projectenable

LOCKED OUT OF THE BANK

ARE NIGERIA'S BANKS WORKING FOR PERSONS WITH DISABILITIES?

FOREWORD

Financial inclusion begins with the ability to use financial services independently. When persons with disabilities cannot enter a bank, operate an ATM, complete a digital transaction, or keep control of their own financial information, they may hold an account but remain excluded from meaningful financial participation. Without that basic access, financial inclusion cannot become economic inclusion. People who are locked out at the point of service have little opportunity to use banking to manage money, receive payments, save, or pursue economic opportunity on equal terms.

This is why Locked Out of the Bank is such an important contribution to Nigeria's financial inclusion conversation. It shifts the discussion from access on paper to access in real life.

The report is based on the experiences of 161 persons with disabilities across 27 states and the FCT. Their responses show a clear gap between formal inclusion and practical access. Many respondents have bank accounts, yet still face barriers at branches, ATMs, mobile apps, USSD channels, and customer service points. For them, banking is too often stressful, unsafe, dependent on others, or unavailable when they need it most.

The findings should concern everyone working in financial services. Seventy-eight percent of respondents reported obstacles at bank branches. Sixty-three percent experienced barriers at ATMs. More than half faced barriers at both branches and ATMs. These are not small service failures. They are system failures that affect independence, privacy, dignity, and trust.

The risks are also financial. When inaccessible systems force people to rely on relatives, guards, staff, or strangers to complete transactions, privacy is lost. The report shows that 38 percent of respondents regularly or often depend on others for banking transactions, while 50 percent have shared sensitive financial details, including PINs, with helpers. This should not be normal in any financial system that claims to protect consumers.

The report also makes one point very clearly: inclusion is not only about infrastructure. Ramps, accessible ATMs, screen-reader compatible apps, and usable USSD journeys are necessary. But people also meet the system through staff. When 72.7 percent of respondents identify staff disability awareness training as their top priority, the sector should listen. Training is one of the fastest, most practical starting points for change.

Nigeria has set a strong financial inclusion ambition. Achieving it will require more than account ownership. It will require banks, fintechs, regulators, and policymakers to ask harder questions. Can a deaf customer complete verification without being locked out by voice-only OTP? Can a blind customer use a mobile banking app without the app failing with a screen reader? Can a wheelchair user enter a branch through the main entrance, use the counter, and complete a transaction without surrendering privacy? Can a person with a disability receive queue priority, as required by law, without having to beg for it?

These questions are not technical side issues. They sit at the centre of consumer protection, digital finance, regulatory compliance, and market growth. A banking system that excludes persons with disabilities is leaving out millions of Nigerians. It is also leaving value, trust, and innovation on the table.

This report is evidence for action. It gives financial institutions a clearer view of where their services fail and where they can begin to fix them. It gives regulators a basis for stronger standards and enforcement. It gives disability advocates data they can use in policy dialogue. Most of all, it centres the experiences of persons with disabilities, whose voices should guide the redesign of financial services that affect their daily lives.

Accessible banking is not charity. It is sound financial inclusion practice. It is good consumer protection. It is also a legal and moral obligation.

I commend Project Enable Africa for producing this timely research. The next step is for the financial sector to respond with the seriousness the findings deserve.

Isaiah Owolabi

Financial Inclusion Expert

LOCKED OUT OF THE BANK

Locked Out of the Bank: Are Nigeria's Banks Working for Persons with Disabilities? provides evidence on the accessibility of banking services for persons with disabilities in Nigeria. The report documents barriers across bank branches, ATMs, mobile banking applications, USSD services, and customer support systems, and offers practical recommendations for banks, fintechs, regulators, and disability advocacy organisations.

How to reference

APA style: Project Enable Africa. (2026). Locked Out of the Bank: Are Nigeria's Banks Working for Persons with Disabilities?

ACKNOWLEDGEMENT

Project Enable Africa acknowledges, first and foremost, the persons with disabilities who contributed their lived experiences to this research. Their willingness to describe the barriers they face across bank branches, ATMs, mobile applications, USSD services, and customer support channels gives this publication its evidence, urgency, and public value.

We also recognise the disability community, advocacy organisations, and networks that supported outreach and helped ensure that the voices reflected in the study were grounded in real experiences. The insights shared by respondents across 27 Nigerian states provide a clear view of the gap between formal account ownership and genuine financial inclusion.

We appreciate the Project Enable Africa research and programme team for designing, fielding, analysing, and presenting this work with a commitment to dignity, accessibility, and practical reform. This report is intended to support banks, fintechs, regulators, policymakers, and disability rights stakeholders in building financial services that persons with disabilities can use safely, independently, and with confidences

ABBREVIATIONS

ARIA: Accessible Rich Internet Applications

ATM: Automated Teller Machine

CAPTCHA: Completely Automated Public Turing test to tell Computers and Humans Apart

CBN: Central Bank of Nigeria

CRPD: Convention on the Rights of Persons with Disabilities

DAPDA: Discrimination Against Persons with Disabilities (Prohibition) Act 2018

OPD: Organisation of Persons with Disabilities

FCT: Federal Capital Territory (Abuja)

FG: Federal Government

ICT: Information and Communication Technologies

NCPWD: National Commission for Persons with Disabilities

OHCHR: Office of the United Nations High Commissioner for Human Rights

OTP: One-Time Passcode

PII: Personally Identifiable Information

PLWD: Persons Living with Disabilities

PWD / PWDs: Person with Disabilities / Persons with Disabilities

SDG: Sustainable Development Goals (SDG 10)

UN: United Nations

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

USSD: Unstructured Supplementary Service Data

W3C: World Wide Web Consortium

WCAG: Web Content Accessibility Guidelines

WHO: World Health Organization

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ABOUT PROJECT ENABLE AFRICA

Project Enable Africa (PEA) is a disability-inclusive development organisation working across Nigeria and West Africa. We bridge the gap between disability rights commitments and real-world implementation, helping governments, businesses, and service providers build systems that work for everyone.

Project Enable Africa has equipped over 15,000 persons with disabilities with employability, entrepreneurial, and ICT skills and connected them to economic opportunities in the formal and informal sectors in the last 12 years. We are a founding member of the Nigeria Business Disability Network, a private-sector-led network where we are providing technical support for disability inclusion in corporate policies and practices.

15,000+

persons with disabilities equipped with employability, entrepreneurial, and ICT skills and connected to economic opportunities in the formal and informal sectors in the last 12 years.

WHO WE ARE

At Project Enable Africa, we promote the rights, empowerment, and social inclusion of persons with disabilities. We are incorporated with the Nigerian government through the Corporate Affairs Commission. We envision an African continent that is socially inclusive for persons with disabilities to prosper.

OUR SERVICES

Disability Inclusion Audit & Advisory

End-to-end physical, digital, and attitudinal accessibility audits for banks, fintechs, government agencies, and corporates. We assess WCAG 2.2, CRPD, and the Disability Act 2018, and produce actionable remediation roadmaps with prioritised, costed recommendations.

Disability Inclusion Training

Customised training programmes for corporate and public sector organisations. We cover disability awareness, inclusive communication, legal obligations, and how to implement accessible service delivery for both front-line staff and senior leadership teams.

Disability Inclusion Market Research

Primary research on disability and financial inclusion, consumer access, and service quality, including studies like this report. We design, field, and analyse surveys and qualitative research that place disability at the centre and produce policy-ready, disaggregated data.

Inclusive Product & Service Design

We facilitate co-design processes that bring persons with disabilities into product and service development from the start, not as an afterthought. From banking apps to government portals to physical branch design, we help organisations build right the first time

OUR IMPACT

12+ years of experience in disability-inclusive practices

50+ corporate organisations supported

500+ professionals trained on disability inclusion

100+ Engaged in Products & Program Co-design)

PROGRAMME HIGHLIGHTS

PEA's work spans research, direct programme delivery, and policy engagement across Nigeria and the West African region.

Disability Inclusion Research

Annual research on state of disability inclusion across Nigeria, producing evidence used by National Commission for Persons with Disabilities (NCPWD), state disability agencies and civil society organisations to drive systemic change.

Corporate Accessibility Programmes

Partnering with Fast Moving Consumer Goods Companies, banks, fintechs, media organisations and corporates to audit accessibility, train staff, and redesign customer journeys so that persons with disabilities can be served with dignity.

Policy Advocacy & Engagement

Engaging regulators, legislators, and government agencies with evidence-based briefs and recommendations to strengthen disability rights frameworks and enforcement mechanisms.

Community Co-Design

Facilitating co-design processes that put persons with disabilities in the room when products, services, and policies are being designed and not consulted after the fact.

Engage us: Whether you are a bank reviewing your accessibility compliance, a regulator developing new standards, a fintech building your next product, or an organisation committed to meaningful disability inclusion. Project Enable Africa has the expertise, evidence, and community relationships to help you get there.

1 in 7

Nigerians lives with a disability [1]

That is over 25 million people. Every one of them is entitled to the same access to financial services as persons without disabilities; a right enshrined in the Nigeria Disability Act and the UN conventions on the right of persons with disabilities which Nigeria is a signatory.[2 3] And yet, as this report demonstrates, the banking system consistently fall short of this standard.

This report is based on 161 survey responses from individuals with disabilities across 27 Nigerian states. This primary research study documents the lived banking experiences of this group across branches, ATMs, mobile apps, and USSD services. The findings are clear, consistent, and urgent.

WHAT WE FOUND

PHYSICAL ACCESS IS THE MOST COMMON FAILURE MODE.

78% of respondents encounter at least one obstacle at bank branches, such as staircases, missing ramps, mantrap security doors that prevent wheelchairs, or counters too high to access while seated. Additionally, 63% experience barriers at ATMs. More than half (56%) face barriers at both locations simultaneously, leaving them without any accessible physical banking options.

DIGITAL BANKING HELPS, BUT NOT ENOUGH, AND NOT FOR EVERYONE.

92% of respondents use mobile banking apps, often because physical channels are inaccessible. However, 29% of those blocked at branches and ATMs have no accessible digital option either. Voice-call OTP delivery locks out deaf users. CAPTCHA locks out blind users. Apps that crash with screen readers lock out visually impaired users.

WHEN SYSTEMS FAIL, PEOPLE ARE PUSHED INTO RISKY WORKAROUNDS.

38% of respondents depend on others, family members, bank guards, or strangers to carry out their banking transactions regularly or often. 50% have shared sensitive financial details, including PINs, with helpers. 39% say this has put them at risk of fraud or theft.[4] This is not a personal choice. It is the direct consequence of inaccessible infrastructure.

QUEUE PRIORITY, A LEGAL RIGHT SINCE 2018, IS ALMOST UNIVERSALLY IGNORED.

14% of respondents say they are always given queue priority in bank branches, while 19% say they are never given it. This research confirms that branches which ignore queue priority also have significantly higher rates of staff discrimination and longer wait times.

MULTI-BANKING DOES NOT SOLVE ACCESSIBILITY

83% of respondents hold accounts at two or more banks, but multi-bank users face the same barrier rates as single-account holders. Respondents are spreading transactions across providers because no single institution offers a reliably accessible service.

1 World Bank (2020). Disability Inclusion in Nigeria: A Rapid Assessment. World Bank Open Knowledge. Estimates approximately 15% of Nigeria's population lives with a disability.
2 Federal Republic of Nigeria (2018). Discrimination Against Persons with Disabilities (Prohibition) Act 2018. Official Gazette. Includes queue priority requirement (Section 6) and 5-year transitional period for physical accessibility.
3 United Nations (2006). Convention on the Rights of Persons with Disabilities (CRPD). Nigeria ratified the CRPD in 2007 and the Optional Protocol in 2010.
4 Puli, L., Layton, N., Bell, D., & Shahriar, A.Z. (2024). Financial inclusion for people with disability: A scoping review. Global Health Action, 17(1), 2342634. Identifies fraud, loss of privacy, and vulnerability as key harm pathways when banking systems are inaccessible.

WHAT NEEDS TO CHANGE

Respondents were clear: 72.7% named staff disability awareness training as their top priority, ahead of ramps, app improvements, or ATM upgrades. The human dimension of this problem is the most urgent and the most fixable in short term.

Banks

must implement queue priority now (already required by law), invest in staff training, retrofit high-barrier branches starting outside Lagos, and achieve WCAG 2.2 compliance for all mobile apps.

Regulators

(CBN and NCPWD) must mandate digital accessibility standards with enforceable penalties, publish independent accessibility audits, and ensure persons with disabilities have formal representation in policy bodies.

Fintechs

must introduce voice-call OTP with accessible alternatives, build Nigerian language interfaces, and test every release with users with disabilities and screen reader technology.

WHY THIS MATTERS NOW

Nigeria has set a target of achieving 95% financial inclusion[5]. However, despite advancements in mobile banking and digital platforms, persons with disabilities (PWDs) continue to face significant barriers, highlighting a broader issue of systemic marginalisation. While Nigeria's banking sector is rapidly digitalising. Every new system deployed without accessibility features risks excluding users with disabilities for years. The cost of retrofitting accessibility is estimated to be 10 to 100 times higher than designing it in from the start.[6] The 161 people in this survey rely on paper banking. In reality, most cannot bank safely, independently, or with dignity. This gap is what this report urges banks, regulators, and technology developers to address. Achieving the country's financial inclusion target will be impossible without integrating persons with disabilities into the financial system.

Nigeria has set a target of achieving 95% financial inclusion

5 The Central Bank of Nigeria (CBN): https://www.cbn.gov.ng/Out/2019/CCD/Q2%202019%20Financial%20Inclusion%20Newsletter_Final_08.08.19.pdf
6 Ekwegh, U. (2019). What businesses need to know and prepare for: Discrimination Against Persons with Disabilities (Prohibition) Act 2018. BusinessDay. Notes that the 5-year transition for retrofitting physical structures expired in 2023.

What does it feel like to walk into a bank and be unable to reach the counter? To join a queue that was never designed for someone using a wheelchair? To hand your PIN to a stranger because the ATM has no voice guidance? To miss a payment because your banking app crashes every time you try to use it with a screen reader?

For millions of Nigerians with disabilities, this is not a hypothetical. It is a daily reality.

Nigeria has over 25 million people with some form of disability[7] the population of Ghana. They have legal rights. Nigeria ratified the UN Convention on the Rights of Persons with Disabilities in 2007.[8] The Discrimination Against Persons with Disabilities (Prohibition) Act was signed into law in 2018.[9] On paper, the framework is there. In practice, as this report shows, it is barely being implemented.

This report focuses on evidence rather than blame. We interviewed 161 people with disabilities across 27 states and compiled their responses into the first structured, data-backed overview of what banking with a disability truly entails in Nigeria today.

WHO IS THIS REPORT FOR?

- **Banks and fintechs:** Understand exactly where your services fail customers with disabilities and recommendations on what to do about it.
- **CBN and NCPWD:** Use this evidence to strengthen standards, accessibility compliance, and accountability.
- **Persons with disabilities and advocacy organisations:** This is your data. Use it to demand systemic change.
- **Everyone else:** One in seven Nigerians lives with a disability.[10] This is not a niche issue.

RESEARCH OBJECTIVES

To understand how persons with disabilities experience banking in Nigeria and use the findings to recommend practical changes that make banking more accessible, safe, private, and independent.

Identify key barriers persons with disabilities face when using bank branches, ATMs, mobile banking, and USSD services in Nigeria.

OBJECTIVES

Examine how banking services affect users' experience, including staff support, communication, privacy, safety, dignity, independence, and reliance on others.

Recommend practical actions for banks, fintechs, the CBN, NCPWD, and disability organisations to improve accessible banking in Nigeria.

7 World Bank (2020). Disability Inclusion in Nigeria: A Rapid Assessment. World Bank Open Knowledge. Estimates approximately 15% of Nigeria's population, or over 25 million people, live with a disability.
8 Office of the United Nations High Commissioner for Human Rights. (n.d.). Ratification status for Nigeria (CRPD and CRPD-OP). Retrieved March 4, 2026, from https://tbinternet.ohchr.org/_layouts/TreatyBodyExternal/Treaty.aspx?CountryID=127&Lang=EN. Nigeria ratified the CRPD in 2007 and the Optional Protocol in 2010.
9 Federal Republic of Nigeria (2018). Discrimination Against Persons with Disabilities (Prohibition) Act, 2018. United Nations. https://www.un.org/development/desa/disabilities/wp-content/uploads/sites/15/2019/11/Nigeria_Discrimination-Against-Persons-with-Disabilities-Prohibition-Act-2018.pdf
10 World Health Organization & World Bank (2011). World Report on Disability. WHO. Estimates over 1 billion people globally live with a disability.

ABOUT THE 161 PEOPLE BEHIND THIS DATA

Before presenting the findings, it is helpful to understand who we heard from. The chart below illustrates how the 161 respondents are distributed by disability type.

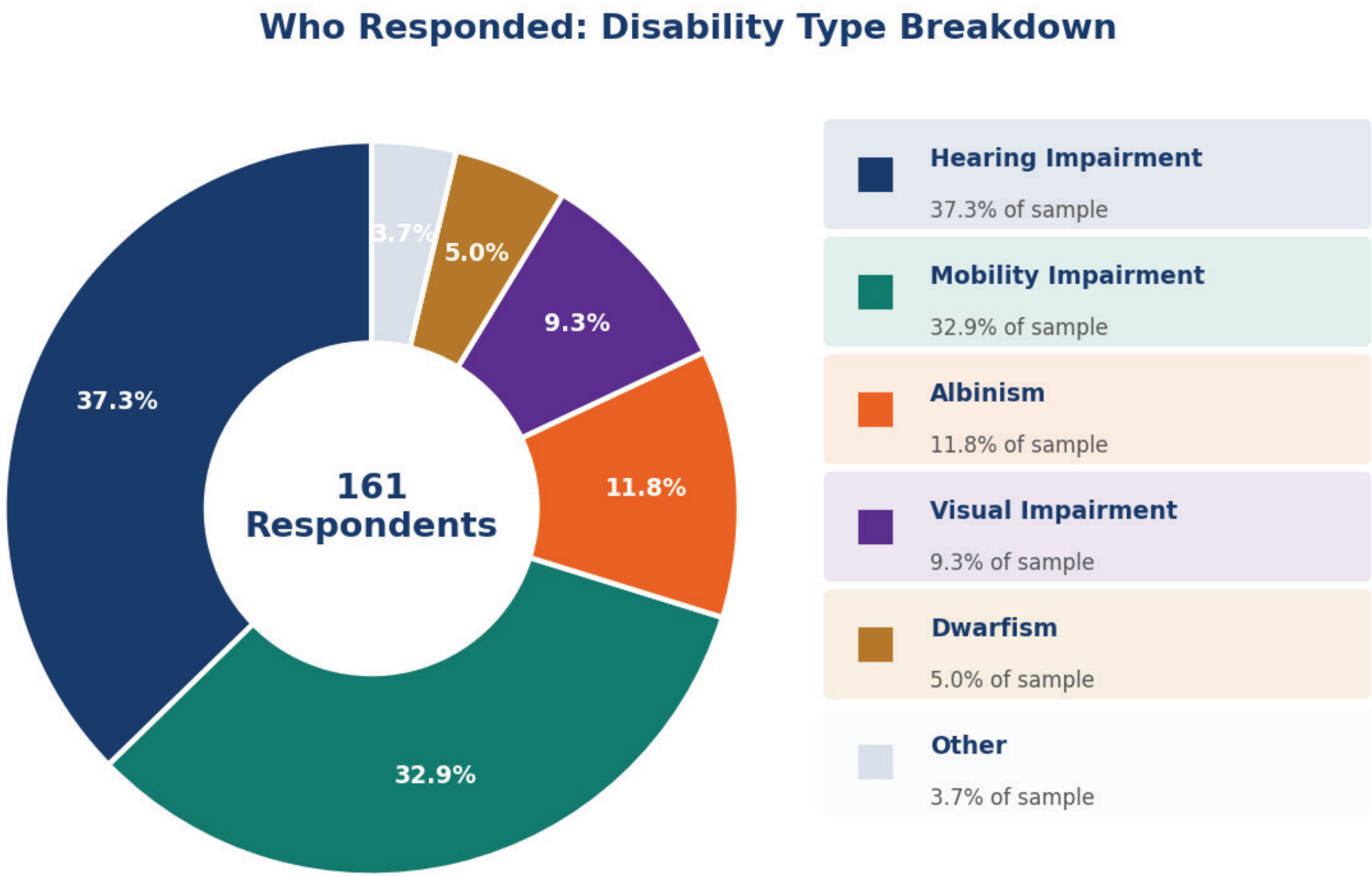


Figure 1: Survey respondents by disability type (N = 161).
Source: Project Enable Africa, 2026.

The two largest groups are people with hearing impairment (37%) and mobility impairment (33%). People with albinism (12%) and visual impairment (9%) represent smaller but significant groups Speech and cognitive impairments (1.2% each)

A note on geography

Responses came from 27 states in Nigeria. Findings skew toward urban Southern Nigeria. Barriers in Northern and rural Nigeria are likely more severe. Future survey rounds will aim for broader geographic coverage.

Reading the figures from left to right: 78% faced a barrier at bank branches; 63% faced an ATM barrier; 56% faced barriers at both branches and ATMs; 38% relied on others frequently or always; 50% shared sensitive financial information with a helper; only 14% consistently received queue priority; 29% of those blocked at both physical channels also lacked an accessible mobile banking app; and 72.7% identified staff disability-awareness training as the most important improvement.

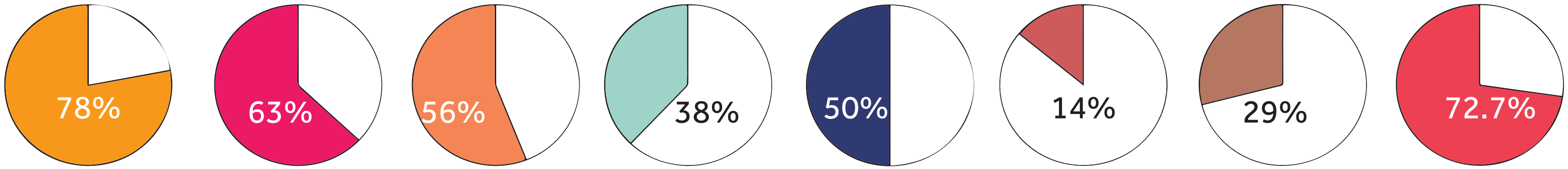


Figure 2: Eight key findings at a glance.
Source: Project Enable Africa Survey, 2026.

FINDING 1

ALMOST EVERY PERSON WITH A DISABILITY FACES A BARRIER AT THEIR BANK

78% of respondents face at least one physical barrier at bank branches. The most common barrier is long queues, followed by missing ramps, tall staircases, mantrap security doors, inaccessible restrooms, and counters too high from a wheelchair. Ramps, staircases, counters, and mantrap doors cluster together in the same buildings, typically older, multi-storey branches. Studies has shown that obstacles to physical has continue to hinder economic empowerment for PWDs in Nigeria.[11] One targeted retrofit per high-barrier branch addresses the full cluster.[12]

78%

Face branch barriers

The majority experience — not a minority one. Long queues (34.2%) are the single most-reported barrier but physical infrastructure failures are close behind.

26%

Say there are no ramps

For wheelchair users, the absence of a ramp at the entrance means the bank is not accessible at all, regardless of what happens inside.

11 Jikukka, L.J., Rawen, L.S., & Yise, K.S. (2022). Influence of bank access on persons with disabilities in Plateau North, Nigeria. AAU Journal of Business Educators, 2(1), 72–80. Documents physical, communication, and institutional barriers to banking access for persons with disabilities in Nigeria.
12 Bolaji, Y.O., Adebisi, R.O., & Oyundoyin, J.O. (2025). Accessibility to banking operational system for persons with disabilities in south-western Nigeria. Journal of New Perspectives in Educational Research.

FINDING 2

ATMS OFFER NO ESCAPE FOR BLIND USERS, BUT REAL RELIEF FOR DEAF USERS

63% of respondents face barriers at ATMs. For hearing impaired respondents, ATMs are generally more accessible than branches: branch barrier rate is 72%, while ATM barrier rate decreases to 45% because ATMs do not require verbal communication. For visually impaired users: barrier rate is 80% at both channels. Standard ATMs lack voice guidance, audio instructions, and tactile keypads. For mobility impaired users: barrier rate is 87% at branches and 74% at ATMs.

45%

ATM barrier rate for deaf users

27 points lower than their branch rate. ATMs remove the communication barrier that makes branches so difficult for deaf customers.

80%

ATM barrier rate for blind users

Identical to their branch rate. Without voice guidance or tactile keypads, ATMs offer no advantage whatsoever over a branch counte

FINDING 3

MORE THAN HALF ARE BLOCKED AT BOTH BRANCH AND ATM

56% face barriers at both branches and ATMs. More than half of the respondents have no working physical banking channel. For them, digital banking is not a convenience; it is the only option. And as Finding 6 shows, digital banking is not reliably accessible either.

The Exclusion Funnel: How People Get Pushed Out Of Banking

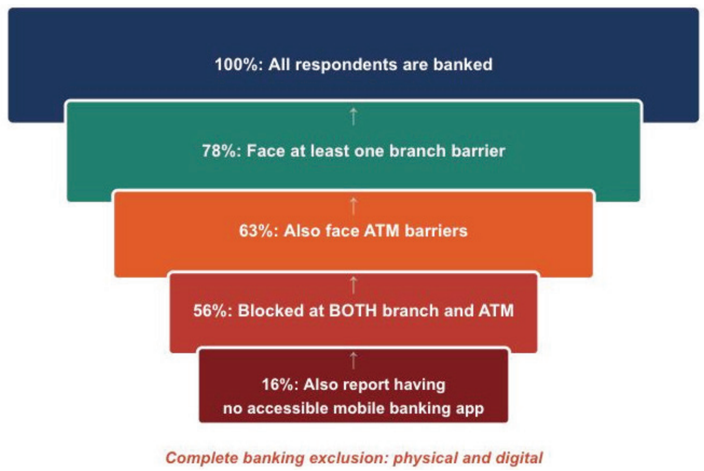


Figure 3: The banking exclusion funnel — how barriers stack to lock people out entirely. Source: Project Enable Africa, 2026.

FINDING 4

DEPENDENCY ON OTHERS IS A SAFETY AND DIGNITY CRISIS

38%

of respondents rely on others frequently or always. 50% have disclosed PINs or account numbers to helpers. 39% have been exposed to fraud or theft risk as a result. More than a quarter describes feelings of vulnerability and embarrassment. When services are inaccessible, people with disabilities may be compelled to rely on others for transactions, thereby heightening their vulnerability to theft, fraud, and privacy loss[13] . This is not a lifestyle choice; it is the direct consequence of inaccessible infrastructure and represents a failure of consumer protection on a large scale.

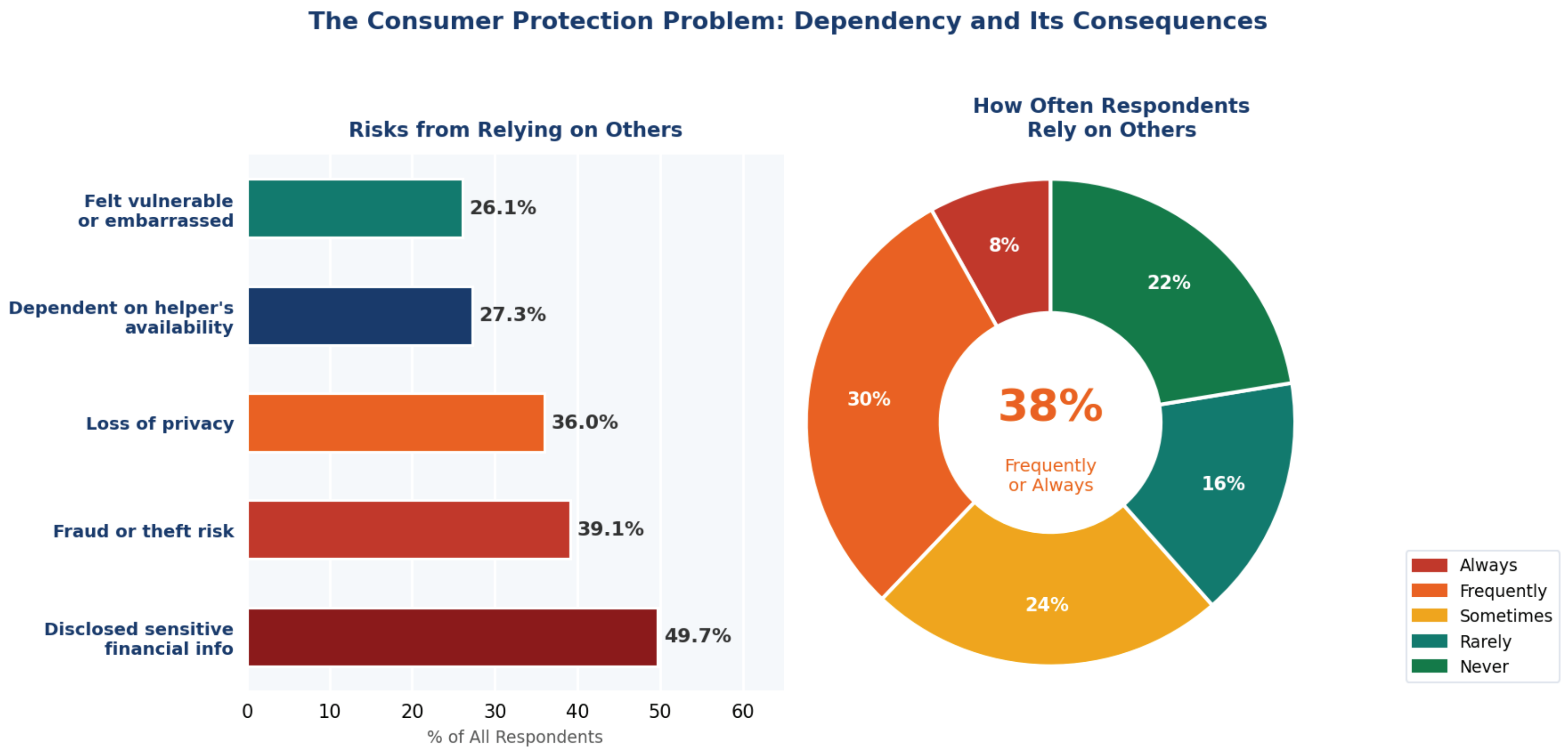


Figure 4: Left — Risks from relying on others. Right — Frequency of reliance by disability type. Source: Project Enable Africa, 2026.

13 Puli, L., Layton, N., Bell, D., & Shahriar, A.Z. (2024). Financial inclusion for people with disability: A scoping review. Global Health Action, 17(1), 2342634. Identifies dependency on others as a recurring outcome of inaccessible banking systems across low- and middle-income countries, including Nigeria.

FINDING 5

THE QUEUE LAW EXISTS. ALMOST NO ONE FOLLOWS IT.

Nigeria's Disability Act 2018 requires banks to give persons with disabilities first consideration in queues.[14] Only 13.7% of respondents consistently receive this. 19.3% never do. Branches that ignore queue priority also show discrimination rates nearly three times higher (39% vs 14%). This shows a wide that exist between laws and implementation.

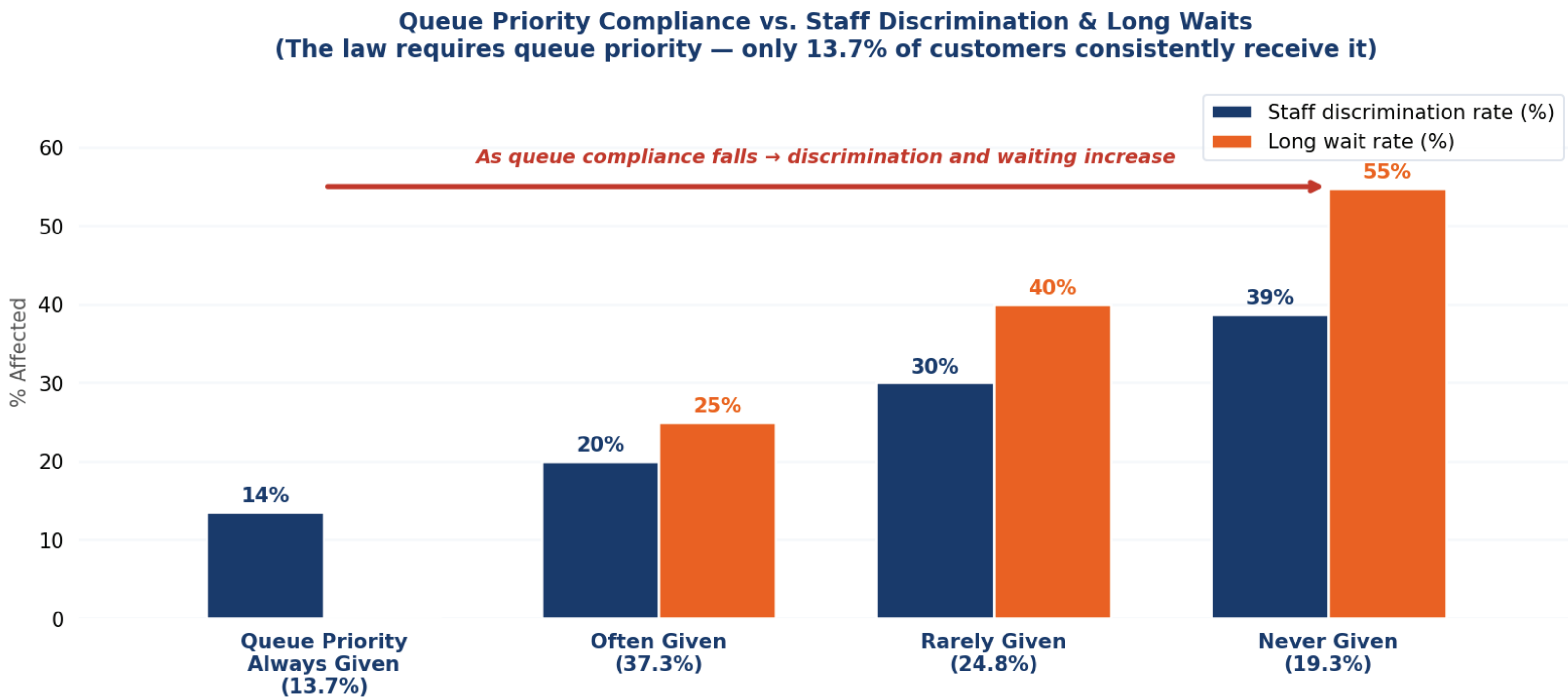


Figure 5: As queue priority compliance falls, discrimination and long wait times increase. Source: Project Enable Africa, 2026.

14 Federal Republic of Nigeria (2018). Discrimination Against Persons with Disabilities (Prohibition) Act 2018. Official Gazette. Section 6 requires that persons with disabilities be given first consideration in queues and, as much as possible, be attended to outside queues.

FINDING 6

DIGITAL BANKING HELPS SOME, FAILS OTHERS

92%

use mobile banking apps, because physical channels are blocked. But 29% of those blocked at branches and ATMs have no accessible mobile app either. The most common obstacle is visual verification, such as CAPTCHA and voice-call OTP. OPay is used by 47% of respondents, more than any traditional bank, because digital-first providers avoid physical barriers entirely.[15]

15%

Deaf users do not use mobile apps

The highest non-use rate — counter intuitive because apps are text-based. The reason: voice-call OTP delivery locks deaf users out at authentication.

47%

Use OPay — more than any bank

Routing by exclusion, not preference. When physical channels fail, people migrate to digital-first providers with no branches to be inaccessible.

FINDING 7

ULTI-BANKING IS A COPING STRATEGY, NOT A SOLUTION

82.6%

hold accounts at two or more banks. Statistical testing shows no difference in barrier rates between multi-bank and single-account holders (Mann-Whitney U, $p = 0.675$). Holding accounts at three or four institutions does not improve accessibility; it simply distributes the problem. Only sector-wide regulatory standards can move the whole industry together.

FINDING 8

PEOPLE KNOW EXACTLY WHAT WOULD HELP

72.7%

named staff disability awareness training as their highest priority, ahead of any physical or digital changes. This underscores a mandate for banks to prioritise their people first. The complete list of recommendations, along with responsible actors, is provided in Section 7.

15 Umeh, J. (2026, January 2). How failures in payment pillars, infrastructure, lock out people with disabilities. Vanguard News. https://www.vanguardngr.com/2026/01/how-failures-in-payment-pillars-infrastructure-lock-out-people-with-disabilities/ Documents how digital payment infrastructure failures compound physical banking exclusion for persons with disabilities.

SECTION 1:
GETTING INTO THE BANK

BRANCHES AND ATMS — WHAT THE DATA SHOWS

Nearly 8 in 10 respondents (78%) reported at least one barrier at bank branches.

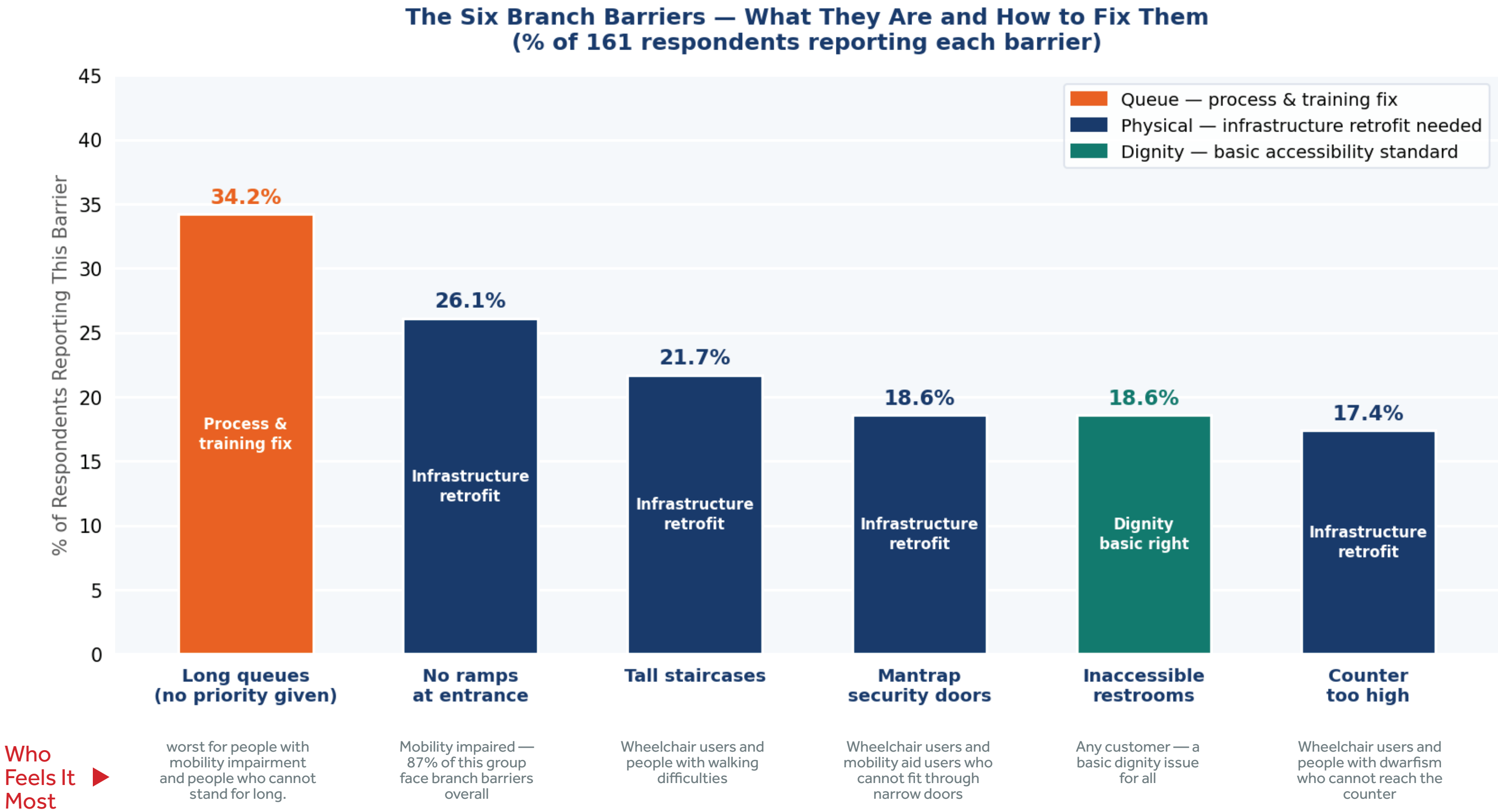


Figure 6: The six branch barriers — what they are, how common, and how to fix them.
Source: Project Enable Africa, 2026.

The cluster effect — why one retrofit fixes many problems

Ramps, staircases, counters, and mantrap doors strongly correlate; they appear in the same buildings.[16] Banks should identify high-barrier branches and schedule one comprehensive retrofit. Queues are a process and training failure that appears everywhere, in old buildings and new ones alike, and requires a different intervention.

16 Ofuani-Sokolo, A.I., & Monye, O. (2024). Engendering financial inclusion for persons with disabilities in Nigeria. African Disability Rights Yearbook, 12, 116–142. Documents the co-occurrence of physical accessibility barriers in Lagos bank branches, including ramps, counter heights, mantrap doors, and inaccessible staircases.

ATM BARRIERS — BY DISABILITY TYPE

For banks and ATM vendors: Voice guidance, tactile keypads, and adjustable screen heights are the features that determine whether blind and mobility-impaired customers can use an ATM independently. These can be specified in procurement contracts today.[17]

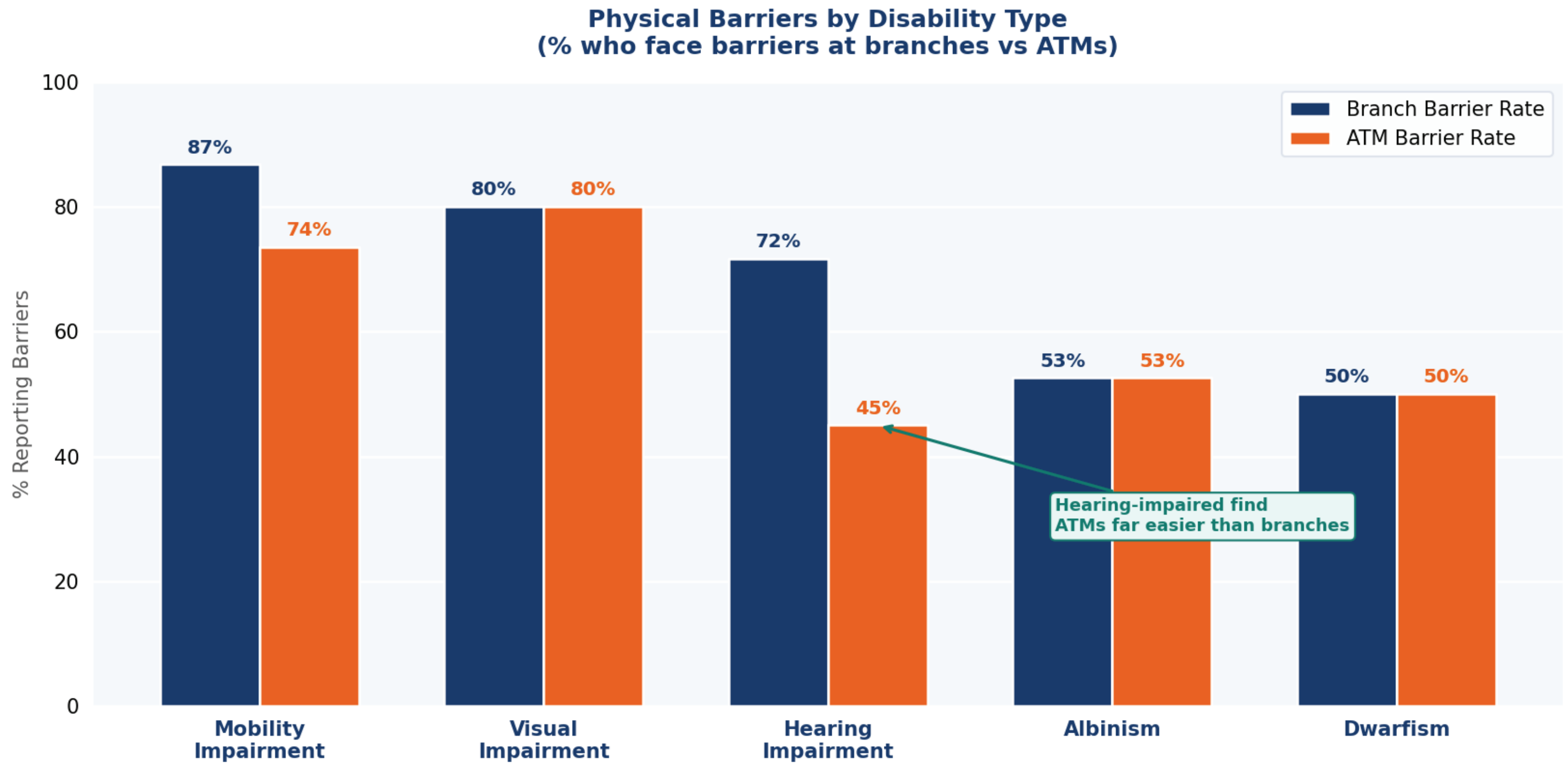


Figure 7: Branch vs ATM barrier rates by disability type.
Source: Project Enable Africa, 2026.

17 Inclusive News Network. (2025, October 17). Centre slams CBN's ATM accessibility guidelines as inadequate for the blind. inclusivenews.com.ng. Notes that specific accessibility features — including voice guidance and tactile keypads — can and should be mandated in procurement and regulatory guidelines.

SECTION 2:
THE HIDDEN HARM — DEPENDING ON OTHERS

WHEN THE SYSTEM FAILS YOU, YOU ASK FOR HELP — AT A COST

38% depend on others for banking regularly or constantly. This results from inaccessible design rather than personal choice, and it has serious, documented consequences.[18]

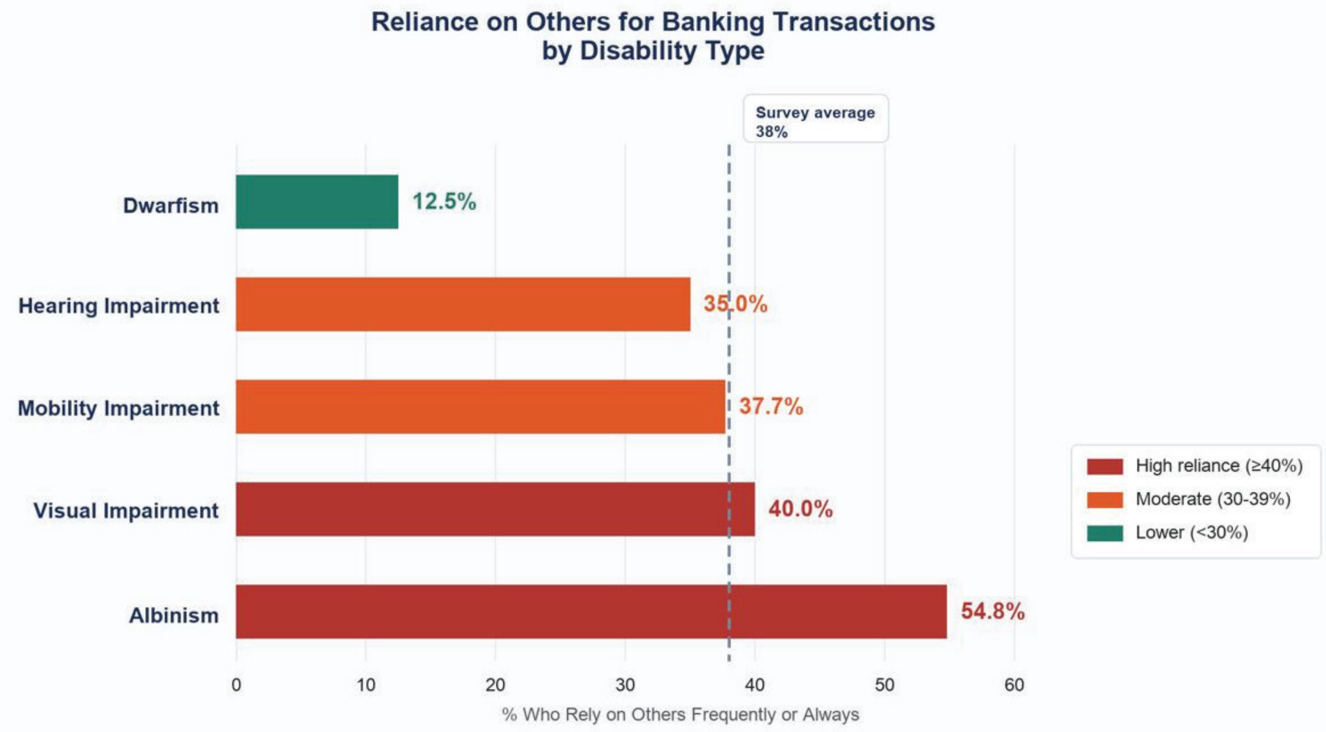


Figure 8: Reliance on others for banking transactions by disability type.
Source: Project Enable Africa, 2026.

Albinism — the counterintuitive finding. People with albinism have the highest reliance rate at 53%, above mobility and visual impairment. The reason is social stigma, anxiety in public spaces, and sun sensitivity that make open banking environments uncomfortable and sometimes unsafe.[19] These are environmental and attitudinal failures, not physical ones.

50% **have disclosed their PIN or account number to a helper**

When half of a group of customers are being forced to share financial credentials because the bank failed to provide accessible service, those banks are creating the conditions for fraud among the very people they are legally obligated to serve.[20]

18 Puli, L., Layton, N., Bell, D., & Shahriar, A.Z. (2024). Financial inclusion for people with disability: A scoping review. Global Health Action, 17(1), 2342634. Identifies fraud, loss of privacy, vulnerability, and constrained autonomy as key documented consequences of inaccessible banking that forces dependency on third parties.
19 Akpambang, E.M., & Akanle, K.B. (2024). Constraints to the rights and protection of persons with disabilities in Nigeria. UCC Law Journal, 4(1), 190-224. Documents attitudinal barriers and legal gaps in disability rights enforcement.
20 Ofuani-Sokolo, A.I., & Monye, O. (2024). Engendering financial inclusion for persons with disabilities in Nigeria. African Disability Rights Yearbook, 12, 116–142. Links banking inaccessibility to conditions for fraud and exploitation, noting that banks bear legal obligations to serve persons with disabilities under the DAPDA 2018.

SECTION 3:

PEOPLE, NOT JUST INFRASTRUCTURE

STAFF EXPERIENCE AND QUEUE COMPLIANCE

13.7% of respondents consistently receive queue priority, a legal requirement since 2018.[21] Branches that ignore this provision are the same branches where discrimination happens most.

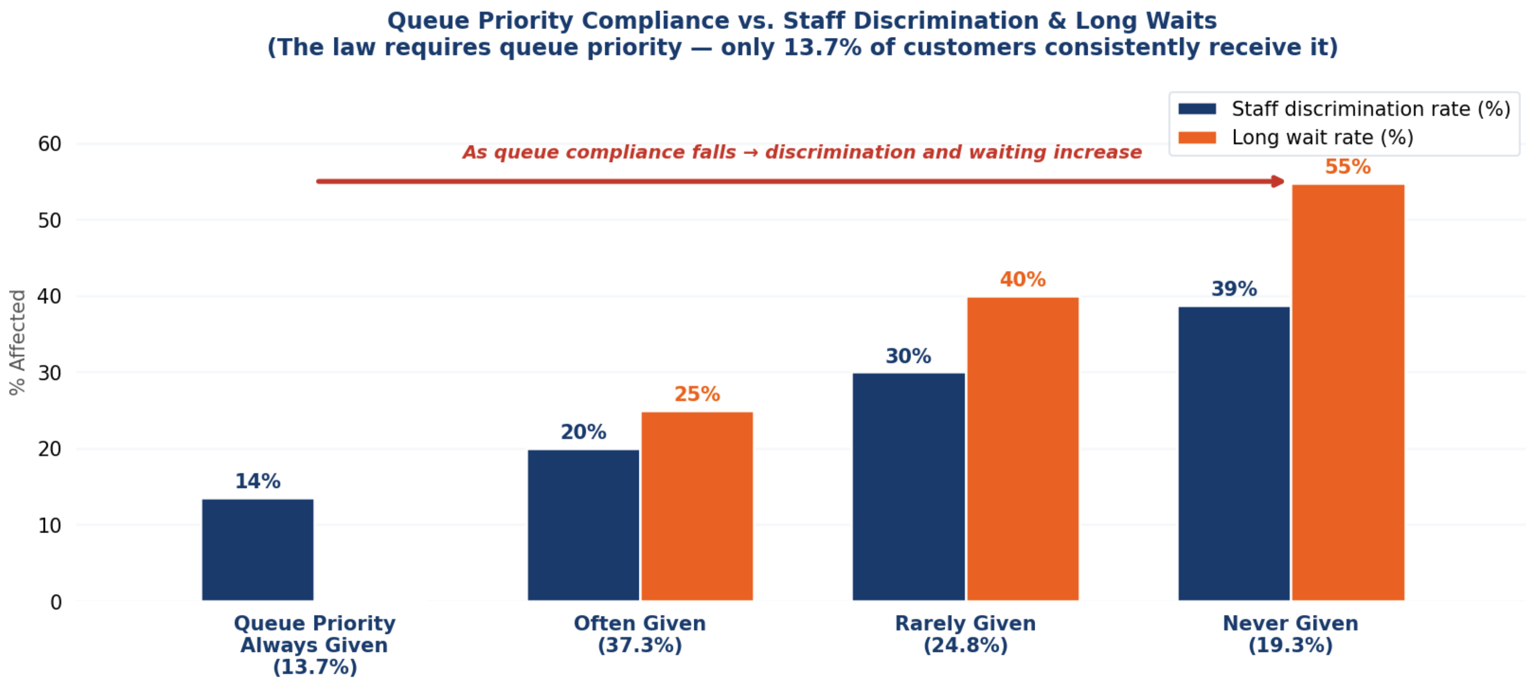


Figure 9: Queue compliance vs discrimination and wait times.
Source: Project Enable Africa, 2026.

Two failure types — two different fixes

The first cluster is attitudinal: discrimination, hostility, insensitivity, and speaking to the aide instead of the customer all appear together. This requires awareness training and accountability.[22]

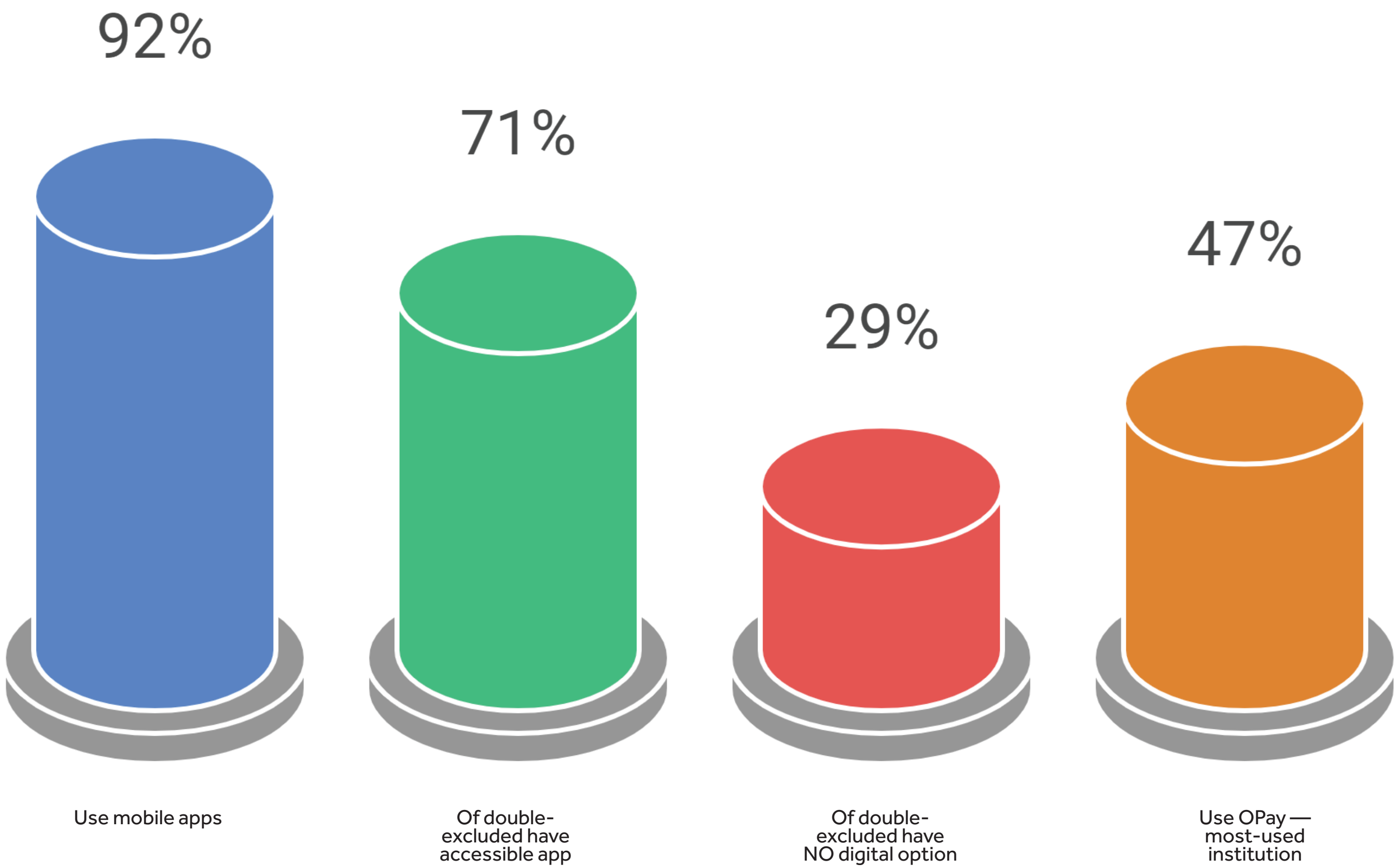
The second is operational: unhelpful but not hostile staff and long waits. This requires standard operating procedures and product knowledge training. These need different programmes.[23]

21 Federal Republic of Nigeria (2018). Discrimination Against Persons with Disabilities (Prohibition) Act 2018. Official Gazette. The queue priority obligation has been enforceable since the Act's commencement and applies to all public service providers, including banks.
22 Ukpe, P. (2023, November 20). Insensitive banking: How Nigerian banks embarrass persons with disabilities. The Whistler Newspaper. https://thewhistler.ng/insensitive-banking-how-nigerian-banks-embarrass-persons-with-disabilities/ Documents attitudinal failures by bank staff and the consequent need for accountability mechanisms and disability awareness training.
23 Anyanwu, S. (2025, June 14). National Commission for Persons with Disabilities organises capacity building training for security agencies on accessibility and anti-discrimination enforcement. Federal Ministry of Information and National Orientation.

SECTION 4:
DIGITAL BANKING — PROGRESS AND GAPS

MOBILE APPS, USSD, AND THE DIGITAL DIVIDE

92% use mobile banking apps. But 29% of those blocked everywhere else have no accessible mobile app either[24], leaving them with no banking channel at all.



24 Umeh, J. (2024, September 18). Trapped in digital dark: How Nigeria's financial system fails persons with disabilities. Vanguard News. Documents persons with disabilities who are left with no viable banking channel when both physical infrastructure and digital platforms are inaccessible.

WHY APPS STILL FAIL

Hard visual verification (CAPTCHA, voice OTP)

The anti-fraud step blocks blind users (CAPTCHA) and deaf users (voice OTP calls). Both can be replaced with accessible alternatives today.

App crashes with screen reader

Apps not tested with assistive technology often crash when screen readers activate. Blind users are locked out at login.

No ARIA labels or alt text

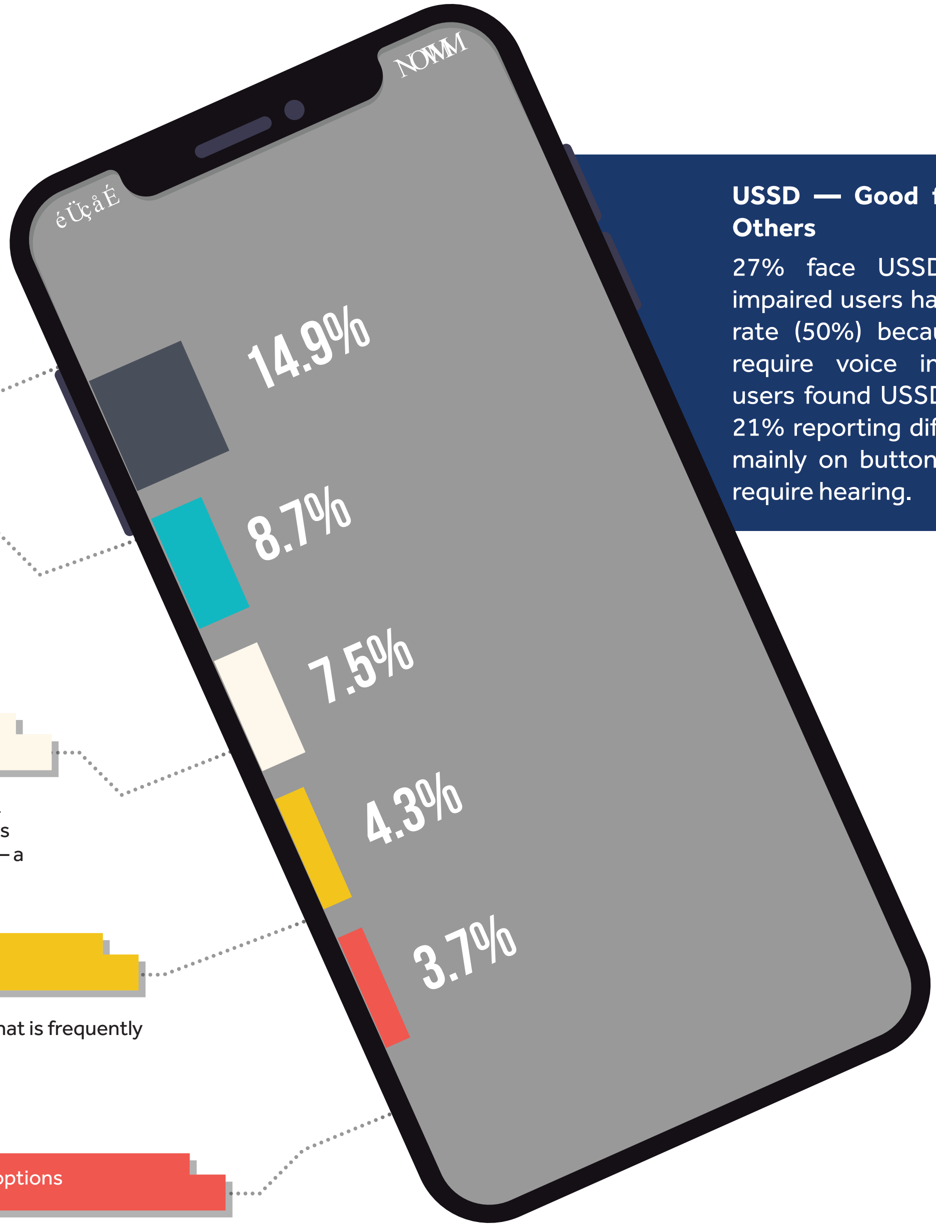
Without ARIA labels, screen readers cannot describe buttons or fields. A blind user hears ‘button’ with no indication of what it does — a straightforward coding fix.

Unlabelled buttons

A standard coding requirement that is frequently skipped in development.

No font size or contrast options

Low-vision users need larger text and higher contrast — basic settings most phones support, but many apps override.



USSD — Good for Some, Difficult for Others

27% face USSD difficulties. Speech-impaired users have the highest difficulty rate (50%) because some USSD flows require voice input. Hearing-impaired users found USSD more accessible, with 21% reporting difficulty, because it relies mainly on button presses and does not require hearing.

SECTION 5:
MULTI-BANKING — A SYMPTOM OF SYSTEMIC FAILURE

WHY 83% HOLD ACCOUNTS AT TWO OR MORE BANKS

82.6% hold accounts at two or more banks. Statistical testing confirms no difference in barrier rates between multi-bank and single-account holders (Mann-Whitney U, $p = 0.675$). Multi-banking is routing by exclusion: people combine institutions because no single one offers reliably accessible service. This is a sector wide failure requiring regulatory standards, not individual bank initiatives.

What multi-banking tells regulators

2 Voluntary initiatives do not work at scale. 83% multi banking proves that market forces alone are not creating accessible services.

1 No institution has solved this. If any bank had, customers would consolidate there — they would not have.

3 Only enforceable, sector wide standards can move the whole industry together.

SECTION 6:

THE RISK PROFILE

WHO IS MOST AT RISK

A composite risk score combining negative staff experience, low queue compliance, and high reliance on others shows 41% of respondents are in a high or very high-risk service situation.

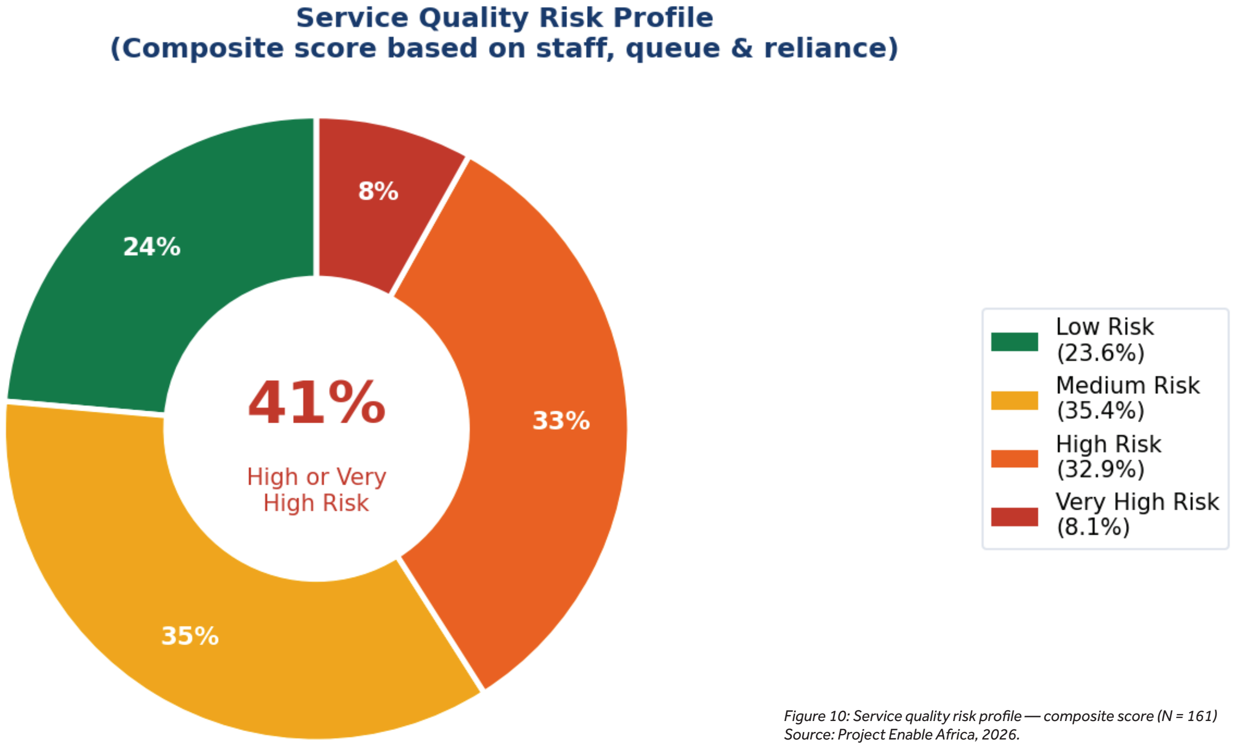


Figure 10: Service quality risk profile — composite score (N = 161)
Source: Project Enable Africa, 2026.

Risk Level	Score	People	% of Sample	What This Means in Practice
Low risk	0/3	38	23.6%	No negative staff, no queue failure, banks independently
Medium risk	1/3	57	35.4%	One system failing e.g. poor staff attitude but manages queue
High risk	2/3	53	32.9%	Two failures simultaneously e.g. discrimination and high reliance on others
Very high risk	3/3	13	8.1%	All three failures present at once , most marginalised customers in this survey

SECTION 7:
WHAT NEEDS TO CHANGE

RECOMMENDATIONS — WHO NEEDS TO DO WHAT

These recommendations come directly from what 161 respondents said when asked what would help most. They are mapped to the actors with the power and responsibility to deliver each change.

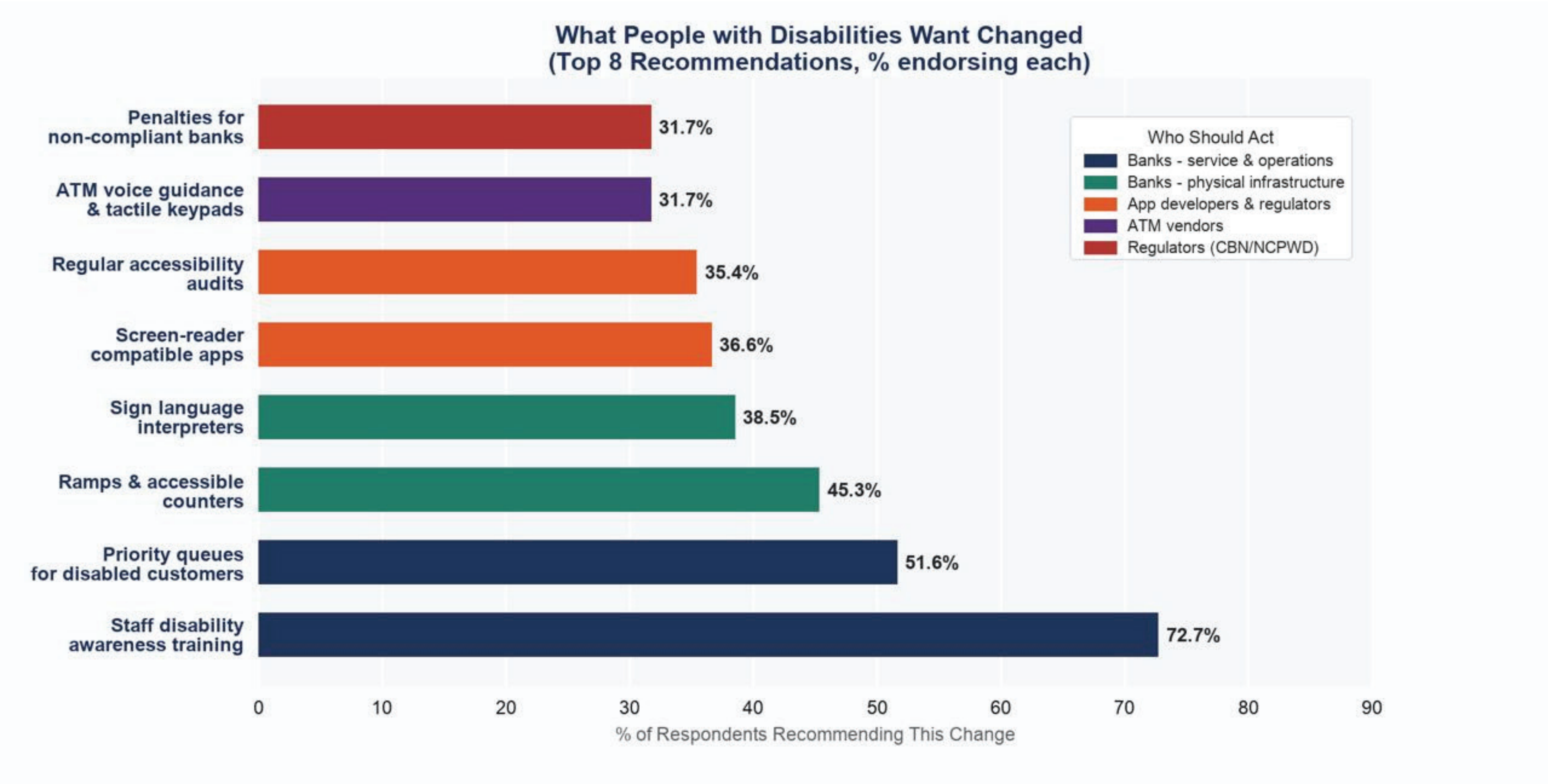


Figure 11: Top recommendations endorsed by respondents, coloured by responsible actor (N = 161).

Source: Project Enable Africa, 2026.

For Banks — Immediate Actions

Train every customer facing staff member on disability awareness (72.7% endorse this).

Cover: queue priority implementation, how to assist different disability types, and what never to do, including speaking to a companion instead of the customer.

Implement queue priority this week.

Already required by law. Requires only a branch procedure and manager accountability. No capital budget.

Audit and retrofit the worst branches, starting outside Lagos.

Ramps, counters, and door replacements cluster together one targeted retrofit per high-barrier branch, addressing the full cluster.

Provide sign language interpretation at branches, at minimum via remote video interpretation on a tablet.

Achieve WCAG 2.2 AA compliance for all mobile apps.

Priority: replace voice-call OTP with SMS or authenticator alternatives; add ARIA labels to all interface elements; test every release with screen reader software.

Publish an annual Disability Access Action Plan covering branch retrofits, digital improvements, and staff training completion rates.

For CBN and NCPWD

CBN: Mandate WCAG 2.2 AA compliance for regulated financial institution apps and websites, with a published timeline and penalties.

NCPWD: Ensure OPDs have voting representation in financial inclusion working groups.

CBN and NCPWD: Commission independent accessibility audits of major banks' branches, ATMs, and digital channels every two years.

NCPWD: Use existing enforcement powers to investigate banks with documented accessibility non-compliance.

CBN: Create financial penalties for priority non-compliance.

For Fintechs and App Developers

Introduce voice-call OTP with other accessible alternatives (SMS, authenticator apps, biometrics) especially critical for deaf and hard-of-hearing users.

Build Nigerian language interfaces. English-only apps already exclude a large portion of the population; for low-literacy users with disabilities, local language is not a feature, it is access.

Hire persons with disabilities as testers and conduct accessibility testing before every release.

SECTION 8:

THE LAW — ACCESSIBLE BANKING IS NOT OPTIONAL

Law / Standard	What It Requires	Current Status in Nigeria
Disability Act 2018	Prohibits discrimination; requires priority queuing; required physical accessibility improvements within 5 years (deadline: January 2024).	Widely non compliant. No financial penalties issued for banking sector violations.
CRPD Article 12	Equal right to control your own finances and access credit, mortgages, and financial products.	Ratified 2007. No banking-specific implementation mechanism exists.
CRPD Article 9	Access to information, communications, and services provided by private actors on an equal basis.	No formal compliance monitoring for financial services.
WCAG 2.2 (W3C, 2023)	Digital accessibility should follow international standards, ensuring that interfaces are perceivable, operable, understandable, and reliable across different user needs.	No Nigerian law yet mandates this for banking apps or websites.
CBN Consumer Protection Framework	Banks must treat all customers fairly with dignity. Disability access is a consumer protection issue.	Disability-specific complaints are rarely escalated or published.

The compliance deadline has passed

The 5-year transitional period under the Disability Act 2018 expired in 2024.[25] Banks with missing ramps, inaccessible counters, and non compliant ATMs are not in a grace period. They are in breach. The only open question is when regulators will begin to enforce it.

25 Human Rights Watch. (2019, January 25). Nigeria passes disability rights law. hrw.org. https://www.hrw.org/news/2019/01/25/nigeria-passes-disability-rights-law Analyses the 5-year transitional period under the DAPDA 2018, designed to allow institutions time to achieve physical accessibility compliance; that period expired in 2023.

METHODOLOGY

HOW THIS RESEARCH WAS CONDUCTED

This study is the first primary research on banking accessibility for persons with disabilities in Nigeria, designed to be accessible, practical, and repeatable.

Design

Cross sectional online survey, structured questionnaire capturing a snapshot at a single point in time

Who was eligible

Nigerian residents, 18+, self-identified persons with disabilities, holding at least one Nigerian bank account

How they were reached

WhatsApp groups of disability organisations, social media, community and healthcare networks

Total responses

161 valid responses

Geographic reach

27 states + FCT. Lagos: 43%. South-West ~70%. North and South-East are underrepresented.

Disability groups

Hearing 37.3%, Mobility 32.9%, Albinism 11.8%, Visual 9.3%, Dwarfism 5.0%, Speech 1.2%, Cognitive 1.2%

Gender split

54% male, 46% female

Age range

Majority aged 25–44 (73%). Older adults and under-25s are underrepresented.

Statistical tests

Mann-Whitney U, Kruskal-Wallis H, Chi-square ($p = 0.008$ for queue-discrimination link), Phi correlation

Analysis tools

Python: pandas, NumPy, SciPy, matplotlib

Ethics

Anonymous, voluntary, no personal data collected, plain language instrument, screen reader tested

Limitations

- Urban Skew: 43% from Lagos. Barriers in Northern and rural Nigeria are likely more severe and underrepresented here.
- Digitally connected sample: Online recruitment likely understates challenges faced by the most digitally excluded people with disabilities.
- Self-reported: All findings reflect respondents' own experiences. No supply side data from banks or regulators was collected.
- Small sub-groups: Speech (n=2) and cognitive (n=2) impairment groups are too small for standalone conclusions.

This is a baseline study, the first in a planned annual series. The methodology is designed to be reproducible, so future rounds can track changes over time.

CONCLUSION

A SYSTEM THAT CAN BE FIXED — IF THOSE IN POWER CHOOSE TO FIX IT

78%

cannot access a bank branch without facing a barrier. More than half have no working physical banking channel

The findings of this report are clear.

Every person who participated in this survey has a bank account. By the most basic measure of financial inclusion, account ownership, this group is formally included. And yet 78% cannot access a bank branch without facing a barrier. More than half have no working physical banking channel at all. A third are in a high or very-high-risk service situation that combines discrimination, ignored legal obligations, and a fraud prone dependence on others. Fewer than 1 in 4 experience banking that is safe, independent, and dignified.

This gap between formal inclusion and genuine inclusion is not accidental. It results from specific, traceable decisions: branches built without ramps; apps launched without ARIA labels; ATMs installed without audio guidance; staff trained without disability awareness; laws passed without enforcement mechanisms; rights ratified without implementation plans. Each of these decisions can be reversed.

What the Data Confirms

The key finding is not just a statistic but the story behind it. 161 people with disabilities shared their experiences of where banking has failed them consistently, not just occasionally. They described entering branches through side doors due to the lack of a ramp at the front, handing their PINs to bank guards because the ATM had no voice guidance, and sitting outside the banking hall while a helper went in on their behalf because the security door wouldn't open for a wheelchair. They also downloaded four different banking apps to find one that worked with their screen reader.[26 27]

These are not edge cases. They are the lived reality of **25 million Nigerians with disabilities**[28], a group that is, according to every legal instrument Nigeria has signed, entitled to the same access to financial services as any other citizen.

The Business Case Is as Strong as the Rights Case

Accessible banking is intelligent service design. The same ramp that assists a wheelchair user also benefits a customer with a pushchair, an elderly customer with a walking frame, and a delivery worker with a trolley. The same screen reader compatibility that aids a blind user makes an app more resilient for all users. The same queue priority that the law mandates for persons with disabilities reduces wait times and complaint rates for everyone.[29]

26 DPI Info Hub. (2026, January 15). Left behind: How Nigeria's banks are failing persons with disabilities. dpi.africa. https://dpi.africa/left-behind-how-nigerias-banks-are-failing-persons-with-disabilities/ Documents specific experiences of persons with disabilities navigating inaccessible banking applications, including screen reader incompatibility.
27 Adebayo, T. (2024, September 19). Discrimination at Abuja bank sparks outrage. Independent Newspaper Nigeria. https://independent.ng/discrimination-at-abuja-bank-sparks-outrage/ Documents a specific incident of discrimination against a person with a disability at a Nigerian bank branch.
28 World Bank. (2020). Disability Inclusion in Nigeria: A Rapid Assessment. World Bank Open Knowledge. https://openknowledge.worldbank.org/entities/publication/0350928c-ea65-5ec8-b2c1-7a74fcfb1e08 Estimates over 25 million Nigerians live with a disability, making this one of the largest disability populations in sub-Saharan Africa.
29 World Health Organization & World Bank. (2011). World Report on Disability. WHO. https://www.who.int/publications/i/item/9789241564182 Documents how accessibility improvements designed for persons with disabilities

Banks that incorporate accessibility from the outset spend a fraction of what they would later spend on retrofitting it. The global estimate is that retrofitting accessibility costs 10 to 100 times more than designing for it from the start. Every new branch opened without a ramp, every app launched without ARIA labels, each represents a future liability: financial, reputational, and legal.[30]

72.7%

gave the same answer: **train your staff**

The public has spoken clearly

When 161 people with disabilities were asked the single most important change they wanted, 72.7% gave the same answer: train your staff. Not a capital programme. Not a technology procurement. Not a regulatory overhaul. A training commitment that every bank in Nigeria could begin rolling out this quarter, at a fraction of the cost of a single ATM machine upgrade.

That number is both a finding and a mandate. The people most affected have identified the solution they most want, most urgently. The only question is whether the institutions responsible will listen.

The 5-year deadline for physical accessibility compliance under Nigeria's Disability Act expired in 2024. Banks with inaccessible branches are not in a grace period, they are in breach of the law. The question is when regulators will begin to enforce it."

30 Akpambang, E.M., & Akanle, K.B. (2024). Constraints to the rights and protection of persons with disabilities in Nigeria. UCC Law Journal, 4(1), 190–224. https://doi.org/10.47963/uccljv4i1.1551 Analyses the financial, reputational, and legal liabilities that accumulate for institutions failing to meet disability accessibility obligations under Nigerian law.

A CALL TO ACTION

To Banks

Start with training. Set a date. Name a person who is accountable. Publish your progress. Retrofit your worst branches. Fix your apps. Every step you take immediately reduces harm for real customers today.

To Regulators

The legal framework exists. The enforcement tools exist. What is missing is political will. Mandate WCAG compliance. Publish audit results. Issue fines for queue violations. Do this visibly and publicly, and the market will move.[31 32]

To fintechs

You are already where excluded customers go when traditional banking fails them. Build inclusive products, not as an afterthought, but as a founding principle. Be the institution that people choose, not just the one they end up with.[33]

To persons with disabilities and advocacy organisations

This data is yours. Use it in every conversation with every bank, regulator, and policymaker. Demand timelines. Demand names. Demand accountability.

Nigeria is building its digital financial infrastructure in real time. The choices made now about ramps, screen readers, queue procedures, and OTP delivery will shape who this system serves for the next twenty years. This report is a call to make those choices deliberately, with full awareness of who is currently being left out, and with the commitment to bring them in.[34]

> **Accessible banking is not a favour. It is a right.**
> And in Nigeria today, it is a right that is being routinely denied.
> That has to change.

31 Inclusion Magazine. (2024, September 24). FG threatens sanctions on banks violating accessibility laws for persons with disabilities. inclusion.com.ng. https://inclusion.com.ng/fg-threatens-sanctions-on-banks-violating-accessibility-laws-for-persons-with-disabilities/ Reports government signalling of enforcement action against non-compliant banks — evidence that public regulatory pressure accelerates institutional response.

32 Central Bank of Nigeria. (n.d.). Financial Inclusion. cbn.gov.ng. https://www.cbn.gov.ng/dfd/Financialinclusion.html The CBN Financial Inclusion Secretariat's mandate includes disability-inclusive regulation, giving the CBN direct authority to mandate and enforce accessible banking.

33 Imandojemu, K., Akinlosotu, N.T., & Odigie, J.N. (2018). Financial inclusion and people living with disabilities (PLWDs) in Nigeria: A disaggregated analysis. CBN Bullion, 42(4), Article 6. https://dc.cbn.gov.ng/bullion/vol42/iss4/6/ Documents how PWDs distribute accounts across institutions in search of accessible service — a pattern that would consolidate if any single provider offered reliably accessible banking.

34 United Nations. (2006). Convention on the Rights of Persons with Disabilities [Treaty]. https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf The CRPD establishes the international legal framework within which Nigeria's financial sector is obligated to operate, including the right of persons with disabilities to access financial services on an equal basis with others.

HOW WE CAN HELP YOUR ORGANISATION

Disability Inclusion Audit & Advisory

Physical, digital, and attitudinal accessibility audits against WCAG 2.2, CRPD, and the Disability Act 2018. Actionable remediation roadmaps with prioritised, costed recommendations.

Disability Inclusion Training

Customised programmes for corporate and public sector organisations — from front-line staff awareness to leadership strategy on disability inclusion and legal obligations.

Disability Inclusion Market Research

Primary research on disability and financial inclusion, consumer access, and service quality. We design, field, and analyse surveys that put disability at the centre and produce policy-ready, disaggregated data.

Inclusive Product & Service Design

Co-design processes that bring persons with disabilities into product and service development from the start — banking apps, government portals, physical branch design, and more.

GLOSSARY & TECHNICAL TERMS

Agent Banking: Providing financial services outside of traditional bank branches through third-party agents.

Albinism: A genetic condition causing a lack of melanin/pigment in the skin, hair, and eyes, which often leads to visual impairment and high sun sensitivity.

ARIA (Accessible Rich Internet Applications): Technical accessibility markup used by software to interpret screen elements for users with disabilities.

Assistive Technologies: Hardware and software, such as screen readers or voice guidance, designed to assist individuals with disabilities in accessing digital systems.

ATM (Automated Teller Machine): Electronic banking outlets that allow customers to complete basic transactions without visiting a branch.

Cognitive Impairment: Disabilities affecting mental processes, including learning, memory, comprehension, and decision-making.

Disability-Disaggregated Data: Information collected and separated specifically by disability status and type to track equity and impact.

Dwarfism: A medical or genetic condition that results in short stature.

Fintech: Technology-driven financial services and digital payment platforms, for example OPay and Moniepoint.

Hearing Impairment: Partial or total inability to hear.

Kruskal-Wallis H Test: A non-parametric statistical test used to compare barrier/accessibility scores across multiple independent groups, for example age groups.

Mann-Whitney U Test: A non-parametric statistical test used to compare differences between two independent groups, for example Lagos vs. non-Lagos.

Mantrap Security Doors: Dual-door security entry systems commonly used in bank branches, which can create physical access barriers.

Mobility Impairment: Physical limitations affecting a person's ability to move, walk, or navigate physical infrastructure, for example stairs and high counters.

OTP (One-Time Passcode): A single-use temporary password sent via call or text for transaction verification.

Phi Correlation Analysis: A statistical technique used to measure the strength of association between binary variables, for example co-occurring barriers or risks.

Screen Reader: Software designed for visually impaired users that reads text and interface elements on a screen aloud.

Social Model of Disability: A framework viewing disability as created by institutional, environmental, and attitudinal barriers rather than individual bodily impairments.

Speech Impairment: Conditions affecting a person's ability to produce speech sounds or communicate verbally.

USSD (Unstructured Supplementary Service Data / Quick Code): GSM protocol-based mobile financial technology accessed via short code prompts without needing internet.

Visual Impairment: Partial or full vision loss that cannot be fully corrected with standard glasses or contact lenses.

Voice Guidance: Audio prompts built into ATMs or digital banking apps to assist visually impaired users.

WCAG (Web Content Accessibility Guidelines): Internationally recognised standards for making web and digital content accessible to people with disabilities.

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Banking Services Research

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