

Towards Inclusive Financial Services: The Responsibility Of Financial Sector Business Actors In Providing Disability-Friendly Services

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Abstract

This study aims to analyze the responsibility of financial sector business actors (PUSK) in providing inclusive financial services for persons with disabilities. The main focus of this study is the SETARA Guidelines on Accessible Financial Services for Empowered Persons with Disabilities, issued by the Financial Services Authority (OJK) as a reference. The method used is normative juridical with a regulatory approach, through a literature study of laws, regulations, and related policy documents, including Law Number 8 of 2016 concerning Persons with Disabilities. The study's results show that the SETARA Guidelines have comprehensively formulated accessibility principles across six service aspects: physical infrastructure, digital infrastructure, service sensitivity, document accessibility, complaint mechanisms, and assistance. However, the implementation of these guidelines still depends on the commitment of each PUSK. This may potentially create access gaps for consumers with disabilities and does not yet guarantee the fulfillment of their rights to equal financial services. The study recommends integrating the principles of the SETARA Guidelines into mandatory regulations and strengthening the role of the OJK in compliance supervision. These efforts are necessary as part of the transformation towards an inclusive and equitable national financial system.

Keywords: *Accessibility, Banking, Financial Services, Persons with Disabilities, Inclusive.*

INTRODUCTION

Inclusive financial services play a crucial role in supporting social and economic well-being, particularly for persons with disabilities who often face various access barriers. The Government and Financial Services Sector Business Actors (Pelaku Usaha Sektor Keuangan/PUSK) have issued the *Guidelines for Access to Financial Services for Empowered Persons with Disabilities* (SETARA Guidelines) as a framework for implementing inclusive financial services (Authority, 2025). These guidelines cover key aspects such as physical and digital infrastructure, service sensitivity, document accessibility, complaint mechanisms, and assistance for persons with disabilities. Although these guidelines are already in place, their effectiveness in practice requires further examination to understand the scope and ongoing challenges. Therefore, an in-depth analysis of the SETARA Guidelines constitutes a crucial initial step toward promoting truly inclusive financial services in Indonesia.

Previous studies indicate that comprehensive regulation and governance are fundamental to achieving financial inclusion for persons with disabilities. The SETARA Guidelines, issued by the Financial Services Authority (Otoritas Jasa Keuangan/OJK), are expected to serve as a strategic instrument to ensure equal and non-discriminatory access to financial services (Law Number 8 of 2016 Concerning Persons with Disabilities, 2016). However, further strengthening and refinement of inclusive principles are still needed to better accommodate the diverse needs of persons with disabilities. This study focuses on a content analysis of the SETARA Guidelines to identify provisions that have been regulated as well as aspects that require further enhancement. The findings will serve as the basis for constructive recommendations to strengthen inclusive financial service policies.

This research aims to provide both academic and practical contributions to the development of inclusive financial services for persons with disabilities in Indonesia through an analysis of the SETARA Guidelines. The resulting recommendations are expected to support

OJK and PUSK in improving the implementation of more responsive and applicable policies. This effort is also aligned with the national commitment to recognize, realize, and protect the rights of persons with disabilities in a fair and equitable manner. Through this study, more effective strategies are expected to be formulated to overcome access barriers and expand the participation of persons with disabilities in the financial sector. Accordingly, this research represents an important contribution to the realization of an inclusive and equitable national financial system.

Overall, this study is expected to provide a comprehensive overview of the potential and challenges in implementing the SETARA Guidelines. It also serves as a valuable input for policymakers and financial service providers in strengthening inclusive financial services. With recommendations grounded in in-depth analysis, improvements in the quality and reach of services for persons with disabilities are anticipated. This study also opens opportunities for broader and more in-depth future research on financial inclusion. In doing so, it contributes to more equitable and sustainable socio-economic development.

RESEARCH METHODS

This study uses a normative legal research method to examine the regulation of inclusive financial services for persons with disabilities in Indonesia (Ariawan, 2013). The approach used includes a statute approach to analyze relevant laws and guidelines, including the Law on Persons with Disabilities and the SETARA Guidelines. Legal sources consist of primary legal materials, such as laws and regulations, and secondary legal materials, such as relevant scientific journals. The legal materials were collected through document studies of various reliable literature. The legal materials analysis in this study was conducted qualitatively to identify and examine the content of legal norms governing access to financial services for persons with disabilities. The primary focus of the analysis was directed at the substance of the regulations and their consistency with the principles of social inclusion in the financial sector. This qualitative approach allows the study to gain an in-depth understanding of the potential for strengthening regulations and implementing more inclusive policies (Harahap, 2020).

RESULTS AND DISCUSSION

SETARA Guidelines as a Framework for Inclusive Financial Services for Persons with Disabilities

The SETARA Guidelines formulated by the Financial Services Authority (Otoritas Jasa Keuangan/OJK) serve as an important reference for Financial Services Sector Business Actors (PUSK) in providing inclusive financial services for persons with disabilities. These guidelines regulate various key aspects, ranging from the accessibility of physical and digital infrastructure, service sensitivity, and the provision of accessible documents, to complaint handling mechanisms and assistance services. The principle of universal design constitutes the primary foundation to ensure that financial services can be accessed and utilized equally by all consumers, including vulnerable groups such as persons with disabilities.

1. Accessibility of Physical Infrastructure

Persons with disabilities are legal subjects and are entitled to access financial services (Siregar, 2022). Primary locations where consumers interact with PUSK—such as head offices, branch offices, ATMs, and agents—constitute critical points that must be easily accessible to everyone, including persons with disabilities and other groups with special needs such as the elderly and pregnant women. All physical facilities are required to be designed so that they can

be used without barriers. The availability of safe and comfortable access enhances user trust and convenience in financial services. Therefore, financial service providers must prioritize accessibility as an integral part of fair and inclusive service delivery, serving as a fundamental basis for building services that can be enjoyed by all segments of society.

The concept of universal design is essential in ensuring comprehensive accessibility within financial facilities. PUSK must develop clear operational guidelines regarding physical accessibility standards and apply them consistently across all branches and service units. Education and training for staff are also crucial to ensure they understand and are able to assist consumers with physical limitations. Active participation from organizations representing persons with disabilities provides valuable input for refining these standards. Regular monitoring of facilities is necessary to maintain and continuously improve accessibility quality in line with evolving needs.

Key elements supporting accessibility include easily accessible designated parking areas, ramps with appropriate gradients, wide and easy-to-open doors, and safe pedestrian pathways equipped with guiding blocks. Facilities such as elevators with braille buttons and voice guidance, accessible toilets, and non-slip flooring are also essential. At headquarters and branch offices, adjustable service counters, visual and audio announcements, and comfortable consultation rooms should be available. The provision of assistive devices such as wheelchairs and crutches, along with strategic waiting area arrangements, further facilitates access for persons with disabilities. Staff competence in assisting users with special needs is also a vital component of inclusive service delivery.

For ATM facilities, various accessibility features must be implemented to enable users with disabilities to conduct transactions independently. ATMs should be located in wheelchair-accessible areas with sufficient space. Buttons with braille markings and ergonomic layouts, as well as audio systems for visually impaired users, are essential standards. Screen displays should offer high contrast and readable font sizes. Transaction time limits should be adjusted to prevent users from feeling rushed. For instance, BCA has introduced ATMs equipped with voice-guided services using personal headsets (BCA, 2025).

If physical facilities do not yet fully meet accessibility standards, PUSK must provide assistance options for consumers with disabilities to ensure uninterrupted access to services. Direct assistance from staff can serve as a temporary solution while facilities are gradually improved. Priority should be given to adjustments that are easy to implement and cost-effective to ensure immediate benefits. Through this approach, financial services can progressively evolve toward a more inclusive and user-friendly system. A commitment to continuous improvement is key to achieving this goal.

2. Accessibility of Digital Infrastructure

PUSK offers various digital services such as banking applications, mobile banking, internet banking, and fintech services including peer-to-peer lending and digital wallets, which hold significant potential for expanding financial access for persons with disabilities. For individuals with physical or visual impairments or those residing in remote areas, digitalization provides greater convenience and flexibility in accessing financial services. Although digital banking systems are designed to improve transaction efficiency, many persons with disabilities still encounter barriers when accessing these services (Arifah, 2022). When digital channels are not user-friendly, individuals may become dependent on others for assistance, thereby compromising privacy and data security. Consequently, it is essential to provide specialized features and adaptations to ensure accessibility.

Universal design principles should serve as the primary guideline to ensure that all digital infrastructure is accessible to all users, including persons with disabilities. Active involvement of disability organizations in the development process is crucial to ensure that technologies are genuinely inclusive and responsive to user needs. Additionally, PUSK must manage electronic

systems in compliance with applicable laws and information technology risk management standards. Technology development plans should be implemented gradually and aligned with institutional capacity, with initial improvements focusing on simple, low-cost components that can immediately enhance accessibility.

PUSK should implement various technological features to facilitate access for persons with disabilities, such as screen reader compatibility for mobile and desktop devices. Voice recognition features are also important to enable navigation without relying on touchscreens or keyboards. Clear and simple language should be prioritized to avoid user confusion. Alternative CAPTCHA options in audio format or simple questions should be provided for users with visual impairments. Allowing additional time for security code entry and offering notifications in both text and audio formats further enhance user convenience and security.

Digital interface design must be flexible to accommodate all users, offering adjustable font sizes, color contrast settings, and keyboard-based navigation options. On social media platforms, content should include alternative text for images and accessible hashtag formatting compatible with screen readers. Phone banking services should employ staff trained to understand the specific needs of persons with disabilities to ensure effective and sensitive communication. Customer service must be easily accessible through multiple channels, including text messaging, video calls with captions, and telephone services, to enable prompt issue resolution. Such provisions are essential to ensure independent and secure use of digital financial services.

PUSK is encouraged to refer to international accessibility standards such as the Web Content Accessibility Guidelines (WCAG) when developing digital services. Disability-friendly technology not only benefits persons with disabilities directly but also enhances the competitive value of financial products and services. Open communication channels should be established to allow all users to provide feedback and suggestions regarding service accessibility. Continuous improvement efforts are necessary to ensure that digital financial services remain accessible, secure, and user-friendly for all segments of society. Inclusive digital infrastructure thus forms a critical foundation for achieving equitable financial services.

3. Service Sensitivity

Service sensitivity toward persons with disabilities largely depends on the quality of communication and direct interaction conducted by PUSK staff, whether through face-to-face interactions at branch offices, telephone services, or mobile operations such as debt collection. The essence of such service lies in employees' ability to recognize and meet consumer needs based on principles of equality and full respect for rights. Therefore, standardized communication protocols are essential to ensure consistent and disability-friendly service delivery. All staff members must understand appropriate communication methods to prevent misunderstandings and barriers. Specialized training for employees who interact directly with consumers with disabilities is a fundamental requirement to improve service quality.

To ensure services are accessible to all consumers, PUSK is encouraged to provide multiple communication methods that accommodate both persons with disabilities and non-disabled users, facilitating feedback on service experiences. Service delivery methods should be tailored to individual needs without reducing service options, thereby realizing genuine inclusion. Employees who receive specialized training are better equipped and more confident in providing friendly and professional services to persons with disabilities. Inclusive communication must be applied across all service channels, including in-person interactions, telephone services, and electronic media, with support for sign language and braille. Facility arrangements such as priority queues and visual and audio announcements significantly enhance user comfort.

Both developed and developing countries increasingly emphasize the creation of inclusive societies for persons with disabilities (Yanti et al., 2022). In line with this, special assistance is highly recommended for persons with disabilities, particularly when using facilities

such as ATMs or completing administrative procedures at service offices. PUSK should provide additional services such as document reading, form completion assistance, and extended consultation times for customers with special needs. In certain situations, transaction documentation involving consumers with disabilities may be recorded to ensure protection and transparency. Identifying consumers with disabilities through specific markers on documents or accounts can further assist staff in providing appropriate services. Banks have demonstrated adaptive initiatives by offering account opening options for visually impaired customers through fingerprint verification, electronic recordings, or special access mechanisms. Where feasible, pick-up services for customers with severe disabilities and mobility challenges may serve as alternative service solutions.

Off-site services, such as credit collection activities, must adhere to social norms, legal provisions, and principles of respect for persons with disabilities. Employees are required to maintain fairness and openness in all interactions to prevent discrimination. Courteous communication free from stereotypes or offensive terminology is mandatory. Staff should communicate directly with persons with disabilities rather than relying on companions as intermediaries and must always respect accessibility needs by asking politely. Respect for diverse service access preferences is a key component of inclusive and responsive service delivery.

To ensure continuous service quality improvement, PUSK should regularly conduct training and socialization programs for all employees regarding inclusive service policies for persons with disabilities. Training should encompass an understanding of corporate policies, respectful interaction techniques, and the use of necessary communication aids. Employees should also be taught basic sign language to facilitate effective communication with deaf customers. Through these efforts, PUSK can deliver services that not only comply with regulations but are also grounded in respect and empathy.

4. Document Accessibility

Prospective users and consumers of PUSK financial services require various types of information, both general information regarding the institution and available products, as well as personal information related to their individual transactions. In the context of consumer protection, PUSK is required to ensure that information is delivered clearly, comprehensively, and transparently to all groups, including persons with disabilities. PUSK must also establish policies and standard procedures governing the preparation and dissemination of documents to meet accessibility needs. Consistent implementation of inclusive document formats is an essential component of providing user-friendly services for all consumers.

PUSK is encouraged to involve organizations of persons with disabilities to obtain appropriate input regarding designs and formats that meet the needs of users with disabilities. All information should be disseminated through media and locations that are easily accessible to consumers with various physical and sensory conditions. To conduct transactions, consumers are required to possess valid official identification, such as a national identity card (KTP), driver's license, passport, or a special identification card for persons with disabilities. Individuals with orthopedic physical disabilities often experience rejection of banking services due to difficulties in providing signatures, even though they are legally considered competent under Article 1330 of the Indonesian Civil Code (Pratama, 2021). For those who experience difficulty signing, PUSK provides alternative options such as thumbprints, fingerprints, iris scanning, facial recognition, or voice recognition. In addition, an official certificate stating the inability to provide a signature may be issued and formally verified to support administrative processes.

Printed documents must be designed to be accessible to persons with visual impairments, for example by providing Braille versions, large-print text, and audio formats to facilitate access. The information presented should also be complemented with images, diagrams, and colors accompanied by explanatory text to enhance understanding. Font usage and layout should consider reading comfort by avoiding excessive capitalization, italics, underlining, or bold text

that may interfere with readability. The paper used for printed documents should be non-glossy to ensure text clarity, and sufficient contrast between background and text must be maintained. Brochures and other printed materials must also apply accessibility principles, particularly to support the needs of persons with intellectual disabilities and low vision.

For digital documents, PUSK is required to comply with international standards such as the Web Content Accessibility Guidelines (WCAG) to ensure content is usable by persons with disabilities using various assistive technologies. The four fundamental principles of web accessibility perceivable, operable, understandable, and robust serve as the primary foundation for designing inclusive content (Consortium, 2008). Electronic document structures must be organized logically to facilitate reading and navigation by all users. Images and visual elements must include alternative text to describe content for users who cannot view images directly. Special characters, such as punctuation marks, must be recognizable by screen readers to ensure information completeness. Document security systems must also be designed so as not to hinder the use of assistive applications such as screen readers and screen magnifiers, enabling documents to be accessed in various formats without difficulty.

By implementing comprehensive accessibility principles across all types of documents, PUSK can enhance protection and comfort for all consumers, particularly those with physical or sensory limitations. Providing information that is accessible and clear will increase trust and encourage active participation of consumers with disabilities in financial services. Involving disability communities in the design process helps ensure that their specific needs are effectively addressed. This policy also reflects PUSK's commitment not only to regulatory compliance but also to the realization of inclusive and equitable financial services. Such a holistic approach is essential to strengthening access and equality within the broader financial sector.

5. Consumer Complaint Handling

PUSK must ensure that all complaint-handling and dispute-resolution processes related to financial products and services are conducted fairly and without discrimination against consumers with disabilities. Complaint mechanisms must provide various accessible communication channels, such as telephone services, SMS, email, and in-person meetings tailored to the specific needs of consumers with disabilities. All complaint channels must be designed to be inclusive and easy to use by all consumers, including those with physical or sensory limitations. The objective is to ensure that all consumers feel safe and have equal access to submit complaints or concerns. This commitment demonstrates PUSK's seriousness in providing fair and accessible complaint services.

In addition, PUSK is required to provide additional services as reasonable accommodations for consumers with disabilities during the complaint process. These include the availability of staff trained to communicate effectively with consumers with disabilities to ensure smooth and empathetic interactions. Information and responses to complaints must also be delivered in accessible and inclusive formats, such as screen-reader-compatible text or sign language. The presence of these specialized services helps eliminate communication barriers while ensuring that the rights of consumers with disabilities are properly fulfilled. This approach also enhances consumer trust and satisfaction with financial services.

All PUSK staff must be responsive and attentive in handling complaints submitted by consumers with disabilities. Promptness and decisiveness in addressing complaints reflect professional service quality and a commitment to fairness. Complaint handling must be carried out in accordance with standard procedures and applicable regulations to ensure transparency and accountability. Employees must also understand the specific needs of consumers with disabilities and provide services with empathy and professionalism. Therefore, regular staff training is essential to enhance the ability to manage complaints from diverse segments of society.

The complaint-handling and dispute-resolution processes implemented by PUSK must refer to the provisions set forth in POJK No. 18/POJK.07/2018 concerning consumer complaint services in the financial services sector (Financial Services Authority Regulation Number 18/POJK.07/2018 Concerning Consumer Complaints Services in the Financial Services Sector, 2018). This regulation provides a clear legal basis for protecting consumer rights, including those of persons with disabilities, to receive appropriate and adequate services. Compliance with these regulations also serves as a foundation for building an effective and trustworthy complaint-handling system. PUSK must routinely evaluate and improve its complaint mechanisms to ensure they remain aligned with current needs and conditions. Thus, complaint services can operate optimally and inclusively without excluding vulnerable groups.

Overall, the existence of an inclusive and responsive complaint system is a crucial element in realizing disability-friendly financial services. The state must ensure that persons with disabilities can actively participate not only through regulations but also through sustained practical actions (Allo, 2022). By providing easy access and adequate support throughout the complaint process, consumers with disabilities feel valued and protected in their rights. PUSK's efforts in developing mechanisms and special accommodations demonstrate a strong commitment to the principles of inclusion and equality. This approach removes barriers that have previously prevented persons with disabilities from submitting complaints and obtaining appropriate solutions, thereby strengthening trust and justice within the financial sector as a whole.

6. Companion Guidelines

Persons with disabilities often require support from companions to assist in decision-making, particularly in accessing and using financial services. Companions function as facilitators who ensure that individuals can access services in an inclusive and secure manner without diminishing their independence. In this context, companions assist in explaining and facilitating access processes while respecting the rights and autonomy of prospective consumers or consumers. Therefore, it is essential for financial institutions to uphold the principle of full respect for individual rights in services involving companions. The primary emphasis is on empowering consumers to continue making their own decisions even when receiving support.

The right of adult consumers with disabilities to determine whether they require a companion must be respected and serve as a reference in service delivery. Consumers have full freedom to choose whether or not to use a companion when interacting with financial institutions, and this decision must not be imposed. As a form of respect for independence, service providers should directly inquire about the consumer's need for a companion. In situations where consumers do not have a personal companion, institutions are expected to provide a competent companion as part of inclusive services. This is essential to ensure equal access to services for all consumers without exception.

Companions provided by institutions are generally employees who have undergone specialized training related to inclusive services and accessibility of financial products. They must also understand special service protocols for persons with disabilities as well as disability-friendly complaint-handling mechanisms. However, companions are not authorized to take over consumer decisions unless they have received formal authorization. For consumers who are minors, guardianship mechanisms apply in accordance with applicable legal provisions to ensure legal protection. Thus, accompaniment is regulated in a manner that does not undermine consumers' legal rights and independence.

Consumers with disabilities who are capable of making independent decisions must meet requirements such as legal adulthood, possession of valid official identification, and legal capacity. Companions may come from family members, individuals directly appointed by the consumer, or institutional staff if the consumer does not have a personal companion. Institutional companions must have received adequate training related to inclusive services and applicable

accessibility standards. If the companion comes from an external party, they must present valid identification for documentation purposes. Documentation of accompaniment is essential to ensure that service processes are transparent and accountable.

Above all, a paradigm shift is needed among law enforcement and service providers to view persons with disabilities as equal and rights-bearing subjects, rather than merely objects of charity or compassion (Priamsari, 2019). During the accompaniment process, activities include assisting with reading documents, completing forms, and accompanying consumers during document signing or fingerprinting procedures. Companions also assist in account opening procedures and the execution of financial transactions according to consumer needs. With the presence of companions, access to services is expected to become easier and more inclusive without reducing consumer independence. This approach demonstrates institutional commitment to respecting the rights and dignity of persons with disabilities. Overall, accompaniment plays a vital role in ensuring that no consumer is left behind in accessing financial services.

Opportunities to Strengthen Regulatory Frameworks to Promote Financial Inclusion for Persons with Disabilities

Accessibility refers to the provision of facilities and infrastructure that enable all members of society to obtain equal opportunities across various aspects of life (Ainulyaqin et al., 2024). The SETARA Guidelines have served as an important milestone in guiding PUSK to deliver disability-friendly and inclusive services. However, their implementation in practice still reveals considerable room for improvement. Several aspects require further regulatory strengthening to ensure that inclusion is fully integrated into the financial system. These strengthening efforts are not merely intended to close existing gaps, but also serve as strategic measures to promote the sustainable and equitable adoption of inclusivity principles.

An evaluation of existing practices constitutes an essential foundation for formulating more progressive legal and policy interventions. Evaluation involves a structured process of assessing specific matters based on predetermined criteria in a systematic manner (Magdalena et al., 2020). In terms of physical infrastructure accessibility, regulations should mandate the implementation of periodic and objective accessibility audits. Such audits should involve the participation of organizations representing persons with disabilities to ensure more accurate and participatory outcomes. Provisions regarding incentives for institutions that meet established standards may further enhance compliance. In addition, harmonization between the SETARA Guidelines and technical digital regulations is crucial to ensure more effective and measurable oversight. Service quality can also be strengthened by introducing inclusive service training certification as a standard competency requirement for PUSK personnel.

Furthermore, with regard to service-related documents, it is necessary to establish dedicated customer service centers for consumers with disabilities to fulfill requests for documents in various alternative formats tailored to their needs. In the complaint-handling mechanism, although POJK No. 18/POJK.07/2018 has established a basic framework, further strengthening is required to ensure that complaint services genuinely reach persons with disabilities. The inclusion of provisions regarding sign language interpreter assistance, information delivery in multiple accessible formats, and adjusted response timeframes would be highly beneficial.

Strengthening is also required in the area of accompaniment by establishing training standards for companions as well as procedures that guarantee respect for consumer independence. These standards are essential to ensure that companions provide appropriate support without undermining the rights and choices of consumers. Through these comprehensive strengthening measures, Indonesia's financial services sector can move more decisively toward a system that is more inclusive, equitable, and oriented toward equality for all citizens, including persons with disabilities.

CONCLUSION

Based on the discussion, it can be concluded that the current form of regulation for inclusive financial services for people with disabilities in Indonesia is outlined in the SETARA Guidelines issued by the Financial Services Authority (OJK). These guidelines cover various service aspects, from physical and digital infrastructure accessibility, service sensitivity, availability of accessible documents, responsive complaint mechanisms, and mentoring support. However, the implementation of these guidelines in the field still faces several challenges, indicating the need for regulatory strengthening. Aspects that could be improved include mandatory physical accessibility audits, harmonization of digital standards with WCAG, mandatory employee training on inclusive services, technical regulations for documents in accessible formats, and the addition of detailed provisions for complaints and mentoring. By strengthening these aspects, financial inclusion can be realized in a more concrete, comprehensive, and equitable manner for people with disabilities in Indonesia.

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