

Collecting Functional Disability Data in Financial Inclusion Cheat Sheet

A practical guide for Financial Service Providers (FSPs) using the Washington Group ShortSet (WGSS)

Financial service providers often want to understand which clients face functional barriers so they can improve access, reduce drop-off, and design inclusive services. The good news: you do not need medical data, diagnoses, or specialists. You need functional information, data that shows what prevents people from accessing and using financial services equally.

This guide outlines the safest, most practical, and globally accepted approach to collecting disability-related data in financial inclusion: the Washington Group Short Set (WGSS) and how to integrate it into operations and use it to remove barriers.

Financial service providers often want to understand which clients face functional barriers so they can improve access, but many do not know where to start. The good news: you do not need medical data, diagnoses, or specialists. What you need is functional information. Data that helps you understand what prevents people from accessing and using financial services equally.

How FSPs Can Provide Accessible and Inclusive Financial Services

Many clients face functional barriers that affect how they access and use financial services, whether through mobile apps, agents, group meetings, branches, call centres, or customer-support channels.

FSPs do not need medical information. Instead, they need functional data to understand:

- why some clients struggle with digital channels
- why drop-off, disbursement, repayment, or usage patterns differ
- why certain segments require more customer support
- how to design services that work for all clients

WGSS is the safest, simplest, globally recognised method for collecting this information.

1) Why WGSS works for FSPs

WGSS helps FSPs:

- Identify which clients experience barriers that affect service access
- Improve accessibility across channels (agents, digital platforms, call centres, branches)
- Strengthen consumer protection and client safeguards
- Inform product design and client-support strategies
- Enhance ESG and GEDSI reporting, particularly the Social dimension
- Reduce operational inefficiencies by addressing barriers early

WGSS requires:

- No medical assessments
- No diagnosis or specialist review
- No sensitive personal health data
- ✓ Simple functional questions
- ✓ Easy integration into onboarding, KYC, loan applications, surveys
- ✓ A globally validated methodology

WGSS is a good-enough baseline for FSPs beginning their disability-inclusive journey.

2) Using a Yes/No format for sensitive contexts

Many FSPs operate in communities where stigma is high, or disclosure feels risky. In these situations, a yes/no format is often preferred:

“Do you have difficulty seeing, even when wearing glasses?”

Yes / No

Benefits:

- Simple for low-literacy clients
- Easy for group lending, agent networks, or mobile onboarding
- Less intimidating for clients

The trade-off is reduced precision, but it is a strong starting point.

3) How FSPs can integrate WGSS into operations

A. Integrate into existing processes

- WGSS can be embedded into:
- Client onboarding (branch, field officers, agents, digital)
- Loan applications (individual, SME, group lending)
- KYC updates and periodic client reviews
- Digital-skills assessments
- Customer satisfaction surveys
- Group meeting attendance checks (for MFIs)

No new forms needed—just integrate the questions into what already exists.

B. Train staff to introduce the questions respectfully

Frontline staff, loan officers, field staff, call-centre agents, and digital agents should use scripts such as:

- *“These questions help us understand any barriers you might face when using our services.”*
- *“Your answers will not affect your eligibility, loan approval, or service access.”*
- *“Your information is confidential and only helps us improve our services.”*

Training should cover:

- respectful communication
- how to record responses accurately
- how to support clients who express a functional difficulty

C. Use functional data to improve accessibility

WGSS data should directly inform service improvement, such as:

- simplifying mobile-app navigation, forms, language, and verification steps
- enabling alternative authentication [PIN, biometric (*fingerprint, face, voice, or iris / the coloured ring of tissue in your eye*), One-Time Password (OTP), voice confirmation]

- improving agent-network accessibility and communication support
- adapting group lending meetings (*seating, timing, noise level*)
- offering support for clients who struggle with forms or digital literacy
- reducing physical barriers in branches or service points

The goal is to ensure clients can access, understand, and complete their financial transactions.

D. Protect privacy and dignity

FSPs should ensure:

- voluntary participation
- clear explanation of purpose
- strict data-access controls
- aggregated data use for analysis
- no negative consequences for clients

WGSS data must always be used to support clients, not exclude them.

4) Partner with Organisations of Persons with Disabilities (OPDs)

OPDs can strengthen FSP inclusion efforts through:

- staff awareness and sensitisation
- reviewing digital products and materials
- supporting community outreach
- advising on service accessibility
- co-designing inclusive lending and customer-support models

Partnerships help build trust and ensure cultural and contextual sensitivity.

5) Advancing beyond WGSS: inclusive practice for mature FSPs

As FSPs advance in their disability-inclusive journey, they can broaden their understanding of client needs beyond the functional domains captured by the WGSS. Many clients experience other types of impairments or differences that influence how they interact with financial services.

Neurodiversity, such as autism, ADHD, dyslexia, or dyspraxia, can affect how clients process information, navigate digital platforms, or interpret text-heavy forms. Recognising these differences helps FSPs design clearer communication, simpler digital experiences, and more intuitive user journeys.

There is also increasing awareness of psychosocial or mental health conditions, including depression, anxiety, bipolar disorder, or trauma-related experiences. These can influence how clients manage stress, cope with crowded or noisy service points, or follow complex procedures. Supportive customer service, flexible processes, and calm, low-pressure environments can significantly improve their experience.

Many chronic illnesses, such as diabetes, heart disease, chronic pain, or conditions that cause fatigue or cognitive fog, may affect stamina, mobility, or concentration. For these clients, barriers often arise from the physical effort required to travel to service points, wait in queues, or complete long forms. Offering remote support, shorter processes, or options for assisted service can reduce these challenges.

Some clients also experience sensory processing differences, including sensitivity to noise, light, crowds, or difficulty filtering background sounds. Busy branches, loud environments, or visually cluttered apps can be overwhelming. Providing quieter spaces, clear layouts, and simplified interfaces can greatly improve usability.

Additionally, other impairments such as visual or hearing disabilities, mobility limitations, intellectual disabilities, and age-related changes, strongly shape how clients access financial services. These highlight the importance of offering multiple ways to receive information, navigate services, authenticate identity, and request support.

By gradually incorporating these broader considerations, FSPs can develop a more holistic understanding of their clients' needs and create services that are genuinely inclusive, usable, and accessible for everyone. Importantly, any expansion of data collection or service adaptation should be undertaken carefully and in consultation with Organisations of Persons with Disabilities (OPDs) to ensure sensitivity, relevance, and privacy.

6) Implementation Steps

Integrate WGSS into Client Engagement

- *Include WGSS in onboarding forms, surveys, or digital platforms.*
- *Ensure questions are asked consistently across branches.*

Train Staff

- *Provide training on respectful and inclusive communication.*
- *Emphasize confidentiality and sensitivity.*

Use Data Strategically

- *Disaggregate client data by disability status.*
- *Monitor service usage, repayment rates, and satisfaction.*
- *Report on GEDSI indicators and progress.*

Use Case	Description
Inclusive Product Design	<i>Simplify forms and use plain language if many clients report communication difficulties.</i>
Accessibility Improvements	<i>Offer mobile banking or home visits if mobility challenges are common.</i>
Targeted Outreach	<i>Partner with Organisations of People with Disability (OPDs) to reach underrepresented groups, such as women with disability.</i>
Monitoring Equity	<i>Use WGSS data to identify gaps in service delivery or repayment rates.</i>
Setting GEDSI Targets	<i>Establish measurable goals (e.g., increase clients with disability by 15%) and track progress.</i>

Some Ethical Considerations:

- Ensure informed consent when collecting disability data.
- Protect client privacy and avoid stigmatisation.
- Use data to empower—not exclude—clients.

Case Study: KOMIDA – Advancing Disability-Inclusive Finance in Indonesia

KOMIDA (KSP Mitra Dhuafa) stands as Indonesia's largest women-focused cooperative, serving almost 900,000 low-income women entrepreneurs across 13 provinces. Among its members, about 27,700 are women with disability, a reflection of KOMIDA's deep commitment to inclusive financial services. Despite the growing availability of digital financial products, many women with disability—particularly those in rural areas—continue to face intersectional barriers. These include limited physical accessibility, low digital literacy, social stigma, and financial products that are not designed with their needs in mind. To address these challenges, KOMIDA adopted the Washington Group Short Set (WGSS)—a globally recognised tool for identifying functional difficulties. This enabled the organisation to better understand the lived experiences of clients with disability and tailor its services accordingly.

KOMIDA's inclusive approach is anchored in several key initiatives:

- **Inclusive Outreach:** *By conducting home-based transactions and engaging directly with communities, KOMIDA ensures that even the most remote and underserved clients are reached.*
- **Accessible Products:** *Loan offerings are designed to be inclusive, requiring minimal documentation, no collateral, and offering flexible repayment options.*
- **Data-Driven Inclusion:** *The cooperative collects impairment-disaggregated data to inform its strategy and monitor progress toward inclusion goals.*
- **Staff Capacity Building:** *Staff are trained to engage respectfully and effectively with clients with disability, fostering a culture of empathy and accessibility.*

Recognising the importance of digital inclusion, KOMIDA is now enhancing its digital mobile app to better serve members with disability. Planned improvements include a more accessible user interface, inclusive communication features, and expanded digital literacy support.

The impact of KOMIDA's inclusive finance model is evident. Thousands of women with disability have gained the ability to access financial services independently, start or grow microenterprises, and participate more actively in their communities.

Looking ahead, KOMIDA is committed to deepening its disability inclusion strategy. This includes scaling WGSS implementation, conducting physical accessibility audits, strengthening partnerships with Organisations of People with Disability (OPDs), and expanding staff training and digital innovation.

KOMIDA's journey demonstrates how inclusive finance can be both transformative and scalable—empowering women with disability to thrive economically and socially.

Case Study: Opportunity Bank of Uganda (OBUL) – Scaling Disability-Inclusive Finance in East Africa

Opportunity Bank of Uganda (OBUL) is a pioneering financial institution committed to advancing inclusive finance for women and people with disability (PWDs). With deep roots in serving women, OBUL has significantly expanded its reach to include over 30,000 clients with disability, up from just 200, through strategic partnerships and a bold commitment to inclusion.

In Uganda, many women and PWDs continue to face systemic barriers to accessing financial services. These include:

- Physical inaccessibility of banking infrastructure
- Limited awareness and outreach
- Social stigma and exclusion
- A lack of financial products tailored to diverse needs

To address these challenges, OBUL launched its flagship initiative, Mainstreaming finance for people with disability, embedding disability inclusion into its core strategy. This approach focuses on institutional change, staff empowerment, and client-centered design. OBUL's inclusive initiatives include:

- **Inclusive Infrastructure:** *OBUL has upgraded its branches with ramps, lowered counters, and sign language support to ensure physical and communication accessibility.*
- **Staff Training:** *Frontline staff are equipped with the skills and sensitivity needed to serve clients with diverse abilities.*
- **Data-Driven Strategy:** *The bank collects and analyses disaggregated data to monitor outreach, service equity, and inform continuous improvement.*
- **Community Engagement:** *OBUL actively engages local communities to raise awareness, build trust, and promote financial literacy among people with disability.*

Recognising the importance of digital inclusion, OBUL is also digitising its linkages with Village Savings and Loan Associations (VSLAs). This innovation is expanding access to financial services for clients with disability, particularly in remote and underserved areas.

At OBUL, inclusion is more than a principle, it is a practice. Through its inclusive finance model, OBUL has empowered thousands of people with disability to access essential financial services, including loans, savings, and training. The results speak volumes: repayment rates are notably higher among women and clients with disability, proving that inclusive finance is not only ethical, but it's effective. This success has attracted a new wave of impact investors who prioritize equity and social transformation.

To build on this momentum, OBUL is advancing its disability inclusion strategy with four key commitments:

- Branch-wide scaling of inclusive practices to ensure every client is served with dignity.
- Staff development to embed inclusive values and capabilities across the organization.

- Strategic partnerships with disability organizations to co-design and deliver better services.
- Digital innovation to reach remote and underserved clients more efficiently.

OBUL's journey is a testament to what's possible when finance meets inclusion and when inclusion is driven by purpose. It illustrates how financial institutions can lead systemic change, creating pathways for economic empowerment and dignity for people with disability across East Africa.