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Input for OHCHR Report on the Impact of International Financial Institution Conditionalities on Human Rights (HRC Resolution 59/19)

I would like to thank you for the invitation to provide information on the **impact of International Financial Institutions on Human Rights**.

First, I would like to note that the Ombudsperson's Office of the Republic of Latvia is an independent National Human Rights Institution. In 2025, it **repeatedly received international evaluation and was re-accredited with the highest "A" status in the United Nations (UN) Subcommittee on Accreditation, confirming the compliance of the Ombudsperson's Office of the Republic of Latvia with the Paris Principles, the effective functioning of the institution, and the relevant national legal framework.**

The Ombudsperson's Office of the Republic of Latvia examines complaints submitted by individuals concerning alleged human rights violations, initiates verification procedures, files applications before courts where appropriate, issues recommendations to competent authorities regarding necessary amendments to legislation, and promotes public awareness and understanding of human rights.

Although the Ombudsperson's Office has not, to date, dealt directly with **International Financial Institutions**, it has examined the compliance of banking services provided in Latvia with the principle of non-discrimination. Consequently, I believe that the information provided below may be useful in improving the accessibility of banking services for persons with disabilities at the international

level, particularly in relation to the issues highlighted in the **United Nations Human Rights Office of the High Commissioner's letter of 6 July 2026**, namely:

- paragraph 3 concerning the participation of civil society;
- paragraph 4 concerning complaints mechanisms;
- paragraph 5 concerning the protection of the rights of persons with disabilities; and
- paragraph 6 inviting submissions on examples of good practice and areas requiring further improvement.

Between 2017 and 2022, the Ombudsperson's Office regularly received complaints from persons with various types of disabilities regarding the inaccessibility of banking services. For example, bank branches were not physically accessible to persons with mobility impairments, or banking services were refused to persons with sensory disabilities because bank employees lacked knowledge of how persons with specific sensory impairments, such as visual impairments, could independently review banking documents. As a result, some banks encouraged customers with sensory disabilities to restrict their legal capacity in order to access banking services. Such practices were incompatible with the legal framework of the Republic of Latvia. Persons with intellectual and psychosocial disabilities likewise encountered significant obstacles in accessing banking services.

It should be noted that the legislation in force in the Republic of Latvia imposes an obligation to ensure the rights of persons with disabilities not only in the public sector but also in services provided by private entities.

In 2022, the Ombudsperson's Office published the study "[Accessibility of Banking Services](#)", which assessed the applicable legal framework, surveyed organisations representing persons with disabilities, and gathered information from the banking sector.

Organisations representing persons with visual impairments identified a number of practical barriers to accessing banking services, including inaccessible queue management systems (touchscreen devices, advertising displayed on screens, and queue numbers that were difficult or impossible to read), difficulties navigating bank premises and locating the correct customer service desk, resulting in their turn being missed, as well as the inaccessibility of mobile banking applications, online banking platforms, authentication devices and automated teller machines (ATMs).

Persons with visual impairments, intellectual disabilities, psychosocial disabilities and hearing impairments also highlighted the insufficient awareness and understanding among bank employees regarding the needs and capabilities of persons with disabilities, which affected their ability to provide appropriate services.

Furthermore, where individuals - particularly older persons or persons with disabilities—did not use online banking services but when applying for low-income or needy person status, were required by municipal social services to submit printed bank account statements. Consequently, these individuals were obliged to visit bank branches in person, creating additional difficulties for persons with reduced mobility and for those living in rural areas.

People living in rural regions also faced additional financial burdens due to the limited geographical availability of ATMs, often having to travel considerable distances simply to withdraw cash.

The banking sector also identified a few practical challenges in providing services to customers with disabilities who are accompanied by an assistant, support person, sign language interpreter or another accompanying person.

Under the **Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing**, banks are required to verify that the customer is the actual beneficiary in the business relationship with the bank. Consequently, the presence of accompanying persons is often perceived as presenting an increased risk from the perspective of customer due diligence requirements.

Banks further noted that information concerning restrictions on an individual's legal capacity is no longer readily available. As a result, they receive only limited information regarding the restrictions of legal capacity of their customers. They also highlighted practical difficulties arising from court judgments imposing restrictions on legal capacity while providing for specific exceptions. For example, judgments may authorise a person to manage financial resources independently up to the amount of a social benefit without specifying the exact amount. Such decisions are difficult to implement in practice, both for banks and for guardians.

Similarly, decisions of Orphans' and Custody Courts appointing guardians often define the scope of the guardian's representation in broad or general terms, creating uncertainty as to whether such authority extends to the use of specific banking products or financial services.

Banks also reported difficulties in obtaining information concerning restrictions on the legal capacity of residents of State social care institutions where such information is necessary for the lawful provision of banking services.

In light of these findings, the Ombudsperson recommended that banks:

- ensure both the physical and digital accessibility of banking services;
- provide training for employees on the rights, needs and appropriate support measures for customers with various types of disabilities;
- develop internal policies and procedures governing the provision of services to persons with various types of disabilities; and
- involve organisations representing persons with disabilities from the earliest stages of designing accessible banking services and throughout the entire development process, ensuring that their expertise informs both the design and implementation of accessibility measures.

Following the publication of the study, the Ombudsperson's Office continued its cooperation with organisations representing persons with disabilities, Latvian banks and the Finance Latvia Association, which represents the majority of banks operating in Latvia, throughout 2023 and 2024. During this cooperation, the Ombudsperson's Office emphasised that genuinely accessible services can only be achieved where the following key principles are observed:

1. **A clear legal framework** setting out the essential requirements that must be taken into account when designing accessible services.
2. **Comprehensive accessibility guidelines** providing detailed technical requirements and practical solutions for ensuring accessibility.
3. **Meaningful involvement of organisations representing persons with disabilities**, in accordance with the principle of *"Nothing about us without us."* Organisations representing different disability groups should participate throughout the process, contributing expertise on the specific needs of different user groups, recent accessibility developments and alternative solutions capable of ensuring accessible services.
4. **Appropriate allocation of financial resources** to implement accessibility measures effectively.
5. **User testing involving persons with disabilities**, in order to verify that the proposed solution is genuinely accessible and usable in practice.
6. **Public launch of the service or product only after successful accessibility testing has been completed.**

Good practices and outcomes

As a result of the Ombudsperson's recommendations and the continued cooperation between the Ombudsperson's Office, the banking sector and organisations representing persons with disabilities, a number of significant practical measures have been implemented.

1. **Finance Latvia Association** – [Guidelines on the Accessibility of Financial Services](#) (2023, available in English).

These Guidelines provide practical information on how banks can ensure that their services are accessible to persons with different types of disabilities. They apply to all banks that are members of the Finance Latvia Association and constitute a common accessibility standard for the Latvian banking sector.

2. **Ombudsperson's Office of the Republic of Latvia** – [Survey of Guardians on Access to Banking Services for Persons with Restricted Legal Capacity](#) (2024, available in Latvian).

The survey collected information from guardians in order to assess whether, and in what manner, financial services are used by persons whose legal capacity has been restricted, and to identify the practical challenges encountered in accessing such services.

3. **Ombudsperson's Office of the Republic of Latvia** – [Recommendations for Guardians, Sworn Advocates, Courts, Orphans' and Custody Courts and Credit Institutions on the Provision of Banking Services to Persons with Restricted Legal Capacity](#) (2024, available in Latvian).

These recommendations provide practical guidance on how financial matters should be formulated in court judgments and administrative decisions so that they can be effectively implemented in practice by guardians and financial institutions.

4. **Training programmes for bank employees** aimed at improving their knowledge and understanding of the needs of clients with different types of disabilities and strengthening their capacity to provide accessible and non-discriminatory banking services.
5. **Active involvement of organisations representing persons with disabilities** in the design, development and testing of accessible banking services, ensuring that accessibility measures are based on the practical experience of end users.

The experience of the Ombudsperson's Office demonstrates the importance of taking into account both the needs of customers with disabilities and the legitimate legal obligations of financial

institutions. Addressing these two aspects in parallel has enabled the development of practical and sustainable solutions that improve access to financial services for diverse groups within society.

At present, it can be concluded that the accessibility of banking services in Latvia has improved significantly. The cooperation established between the Ombudsperson's Office, the banking sector and organisations representing persons with disabilities represents an example of good practice that may be of value to other countries seeking to enhance the accessibility of financial services.

I would also like to draw attention to the fact that all of the above-mentioned documents have been prepared as practical guidance and contain detailed recommendations that can be readily adapted and applied in practice.

Yours sincerely

the Ombudsperson

Karina Palkova