

# The UK Finance Accessible Cards Code of Practice

## Introduction

### The Code

UK Finance has developed an Accessible Cards Code of Practice ('the Code') that provides guidelines for accessible payment card design for flat printed cards. We believe the Code will mean that the UK will be the first country in the world to have national common accessibility design guidelines for flat printed payment cards. Those guidelines cover tactile features, colour contrast standards and type set legibility, aiding customers to use their cards in store, on the phone or online. Customers will be able to tell whether a card is a payment card and whether it is a debit card or a credit card and the card details on the back of the card will be much easier to read and understand.

The Code is voluntary and not legally binding. Firms may use the Code without being a member of UK Finance.

The Code has been developed in collaboration with payment industry stakeholders, RNIB (Royal National Institute of Blind People) and other accessibility experts, and consumer advocates.

### The Equality Act

The Equality Act 2010 is the main UK law prohibiting discrimination, harassment and victimisation on the basis of certain prohibited characteristics<sup>1</sup>. Its core purpose is to ensure fair treatment and equal access to a number of areas including services and consumer products. The Equality Act imposes a general duty on service providers to make reasonable adjustments where required so that a disabled person is not excluded from using goods and services. The duty to make reasonable adjustments is "anticipatory". This means that service providers are required to give consideration to and take action in relation to the barriers that disabled people may encounter when seeking to use a service. This is relevant because, as identified below, complying with

---

<sup>1</sup> In Northern Ireland the relevant law is The Disability Discrimination Act 1995 and the Disability Discrimination (Northern Ireland) Order 2006

the Code may assist a bank or card issuer in meeting their anticipatory duties in relation to the barriers customers may face in using payment cards.

The protected characteristic relevant to payment cards is disability. Visual impairment or blindness and cognitive and dexterity impairments are the main (but not all) disabilities relevant to a person's use of a payment card.

The minimum requirements set out in the Code are designed to ensure that as many disabled people as possible will have access to payment cards that are inclusive to them and meet their needs. It is also designed to help issuers meet their "reasonable adjustments" obligations under the Equality Act. The additional best practice aspects of the Code will reach more people who need their bank or card issuer to provide additional reasonable adjustments. However, it is recognised that some individuals may have additional needs or require additional reasonable adjustments that are not set out in the Code. In such cases those individuals should raise their needs with the relevant bank or card issuer in order that if required under the Equality Act, the issuer can make appropriate additional reasonable adjustments.

## **Beyond the UK**

The Code was developed with the engagement of two major international card payment networks (Mastercard and Visa) and involved many months of detailed discussions amongst large UK issuers and leading accessibility experts. Given the industry partnerships and the likely outcomes, we believe that the Code, or key design elements within it, represent a readily available blueprint for use beyond the UK, facilitating accessibility benefits to millions of people worldwide. To that end:

- ▶ UK Finance encourages organisations and issuers outside of the UK, to adopt similar codes (or elements of the Code) within national or regional locations and permits any such organisation or issuer to refer to the Code in their public materials; and
- ▶ as set out in the Code, UK Finance does not require any approval, fees or licensing arrangements for any organisation in a country or region that wishes to adopt an equivalent or substantially similar local code.

## **Card Issuing**

Card issuing is a complex business and it takes many months to change how cards look and feel. Issuers procure cards from manufacturers in large quantities, ensuring they never run out. Some issuers provide accessible cards to all of their customers but most issue general cards and separately issue accessible cards. Many issuers have stocks of accessible cards, designed differently to the specifications set out in the Code. UK Finance supports sustainability and does not wish to see plastic cards being wasted. It is acknowledged that after adopting the Code, issuers may also choose to run down and issue their stock of existing accessible cards, before issuing accessible

cards that follow the Code. Accessible cards that have been issued will remain in circulation. Customers should expect that the implementation of the Code (and receipt of accessible cards) will vary from issuer to issuer.

### **Effective timelines and target implementation**

The Code is effective upon its public launch on the UK Finance website. By confirming to UK Finance that a Firm is choosing to use the Code, that Firm shall endeavour to commence issuing (or if not an issuer, supporting the issuing of) accessible cards in accordance with the Code as soon as possible, taking into account lead times for card design, procurement, manufacture and its public-facing collateral. This means that Firms should preferably commence their detailed project planning as early as possible after the launch of the Code.

A number of issuers who are the initial participants to this Code have informed UK Finance that they will be issuing cards under this Code by 30 June 2027 and are encouraged to be issuing such cards by the end of 2026.

An issuer that is not an initial participant to this Code may notify UK Finance at any time that it wishes to become a participant, provided that such notice states that such issuer will be issuing cards under this Code by the later of 30 June 2027 or within 12 months after the date of the notice.

### **Acknowledgements**

UK Finance wishes to acknowledge the collaboration of many stakeholders in developing this Code. Our members in particular have worked tirelessly for over a year. We are very grateful for the support of the card manufacturer Idemia, who produced many iterations of mock ups of proposed card designs, and to Nationwide for engaging them. We are fortunate to be able to partner with the RNIB and the British Dyslexia Association without whom the Code would not exist. We are extremely grateful for the engagement of Mastercard and VISA, who are the payment networks on which most UK credit and debit cards are issued in the UK. Additional thanks are due to Mastercard for developing their Mastercard Touch Card™ specification and enabling it to be incorporated in the Code. We also wish to acknowledge the support of HM Treasury and the Cabinet Office Disability Unit, who have warmly and publicly encouraged industry to develop the Code.

# Background

When conducting payments, consumers must be able to identify and differentiate their cards, orient cards into terminals and read their card details.

Over the last ten years, the UK card industry has transitioned away from embossed payment cards to flat printed payment cards, helping advance consumer protection against fraud. However, embossing provided a tactile element and therefore provided a good level of accessibility for blind and partially sighted users.

The development of the Code embeds innovations for flat printed card design that seek to improve tactile and visual accessibility at the outset. The core tactile elements of the design are based on Mastercard's Touch Card™ feature (see Annex 3), which has set an industry benchmark for accessibility in card design. The visual elements are designed to help customers with a range of impairments, including one of many types of partial sight loss, dyslexia or cognitive capacity. The visual elements will also help those people that need reading glasses to read text. The visual elements have been created using a range of inputs, especially from the British Dyslexia Association (BDA) and the Royal National Institute of Blind People (RNIB).

## The UK Finance Accessible Cards Code of Practice

### Scope of the Code of Practice

In this document a “Firm” means any card issuer, card payment scheme or payment network, card manufacturer or any trade association or similar collective or member organisation. The scope of the Code is limited to flat printed payment cards.

Embossed cards are generally regarded as having good levels of accessibility and are not subject to the Code, but embossed card issuers may wish to consider any of the Code's relevant design principles and apply them to embossed cards (with no requirement to obtain permission from UK Finance).

The Code provides design specifications which Firms can follow to help ensure their cards meet accessibility guidelines from the RNIB and BDA. It is separated into two sections covering firstly, minimum requirements for accessibility and secondly, additional considerations which could be adopted for best practice.

This Code applies to physical debit and credit and a range of other cards such as prepaid, savings or cash/ATM cards, issued by banks, building societies, e-money and payment institutions and credit card providers.

Issuers may follow the Code for newly issued or replaced cards. Existing cards in issue that do not follow the Code may remain in issue until replaced. However, a customer that requests an accessible card should be given an accessible card as soon as reasonably practicable, but can only receive a Code compliant card when the issuer in question is ready to issue them. Issuers that do not have any accessible cards at the commencement date of this Code are strongly encouraged to implement the Code before the target implementation date mentioned above.

It is good practice for issuers to note on their accessibility pages of their websites that a customer may obtain an accessible card upon request.

Annex 1 sets out the Code's technical design requirements and additional considerations for best practice.

# Conditions for Using the Code of Practice

## **Voluntary**

This Code is voluntary and non-binding, but any Firm is deemed a 'participant' under the Code if it participates in, references, or makes use of this Code (whether in whole or in part). Participation in the Code by an issuer means that its accessible cards issued under this Code will follow the minimum specifications set out above.

Participation in the Code by a non-issuer Firm (including without limitation, manufacturers, card payment schemes or payment networks), means that such Firm references, permits use of the Code and/or the specifications in Annex 1 in connection with its activities, policies, standards or guidance relating to payment cards. For the avoidance of doubt, participation by a non-issuer Firm does not require that Firm to manufacture, implement, enforce, or otherwise directly apply the specifications in Annex 1 to any card product.

UK Finance will not undertake any verification or auditing of any Firm that states it is participating in the Code. Firms can self-attest their own compliance with the Code and Firms may publicly state they will participate in, reference or otherwise support the Code.

## **Publishing Participant List**

UK Finance may publish on its website a list of Firms that have told us they will participate in the Code and have consented to UK Finance so publishing. UK Finance may remove a Firms' entry from the website if it becomes aware that such Firm is materially incorrectly claiming its accessible cards are issued in conformance with the minimum requirements of the Code.

It is recognised that Firms may wish to use the Code but the timing or applicability to different business lines, subsidiaries and affiliates or card products may differ. Firms may indicate to UK Finance which business lines or products are initially using the Code and update that status periodically. UK Finance will place that status on its website next to the relevant issuer's entry.

## **References to the Code**

Any reference by a Firm to this Code in public materials should refer initially in each collateral item to the "UK Finance Accessible Cards Code of Practice" and ideally provide one footnote or hyperlink to the Code's landing page on the UK Finance website.

## **Payment Networks**

Statements of participation, public support or adoption by any payment scheme will not bind it or its operations to follow the Code or impose a requirement that its members must follow the Code. Any payment network may also use the Code in its

branding or accessibility guidelines or requirements globally, regionally or nationally. The Code does not affect any payment networks' approval rights and terms and conditions over factors such as branding, design and related intellectual property.

Mastercard supports the Code and has authorised UK Finance and Firms engaged in the use, design, manufacture, or issuance of bank, credit or payment cards to enable them to use the Mastercard Touch Card™ Specifications as part of those Firms' adoption of the Code. However, as a condition for the use of the Specifications, Firms must not make a reference to the Mastercard Touch Card™ sign or the MASTERCARD brand in their customer facing or marketing materials, unless the cards in question are Mastercard branded cards. Non-Mastercard issuers and Firms supporting non-Mastercard issuers may otherwise refer to the Mastercard Touch Card™ Specifications for technical identification purposes only, and only to the extent reasonably necessary.

### **No Intellectual Property**

Without prejudice to Mastercard's intellectual property rights in the Specifications and the Mastercard Touch Card™ trademark, by using the Code, each Firm confirms that it has no intellectual property rights in the Code.

### **Disclaimer and Legal**

The Code aims to complement, not replace, legal obligations under the Equality Act 2010 and relevant international accessibility standards. The Code recognises that issuers may decide to issue all cards in accordance with the Code, or issue only to customers with accessibility needs. UK Finance makes no representations that the Code meets the requirements of the Equality Act, the European Accessibility Act<sup>2</sup> (or any enacting EU member state law), or any other law, regulation or mandatory requirement in any jurisdiction. The issuance of the Code does not mean that cards issued not in accordance with the Code are deemed to not comply with any of the above mentioned requirements.

UK Finance disclaims all legal liability to the fullest extent of the law in respect of any participation in the Code by any Firm, any card issued by any card issuer or manufactured by any manufacturer or the use, non-use or misuse of the Code by any party, in connection directly or indirectly with the Code.

## **Version**

The Code will be reviewed annually in consultation with our members. This is version 1 of the Code.

---

<sup>2</sup> (EU) 2019/882

# Annex 1 – As a Minimum for Accessibility

A Firm may be considered as participating in the Code, if its cards issued under the Code follow the minimum specifications set out in this section.

The core design principle under the Code is for people to be able to differentiate a payment card from other (non-payment) cards. The minimum specifications under this Code are below and are either tactile or non-tactile specifications.

The tactile specifications:

- ▶ Notches based on a combination of the existing round notch and the Mastercard Touch Card™ Specification (see Annex 3) to identify the card type (between credit, debit and other cards), as follows:
  - Round notch for debit cards (consumer, business/corporate)
  - Square notch for credit cards (consumer, business/corporate credit card, business/corporate charge card)
  - Triangular notch for all other payment cards (consumer/business/corporate prepaid, ATM cards, savings cards etc)
- ▶ There is a limited exception to the above specifications. Cards that use alternative accessibility technologies (such as physical cards with haptic or biometric features) and cannot be manufactured with the notch system set out above, may be considered to be cards issued under this Code if such cards:
  - follow the non-tactile minimum specifications set out below; and
  - adopt alternative tactile features that clearly:
    - identify the card as a payment card
    - support correct orientation and
    - allow debit and credit cards to easily be distinguished (preferably by following the tactile dot identifiers listed below).
- ▶ Tactile dots or Braille are not mandatory if a notch is applied to a card. Tactile dots may be applied to indicate whether the card is a debit or credit card using only  $\text{⠠}$   $\text{⠡}$  for debit and  $\text{⠠}$   $\text{⠢}$  for credit and not any other dot formulation. Any dots used for any other purpose (such as signifying the card relates to a sole or joint account or a consumer or business account) should be designed so as not to be similar to these indicators. Specification level detail on braille and dots is set out in Annex 2.

## Non-tactile specifications :

- ▶ Minimum font size for crucial numerical information

- 4.5mm minimum for card number
- ▶ Minimum font size for other important information (capital letter size)
  - 3.5mm for security code, expiry date, account number, sort code
- ▶ Minimum font size for less crucial information (capital letter size)
  - 2.5mm for customer name
  - 2mm for UK phone number
- ▶ Font type of Sans Serif or similar and no italics
- ▶ Contrast background colour 4:5:1 as an absolute minimum for all the above text including type of card (i.e. Debit or Credit card, or type of account)
- ▶ Consistency across abbreviations as set out in Annex 4
- ▶ Text is non-reflective and on a matte part of the card
- ▶ Ensuring there is enough differentiation in design and colour between different cards of the same issuer (i.e. to make it easy to visually differentiate between different card types or accounts)
- ▶ All information relating to cards issued under the Code should be provided in an accessible format.

These specifications establish a minimum standard for accessibility under the Code, but organisations are encouraged to go further where possible. While the standard will benefit many individuals, we also recognise that it may not address every need.

## Additional Considerations for Best Practice

Firms can incorporate the following specifications to offer further support to vulnerable customers.

- ▶ Other elements that could be considered for the card design include:
  - Braille to identify issuer (e.g. two or three letters in braille) or a single or joint account, or the type of card if not credit or debit (e.g. a cash card or savings card that could be used at a cashpoint/ATM)
  - Matte finish of the card to prevent glare
  - Colour contrast of at least 7:1 for all information
  - A clear “Debit” or “Credit” written indication with a font size of at least 3.5mm (capital letter size)
  - Colour contrast of at least 4.5:1 for logos
  - Signature strips to stand out visually with good contrast
  - The inclusion of a printed triangle or arrow on the front of the card pointing to the side of the card housing the chip - therefore providing a visual direction of the correct side of the card to insert into the payment terminal or ATM

In addition, issuers may wish to consider providing the following aids to accessibility:

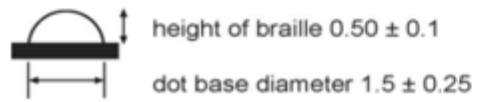
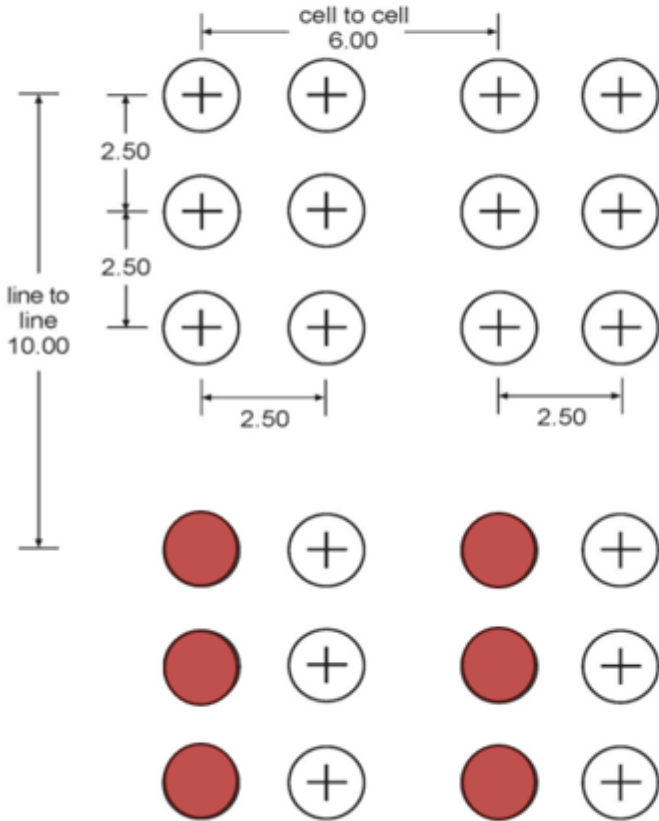
- ▶ Accessible card option accompanied by information on support needs and option to update communication preferences
- ▶ Personalisation for users (font size, colour, issuer identifiers, braille, tactile marking options)
- ▶ Digital issuers with no physical cards to consider alternative methods of accessibility (testing apps and website, respecting accessibility settings)

# Annex 2 – Braille Dot Specifications

## Debit card

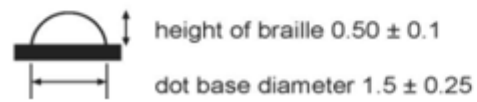
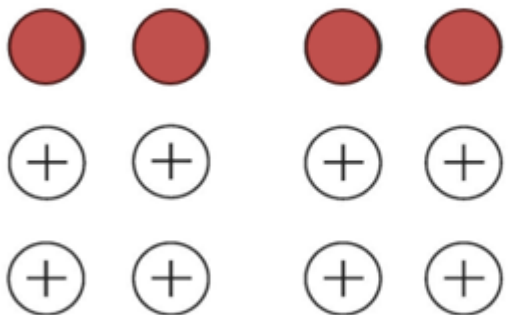
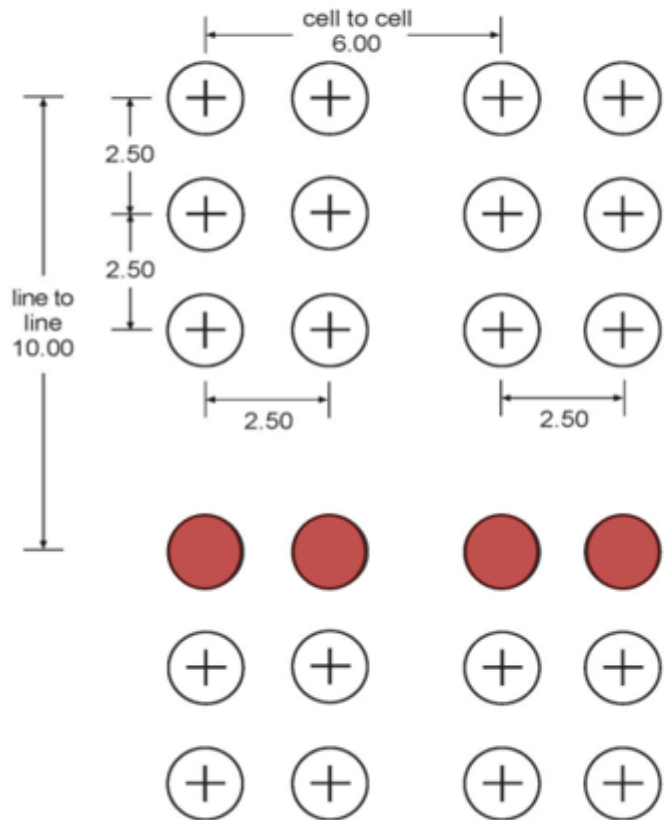
⠆ this is 'll' in braille

⠆⠆ this is what the braille cells look like (and shows that the left three dots are raised so there is a slight gap between the two vertical rows as the right side of the braille cell is not used).

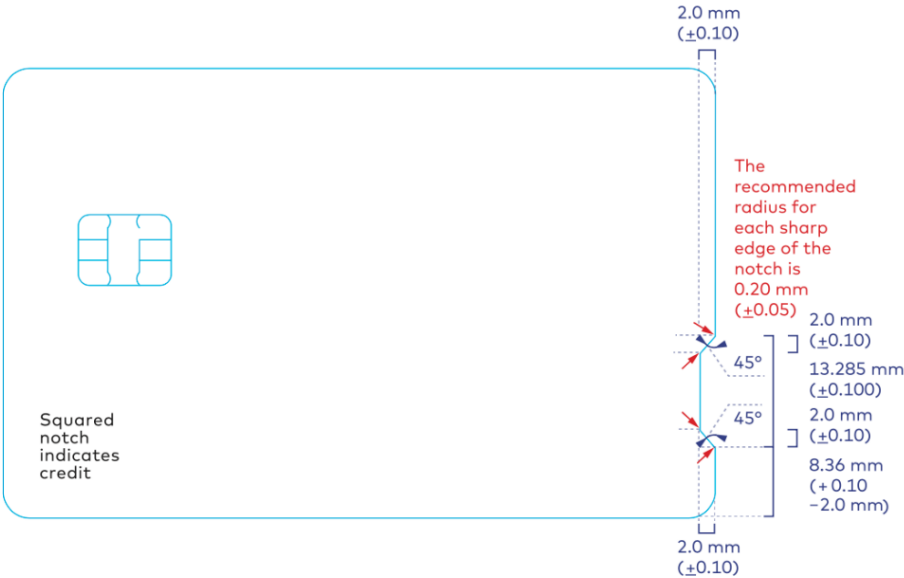


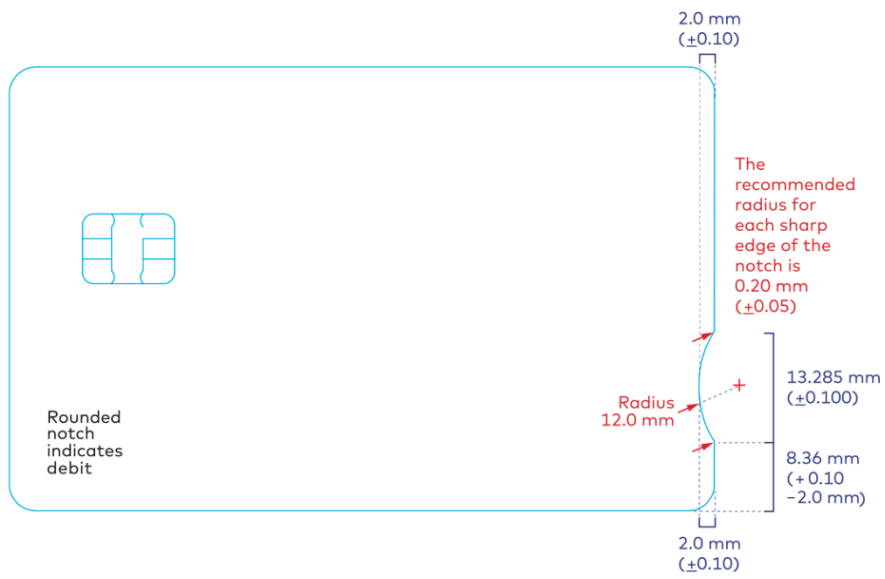
# Credit card

“ ” this is 'cc' in braille (this is what the braille cell looks like, and the c just uses the top two dots, so cc is four dots in a row ☺☺)



# Annex 3 – Mastercard Touch Card™ Specifications





## Annex 4 – Abbreviations

The following abbreviations should be used.

ACC Account Number

CVC Card Verification Code

CVV Card Verification Value

EXP Expiry Date

SC Sort Code

Other abbreviations should be avoided unless they are already well established in UK consumer banking.