepest appreciation to Chandra Sugarda, a gender inclusion expert, for agreeing to write this policy brief, the HWDI Project team, the Women's Digital Financial Inclusion Coalition (IKDP), and Women's World Banking (WWB), for their support to HWDI.

We would also like to thank all respondents of the digital financial inclusion survey for persons with disabilities, women with disabilities who are MSME owners, organizations of persons with disabilities, and institutions attending every discussion and writing process of the Policy Brief, especially the Financial Services Authority (OJK), Bank Indonesia, Bank Central Asia, Bank Rakyat Indonesia, LBH Apik Jakarta and Dana, Tokopedia, Blu BCA, Link Aja which provided valuable contributions and recommendations.

We hope that the results and studies in this policy brief are useful for advocacy at the policy level and form a shared commitment to increasing digital financial inclusion for women with disabilities.

Kind regards,

Revita Alvi
President of HWDI

EXECUTIVE SUMMARY

Digital financial services have the potential to flourish in Indonesia, since around 81% of its population has not been reached by the conventional financial services (Google, Temasek, Bain & Company, 2022), and the country has a high number of mobile phone owners (90.54%) and internet users (62%) (Susenas, 2021). Based on these statistics, the Government has developed a digital economic transformation program that targets, among other things, inclusive digital finance, and developed the technical guidelines related to financial services for persons with disabilities. This Policy Brief is focused on the access and use of digital financial services and digital banks by persons with disabilities, especially women with disabilities, based on a survey (with 695 respondents) and FDGs involving all types of disabilities and representatives of stakeholders.

In accessing and using digital financial services and digital wallet services, persons with disabilities still face some constraints. Of all kinds of disabilities, one group that is most left behind or experiences the biggest constraints is those with intellectual disabilities. Women with disabilities also experience gaps when compared to men with disabilities, especially in accessing resources related to digital financial services.

The constraints faced by persons with disabilities, especially women with disabilities, have received the attention of the policy makers, but their interests have not been fully accommodated by providers of digital financial services and digital wallets. Existing policies do not really consider differences in access to resources between women and men, so they tend to be gender neutral. The implementation of regulations by providers of digital financial services and digital wallets is diverse and tends to be not gender-responsive, causing women with disabilities to be more likely to be left behind. The same thing happens to the implementation of financial inclusion by the providers of digital wallets, although programs that support women's empowerment are already in place in some services.

This Policy Brief highlights four (4) main issues faced by persons with disabilities, including women with disabilities, in accessing and using digital financial services: education or increasing disability-inclusive digital financial literacy, policies on disability-inclusive digital

financial services, collaboration and coordination between institutions or stakeholders, as well as infrastructure development including the applications/software for disability-inclusive digital financial services. This Policy Brief also presents a list of needs for access to digital financial services by various disabilities (Appendix 1) which can be used as a reference by service providers and infrastructure developers when developing their services and products.

Based on the findings and results of the analysis, this Policy Brief puts forward a number of recommendations to Bank Indonesia and the Financial Services Authority as the policy makers, providers of digital financial services, and developers of technical infrastructure in the form of digital financial service applications/software, and law enforcement and service institutions. The recommendations are also submitted to the Ministry of Communication and Information Technology to increase accessible digital financial literacy and encourage telecommunications service providers to facilitate access to digital financial services.

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1. Introduction

1.1. Background

Indonesia is a country with an enormous potential as the target market for digital financial services because a lot people are not yet reached by the conventional financial services. In 2022, it was recorded that 81% of the population had not been served by financial services (Google, Temasek, Bain & Company, 2022), despite the fact that digitalization of wage payments in the private sector can reduce the number of people without a bank account by up to 17 million people (the World Bank, 2021[1]). Meanwhile, a high number of informal workers, constituting 59% of the total workforce (Sakernas, 2022) lead to the domination of cash-based transactions in various regions in Indonesia. This is mainly found among farmers who live in rural areas.

The potential increase in digital financial services is also supported by the high number of internet and mobile phone users in the country. The Statistics Indonesia (BPS) noted that households that have mobile phones reached 90.54% and the population (individuals) who had mobile phones reached 65.87% in 2021 (the National Socioeconomic Survey, 2021). Meanwhile, according to the GSMA[2] report, mobile phone owners and users in Indonesia were 80% male and 72% female (GSMA, 2020).

The proportion of the population accessing the internet in the last 5 years had also increased from 32.34% in 2017 to 62.10% in 2021, with around 212.4 million internet users in 2022. The percentage of women who owned mobile phones for purposes from sending SMS to surfing the internet was 6% lower than that of men (GSMA, 2020). The activities when accessing the internet also varied, including 30% buying or selling goods and services and 10% accessing financial facilities.

The policy in the Indonesian Payment Systems Blueprint 2025 (BI, 2019) to direct the transformation of Indonesia's digital economy have the goals (1) to increase banking digitization, (2) to increase digital financial transactions, and (3) to increase inclusive digital

[1] Source: The Global Findex Database 2021, World Bank Group.
[2] Source: The Mobile Gender Gap Report 2020, GSM Association.

finance by 2025. However, this policy has not specifically targeted the provision of inclusive digital financial access and services for persons with disabilities and other vulnerable groups, despite the fact that persons with disabilities experience many constraints and discrimination in accessing both conventional and digital financial services.

The Operational and Technical Guidelines for Financial Services for Persons with Disabilities issued by the Financial Services Authority in 2018 describe in details the minimum standards of financial services for customers or consumers with disabilities, but their implementation has not been evenly distributed in all offices and outlets/branches of Financial Services Businesses (PUJK). The OJK has complemented the Guidelines with OJK Regulation Number 7 of 2022 on the Consumer and Community Protection in the Financial Services Sector, one of the focuses of which is the provision of special services for customers with disabilities. However, the existing Guidelines have not regulated the supervision of financial technology (fintech), especially in the digital financial innovation cluster and the minimum standards for provision of digital financial services for persons with disabilities, including the provision of disability-friendly digital financial platforms. The Guidelines do not take a gender perspective nor do they specifically regulate financial services for women with disabilities who are more vulnerable than men with disabilities.

Persons with disabilities also face various obstacles when accessing various digital financial services, including lacking the devices to access digital financial services and having minimum digital financial literacy. In addition, the public, including policy makers and providers of digital platform, have limited understanding of perspectives and interactions with disabilities, making the use digital financial services seem to be irrelevant for persons with disabilities. Among persons with disabilities, women with disabilities experience a double gap, especially in terms of accessing resources, including access to digital devices and access to financial resources since men with disabilities are often prioritized. This condition causes women with disabilities are more likely to be left behind in enjoying the benefits from digital financial services.

1.2 Objectives of the Policy Brief

The Digital Financial Inclusion Program for Women with Disabilities promoted by HWDI was one of the first programs to receive the support in the form of grants and guidance from the Women's Digital Financial Inclusion (WDFI) Coalition which was launched in Indonesia in 2022. With its involvement in the WDFI Coalition, HWDI prepared a Policy Brief entitled Digital Financial Inclusion of Women with Disabilities in Indonesia by engaging persons with disabilities, especially women with disabilities, from 32 provinces in Indonesia and a number of stakeholders.

The objectives of the Policy Brief are:

- To identify the understanding, literacy and skills of persons with disabilities, especially women with disabilities, in accessing digital financial services.
- To put forward recommendations to support and facilitate women with disabilities to increase their understanding, literacy and skills in accessing digital financial services and increasing the use of digital financial application platforms, both as customers and business actors.

2. Women with Disabilities and Bank Account Ownership

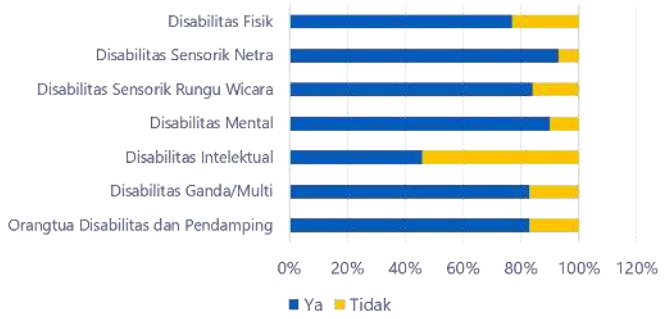
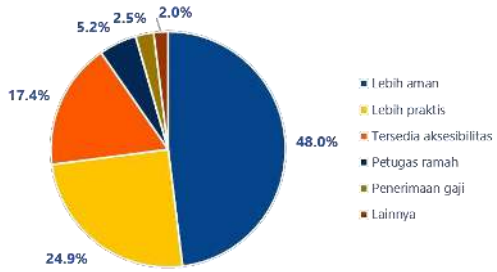
2.1. Access to Financial Services

"One experience that is quite confusing is the different service at different bank branches for account opening for persons with visual impairment. If there is a policy or technical and operational guidelines in place, any financial institutions can implement it wherever they are located"

Juwita, PERTUNI, Jakarta.

The majority of persons with disabilities have a bank account and there is no difference between women and men with disabilities in terms of ownership of a bank account. Approximately 80% of respondents with disabilities had a bank account and holders of a bank account by gender show that 80% of female respondents and 80% of male respondents had a bank account. This shows that conventional banks have been widely accessed by persons with disabilities, and there is no gap between women and men with disabilities in terms of ownership of a bank account. **However, the category of persons with intellectual disabilities has the lowest rate of ownership.** Of 80% of respondents who had bank accounts, persons with visual impairment and mental disabilities had the highest rate of ownership at 93% and 90% respectively. Meanwhile, only 46.2% of persons with intellectual disabilities had a bank account.

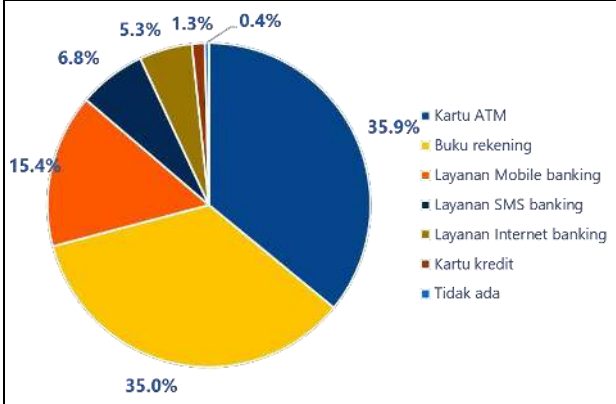
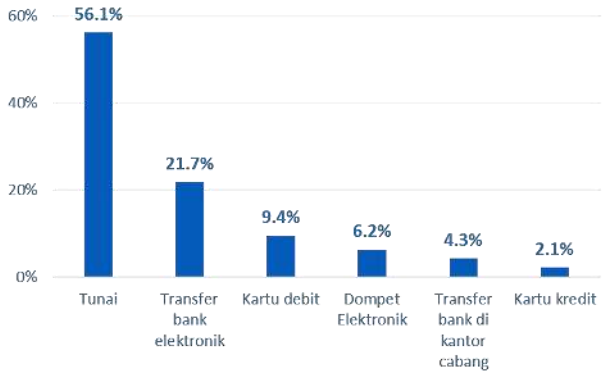
State-owned banks, such as BRI, BNI and Bank Mandiri, are the most popular banks and security and accessibility are the main factors in choosing a bank. About 75% of respondents had bank accounts at state-owned banks, 20% at private banks, such as BCA, CIMB Niaga and Permata Bank, while the remaining 5% had accounts at Regional Development Banks. The safety was the main factor in choosing a bank (48%), followed by practicality and accessibility at 25% and 17% respectively.

Bank Account Ownership by Type of Disabilities	Reasons for Choosing a Bank
	

About 20% of persons with disabilities who did not have a bank account were those who did not work and had no income. However, there were also respondents who did not have an account at the bank because the officers were not friendly to them while they were at the bank, their signature was not accepted, and the location of the bank was far from where their house. Since persons with disabilities often experience discrimination, financial and banking institutions should improve their services so that they are accessible and non-discriminatory in all their branches.

2.2. Use of Financial Services

Only a third of account holders with disabilities use mobile banking, SMS banking and internet banking services. The majority relied on passbooks (35%) and ATM cards (35.9%). This can also be seen from the payment method most often used by customers with disabilities i.e., cash (56.1%) and electronic bank transfer (21.7%).

Banking Facilities Owned and Used	Frequently Used Payment Methods
	

The majority of persons with disabilities who worked and had a bank account received their income through a bank (53.3%) and made cash withdrawal of portion of their income to spend on their daily needs (39.5%). Respondents who did not receive income through a bank kept a portion of their income in a bank (75.6%) and 5.3% kept their income in an e-wallet. In general, access to digital financial services was fairly even in all age groups, except for the 20-30 age group as they were more dominant in using bank services (53%). However, by region, persons with disabilities in Java and Sumatra were more dominant in accessing digital financial services at 51% and 44% respectively. The lack of access to digital financial services in areas, such as Maluku and Papua is partly due to limited network and internet access in these areas.

Meanwhile, 36% of account holders had ATM cards, but still had problems when using the services through ATMs. The biggest constraints faced when using an ATM card were the ATM lacked sound (28.7%) and there was no ATM nearby (36%). The sound feature on the ATM is needed by persons with visual impairment to direct them when using an ATM, but according to respondents some of the ATMs they used emited sound at the beginning and at the end, while others did emit any sound at all.

3. Women with Disabilities and Digital Financial Services

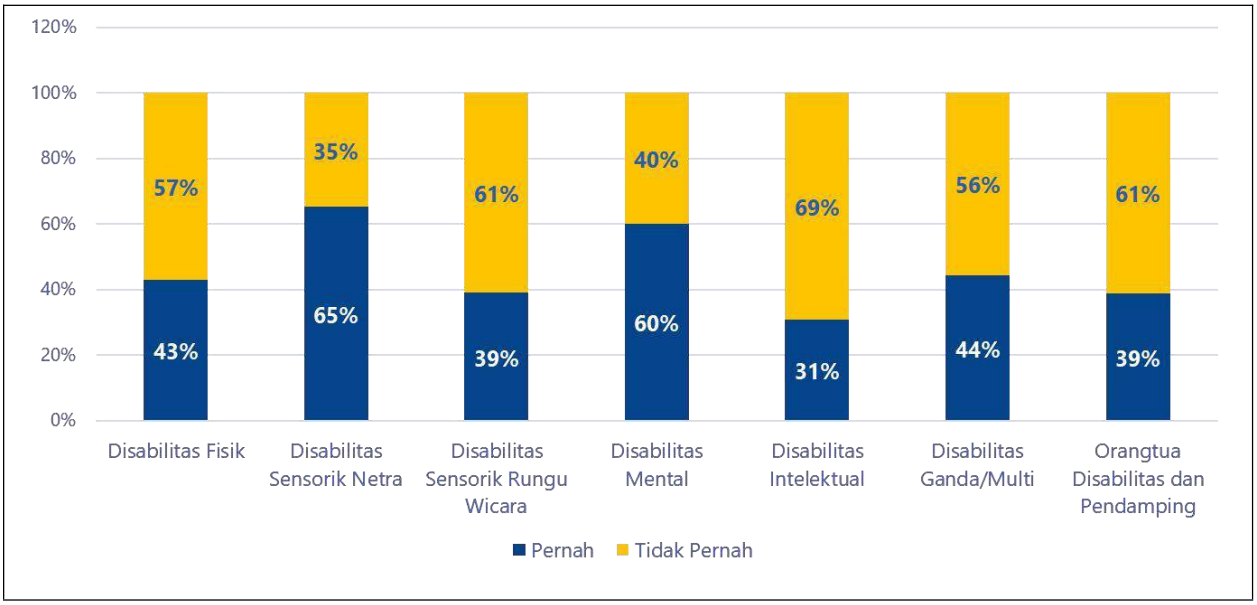
3.1. Access to Digital Financial Services

Access to digital financial services was generally fairly even for all age groups, except for the 20-30 age group who were more dominant in using it (53%). **However, by region, persons with disabilities in Java and Sumatra islands are more dominant** in accessing digital financial services at 51% and 44% respectively. The lack of access to digital financial services in areas such as Maluku and Papua islands is partly due to limited network and internet access in these areas.

Meanwhile, a gender gap was found in access to digital financial services, where access for women with disabilities was lower than men with disabilities. The survey shows that about 42.1% women with disabilities were able to access digital financial services. This figure is smaller than access by men with disabilities, which reached nearly 60%. The limited access of women with disabilities to resources, such as digital devices and internet networks, and the lack of digital literacy of women with disabilities contribute to this gap.

Persons with visual impairment were more dominant in accessing digital financial services, while persons with intellectual disabilities had the lowest access to digital financial services. The relatively high number of persons with visual impairment in accessing digital financial services (65%) indicates that there is ease of accessing and operating features in digital financial applications. However, the ease of access still needs to be improved, so that it is accessible by more and more persons with disabilities of different types and needs.

Access to Digital Financial Services by Various Disabilities

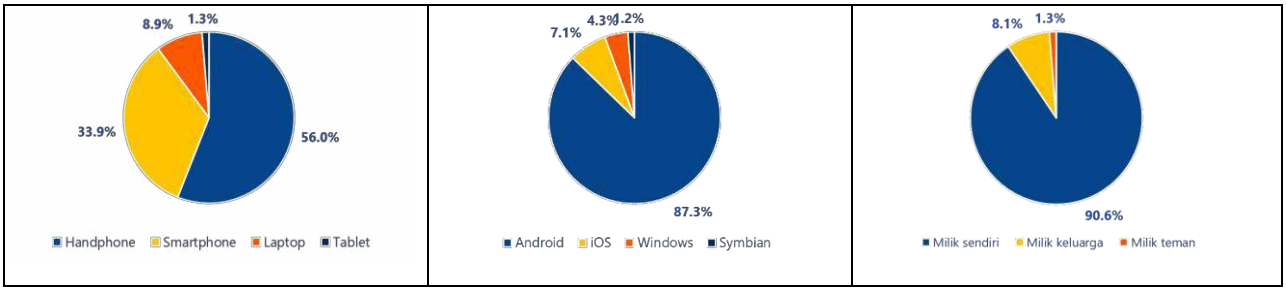


3.2. Use of Digital Financial Services

The use of digital financial services for productive activities by entrepreneurs was still limited or only 7.4%, even though 31% of the respondents were entrepreneurs. Online shopping was dominant in the use of digital financial services, at 17%, followed by routine monthly transactions. These routine transactions include money transfers to family members, buying phone credits, checking balances, and paying electricity/water/phone bills, each at 14%. This shows that digital financial services are very helpful to persons with disabilities in managing their family's routine transactions, but are not yet prevalent in helping them to improve their economy.

The majority of users of digital financial services used cellphones and smartphones to access services through the Android OS (87.3%). As many as 56% of users of digital financial services used cellphones, while 34% used smartphones. About 91% respondents used their own digital devices, while some shared their digital devices with their family (8%) and friends (1%).

Digital Deviced Used	OS Used	Ownership of Digital Devices



Digital financial services were not fully used by persons with disabilities and the main constraint was their lack of understanding in using digital devices and digital financial applications (58.8%). The constraints often faced were the limitation of reception signal at the geographical location of their domicile (24%), a long loading time (20%), and applications often had problems (14%). Therefore, increasing digital financial literacy for persons with disabilities, strengthening of reception signal in certain areas, and improving digital financial applications still need to be carried out.

4. Women with Disabilities and Digital Bank Services or Electronic Wallets

4.1. Access to Digital Bank Services or Electronic Wallets

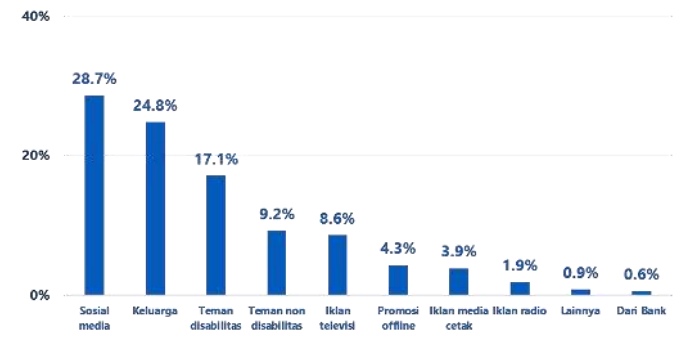
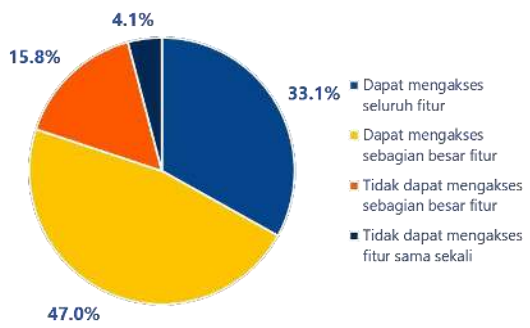
> *"The existing e-wallet applications have sufficient access for persons with visual impairment since they can be read by screen readers that we normally use. However, the required updates of applications sometimes make the applications no longer accessible. It is better if the application update maintains the accessibility for persons with disabilities."*
>
> *Retta, HWDI, Jakarta.*

People with intellectual disabilities had the lowest level of knowledge related to e-wallet services (23%). This figure is followed by persons with physical disabilities (45%). Meanwhile, other types of disabilities were sufficiently informed about e-wallet services, between 52% - 80%.

A gender gap was found in knowledge related to e-wallet services. The proportion of women with disabilities who had the knowledge about e-wallet services was lower, at 49.7%, than men with disabilities, at 63.3%. This further supports the proposition that

women with disabilities had less access to resources, including knowledge and information, than men with disabilities, even though the proportion of women with disabilities who had bank accounts was higher than men with disabilities.

Social media was the most used medium for access to information among persons with disabilities, including in obtaining information about digital banks. The most accessed sources of information to get the knowledge about digital banking were social media (29%), family (25%), and friends with disabilities (17%). Therefore, digital bank service providers should increase the dissemination of information about their services through social media (such as Facebook and WhatsApp) in a format that is easy for all types of disabilities to read.

Sources of Information on Digital Services	Access to Digital Service Features
	

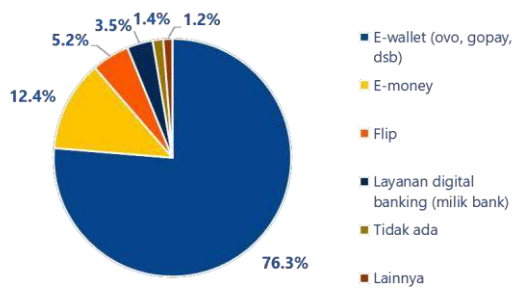
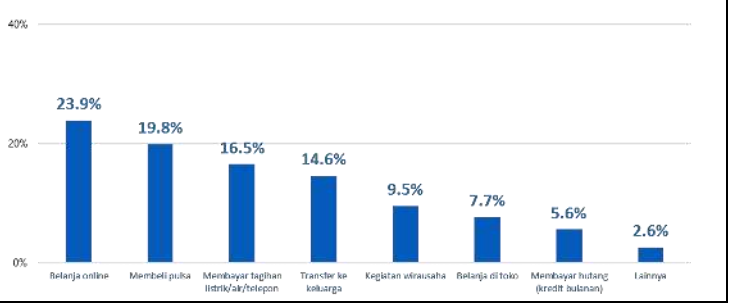
In accessing digital banks or e-wallets, the majority of persons with disabilities stated that they could access most of the features (47%) and only a third could access all of the features in digital services, while about 16% said they could not access most of the features. Not understanding how to use digital devices and a lack of understanding of using digital bank applications were the main factors for the low rate of access to digital banking among persons with disabilities.

4.2. Use of Digital Bank Services or Electronic Wallets

The majority of persons with disabilities used digital bank services or e-wallets (74.5%). Persons with intellectual disabilities were the lowest at 33%. Meanwhile, users of digital banks with other disabilities ranged from 64% - 88%, and those with the deaf-mute and mental disabilities were the most users or above 80%.

By gender, the majority of male and female respondents who were familiar with digital banking used it. There were 73.7% men with disabilities and 74.7% women with disabilities who used digital banks, so it can be said that there is no gender gap in the use of digital banks.

The facility that dominated the use of digital banks was e-wallet, such as Ovo and Gopay, at about 76.3%. While the rest used e-money (12.4%), Flip (5%), and bank-owned digital services (4%). Users of digital bank services said the main factors that encouraged them to use them were ease of transaction (66.9%) and independence (23%). Therefore, providers of digital banking service can still increase the number of service users by enhancing their applications to make them easy to use and disability-friendly

Facilities of Digital Banks Used	Use of Digital Banks
	

Persons with disabilities used digital banks for online shopping (24%) and made routine monthly transactions, such as buying phone credits (20%), paying the electricity/water/phone bills (17%), and making a money transfer to family members (15%). Only a small portion or 10% of the users used digital banks in their business. The use of

digital banks for business activities can be increased by making entrepreneurial programs which are disability-friendly.

Meanwhile, for persons with disabilities who did not used digital bank services, the lack of understanding became the most dominant factor (42%). Another factor was the use of internet quota which was burdensome economically (18%), especially for those who were not working, and there was still uncertainty about the security of transactions (16%).

5. Analysis of Disability Inclusive Digital Financial Services

The results of the FGDs corroborate the survey findings which show **that persons with disabilities face various contraints in accessing and using digital financial services and digital wallet services**. In addition, of the various types of disabilities, persons with intellectual disabilities are the most disadvantaged group in terms of accessing and using digital financial services and e-wallets. Meanwhile, persons with visual impairment, deaf-mute, mental and physical disabilities have used a lot of services, although they sometimes encounter obstacles in accessing and interacting. Those who have used them said they have greatly helped in facilitating their affairs in their daily life.

Women with disabilities face a double gap that does emerge not only due to their being disabled, but also due to the gender roles assigned to them by society where the majority adheres to a patrilineal system. This condition causes women with disabilities to be more marginalized than men with disabilities, since the prevailing norms, culture, and policies are gender neutral, and the support from the public is minimal, including from providers of inclusive financial services which are less gender responsive. The gender gap can be seen, among other things, in access to digital devices, to digital services, and to information or dissemination of digital financial services. This hinders the use of digital financial services and opportunities to improve the economy of women with disabilities, especially those who are business owners.

The constraints faced by persons with disabilities, especially women with disabilities, have received the attention of the policy makers, but their needs have not been fully accommodated by providers of digital financial services and digital wallets. In terms of

policy, Bank Indonesia has formed a division of financial inclusion policy in 2022 which engages several work units at Bank Indonesia. This division is specifically tasked with increasing financial inclusion in Indonesia, including disability inclusion. The Financial Services Authority (OJK) has issued several regulations including:

- OJK Regulation Number 76 of 2016 on the Improvement of Financial Literacy and Inclusion in the Financial Services Sector for Consumers and/or the Public which among other things regulates the provision of various facilities for groups with special needs to access financial products and/or services (article 15) with the objective to expand access to financial products and services.
- The Operational and Technical Guidelines (PTO) for Financial Services for Persons with Disabilities (OJK, 2018) which set the minimum standards for financial services for customers with disabilities.
- OJK Regulation Number 7 of 2022 on Consumer and Public Protection in the Financial Services Sector, one of the focuses of which regulates the provision of special services to customers with disabilities and the elderly, including providing disability-friendly application features, providing trained staff to serve persons with disabilities and the elderly, providing information media that consider the needs of customers with disabilities, and others (article 35).

However, the existing OJK regulations do not yet regulate the supervision of fintech, which is part of OJK's authority, particularly in the cluster of digital financial innovations. This includes setting the minimum standards for the provision of digital financial services for persons with disabilities, including the provision of disability-friendly digital financial platforms. **Existing policies have not seriously considered differences in access to resources between women and men, so they tend to be gender neutral.** This can result in a greater economic gap between women and men.

In general, about 76.5% of working persons with disabilities do informal jobs, and the number of women with disabilities as informal workers is higher than that of men, especially in the field of micro and small businesses (such as running a small grocery shop and selling food in a cart (*angkringan)*) and handicraft businesses[3]. Based on these findings, the

[3] Source: Laporan Asesmen Cepat Dampak Covid-19 bagi Penyandang Disabilitas di Seluruh Indonesia, 2020.

provision of disability-friendly digital financial services **can increase the economic potential of persons with disabilities, especially women with disabilities, to reduce the economic gap of women with disabilities.**

The implementation of regulations by providers of digital financial services and digital wallets is diverse and not yet gender responsive. Almost all providers that have provided disability-friendly services have not been able to accommodate all types of disabilities. The providers of services still view the customers as a one-dimensional entity and have not considered other dimensions such as differences in access and gender roles which can lead to gaps. Bank Rakyat Indonesia (BRI), for example, has the procedure for services for persons with disabilities in place, especially for account opening, but the customers must bring their own companion. Persons with disabilities consider this to be inconvenient as it increases their dependence on family or friends. The service providers are recommended to provide trained officers to interact with and assist persons with disabilities, so that the services become an integral part of the financial services provided.

Internal regulations of financial service providers on accessibility and the provision of digital service designs that are accommodating to all types of disabilities are not yet available, let alone those that consider differences in access between women and men. Bank Central Asia (BCA) already has the procedure for serving customers with disabilities, and has developed several digital products that consider the accessibility needs of various types of disabilities. Apart from that, BCA has also implemented the Operational and Technical Guidelines from the OJK, such as building ramps at several branch offices, but not in all branches.

The implementation of financial inclusion by providers of digital wallet services also faced the same issue. DANA, for example, is an application accessible by people with hearing and visual impairment (through the use of screen readers), but it admitted that it had not been able to accommodate all of the needs of persons with various disabilities. In Indonesia DANA application has 227 representatives who can conduct digital financial education and increase

(Report on the Rapid Assessment of the Impact of Covid-19 for Persons with Disabilities throughout Indonesia, 2020).

women's empowerment, especially MSME owners, but are still unable to interact with all kinds of disabilities. In addition, Tokopedia marketplace has started disability-friendly and inclusive programs according to the regulations of the OJK and the Ministry of Communication and Information Technology, but the development is still on progress. Currently, Tokopedia has launched a voice over service so that customers can shop by voice, and developed a digital financial literacy module launched in May 2022 with the target MSMEs, especially women owners of MSMEs, as training participants.

The following are a number of issues faced by persons with disabilities, including women with disabilities, in accessing and using digital financial services:

a. Education on Disability Inclusive Digital Financial Services

The widespread lack of understanding among persons with disabilities, especially women with disabilities, in using digital devices and digital financial applications is the main factor for the low use of digital financial services by persons with disabilities, both as business actors and as customers. For this reason, digital financial service providers need to collaborate with various parties, including disability organizations and women's organizations, to regularly provide education and information on the use of various digital financial applications and digital tools that are continuously developing. Information may be provided through various channels, such as direct dissemination especially when there is a new application or program, and through social media, such as Facebook and Whatsapp which are widely accessed by persons with disabilities. If the information is presented using video, then the video needs to be supplemented with a subtitle or sign language so that it can be accessed by persons with hearing impairment, and equipped with clear narratives that persons with visual impairment and intellectual disabilities find easy to understand.

In addition, education on disability-inclusive digital financial services also needs to be provided to service providers and strengthened by SOPs on Disability Inclusive Services, including application developers and customer service staff, so that in carrying out their duties they have considered the special needs of various types of disabilities. The customer service staff must have the capacity to interact with a variety of disabilities,

both directly (face-to-face) and indirectly (for example, by telephone, video call, etc.) and the consultation time is not limited. Application/software developers also need to ensure that all mobile banking applications and their updates use a language that is easy to understand, are text-based, and have more than one verification option that can be accessed by a variety of disabilities.

b. Disability-Inclusive Digital Financial Services Policy

Disability-inclusive digital financial services can be created if the supporting policies are disability-friendly. For this reason, it is very important to engage organizations of persons with disabilities in the formulation of various policies related to digital financial services. One thing the policy makers can do is to revise the Indonesia Payment Systems Blueprint 2025 by adding the provision of inclusive digital financial access and services for persons with disabilities and other vulnerable groups.

In addition, the Operational and Technical Guidelines for Financial Services for Persons with Disabilities also need to regulate supervision of the digital financial innovation cluster on the minimum standards for provision of digital financial services for persons with disabilities, including provision of disability-friendly digital financial platforms. The Guidelines also need to be supported with a gender perspective and to regulate financial services for women with disabilities are more vulnerable than men with disabilities, causing them to have less access to resources.

c. Collaboration and Coordination amongs Agencies or Stakeholders

One of the findings of the survey and FGDs highlighted the need for stakeholders to collaborate and coordinate to ensure access to digital financial services and digital banks for persons with disabilities, especially women with disabilities. Collaboration of stakeholders can start from the design of digital products, dissemination of information of the products, and the provision of other digital financial services. Issues to be addressed include the different needs of various types of disabilities, differences in access to resources for women with disabilities, and differences in access for persons

with disabilities by geographical areas (urban vs. rural) and the availability of internet networks in the area.

The issue of coordination of disability organizations, financial service institutions, the government, and the legal aid network also has surfaced. Persons with disabilities who face problems while accessing digital banking and financial services often do not know who to consult, especially those who face legal problems related to financial services, such as loss of funds or becoming victims of fraud. To address this, service organizations and institutions such as HWDI and the legal aid network should actively coordinate with the policy makers in financial services such as Bank Indonesia, the Financial Services Authority, and conventional and digital financial service institutions.

In addition, in the dissemination of information and training on digital financial services for women with disabilities, coordination among disability organizations, financial service institutions and the Ministry of Communication and Information Technology is also crucial. The policies prepared by Ministry of Communication and Information Technology in coordination with financial policy institutions ensure that the minimum standards of dissemination of information are met and digital literacy is accessible to persons with disabilities. In addition, methods and tools of dissemination of information must use the principle of provision of accommodation which is appropriate for persons with disabilities and has a gender perspective.

d. Development of Disability-Inclusive Digital Financial Services Applications/Software

The development and updates of applications/software and internet and mobile banking pages should engage the representatives of various types of disabilities to ensure accessibility. Software and website developers need to understand that there are different needs for different types of disabilities. For example, persons with hearing impairment need an option of verification via video calls or a text-based one and the use of live chat with voice notes. Meanwhile, persons with mental disabilities need to a feature to limit the use of funds as determined by users themselves when registering and this should apply to all platforms and marketplaces.

Other issues that need to be addressed include:

a. The time to fill out the OTP code is considered too short, so it should be extended for customers with disabilities.
b. For mobile banking or e-wallet applications, there should be a feature to zoom-in the screen to make the text easier to read.
c. There needs to be a dictation feature for persons with physical disabilities who find it difficult to move their hands.
d. The interface needs to be simplified to make it easier to understand and follow.

6. Conclusions and Recommendations

The government has made various efforts to improve inclusive financial services for all people, including digital financial services. The government has established various inclusive regulations and encourages the banking sector (both private and state-owned) and other financial institutions to develop disability-inclusive digital financial services. However, based on the findings, persons with disabilities still face various obstacles in accessing and using digital financial services and digital banks. In addition, existing digital financial policies and products tend to be gender neutral, so they have not been able to encourage the empowerment of women with disabilities.

Based on the analysis of the survey findings and FGDs, it can be concluded that:

- The policies on inclusive financial services are already in place, but need to be supplemented by regulations, technical guidelines, and supervision of digital financial services and digital banks that are able to accommodate the needs of all kinds of disabilities and are gender responsive.
- Increased inclusive financial literacy is already underway, but it still needs to be complemented by digital financial literacy. In addition, the approach of dissemination also needs to consider women's access to information, which is different from men's, including if they want to conduct face-to-face dissemination. Information disseminated must include a clear complaint channel accessible by persons with disabilities who face problems when accessing digital services

- The provision of digital financial services and digital banks have started to provide disability-friendly features in their services and applications, but have not been able to cover all types of disabilities. **Appendix 1 presents a list of needs for access to digital financial services based on a variety of disabilities** which can be used as a reference for service providers in developing their products.

By ensuring the development of disability-friendly and gender-responsive digital financial policies and services (including digital applications) using a universal design approach[4], the policy makers and the service providers can meet the needs of other vulnerable groups in society, such as children and the elderly.

To increase access to and use of digital financial services and use of financial application platforms by persons with disabilities, especially women with disabilities, the following are a number of recommendations to the policy makers, service providers, and developers of digital financial service applications/software, as well as to the law enforcement and service institutions.

Recommendations to Bank Indonesia and OJK as the policy makers:

a. To strengthen the commitment of the policy makers to ensure the fulfillment of the rights of persons with disabilities in accessing and using digital financial services. The commitment can be proven by immediately revising the Indonesia Payment Systems Blueprint 2025 and the Technical and Operational Guidelines for Financial Services for Persons with Disabilities, revise other relevant policies, or develop new policies that are accommodating to the needs of the persons with disabilities and gender responsive.
b. To develop policies as a reference for financial service providers and application developers to ensure meaningful engagement of persons with disabilities in all stages of their operations, from the planning, budgeting, implementation, monitoring to the evaluation, in accordance with the principles set out in the Convention on the Rights of Persons with Disabilities (CRPD) "nothing about us without us".

[4] This universal design can be used by persons with different abilities and needs, and the use of the design is easy to understand regardless users' understanding, ability, language skills or education level.

c. To formulate policies or (if they are in place) disseminate the policies on digital financial services which supervise and protect Indonesian citizens, especially persons with disabilities, in using digital financial applications from other countries. The policies also need to regulate the complaint process, if there are members of the society, especially persons with disabilities who face problems, such as accessibility.
d. To ensure the meaningful engagement[5] of organizations of persons with disabilities in the formulation and improvement of policies related to digital financial services.
e. To conduct dissemination of policies to all providers of digital financial service, both banking institutions and digital bank institutions, by engaging organizations of persons with disabilities.
f. To conduct harmonization with financial guarantee institutions to strengthen disability-inclusive digital financial services.

Recommendations to providers of digital financial services:

a. To strengthen the commitment to providing digital financial services which can be enjoyed and used by all types of disabilities, not just certain types of disabilities. The commitment is shown by implementing the principle of disability-inclusive digital financial services, where various features are available to accommodate persons with different disabilities and give choices of approaches that can be selected according to their needs or obstacles.
b. To develop digital financial service infrastructure that is disability-friendly according to the needs of each type of disability (Appendix 1).
c. To strengthen the capacity of the personnel, including customer service staff, by carrying out capacity building in all lines of digital financial services by engaging organizations of disabilities in the provision of education on disabilities and their different needs. By strengthening the capacity of these personnel, providers of digital financial service will have officers who are trained to interact with and assist persons with disabilities (i.e., to open accounts), as an integral part of the financial services provided.

[5] Meaningful engagement means it is not only to attend meetings (or to meet the attendance requirements), but it must give opportunities to persons with disabilities to express opinions and provide input, as well as being involved in the decision-making process.

d. To provide the physical and non-physical accessibility to financial services for persons with disabilities, by engaging or consulting organizations of persons with disabilities.
e. To invite disability organizations in the development of new digital financial service programs/products and new banking facilities to ensure that the needs of all kinds of disabilities are accommodated.
f. To conduct dissemination and training to introduce digital financial products or services to persons with disabilities, especially women with disabilities. The dissemination and training use accessible methods and tools and ensuring adequate accommodation for all types of disabilities, for example, by providing sign language translators, texts and narratives so that all types of disabilities can follow and understand them, and if the training is conducted face-to-face, by providing a separate room for persons with mental disabilities who need time alone to rest.
g. To design digital financial products or services for entrepreneurs with disabilities, especially women with disabilities, to increase their access to digital financial services as a means of transaction and support for their businesses.

Recommendations to the Ministry of Communication and Information Technology:

a. To develop policies or the Standard Operating Procedures (SOPs) for dissemination of information and accessible digital financial literacy by meaningfully engaging persons with disabilities.
b. To ensure that dissemination methods and tools are accessible, using the principle of providing accommodation for disabilities which is appropriate and has a gender perspective.
c. Together with relevant financial service institutions, to conduct the dissemination on increasing digital financial literacy for persons with disabilities, especially women with disabilities
d. To encourage providers of telecommunication services to facilitate access to digital financial services.

Recommendations to developers of digital financial service applications/software:

a. To increase the capacity of developers of digital financial service applications/software on accessibility so that they can accommodate the needs of

various disabilities in their applications/software.

b. To engage representatives of various disabilities in the development of digital financial service applications/software, including during the trial process.

Recommendations to institutions of law enforcement and legal services:

a. To perform special consolidation among the legal aid network, disability organizations, the government as the policy maker, and financial service institutions to resolve various problems faced by persons with disabilities related to financial services, such as loss of funds or being a victim of fraud.

b. To conduct dissemination to persons with disabilities who need access to legal aid related to financial services.

APPENDIX 1. List of Needs for Access related to Disability-Inclusive Digital Finance by Type of Disabilities

Type of Disabilities	Constraints (Law No. 8/2016)	Needs for Access related to Disability-Inclusive Digital Finance
General Needs for Access for All Disabilities	Common constraints experienced by all types of disabilities	Applications or Digital Platforms:: • A feature to enlarge the text (zoom-in) on the screen to make it easier to read. • Simplified interface which is easier to understand and follow, straightforward, concise, easy to recognize, and there are no overlapping steps/commands. • Digital verification/security features customers can choose from. • Use of words that are short and easy to understand on applications or digital platforms. • Easy to use when the internet network is slow or has limited bandwidth. • Customer service staff must be accommodating and easy to contact by a variety of ways that can be chosen by persons with disabilities who use the application. • Character consistency on a strong application. • Efficiency of characters on applications that can speed up/make it easier for users. • There is a user forgiving feature or a feature to confirm for an action that may be wrong. ATM Facilities: • The ATM should not be too high, so it can be reached by all types of disabilities. • The ATM should be put in a safe and easily accessible place. • To provide an officer/security officer who can assist whenever there are persons with disabilities who need them. • To provide various features to be selected by any type of disabilities in every digital service process, such as: payment stage, verification stage, etc. • To provide graphical icons for navigation for persons with disabilities and individuals with literacy and language limitations.
Physical Disabilities	Impaired mobility	Applications or Digital Platforms: • To provide a longer time to fill in the OTP code. • To provide features of voice command recognition or electronic device control using a voice command. • To ensure that the voice command recognition can be used in applications on digital platforms (permitted). ATM facilities: • The height of the ATM screen should not more than 110 cm. • To give some space at the bottom part of the ATM at least

Type of Disabilities	Constraints (Law No. 8/2016)	Needs for Access related to Disability-Inclusive Digital Finance
		75 cm high so that any wheelchair users can position themselves as closely as possible to the screen or the command receiving device on the ATM. • The path to the ATM should be as flat as possible, not rocky, not grassy/thickly carpeted/slippery floor, separated by ditches/water drains. • If the ATM room is located in a higher location, there must be a ramp with a slope of not more than 10 degrees and a width of not less than 90 cm. • The ATM room must be more spacious with a minimum width of the door of 90 cm. • The free area in the ATM room must be at least 2x2 sqm, with a door with a minimum width of 90 cm that opens outwards. • There must be a feature that can transfer transaction orders by using the numeric keypad (the hardware which receives the order) or the buttons under the screen.
Visual Disabilities	Visual impairment	<u>Applications or Digital Platforms:</u> • To develop digital financial applications that can be read by screen-readers (including the application updates). • To add a dictation feature on electronic devices to convert voice into text. • To provide a feature of voice command recognition or electronic device control using voice commands. • To provide features in applications using contrasting colors so that persons with low vision can easily recognize them. • To hold a peer training (among those with visual impairment) on the use of applications on digital platforms. • To ensure features with image, animation and motion image do not interfere with the navigation of screen readers by users. • To provide a text on each button and an image that can be read by screen reader. • To ensure the copy paste function can be used or permitted in applications on digital platforms. • To ensure that a dictation feature can be used or permitted in applications on digital platforms. • To ensure that a voice command recognition can be used or permitted in applications on digital platforms. • To provide an accessible e-signature feature for users of screen readers. • To allow an easy face verification process with a wide frame, without 'don't blink' prompt, without 'look forward' command, and without the need for overly accurate facial placement in the frame. • There must be a replacement for face verification when it is difficult for persons with visual impairment to do it. • There must be a customer service call feature/button that

Type of Disabilities	Constraints (Law No. 8/2016)	Needs for Access related to Disability-Inclusive Digital Finance
		can be easily accessed (on the main page). • It is necessary to provide a PIN code button which systematically changes from a single tap to a double tap when someone with visual impairment enters the PIN for verification of payment (transaction). • The use of a third party digital wallet in one application should only require one-time verification when it is integrated for the first time. For the next payment process, they only need to enter the PIN code to proceed with the payment. • To provide a feature that can transfer the transaction order by using the numeric keypad (hardware which receives the command) or buttons below the screen (changing the touch screen command to the keyboard command). • To clarify the choice of gestures in making the payments. For example: “click to pay” not “slide to pay”
		ATM facilities: • To provide complete a sound feature on ATMs. • To provide tactile markings on ATMs, such as Braille, embossed markings, different button shapes, and others. • To provide an ATM officer to assist. • The road to the ATM is equipped with guiding blocks and warning blocks. • To provide an easily recognizable symbol or sign outdoors.
Deaf-Mute Disabilities	Impaired hearing and speech functions	Applications or Digital Platforms: • To provide registration and transaction verification options via a video call or a text-based method (equipped with a text or a running text). • To provide an option of live chat with voice notes. • To provide an option of live chat with assistance of officer/customer service staff. • To provide visible or recognizable symbols or directions. • To ensure features use attractive and recognizable icons. • To ensure all voice features have a text that is easy to read. Telecommunication Facilities: • Telecommunications devices for the deaf-mute persons must allow text messaging over telephone lines. • Telecommunications relay services enable text to be converted by the telephone carriers. • To ensure the use of vibration/text alerts instead of audio/voice alerts. • The use of virtual drawing boards and communication solutions. • To provide a connector with the option of customer service, including email, IVR Systems, SMS, telephone relay, and video conference.

Type of Disabilities	Constraints (Law No. 8/2016)	Needs for Access related to Disability-Inclusive Digital Finance
Mental Disabilities	Impaired cognitive, emotional and behavioral functions	<u>Applications or Digital Platforms:</u> • To allow users to set the limit of funds to be used at the time of registration at at all platforms and marketplaces. • Do not automatically assign the financial rights of persons with mental disabilities to their families/other people, since persons with mental disabilities have the rights to their finance. • To provide the full support so that persons with mental disabilities can make their own choices regarding digital financial transactions, including providing information as clearly as possible, including the advantages, disadvantages, and risks from choices related to finance (transparency).
Intellectual Disabilities	Cognitive impairment due to below the average level of intelligence	<u>Applications or Digital Platforms:</u> • To provide instructions for using digital financial applications in a simple and easy to understand language. • To use symbols in the form of images or graphic icons to facilitate navigation or operation of digital financial applications. • To provide additional information that is easy to understand through voice and can be repeated, especially when opening a digital account, to ensure that persons with intellectual disabilities understand every step they need to take. • To provide an option for users to set the limit on the fund to use when they register themselves and the limit applies all platforms and marketplaces. • To allow companions from a family or someone trusted by persons with intellectual disabilities when they make digital financial transactions.
Multiple Disabilities	Disabled persons who have two or more types of disabilities	<u>Banks and ATM facilities</u>: • To provide an officer who understand how to interact with various disabilities and can assist persons with multiple disabilities in transactions • To ensure that the locations of banks and ATMs are easy to identify, either by touching their feet, hands and/or smells or contrasting colors (multisensory approach).

APPENDIX 2. Data Collection Methodology and Profiles of Respondents

This Policy Brief is prepared based on the data collected using an online survey (quantitative) and FGDs (qualitative) conducted in November – December 2022 and January 2023. The online survey was distributed in 32 provinces in Indonesia with women with disabilities as main target but it also filled out by a number of men with disabilities and parents/companions of persons with disabilities.

The FGDs were held in December 2022 and January 2023 and participated by representatives of organizations of persons with disabilities, government representatives, representatives of banks and providers of digital financial services, and representatives of legal aid institutions. The purpose of the FDGs is to identify the needs and constraints of persons with disabilities, especially women with disabilities, in accessing digital financial services, identify digital platforms used by persons with disabilities, and identify stakeholders' support to increase access to digital skills and finance.

The online survey was filled out by 695 respondents with the ratio 87% female, 13% male and 0.1% transgender. Almost all respondents were persons with disabilities, except for 5.2% of respondents who were parents and companions of persons with disabilities (non-disabled persons).

The majority of respondents at 37% were between 40-50 years. The second largest group of respondents, 30%, came from the age group of 30-40 years. The respondents were from all regions in Indonesia, with the largest number of respondents (51%) from the Java island, while respondents from Sumatra and Bali - Nusa Tenggara islands ranked second and third at 20% and 12% respectively. Respondents from Kalimantan and Maluku–Papua islands were the least in number at 2.6% and 3.5% respectively. In terms of education, the majority of respondents were graduates of high school, at 45%, while graduates of junior high school and bachelor's education each was 17%.

Based on their occupation, respondents with intellectual disabilities are persons with

disabilities with the highest rate of unemployment at 77%, making them the most economically vulnerable. Meanwhile, the majority of respondents with mental disabilities and visual disabilities had formal jobs, at 60% and 33% respectively. The percentage of respondents who are self-employed was quite large, about a third in each type of disabilities, at 36% of those with physical disabilities, 31% of those with hearing disabilities, 29% of those with visual impairment, and 20% among those with mental disabilities. This shows their fighting spirit to improve their economy.

Note:
The respondents did not describe the demographics of persons with disabilities in Indonesia, but represented the experiences of persons with disabilities, especially women with disabilities, in accessing and using financial services, both conventional and digital.