



## **The Hong Kong Association of Banks**

### **Guideline on Elderly-friendly Banking Services**

#### **January 2026**

##### **(1) Introduction**

According to the Hong Kong Government's population projections, population ageing in Hong Kong is expected to continue in the years ahead. Meanwhile, the advancement of financial technology (fintech) is transforming the ways in which banks engage with their customers. While promoting digital transformation, banks should also take into account the needs of diverse customer segments to enhance financial inclusion. To further enhance the experience of elderly citizens in using banking services and strengthen support for their use of digital banking services, thereby assisting them in managing their daily living and financial needs while appropriately safeguarding their assets held with banks, the Association has formulated this Guideline on Elderly-friendly Banking Services ("Guideline"), which sets out the principles and good practices recommended for banks in the provision of banking services to elderly customers.

In view of the growing elderly population and the projected increase in the number of individuals affected by dementia in Hong Kong, the Association issued the "Guideline on Banking Services for Persons with Dementia" in 2021, which sets out the principles and good practices recommended for the industry in the provision of appropriate banking services to persons with dementia and customers in need. In providing services to elderly customers, banks should implement the recommended practices as set out in this Guideline, in conjunction with the "Guideline on Banking Services for Persons with Dementia".

As with ordinary customers of banks, when providing services to elderly customers, banks are required to comply with the relevant requirements of the Code of Banking Practice, provide appropriate services, as well as explain clearly to customers, among others, the relevant terms, associated risks, applicable fees, and customer responsibilities.

Banking services are important to the daily lives of the elderly. Amid the opportunities and challenges brought about by digital transformation, banks are expected to take into account the elderly's circumstances, risk appetite and behavioural habits when formulating and implementing their policies and procedures, so as to facilitate their access to basic banking services. The principles and good practices set out in this Guideline are designed to provide the banking industry with practical and actionable recommendations in support of financial inclusion.

##### **(2) Application and Implementation**

This Guideline applies to all banks providing retail banking services. Its contents are principle-based. Banks should formulate their implementation arrangements and details as appropriate. In addition, banks are expected to adopt the following eight principles set out in **Part A** in providing banking services to the elderly, as well as to implement the recommended good practices set out in **Part B**. As the implementation of some measures may require modifications to existing systems or setups, banks may prioritise the implementation of the more readily actionable measures within six months following the issuance of this Guideline. The remaining measures may be implemented in phases, with full implementation completed within 18 months.

The Association will periodically review and revise this Guideline as necessary in light of the latest developments.

### **(3) Basic Principles and Recommended Good Practices**

#### **(Part A) Basic Principles**

Banks are required to uphold the principle of treating customers fairly, and enhance consumer protection and education, thereby strengthening customers' confidence and trust in banks. This Guideline sets out eight high-level principles primarily tailored for elderly customers, intended to complement rather than change existing requirements.

- 1. Digital Enablement** - Banks should ensure that their digital banking services, including online banking and mobile banking services, are designed with the characteristics of elderly customers in mind. These services should emphasise operational convenience through simple, intuitive user interfaces, coupled with secure and accessible transaction methods. Furthermore, banks should foster digital inclusion by offering appropriate technical support and education to elderly customers.
- 2. Accessibility of Basic Services** - Banks should endeavour to ensure elderly customers' accessibility to banking services in a fair, reasonable and convenient manner, with particular attention to the needs of vulnerable groups. In providing banking services, due consideration should be given to the elderly customers' banking needs, risk appetite, behavioural habits, and digital literacy.
- 3. Distribution of Physical Banking Facilities** - Banks should consider the banking needs and expectations of elderly customers when developing their business strategy, particularly when reviewing the distribution of their physical branches, cash counters, as well as self-service banking facilities. This review should consider a range of factors, including district demographics, the proportion of elderly population, transportation accessibility, elderly customers' demand for cash services, as well as their habits in using digital banking services. Banks should also maintain a reasonable coverage of physical banking facilities and cash services to enhance elderly customers' access to basic banking services.
- 4. Transparency of Authorisation Information** - When elderly customers request to arrange authorisation of a third party to handle their banking affairs on their behalf, banks should provide clear information about the available authorisation arrangements to assist the elderly customers in need in making such arrangement voluntarily and in compliance with relevant rules and regulations. The relevant authorisation arrangements should be transparent, covering the authorisation methods, details, scope of authorisation, conferred powers, associated risks, applicable fees, customer responsibilities, and the procedures for revoking the authorisation.
- 5. Education and Outreach** - Banks should actively organise educational and promotional activities in collaboration with community partners to enhance elderly customers' understanding of banking services. Banks should also review their support measures and gather feedback from elderly customers from time to time to continuously improve services, thereby enhancing their trust and experience in banking services.
- 6. Staff Training** - Banks should provide appropriate training for their staff, including enhancing their understanding of banking products and related procedures. Banks should also encourage staff to communicate with customers in a clear, patient, and appropriate manner to better understand the circumstances of individual customers and ensure that appropriate services are provided to them. Furthermore, banks should strengthen staff's competency in identifying potential risks, including suspicious transactions or fraud, and proactively offer assistance to elderly customers as appropriate.
- 7. Customer Communication and Protection** - Banks should clearly explain to elderly customers their banking product features, associated risks, applicable terms and relevant fees, and provide the relevant materials for their reference. Banks should also ensure that

their communication with elderly customers is clear and in plain language, to help them make informed and responsible financial decisions and protect their interests. Furthermore, banks should adopt appropriate measures to protect customer deposits and assets held with the banks from loss due to fraud, misappropriation, or other improper uses.

- 8. Elderly-Friendly Design** - Banks should proactively provide an elderly-friendly physical service environment and banking facilities that are more accessible and comfortable. Banks should also take into account the visual, hearing, physical conditions, as well as other practical needs of elderly customers, and adopt appropriate barrier-free measures in physical branches and facilities to facilitate their access to and use of banking services.

## **(Part B) Good Practices**

To put the principles set out in Part A into practice, this Part sets out the good practices recommended by the Association regarding the provision of banking services to elderly customers. Banks are required to implement the following recommendations.

### **1. Digital Enablement**

- 1.1 Develop easily comprehensible user guides, including illustrated manuals or narrated tutorial videos, to assist elderly customers in adopting digital banking services, such as mobile banking apps, online banking, ATMs, other self-service banking facilities, “cardless withdrawal” services, mobile security keys or tokens, and various electronic or biometric authentication methods.
- 1.2 The design of telephone banking menus should be as user-friendly as possible, such as implementing a simplified menu structure or utilising voice recognition functions to assist elderly customers in selecting the desired services or seeking support as appropriate.
- 1.3 Adopt supportive measures to assist elderly customers in using telephone banking services. These measures may include extending input time limits where appropriate and reducing the waiting time to connect with a customer service representative.
- 1.4 The design of mobile banking apps and online banking platform should accommodate the characteristics and accessibility needs of elderly users. Banks are encouraged to provide simplified or elderly-friendly versions of these mobile banking apps and online banking platforms. Banks may make reference to the “Elderly-friendly Website/Mobile Application Design Guide”<sup>1</sup> published by the Digital Policy Office in designing user interfaces with larger font sizes and clear, intuitive layouts to enhance usability for elderly customers.
- 1.5 Provide online instant chat or text-based conversation functions on digital channels, such as mobile banking apps or online banking services to facilitate communication and enable availability of immediate assistance from the bank. The chat interface should indicate whether the interaction is being handled by a human agent to enable easy identification by customers.
- 1.6 Enhance elderly customers’ awareness and adoption of the Government’s digital identity and authentication application, iAM Smart, or other biometric authentication methods, to help them save time in completing forms.
- 1.7 Provide elderly customers with timely, practical, and clearly comprehensible educational information about digital services through various channels, such as outreach activities, digital workshops, and online learning platforms. Such

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<sup>1</sup>[https://www.digitalpolicy.gov.hk/en/our\\_work/digital\\_government/digital\\_inclusion/accessibility/promulgating\\_resources/application\\_design\\_guide/doc/elderly\\_friendly\\_design\\_guide\\_eng.pdf](https://www.digitalpolicy.gov.hk/en/our_work/digital_government/digital_inclusion/accessibility/promulgating_resources/application_design_guide/doc/elderly_friendly_design_guide_eng.pdf)

information can be presented in the form of frequently asked questions and practical tips.

- 1.8 Proactively promote to elderly customers practical resources available on banks' websites, including information and tips on fraud prevention, digital banking services, as well as electronic or biometric authentication methods and their application, to raise elderly customers' vigilance against scams and enhance their financial literacy.
- 1.9 Designate staff members to handle elderly customers' inquiries related to digital banking services to facilitate the provision of more detailed, personalised guidance and support.

## **2. Accessibility of Basic Services**

- 2.1 Offer a simplified version of Automated Teller Machine (ATM) cards or debit cards for customers to choose from. These should feature larger font sizes when used at the bank's own ATMs to facilitate transaction viewing. Daily withdrawal or debit limits can be set on such ATM or debit cards.
- 2.2 Provide elderly customers with basic bank account services with no initial deposit and minimum balance requirements to cater for their daily banking needs, including deposits and withdrawals, fund transfers, and bill payments.
- 2.3 Account holders of basic bank accounts are allowed to adjust the transaction limits for withdrawals, transfers or payments.
- 2.4 For vulnerable groups and elderly customers with special needs, provide fee waivers for the following items:
  - a) fees for passbook replacement;
  - b) counter service-related fees;
  - c) annual fees for ATM and debit cards; and
  - d) postage and printing fees for paper monthly statements.
- 2.5 Adopt a flexible approach in providing fee waivers on other banking services for vulnerable groups and elderly customers with special needs.
- 2.6 Allow elderly account holders to use electronic signatures, seal (chop) signatures, or handwritten signatures.
- 2.7 Streamline banking procedures for elderly customers and reduce unnecessary steps such as repeated completion of forms, where appropriate and in compliance with relevant requirements and risk controls.
- 2.8 Clearly disclose on the bank's website which branches provide cash counter services, for easy reference by elderly customers.
- 2.9 List the locations and service information of branches, ATMs and other self-service banking facilities on the bank's website.

## **3. Distribution of Physical Banking Facilities**

- 3.1 Prior to planning the closure, relocation or material change to the scope of services of any bank branch, banks should conduct a comprehensive assessment of a range of factors, including the local community's demand for banking services and the potential impacts on customers in the neighbourhood, especially in areas with a higher proportion of elderly residents.

- 3.2 Following a decision to close, relocate or make a material change to the scope of services of a branch in an area with a higher proportion of elderly residents, banks should endeavour to maintain and strengthen the availability of alternative physical banking facilities, such as ATMs, cash deposit machines or mobile branch services, alongside the implementation of other effective remedial measures.
- 3.3 Prior to the closure or relocation of a branch, banks should establish appropriate transitional measures, including the redeployment of staff and strengthening support for elderly customers. Banks should also ensure compliance with the requirements set out in the Code of Banking Practice relating to modifications of bank branch services, including the provision of reasonable advance notification to affected customers.
- 3.4 In local communities with insufficient physical bank branches and a relatively high elderly population, banks should strive to improve service coverage, including setting up self-service banking facilities and deploying staff members to provide assistance to elderly customers, where appropriate and practicable.
- 3.5 When selecting locations for ATMs, banks should consider multiple factors, such as convenience and safety for elderly customers, to ensure that they can access ATM services with peace of mind.
- 3.6 Banks should consider collaborating with relevant social welfare organisations, such as the Hong Kong Council of Social Service or the Hong Kong Association of Senior Citizens, to facilitate the provision of mobile or outreach banking services to elderly customers in need. The relevant arrangements must comply with the relevant supervisory requirements.

#### **4. Transparency of Authorisation Information**

- 4.1 Develop a clear authorisation user guide for customers, outlining the relevant arrangement details with respect to the authorisation of a third party to act on an account holder's behalf. These guides may cover the methods of authorisation, such as in the form of a general power of attorney, an enduring power of attorney, or other relevant instruments. For these authorisation methods, the guide should specify the relevant application procedures, required information, associated risks, applicable fees, customer responsibilities, permissible scope and limitations of the authorisations, the authority conferred upon the attorney or delegate, as well as relevant frequently asked questions.
- 4.2 Make the authorisation user guides available to customers on banks' websites and at branches.
- 4.3 To ensure that the needs and requests of elderly customers are duly respected and safeguarded, frontline staff of banks may remind elderly customers to appoint a person whom they trust as their authorised representative, and also to encourage elderly customers to be accompanied by their family members, relatives, friends, or other trusted persons during the application process.
- 4.4 Before proceeding with an authorisation application, banks should clearly explain to elderly customers the relevant terms and risks associated with the authorisation arrangement.
- 4.5 Provide guidance to staff for handling more complex authorisation cases, such as cases involving disputes, or make inquiries or referrals to the relevant departments to ensure effective handling of customer authorisation arrangements.

## **5. Education and Outreach**

- 5.1 Organise educational activities for elderly customers to enhance their understanding of banking services, including digital banking services, use of self-service banking facilities, various electronic or biometric authentication methods and their usage, elderly-friendly banking measures offered by banks, as well as financial literacy education tailored for the elderly.
- 5.2 Promote anti-scam skills and knowledge among elderly customers to help them protect their assets held with banks.
- 5.3 Banks may collaborate with relevant social welfare organisations or local community groups, such as the Hong Kong Council of Social Service and the Hong Kong Association of Senior Citizens, to gain a deeper understanding of the banking service needs among the elderly community.
- 5.4 Banks may inform elderly customers about banking services available for persons with dementia, including the arrangement for opening dedicated accounts.

## **6. Staff Training**

- 6.1 Strengthen training for staff to equip them with necessary skills for effective communication with elderly customers, including persons with dementia. The training may cover various areas on emergency response and handling, potential challenges in customer communication, common inquiries regarding the use of digital banking services, identification of situations where customers may be at risk of fraud, as well as established mechanisms or channels for reporting suspected fraudulent activities.
- 6.2 Ensure staff members are familiar with the principles and recommendations outlined in this Guideline through induction training for new joiners or regular training for existing staff. The relevant training materials should be accessible on the bank's intranet for staff to revisit.
- 6.3 Enhance frontline staff members' understanding of the bank's latest policies and procedures through effective internal communication channels, enabling them to clearly explain relevant requirements and provide assistance to customers.

## **7. Customer Communication and Protection**

- 7.1 Provide elderly customers with the option of adjusting daily withdrawal or debit limits for their ATM cards or online banking accounts through making an application at a bank branch.
- 7.2 Enhance elderly customers' awareness of the "Money Safe" service, as well as their understanding of its application and the additional protections it provides.
- 7.3 If an elderly customer, as an account holder, withdraws or requests the transfer of a large amount of money at a bank counter, and bank staff suspect potential fraud, staff should alert the elderly customer to seek advice from his/her family members, authorised representatives or social workers as appropriate.
- 7.4 If a bank's staff suspects that an elderly customer, as an account holder, may have become the target of a scam, and there is a registered record of an authorised person for the account, the bank's staff may, with the customer's consent, assist in contacting that registered authorised person.

- 7.5 As with other customers, banks should conduct an effective assessment (such as risk profile assessment and financial needs analysis) prior to recommending any suitable financial products or providing services involving complex investment products to an elderly customer. The assessment should take into consideration the elderly customer's circumstances (e.g. his/her investment objectives, investment horizon, investment experience and knowledge, risk tolerance, affordability, asset concentration, etc.) to ensure that the recommendations or complex products are suitable for the elderly customer concerned.
- 7.6 Unless the elderly customer concerned is not classified as a vulnerable customer and has opted out of the audio-recording arrangement, and invests in a comparable product, banks should audio-record the face-to-face sale process in the following situations:
- (i) distribution of or provision of advice on complex investment products; or
  - (ii) solicitation or recommendation of non-complex investment products, exchange-traded derivatives, or non-leveraged currency-linked or interest rate-linked deposits with standardised features where there is a risk mismatch.
- 7.7 For distribution of annuity insurance products, unless the elderly customer concerned is not classified as a vulnerable customer and has opted out of the audio-recording arrangement, banks should audio-record the sales process.
- 7.8 Unless otherwise stipulated by relevant guidelines, banks should follow the relevant arrangements of "Pre-investment Cooling-off Period", allowing at least two calendar days to elderly customers intending to purchase derivative products (excluding investment funds or those listed in Hong Kong) or debentures with certain specified features (excluding those listed in Hong Kong)<sup>2</sup> to consider the appropriateness of the proposed investment.
- 7.9 When selling investment products<sup>3</sup> and long-term insurance products, banks should allow elderly customers who are classified as vulnerable customers to choose whether to:
- (i) bring along a companion to witness the sales process; and/or
  - (ii) have a second frontline staff member to handle the sale<sup>4</sup>.
- The elderly customer can choose to have either, neither or both of these safeguards.
- 7.10 Banks should provide appropriate support and communication channels to facilitate elderly customers in seeking assistance on banking services, thereby strengthening their confidence in using these services.
- 7.11 Banks should offer diversified retirement financial products that are suitable for elderly customers, with due consideration to their financial needs and risk preferences. The promotion for these products should be conducted in a clear and easily understandable manner. Banks may also provide financial advisory services to support elderly customers in retirement funding and wealth planning.

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<sup>2</sup> Please refer to section (A)(II.6) of Annex 1 to the circular entitled "*Investor Protection Measures in respect of Investment, Insurance and Mandatory Provident Fund Products*" issued by the HKMA on 25 September 2019 for the details.

<sup>3</sup> The bank can obtain the customer's choice of the following safeguard(s) for investment products on a one-off basis.

<sup>4</sup> Please refer to section (A)(II.7) and section (B)(VI) of Annex 1 to the circular entitled "*Investor Protection Measures in respect of Investment, Insurance and Mandatory Provident Fund Products*" issued by the HKMA on 25 September 2019 for the details.

## **8. Elderly-Friendly Design**

- 8.1 Provide more waiting seats in branch lobbies, where practicable, to enhance elderly customers' banking experience.
- 8.2 Provide information about peak and off-peak hours at branches as a customer flow management measure, enabling customers to plan their visits accordingly and reduce waiting time at branches.
- 8.3 Provide telephone appointments or online remote ticketing arrangements for designated branch services.
- 8.4 Implement flexible staffing arrangements for counter services and employ effective measures, such as a ticketing system for counter services, to reduce waiting times in branches.
- 8.5 Make reading or magnifying glasses available in branches for use by elderly customers, and arrange staff to provide assistance to elderly customers in need.
- 8.6 Implement the barrier-free measures in the designs and layouts of branches as recommended in the "Practical Guideline on Barrier-free Banking Services" issued by the Association, to ensure a safe, convenient and accessible banking environment for elderly customers.