

DISABILITY ACT 715



**ASHESI UNIVERSITY**

**INVESTIGATING BANKS' COMPLIANCE TO PUBLIC BUILDING POLICIES  
PROTECTING THE DISABLED (ACT715)**

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Ashesi University in partial fulfilment of the requirement for the award of Bachelor of  
Science degree in Business Administration.

B.Sc. Business Administration

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**May 2020**

DECLARATION

I hereby declare that this thesis is my original work and that no part of it has been presented for another degree in this university or elsewhere.

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I hereby declare that the preparation and presentation of this thesis were supervised in accordance with the guidelines on supervision of theses established by Ashesi University,

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### Abstract

The Persons with Disability Act obligates all public service providers to make their buildings accessible to Persons with Disabilities (PWDs). However, since the passing of this Act, several public buildings have failed to comply with this requirement. In the Financial sector, the Bank of Ghana aims to increase financial inclusion by the year 2023. Since bank branches are an access point for financial services, it is important to research considerations made to promote accessibility of bank buildings to PWDs. To do this, the study examined: (1) the influence of the Disability Act on the design and selection of bank branches in Accra, (2) challenges banks face with compliance to the Disability Act, and (3) measures to improve the level of compliance with the Disability Act in the banking industry. Data for this qualitative study was collected through semi-structured interviews and analysed using the Locke and Latham model. Seven banks in Accra and a project supervisor from the Accra Metropolitan Assembly were contacted for this study. The results showed that the Bank of Ghana and standards such as the Ghana Building Code play a major role in the design and selection of branch buildings. The fundamental problem with making bank buildings compliant is the vagueness of the Disability Act. Spatial constraints, and a lack of urgency to modify non-compliant branches are additional challenges. The study recommends that the Disability Act be revised and clearly define accessibility to public buildings. Also, it must specify the bodies in charge of enforcing the requirements.

*Keywords:* PWDs Act, public buildings, compliance, banks, financial inclusion.

LIST OF ABBREVIATIONS

PWD: Persons with Disability

B.o.G: Bank of Ghana

A.M.A: Accra Metropolitan Assembly

WHO: World Health Organization

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## CHAPTER 1: INTRODUCTION

### 1.1 Background

The services sector plays a vital role in the development of nations. In most countries, it makes an essential contribution towards GDP by providing jobs, inputs and public services for the economy (OECD, 2008). In low-income countries, it generates over 50% of GDP, and between 2000 and 2005 in the Sub-Saharan region, it contributed towards 47% of growth (OECD, 2008).

Access to financial services is critical. According to the World Bank (2018), financial access facilitates day to day living and helps families and businesses plan their long- and short-term goals. It also allows them to access credit, insurance, and invest in education or health. The Banking industry falls within this sector and serves as an intermediary between lenders and borrowers. Due to the importance of the offerings of this and other industries, citizens have rights to equal access to them. As part of this effort, the B.o.G has a goal to increase its financial inclusion rate from 58% as of 2017 to 75% by the end of 2023 (Bank of Ghana, 2019). Financial Inclusion is the process of ensuring access to vital financial products and services by all groups in society including the weak and vulnerable (Chakrabarty, 2010). This should be affordable, transparent and regulated by mainstream institutional players (Chakrabarty, 2010).

However, an assessment by the World Bank (2013), shows that Persons with Disability (PWDs) experience exclusion from social systems, which offsets their rights of equal access to education, health and other services meant for the public. PWDs also experience difficulty when accessing the physical infrastructure that hosts these public

services because the buildings lack the facilities that promote smooth mobility for them. This results in discrimination and a violation of their rights to equal access to these services.

PWDs are “individuals who have long term physical, mental, intellectual or sensory impairments, which in interaction with various barriers may hinder their full participation in society on an equal basis with others” (United Nations, 2006). The regional distribution of PWDs shows Africa recording 3.1% of people living with a severe disability (Ghana Statistical Service, 2014). Also, 3% of Ghanaians are persons living with disability and the proportion of females which is 3.1% is higher than the males with 2.9% (Ghana Statistical Service, 2010).

Due to such reports of discrimination, the government of Ghana passed the Persons with Disability Act in 2006, which stipulates that public buildings and services be made accessible for PWDs. A 10-year moratorium was given within which all public buildings were to be made compliant. However, research shows that most public buildings in Accra, including bank buildings are not fully compliant with the Act (Danso et al., 2019). Research has also revealed that second to health facilities, banks have the highest rate of conformity with regards to accessibility for wheelchair users (Yarfi, Ashigbi, & Nakua, 2017). This study aims to explore the considerations made by banks to promote accessibility of their branches in Accra to persons with physical disabilities.

## 1.2 Problem statement

The physical environment is one of the major barriers that affects persons with mobility disability (Salvage & Zarb, 1995). Several public buildings in Ghana before and after the passing of the PWDs Act (715) do not include avenues to facilitate smooth mobility for PWDs which results in their exclusion from social life (Abedi Asante & Sasu,

2015). This also violates their rights to equally access public spaces which provide essential services. Tudzi, Danso and Ashigbui (2011), Ansah and Owusu (2012) and many others have conducted research which uncovers the low rate of compliance of educational institutions, recreational centres and other public buildings to the Act. In some of the research done, banks seem to have a relatively higher rate of compliance as compared to others (Yarfi et al., 2017). Since there is not much information on the factors explaining the low level of compliance to the Act in Ghana, this study, using banks in Accra as a case, seeks to understand the factors they consider when selecting buildings to host their services.

### 1.3 Aim & Objectives

The primary aim of this research is to explore the considerations made to promote accessibility of bank buildings to PWDs in Accra. The objectives of the study are:

1. To assess the influence the Disability Act has on decisions regarding building in this sector.
2. To determine the challenges that affect the implementation of the Act.
3. To suggest strategies to improve the level of compliance in the industry.

### 1.4 Research Questions

1. What influence does the Disability Act have on the design and selection of bank branches in Accra?
2. What challenges does the Banking industry face with compliance to the Disability Act?
3. What measures can be taken to improve the level of compliance with the Disability Act in the banking industry?

### 1.5 Scope of the study

This research looks at the Disability Act as a policy in Ghana that governs building layouts and how they incorporate the disabled. It reviews the challenges faced with implementation of this policy and suggests measures to increase compliance. With regards to the specific disability being looked at, people with physical impairments, mainly wheelchair users will be the target of this thesis. According to Chiteraka (2010) physical impairments can be said to include certain skeletal, visceral and disfiguring impairments examples of which are amputations and paralysis. It does not include individuals with visual, intellectual and other impairments.

The scope of this study is the financial sector and specifically, the banking sector in Accra. According to the Ghana Statistical Service (2019), out of the three main sectors, namely the Agricultural, Industry and Services sectors, the Services sector remains the largest in the Ghanaian economy. From the breakdown shown in the 2013-2018 Annual Gross Domestic Product report, the sector consists of a variety of services ranging from hotels and restaurants to health and social work (Ghana Statistical Service, 2019). The Finance and Insurance industry fall within this sector and within it can be found the Banking industry. The Banking industry was selected as the focus of the study due to the B.o.G's interest in increasing the financial inclusion rate from 58% in 2017 to 75% by the end of 2023 (Bank of Ghana, 2019). Doing this will aid Ghana's progress in meeting the SDG goals which seek to promote inclusion in our societies. This study will additionally aid policy makers in understanding the challenges accounting for poor compliance to policies. Finally, it will serve as a good resource for professionals in other industries to observe the benefits of providing accessibility features for PWDs in their buildings.

### 1.6 Research Method

The study was broken down into three parts, namely; interviews with bank managers in charge of building design and selection, followed by interviews with a project supervisor in the Works and Housing department of the A.M.A and finally an interview with architects who have worked on these banks. The final phase involved the development of themes from data and the analysis of findings using the Locke and Latham model (1979) to generate recommendations. The qualitative method was used, because it is useful in discovering the meaning people give to events (Merriam, 1998). It will aid in generating the meaning behind the level of compliance to the Act in the Banking industry and will employ the use of semi-structured interviews targeted at getting information from the various participants.

### 1.7 Justification

The Sustainable Development Goals (SDGs) were built around the theme, “leaving no man behind” which emphasizes inclusion and working towards sustainable development for all. These goals were adopted by the General Assembly of the United Nations to have all member nations work on an agenda of achieving them by the year 2030 (United Nations, 2015).

This thesis contributes towards the achievement of SDGs 1 and 2, which seek to end poverty and hunger, as well as SDGs 10 and 11, which seek to reduce inequality and promote inclusive cities. The B.o.G is targeting these SDGs by aiming to increase its financial inclusion rate. A major factor to be considered is the accessibility of bank buildings by PWDs. Data shows that the proportion of PWDs living under the international poverty line is greater than that of persons without disabilities. This is due to

discrimination, limited access to education and a lack of inclusion in livelihood and social programmes(United Nations, 2018). By improving accessibility of financial services to PWDs, they could be helped out of poverty, resulting in a reduction in inequality and a more inclusive community (United Nations, 2018).

Moreover, this study brings additional value to the corporate world because it provides insight on the importance of providing service to all clients without discrimination. It would also aid policymakers bridge the gap between policymaking and implementation.

### 1.8 Thesis outline

This thesis contains five chapters. The first includes the background and introduction to the topic. It contains the importance of the topic, the aims and objectives, the scope, and how the data was collected and analysed. This is important to give readers a general idea about the topic as well as its relevance. The second chapter contains the literature review which throws light on works which provide insight on the study. The third chapter covers the methodology which contains a detailed outline of the data collection and analysis process. The fourth chapter includes the analysis and findings of the data collected. Finally, based on all the information provided, the fifth chapter discusses the conclusion and recommendations.

## CHAPTER 2: LITERATURE REVIEW

### 2.1 Introduction

This chapter highlights relevant literature relating to the PWDs Act 715 and its implementation in Banks in Ghana. The chapter is broken down into several sections which describe disability in Ghana, the environment and the importance of making it inclusive. It also touches on banks and why they should be inclusive, followed by policies that promote the inclusion of PWDs. Finally, it highlights some challenges that affect effective implementation and theoretical models that aid in analysing the implementation process.

### 2.2 PWDs

In 2011, the WHO described disability as an inescapable human condition since, at some point in life almost every person may experience a form of temporary or permanent disability (WHO & World Bank, 2011). This description highlights the importance of addressing the barriers to mobility because anyone can fall into this category. It could range from the sprain of an ankle, which will cause the individual to limp for a few months to an individual who is required to use a wheelchair permanently.

According to the WHO (2018), more than 1 billion people, comprising of 15% of the global populace have some form of disability. Several adults, between 110 million and 190 million have difficulties in functioning, and the rates of disability are increasing due to the ageing population of the world, the increase in chronic health conditions and more.

### 2.3 Disability in Ghana

In Ghana, the three most predominant types of disability are visual, hearing, and physical impairments (Kuyini, Alhassan & Mahama 2011). Out of these, physical impairment was the second most common type of disability in the country after visual

impairments. This trend runs through for disabled persons both in urban and rural areas (Ghana Statistical Service, 2019). According to Chiteraka (2010), physical impairments can be said to include some skeletal, visceral and disfiguring impairments examples of which are amputations and paralysis. These restrict the ease of mobility for these individuals which causes their environment to become a critical factor in promoting their inclusion in society.

#### 2.4 The importance of a barrier-free environment

Limitation to mobility by PWDs has been identified as the most common handicap among them (Lysack et al., 1999). Tijm, Cornielje, and Edusei, (2011) explained that individuals with physical disabilities are confronted with several challenges which come in the form of social and architectural problems. They continue to explain that physical barriers such as inaccessible public buildings and the lack of an appropriate means of transportation for PWDs in Ghana, put them at a disadvantage in society. In addition to this, Hosking (2008) explains that the social disadvantage experienced by PWDs is caused by three factors namely; the physical, attitudinal and institutional environment which does not meet the needs of PWDs. These authors paint a picture of how important the environment is to PWDs and its effect on their social life.

It is therefore important to create a barrier-free environment not only to remove the social disadvantage from PWDs, but also because they are entitled to their rights and freedoms as Ghanaians. Under the constitution, they are entitled to equal access to opportunities in the country. Integrating them into society would require the elimination of all social and physical barriers (Yarfi, Ashigbi, & Nakua, 2017). This barrier-free environment is characterised by ramps and low heights of steps for example. This point



falls under the Moral argument, which focuses on access to the environment as a fundamental human right of individuals (Peel et al. 2009). It explains that there is a moral obligation to strategize and remove the barriers to create an inclusive environment. Other arguments such as the Sustainable, Professional, Economic and Legal arguments exist as well (Peel et al. 2009). The Sustainability argument touches on the importance of a barrier free environment by advocating for flexible buildings since they can address the changing needs of individuals over time. The Economic argument proposes that it does not make business sense to exclude individuals from the workplace due to environmental barriers. This supports the aim of this thesis which explores the considerations in the Banking industry to promote accessibility for PWDs in their buildings. Finally, the legal cases are those preserved in constitutional instruments which contain the rights of PWDs to a barrier-free environment. These points raised by various authors use different lenses to advance the importance of a barrier-free environment.

### 2.5. Mobility in Ghana

Research, however, shows that several facilities in Ghana do not promote smooth movement for PWDs. In a study in 2017 on wheelchair accessibility to public buildings in Kumasi (Yarfi, Ashigbi, & Nakua, 2017), a sample of 84 buildings in Kumasi were assessed using the abridged form of the Americans with Disabilities Act Accessibility Guidelines (ADAAG 1990).

The types of buildings under observation included educational and health facilities, ministries, departments and agencies, sports, banks and recreational facilities. The assessment looked at various factors, such as the width of the entrances and the presence of reserved parking spaces. Results of the study recorded the health facilities

with the highest frequency (91.7%) of wheelchair accessible layouts. In contrast, religious buildings had the lowest percentage, with 2 out of 10 of the buildings sampled being wheelchair accessible. Banks, on the other hand, recorded 3/4 of the sampled buildings wheelchair convenient. None of the structures observed in the ministries and department agencies were wheelchair friendly.

Overall, the results showed that 1/3 of the buildings sampled were accessible to wheelchair users. The study suggests that individuals with physical disability aided by wheelchairs can gain access to 40.5% of public buildings in Kumasi region (Yarfi et al., 2017).

In addition, research on the mobility challenges of PWDs at the University of Ghana (Tudzi, Danso, & Ashigbi, 2011) assessed the accessibility of a "built environment" using the British Standards and Ghana's National Building Regulations (LI 1630, 1996) which is currently under review. In this paper, the built environment was defined as all buildings, spaces and products formed or altered by people (Clarke et al., 2009). Examples of these are schools, workplaces and transportation systems. Specifically, the research sought to assess the car parks, lecture halls, halls of residence and more. A total of 44 structures were assessed for the study. Table 1 in Appendix 1 outlines the results of the assessment. Sanitary areas recorded the highest outcomes of severe restriction with 66%, followed by car parks which recorded 47.8%. Overall, the study concluded that the built environment of the University of Ghana presents several barriers to PWDs with mobility disabilities (Ghana Statistical Service, 2014).

These examples outline the need for structural modifications in most of our public buildings in Ghana. It also highlights the fact that PWDs face challenges, and these

challenges can mainly be addressed through informed policy decisions backed by the proper implementation (Ghana Statistical Service, 2014).

## 2.6 Mobility in Banks

Financial intermediaries, which includes banks, can be described as organisations that raise money from investors and provide financing for individuals, companies and other organisations (Brealey, Myers, Allen, & Mohanty, 2012). Banks can be classified with regards to ownership, nationality and the role played by the national banking system (Ionescu, 2012). In 2018 in the Ghanaian financial services sector, there was a blow to the industry, leading to the merger and closure of several banks by the B.o.G. In January 2019, the official list of 24 licensed banks was released (BoG, 2019). These banks consist of agricultural, investment, universal, multinational and more. These banks provide services of lending, saving and employment to the people of Ghana, which includes PWDs.

In the last two decades, the Banking industry has witnessed a leap in technology to meet the growing demands of customers (Vivekanandan & Jayasena, 2012). They have developed a variety of techniques and services by offering different channels for access to banking services. Some examples of such channels are the Automated Teller Machines, telephone banking, online banking and mobile banking to the extent of providing SMS banking (Villavarajah, 2008). In a "push button" society, industry analysts and banking experts have predicted the doom of bank branch offices (Moutinho et al., 1997).

However, even though individuals have the convenience of online interaction, some banking activities are still tied to the physical bank location (WBR Insights & Coconut Software, 2019). A survey done on 1,500 retail bank customers in the United States showed that 52% of the respondents prefer to visit a branch when applying for or discussing a loan

(WBR Insights & Coconut Software, 2019). This same study revealed that, out of 9 possible factors, 34% of respondents would consider a bank that has a branch close to their home or office when establishing a new bank relationship. Thus, bank branch offices are still widely patronised by consumers and must remain accessible to all.

Globally, banks have different levels of accessibility by PWDs. In Nigeria, a study on the user-friendliness of banking halls by PWDs was conducted, and it covered 22 banks and a total of 140 branches (Ogunlade et al., 2015). It considered factors such as the number of floors in the bank, availability of ramps for wheelchair users, the availability of an elevator in branches with multiple levels and an accessible toilet by PWDs. The results of the study revealed that only 2 out of the 140 branches had the necessary accessibility features. All the branches used slim oval steel doors as an anti-robbery mechanism. This made it difficult for wheelchair users and others who require mobility assistance to access the banks. The results showed a deficient level of compliance to their Special People's Bill of 2010, which prohibits discrimination of PWDs in Nigeria and stipulates that public buildings must have accessibility aids for them.

In Mauritius, research shows that in larger banks, branches are designed so that their services are accessible by PWDs (Benoit, 2018). For persons with physical disabilities, ramps are included, and meeting spaces are large enough to accommodate wheelchairs. However, these are not available in smaller banks. Recommendations were to design broader aisles for wheelchair users, provision of a wheelchair lift and low-level counters and ATMs.

In Ghana, a study assessing bank services in Kumasi (Owusu Hemeng, 2015) revealed that most banking halls were disability unfriendly, which contrasts the findings of

Yarfi et al. (2017) where three out of four banks sampled were disability friendly. However, a few banks such as Cal bank, Access bank, HFC bank and GCB were listed as the most accessible by PWDs. A respondent stated that "I changed my bank because the ramps were not accessible, but with my new bank, I think I am comfortable. The officers are quite friendly, especially the security officers." (Owusu Hemeng, 2015). These banks were selected based on the availability of ramps, designated staff to assist customers, and unique entry for PWDs. This shows that overall, some banks are more accessible than others.

According to Evanoff (1988), the factors that influence the level of accessibility in banks include elements that influence consumer demand and the degree of regulatory stringency imposed by the banking authorities. These factors will be looked out for in exploring the factors that influence the level of compliance to the PWD Act in local banks.

#### 2.7. A case for why banks need to be inclusive with their physical space: Human rights

The Sustainable Development Goals (SDGs) were adopted by the General Assembly of the United Nations to have all member nations work on an agenda of achieving 17 SDGs by the year 2030 (United Nations, 2015). It lays emphasis on inclusion and sustainable development for all and is built on the principle of "leaving no man behind". According to the United Nations (2015), disability is referenced in various parts of the SDGs such as SDG 10 which focuses on reducing inequality, and Goal 11 which also seeks to make cities and human settlements inclusive, safe and sustainable. These goals, coupled with other human rights issues, have created the need for countries to build a more accessible environment for citizens.

According to the UN Flagship Report on Disability and Development (2018), financial inclusion can aid in ending poverty and hunger for all persons with a disability.

Nevertheless, it states that even though financial inclusion may help PWDs out of poverty, access to financial services such as banks does not facilitate mobility by PWDs due to their lack of physical and virtual access to the service. According to the report, in certain countries, more than 30% of banks remain inaccessible to PWDs.

Hanning and Jansen (2010), describe the aim of financial inclusion as drawing-in the "unbanked" population into the formal financial system and providing them with the so that they have the chance to access financial services. These services include savings, and transfers to credit and insurance. There are many models which show how financial exclusion can lead to income inequality or poverty traps and low growth in a nation (Ackah & Asiamah, 2014). According to the document, after the financial crisis, many countries are making efforts to prioritise financial stability through the use of regulations and the promotion of inclusive growth, especially in developing countries.

In 2018, the head of the payment system at the B.o.G was reported by media companies to have said that the Central Bank, (Bank of Ghana) wants to deepen financial inclusion by increasing its percentage from 58% as at the end of 2017 to 75% by the close of 2023 (Bank of Ghana). The deputy governor of the B.o.G, Dr Maxwell Opoku Afari commented on the crucial role of rural and community banks in supporting the government to achieve the objectives of the National Financial Inclusion Strategy (Bank of Ghana, 2019).

## 2.8. Gaps in the Research

In Ghana's quest to achieve financial inclusion by 2023, it would be essential to research considerations made to draw-in PWDs. This is because according to UN Flagship Report (2018) PWDs are more likely to live in poverty than persons without disabilities.

This is as a result of obstacles in society including discrimination, limited access to education, a lack of inclusion in livelihood and other social programmes. Several studies have focused on public buildings in general and not specifically on banks. This article complements the literature on the topic and seeks to fill in the gap concerning the PWDs and financial inclusion as well.

## 2.9. Considerations made for PWDs

This section discusses some of the local and international measures put in place to protect PWDs. It includes policies which have been passed in the country, policies adopted due to our global affiliations and organisations which seek to promote the interest of PWDs.

### 2.9.1 Policies and Organisations Protecting PWDs

Even though PWDs in Ghana are faced with environmentally unfriendly barriers to mobility, there are policies implemented globally and locally to curb this. Internationally, the United Nations Convention on the Rights of PWDs (UNCRPD) is the policy for addressing the needs of PWDs (Ghana Statistical Service, 2014). Other international agreements are the African Charter on Human and People's Rights and the African Decade of the Disabled 2000-2009.

Some national policies and programs, which make provision for PWDs are the 1992 constitution of Ghana which outlines the fundamental human rights of Ghanaians and explicitly put an obligation on the parliament to legislate laws to protect PWDs. Another was the National Disability policy passed in 2000, which sought to ensure that PWDs receive appropriate training, technical skills, among others. The Disability Act passed in 2006 is a more recent one divided into eight sections which address the various needs of

PWDs. (Ghana Statistical Service, 2014). The National Building code of Ghana was also revised to include provisions for PWDs. This paper focuses on this Act in assessing the level of compliance of Banks in Accra.

### 2.9.2 The PWD ACT (715)

The PWDs Act was passed in June 2006 by the Ghanaian parliament. It was considered an excellent milestone for Ghana, especially in its quest to promote human rights (Oduro, 2009). It is also described as a fulfilment of constitutional requirements and an implementation of feedback on human rights conventions (Mantey, 2019).

The Act is divided into eight major sections; namely, the rights of PWDs, employment, education, transportation, health, miscellaneous provisions and the seventh and eighth chapter discuss the establishment of the National Council for Disability and its administrative and financial requirements (Ghana Statistical Service, 2014).

The sections touch on the physical environment and the need to adjust its design to facilitate smooth mobility of PWDs. The 6<sup>th</sup> section states that the owner or occupant of a place to which the public has access shall provide appropriate facilities that make the site accessible to and available for use by a person with a disability. In addition, the 7<sup>th</sup> provision discusses the provision of public services. It states that a person who provides service to the public shall put in place the necessary facilities that make the service available and accessible to a person with a disability.

Other sections go into detail to discuss public libraries, educational facilities, aviation ports such as the airport and even parking spaces. All these spaces are to be mobile-friendly for PWDs. Section 1 is more general and states that a person with disability shall not be deprived of the right to live, with his or her family or the right to participate in social,



political, economic, creative or recreational activities. The penalty for going against these and many of the other civil liberties outlined in sections is a fine not exceeding 50 penalty units or a prison term not exceeding three months.

After the passing of the law, there was a ten-year moratorium giving ample time for public buildings to restructure and be made accessible by PWDs. Also, the National Council on Persons with Disability was set up with the main aim of proposing and evolving policies and strategies to enable persons with disability to enter and participate in the mainstream of the national development process by the Act.

However, a few years down the line, some research has found a low compliance rate in certain parts of the country and problems with the law itself. According to Owusu and Ansah (2012), eight years after passing the Act 715, there are still several public buildings which were constructed after 2006, which are inaccessible by PWDs. In addition, the drafters of the Act were said to have left out housing for PWDs, especially when the UN-Habitat (2009) has indicated that PWDs in Ghana experience challenges in getting access to adequate housing with physical accessibility (Abedi Asante & Sasu, 2015). To back this statement was the example of the SSNIT flats in Ghana, which have no provision for PWDs (Abedi Asante & Sasu, 2015).

It was suggested in the article that attention should also be paid to construction professionals such as architects and contractors to improve the rate of compliance within the country (Abedi Asante & Sasu, 2015). Due to the nature of their occupation, architects and contractors, are those who form the built environment and owners usually finance the projects (Kadir and Jamaludin, 2012).

## 2.10 The Challenge with Implementation

The discipline of policy analysis evolved during the 1950s when the focus was mainly on solving government problems (Kendal, 2010). Over the decades, the ability of policy to achieve its objectives was questioned, and in the 1970s, implementation as a field of enquiry emerged (Annor & Allen, 2009). Policy implementation research emerged due to a yearning to understand, explain and tackle issues associated with translating explicit and implicit intentions into desired changes (Annor & Allen, 2009). The authors Annor and Allen (2009) also highlighted the disparity between policy objectives and ground-level reality.

According to Tebele (2016), the problem with policies is that they describe "what" they do and not "how". However, this is important in implementation because a policy aims to put it into effect. Hanekom (1987), mentioned that the implementation of public policy is a challenging and complicated social process because all the appropriate stakeholders need to be included. Broadnax (1976) compliments this in his article by explaining that non-compliance to policies is because all the relevant stakeholders are usually not "activated" until the implementation phase has begun. However, Ghana's PWD Act (715) in section 41 established the National Council on Persons with Disability to formulate strategies for broad-based inter-sectoral involvement in the implementation of the Act. The governing body of the board includes representatives from the various key stakeholders, such as the deputy director of the Ministry of health and a representative from the ministry of local government and rural development.

Caesar (2015) conducted a study on the challenges with the implementation of the Disability Act in the Ghanaian Built Environment. The results revealed several factors

which hinder the successful implementation of the Act. One of these was the weakness and shallow nature of the provisions of the Disability Act . Some other factors were the poor enforcement of the Act, ignorance of the architects and engineers and the lack of a reference design guideline in the Disability Act. It also touched on negative attitudes towards PWDs, and poor coordination between departments as challenges obstructing effective implementation. However, one outstanding factor was the complexity and high cost of the design of a fully inclusive building. A respondent in Caesar's (2015) research *described his experience with constructing an all-inclusive building*. "Take it, for instance, the situation where you have to provide ramps at building entrances together with steps. The construction of the ramp brings another cost. Moreover, spaces in washrooms should be wide enough to ensure that wheelchair users can use them. Fittings and fixtures in buildings are specially designed to ensure that the disabled can use them. All these things add up to the cost of construction".

This increased cost of construction demotivates the clients especially when few disabled people will use the facility (Ceasar,2015).

To counter this, Vandebelt (2001) mentioned that even though designing an all-inclusive building may cost more, by integrating the principles of universal design, it is possible to create a comprehensive structure that is cost-friendly. The comprehensive design also boosts the brand of the company, which could translate into more customers and higher returns.

In addition, low demand by PWDs should not be an excuse because according to the WHO (2011) disability is an inescapable human condition and at some point in life, almost every person may experience some form of temporary or permanent disability. It

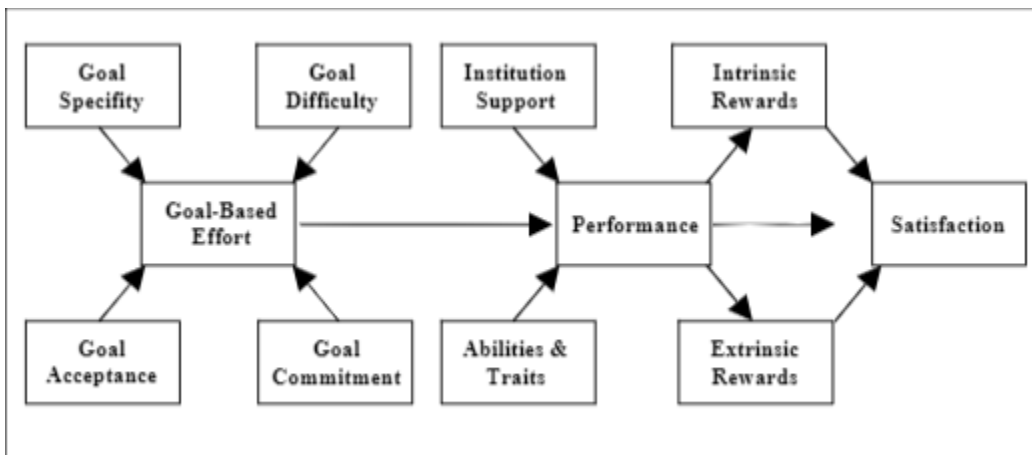
makes a case that a disability can affect the mobility of staff and customers who are not permanently disabled. This is in the event of an injury or for the comfort of an older person. In addition,, it is the right of PWDs to be able to access these services; thus, it is illegal to deny them this.

Ametepey et al. (2015) also ranked factors that affect the implementation of sustainable construction. Based on the literature, the six common factors were increased cost which affect profitability, lack of building codes on sustainability, lack of leadership and motivation, lack of sustainable materials, lack of demand for sustainable products and poor awareness by professionals and clients. Most of these findings are also consistent with those from Caesar's research (2015).

### 2.11 Theoretical Models

The Locke and Latham model (1979) serves as a lens for analysing the factors that public services consider, which influences compliance to the Disability Act. It views performance as a result of a specific goal-based effort. In their model, a goal-based effort is a function of goal specificity, which is the extent to which the goal (compliance) is clear. Goal difficulty is the degree to which the goal is attainable; goal acceptance is the extent to which individuals accept the goal as their own and goal commitment is the extent individuals feel committed to the outcome. Therefore, combining goal-based effort with the individuals' (bank's) capabilities and qualities and institutional support results in the observed level of performance. The performance leads to intrinsic and extrinsic rewards and, in turn, the perceived level of satisfaction, as shown in Figure 1 (Middlemass et al., 2005).

This lens focuses directly on a goal and other factors that affect its success. It is appropriate for this research because it seeks to uncover the challenges banks face in making their buildings accessible to PWDs in compliance with the Disability Act. In this study, the goal is that all public buildings need to be accessible to PWDs. Research has shown that the success level of this goal is low. Thus, this model helped analyse the various components that affect the effective implementation of the Disability Act specifically in banks as public buildings. This was done by reviewing the factors influencing the dedication banks have in making their buildings compliant with the Disability Act, how this dedication affects their execution of the goal and finally the benefits they reap as a result of this.



*Figure 1* Diagram showing the expanded goal setting theory of Locke and Latham.

Reprinted from “Factors affecting the implementation of the Special Education Needs Disability Act (SENDA) in higher education-built environment departments in the United Kingdom” by R. Middlemass, P. Farrell and T. Auchterlounie, 2005.

## CHAPTER 3: METHODOLOGY

### 3.1 Introduction

This chapter describes the approach used to collect and analyse data to help meet the research objectives. It touches on the research design for the study, the scope it covers, and the sampling strategy used. It also includes how data will be collected and analysed, the ethical considerations and the limitations of the research.

### 3.2 Research Design

A research design guides researchers in the process of collecting, analysing and collecting data (Amoako, 2012). This study makes use of the qualitative approach because it is useful for obtaining intricate details of phenomena that cannot be examined with the quantitative approach (Strauss & Corbin, 1998). In this case, there exists quantitative data on the number of compliant buildings; however, this study seeks to find out the factors influencing these figures. Thus, the qualitative approach, which is useful for getting in-depth knowledge on a particular subject (Arthur, 2017), is compatible with the research objectives.

This research will employ the use of semi-structured interviews to obtain information from participants. According to Choy (2014), flexible data collection tools such as interviews for an enquiry helps to unearth relevant information which could not be obtained using quantitative data collection tools like questionnaires. In addition, to elicit rich data collection, semi-structured interviews were employed to give participants more room to answer regarding their priorities (Miles & Huberman, 1994; Strauss & Corbin, 1998). It also helps to control the introduction and flow of topics by participants (Mishler,

1986). Thus, it would be a suitable tool in generating insights on the considerations of banks to promote accessibility of their branches to PWDs.

### 3.3 Research Scope

The study is focused on accessibility for persons with physical disability concerning Act 715. The material scope covers banks in the Greater Accra region because more than 35% of banks in Ghana primarily have their branches located there (ISSER, 2008). In addition, the 23 registered banks in the country have their representative offices in Accra, and a pilot study carried out prior to this study, revealed that the decision on location and building selection is made in a department usually found in the head offices of the banks. The staff in the smaller branches have little knowledge on these. Due to the location, the regulatory body that was contacted was the Accra Metropolitan Assembly (A.M.A), specifically the Works and Housing department in charge of works in the district.

### 3.4 Sampling Strategy

A combination of purposive and quota sampling was used to select the sample of the study.

Qualitative purposive samples are selected based on their capacity to provide richly textured information relevant to the phenomenon under investigation (Vasileiou et al., 2018). The study was targeted at the bank's department in charge of the selection of buildings to host their services. This department goes by different names in various banks such as "Business Support Services Department", "Projects and Facilities Department", and "Physical Facilities and Management Department". In each bank, the manager for this department was contacted for a one-on-one interview in person or over the phone.

In addition, architects who have worked on these bank buildings were contacted. The managers referred the architects since they work with them. Finally, a supervisor from the Works Department of the Metropolitan Assembly was contacted to find out the challenges the assembly faces with the enforcement of the Disability Act.

These people were contacted because of their status, experience and special knowledge on the implementation of the Disability Act in banks. The managers were contacted because they could contribute information on the factors the bank considers when selecting a building to host its services. They also shared knowledge on the challenges they face with making their branches inclusive. This contributed towards research questions 1 & 2 which are:

1. What factors account for the level of compliance in banks?
2. What challenges does the banking industry face with the implementation since their branches are not 100% compliant?

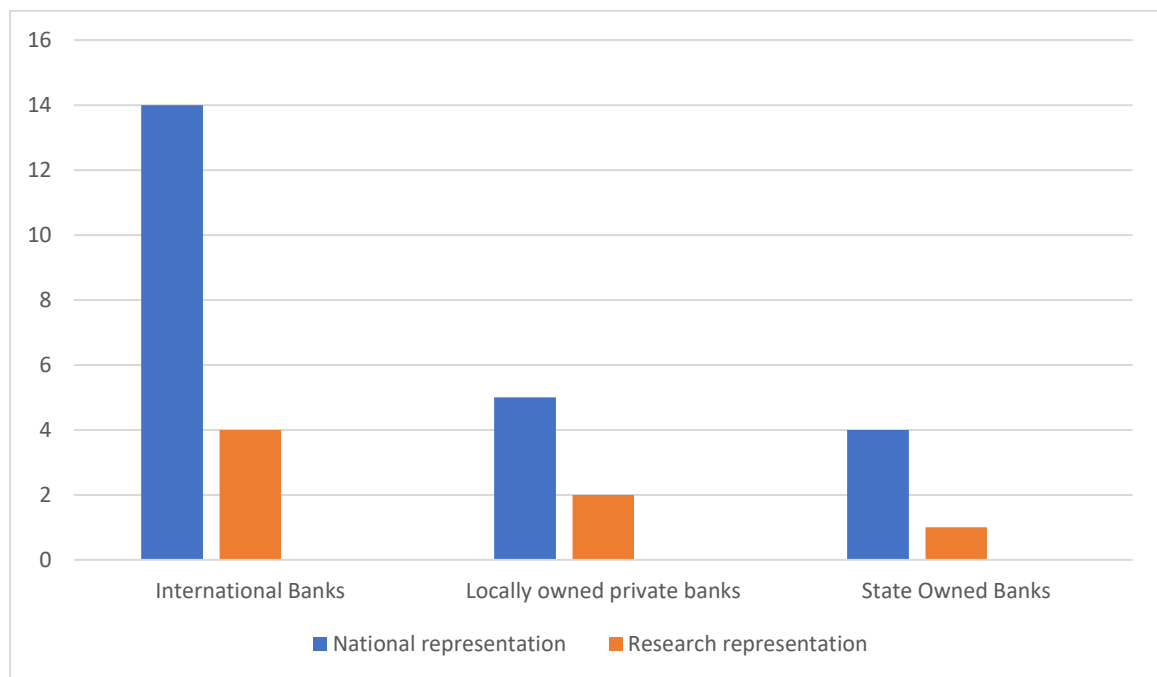
Asante and Sasu (2015) recommended that attention should be paid to architects in the implementation of the Disability Act. This is because architects, by the nature of their profession, create the built environment (Kadir and Jamaludin, 2012) while owners mostly play the significant role of financiers. Their responses contributed to research questions 1 & 2.

Finally, the A.M.A which is in charge of the overall development of the district, was contacted because they are in charge of building regulations and provided information on the challenges of implementing the Act. They contributed towards research question 2.

Bhattacharjee (2012) emphasises that qualitative research requires a small population which generates detailed information. Due to this, the 23 banks in Ghana were



grouped into three sections based on ownership (Ionescu, 2012). This is where quota sampling came in as the method in which the researcher decides on the specific characteristics and allocations of sample members to be selected (Mugenda & Mugenda, 2003). The banks were grouped into foreign, state-owned and locally owned banks as seen in figure 2 below. Foreign banks have the most significant representation (14), followed by the local banks (5) and then state-owned banks (4). Due to this, the proportion of sampled banks were as follows: four foreign banks, two locally owned banks and finally one state-owned bank as represented in figure 2 below.



*Figure 2* Chart showing distribution of banks in Ghana based on ownership.

In qualitative research, the most widely used principle for determining the efficiency of sample size is saturation (Vasileiou et al., 2018). Saturation becomes evident when ‘gathering fresh data no longer sparks new theoretical insights, nor reveals new properties of your core theoretical categories’(Charmaz, 2006). A total of seven banks were contacted because after interaction with this number of participants the information

obtained became redundant and no fresh insights were being generated. Thus, the saturation criteria was met. (Merriam, 1998). Three architects were contacted based on referrals from the managers contacted. The small size of this group is attributed to the fact that some of the architects had worked on multiple banks. Thus, the same individuals were referred.

Overall, 11 participants were interviewed, and this meets the criteria of Morse (1994), which suggests that qualitative researchers use a minimum of six participants in investigations where the objective is to understand the meaning of their experience. For confidentiality purposes, their identities have been replaced with letters for representation. Table 2 in the appendix gives a summary of participant description.

### 3.5 Data Collection

Qualitative data was collected using semi-structured interviews with respondents. Semi-structured interviews are conducted conversationally with one respondent at a time. It often blends open and closed-ended questions and has follow-up why and how questions (Adams, 2015). This tool was used because it allows the dialogue to meander around the topics under study as compared to verbatim questions used in a standardized survey (Adams, 2015). Admitting non-compliance can be a sensitive issue and thus, this tool was employed. Interviews are helpful when one needs to ask probing, flexible questions on topics that your respondents might not be sincere about if sitting in focus group discussions (Adams, 2015).

Seven out of the eleven participants were interviewed face to face. The remaining four were contacted via telephone due to external factors in the country. The responses were simultaneously recorded using audio recorders and transcribed on paper because

accurate transcripts are important for precise analysis and interpretation of interview data (Mishler, 1986).

### 3.6 Data Analysis

Based on each respondent's feedback to a question, the phrases and statements which were significant to the study were highlighted. The constant comparative method, which is an inductive data coding process used for categorizing and comparing qualitative data for analysis was used to develop themes (Mathison, 2005). The themes and categories were grouped and coded. They were then compared and related to the findings of other related studies (Bazeley, 2009) and presented.

### 3.9 Limitations of Data Collection

Due to the narrow scope of the study, the results cannot be generalized to all industries in the country. The study sampled individuals in the banking sector and other stakeholders who aid in their work. This is not representative of individuals in other industries in Accra and other regions.

Also, a weakness of interviews as a data collection tool is the "interviewer effect". This is when participants respond differently depending on how they perceive the interviewer (Denscombe, 2007). Age, sex and ethnic origins of the interviewer influence the sum of information participants are willing to give and how honest they are about it (Denscombe, 2007). Although it is impossible to evaluate its effect on my study fully, the consistency of the interviewees' responses was used to check this.

### 3.7 Validity and Reliability

Reliability is described as how consistent the measurement of the data collected is under varied conditions (Hsieh & Shannon, 2005). The validity of an interview depends on

the extent to which the respondent's opinions are genuinely reflected (Newton, 2010). The use of leading questions could threaten this validity. This was averted by having the questions reviewed by my supervisor and the Institutional Review Board (IRB), a board of research professionals.

Conformability is also an alternative for assessing the credibility of qualitative research (Mandal, 2018). It refers to the objectivity between two or more independent parties about the accuracy of the data, its relevance and meaning (Mandal, 2018). This criterion was met by comparing data, reviewing literature for similar studies and obtaining multiple perspectives (Strauss & Corbin, 1998).

### 3.8 Ethical Considerations

The consent of all participants was sought before undertaking any of the interviews. The identities of the respondents have been kept anonymous throughout, and their responses were not given under duress. Participants were given the option to withdraw from the study at any point or refuse to answer any question. This did not influence its relationship with the interviewer and the representing institution.

## CHAPTER 4: DATA ANALYSIS & FINDINGS

### 4.1. Overview

This chapter includes the findings of the study based on the interviews carried out. It also includes an analysis of this data collected during the study. To meet the objectives of the study three main stakeholders, namely facility managers of the various banks, architects who have worked on the buildings of these banks, and lastly a representative from the Works and Housing department of the A.M.A were contacted. Their responses were coded and grouped into various themes which answer the research questions:

1. What factors influence the design and selection of bank branches in Accra?
2. What challenges does the Banking industry face with implementation since their branches are not 100% compliant?

The data was collected between February and March 2020.

#### 4.1 Factors that influence the design and selection of bank branches in Accra?

Some themes which emerged under this section were: Research, specific requirements in the industry, standards and the engagement of stakeholders.

#### Theme 1: Feasibility Study

Prior to the construction or purchase of any building to host a bank's facility, a department conducts a feasibility study on the proposed area for the branch. This department is usually located in the head office and looks at the benefits of moving to this area and its effect on the bank. The department is variously named; common among these names are 'Business Continuity' and 'Business Activity'. During the feasibility study, the team narrows down a specific radius where the bank should be located, and then scouts for suitable buildings that meet their requirements. It was explained that buildings could either

be constructed from scratch or rented out. Banks mostly prefer to rent and remodel existing buildings. Since banks handle large sums of money in their operations, factors like security are very crucial while they conduct their feasibility study. According to architect A, "Security is an important factor the Bank of Ghana insists on. The security of the cash coming in and the staff of the bank. This influences decisions like the design of the tellers' desks and the positioning of the various departments." The team also looks out for accessibility for vehicles such as the bullion van that carries in the money. Thus, the feasibility of the location and the design of the building is assessed during this stage.

## Theme 2: Specific Building Features

### *Accessibility*

Architects lookout for buildings that are easily accessible by customers. According to the facility managers, the competitive nature of the industry requires that they make the banks easily reachable by customers. This includes their vehicles and physical bodies, and it contributes to the confidence clients have in the bank. Bank C Respondent 3 mentioned that "Easy access gives the bank a good standing with the public and prevents discrimination" it correspondingly increases the bank's brand and reputation. The bank's design principles which are found in its *branch book guide* the design of accessibility features in their branches. Another standard that governs the accessibility of banks is the National Building Code. It is used during the drawing of the design before the submission to the Metropolitan Assemblies. Also, the Internal Compliance division of the bank communicates the accessibility features required by the B.o.G to every branch. This is incorporated in the design of their buildings.

### *Visibility*

To attract customers, banks are set up in locations that are very visible to customers. This contributes towards growth in their customer base and brand awareness. However, there are occasions when there are few options available and banks settle for buildings that do not meet these criteria accessibility features. This is consistent with a study done on public buildings in Kumasi where banks had 75% accessibility for wheelchair users (Yarfi, Ashigbi, & Nakua, 2017). It however affects the contribution of Bank A Respondent 1, who stated that “During the feasibility study, if the building does not meet the accessibility requirements, the bank does not go-ahead to purchase.” The data from observation shows that this is not consistent with all banks because there are some branches that do not have accessibility features for PWDs.

### Theme 3: Standards Used

#### *Bank's Design Principle*

Every bank has a standard design for each branch which adds to its brand. This document contains the style and design for every branch, including the colours to be used, the form of the teller's desk and more. Most importantly, this document outlines certain accessibility features every branch must have, including the designation of unique bathrooms for persons with disability. This document, complemented by the building code, contributes to the rate of compliance for most banks. It also highlights the consideration of PWDs in the design of their branches.

#### *National Building Code*

The National Building Code contains regulations that *can* be adopted by various departments, the metropolitan, municipal, district assemblies and other private and public

bodies. It covers administrative laws, development control rules and general building requirements (Ghana Building Code, 2012). The facility managers and architects engaged are very knowledgeable on the Building Code, and they make use of the document during the drawing up of the design for the buildings. The plan is then submitted to the Metropolitan Assembly for approval. The revised building code contains required features for every building, including features that ensure smooth mobility for persons with disability. This finding contradicts the claim in Caesar (2011) which stated that there is no Building Code in Ghana to serve as a standard for industry professionals.

#### *Architects' data*

Prior to the release of the reviewed national building code, the "Architects' data" written by Ernst Neufert was used to guide architects on basic rules for designing buildings. It includes features that ensure smooth mobility for persons with disability. This document is used by architects that work on bank buildings and is introduced to them in the university. This introduces architects to the importance of including disability features in buildings and provides guidelines on how to go about this. This should contribute towards increased compliance of public buildings in the country.

#### Theme 4: Engagement of Stakeholders

##### *Architects/Engineers*

The banks have their internal architects and engineers who they engage during the construction or selection of a building to rent. Based on the responses from participants, banks prefer to rent buildings rather than build from scratch as this is a cheaper alternative. When the building is to be constructed, the architects and engineers are engaged from the design stage till completion. However, when the space is to be rented in an existing building, they are mostly engaged when the space needs to be remodelled and to ensure



that the building meets safety certain requirements. From the interviews conducted, these architects were knowledgeable about the requirements for mobility for the disabled and the Disability Act and used it to guide their designs. This finding contradicts Caesar's study (2015) which revealed that even though the majority of the designers are aware of the Disability Act, its utilisation in the design of facilities is low. It also counters Salmen (2001), where she mentioned that building professionals such as engineers and architects fail to recognise the dynamic needs of society. The architects employed by the banks were very knowledgeable about the Act and implemented it when they could.

The availability of funds by the banks promotes the work of the architects as well. That is, they can afford to implement these features regardless of the marginal cost that they will incur. Architect D Respondent 10 mentioned that “to construct a simple ramp with a handrail cost GHC4000.” According to respondents, not all businesses may be in good financial standing to consider prioritising this.

#### *Internal Compliance*

The Internal Compliance team analyses the risk of the company and the requirements the building is to meet by law. The team reviews the drawing of the architect to ensure that it complies with various regulations in the industry, especially the B.o.G's regulations. The internal compliance team also communicates to the company new regulations that are released to ensure compliance. They liaise with the B.o.G and ensure that all works meet the requirements before the inspection.

#### *Bank of Ghana*

The Central Bank supervises the activities of other banks in a country. In Ghana, the B.o.G is the Central bank (Ionescu, 2012) and under Ghana's Act 612 and 673, the

functions of the Central Bank as the regulator are defined. One of these which is relevant to this paper is that it is to regulate, supervise and direct the banking and credit system to ensure smooth operations (Bank of Ghana, 2020). This supports why the B.o.G inspects compliance with the Persons with Disability Act since it contributes towards the smooth operations of the banks. Information gathered from the interviews shows that the B.o.G comes in at the end of the construction process to inspect the buildings. If the necessary security and accessibility requirements are not met, the branch license will not be issued to the bank.

They also communicate the features they look out for in buildings to the internal compliance division of the banks so that the architects incorporate these in their designs. The branch license gives banks the authority to open a branch in an area and begin operations. In addition, the B.o.G issues heavy penalties on banks that fail to comply with the necessary regulations. These penalties include huge fines which are deducted from the bank's funds being kept by the bank. Thus, most banks do their best to comply with regulations to avoid these penalties.

#### *Metropolitan Assembly*

According to the local governance Act 936, a District Assembly includes a Metropolitan and Municipal Assembly. The Metropolitan Assembly was contacted for this research. One of the functions of the District Assembly is to have a District Planning Authority in charge of issuing permits for building construction. They also have the right to inspect works while they are ongoing. Most of the banks engage the Metropolitan Assemblies to review plans submitted and for counsel on what is permitted and what is not.

#### 4.2. Effectiveness of the Standards Used in the Selection and Design of Bank Branches

As mentioned in the previous section, the bank's design principle contained in its branch book, the National Building Code and the Architects' Data guide the selection and construction of bank buildings. From the interviews conducted, even though most of the respondents had little knowledge of the details of the Disability Act, they had general ideas about what the Act requires concerning accessibility in public buildings. The architects employed by the banks had the most knowledge of the Act. These features are found in the standards used to select and design buildings; thus, they are useful in increasing mobility for persons with disability in banks.

#### 4.3. Challenges that Affect Implementation of the Act

Based on research and observation, not all banks are 100% compliant with the Disability Act. Findings from the interviews reveal that factors like the date the building was constructed, space available and the lack of urgency for the change are factors that influence compliance. Results show that for the branches which are in old buildings, the accessibility features were not a requirement at the time of construction. Due to this, the banks' regulators do not pay much attention to those buildings, provided that they have an alternative method for PWDs to access their buildings.

However, some architects discovered that the availability of space to make the necessary adjustments posed a challenge to implementation. "It is easier to plan on paper and implement than to implement and make modifications on-site". These are the words of one of the Architect A when describing the cumbersome process of constructing a ramp in an existing bank branch. Space was not enough due to the ratio of 1:12 the ramp's slope

is supposed to meet. This means that for every inch the ramp rises, one foot of the ramp must be constructed. This ensures that the incline is not too steep for users.

On the other hand, it means that there must be a specific amount of space for the ramp to be constructed well. In the old branches, there is not always enough space for the ramp to be constructed since it was not considered prior to construction. Thus, for one of the branches, the ramp had to be bent into the parking lot space. This means that customers on wheelchairs would need to wheel up a long-curved ramp before gaining access to the bank.

Also, for most of these old buildings, the banks have not remodelled due to the lack of urgency. For years, customers have used those branches, and it has not affected the service so much. Thus, they do not pay much attention to remodelling them. Since most branches are one floor, the need is not always seen to include certain accessibility features because there isn't much movement required by the customers.

In addition, the Act (715) stipulating these requirements is not explicit on who has the power to enforce this law. Thus, the engineers in the Assembly attribute the low rate of compliance to their lack of power to enforce the law. After a thorough analysis of the Act, it is clear what the requirements for public buildings are and the penalty attached for non-compliance. However, it is not explicitly stated who has the power to implement this. The Metropolitan Assemblies in charge of issuing permits use the National Building Regulations as a standard for regulating the construction of buildings. These Regulations, however, have not been revised to include accessibility features for persons with disability.

The National Building Code was amended to include the elements necessary for accessibility for the disabled and released in 2018 by the Ghana Standards Authority. Yet,

it mainly serves as an advisory tool for industry professionals because it lacks legal backing. This is because the Assemblies in charge of regulating buildings are set up by the local governance act of 1993. Under it, they are to use the National Building Regulations L1 1630 (1996) which has not been revised. Thus, they can only give advice on compliance to section 6 of the Persons with Disability Act which covers public buildings. However, they do not have the authority to prosecute offenders for failing to comply.

#### 4.4. The Effect of Compliance on the Bank

##### Theme 1: Goodwill/Reputation

Compliance with the Act boosts the reputation of banks not only to the clients but also to the regulators. The smooth mobility for customers who are permanently or temporarily disabled contributes to the quality of service received by these customers. It strengthens the relationship between the customer and the bank.

##### Theme 2: Increased Customer Base

Permanently disabled persons account for 3% of the Ghanaian population (Ghana Statistical Service, 2014). These citizens have rights to access financial services, and compliance with the Act will make it more convenient for them to bank with these institutions. It will also contribute to the goal of the B.o.G to increase the nation's financial inclusion rate. Also, temporarily disabled persons will not find it difficult to access the services of the banks.

##### Theme 3: Increased Employment

Promoting an environment that does not inhibit mobility for disabled persons would also encourage persons with disability to seek employment in such institutions,

thereby improving diversity and closing the poverty gap for persons living with disabilities.

Theme 4: Profit Increase

The accessibility of the bank to all persons would increase the customer base, and this could translate into an increase in profit for the various banks.

4.5. Analysis of Findings

The analysis of the research findings was done using the Locke and Latham model (1979) as a framework. It considers 8 factors which contribute towards the effort a firm puts into achieving a goal, their output and the resulting satisfaction.

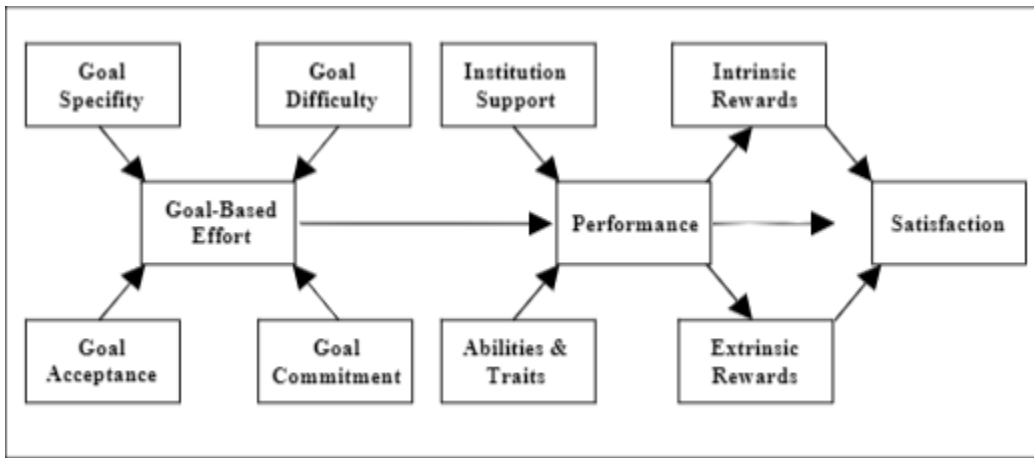


Figure 1: The Expanded Goal Setting Theory of Locke and Latham (1979)

1. Goal-Based Effort

The goal-based effort focuses on the dedication the party, in this case the banks have in their quest to be compliant with the Disability Act.

### *Goal Specificity*

According to Locke & Latham (1991), goal specificity falls under one of the attributes of a goal which is goal content. This can range from a vague goal, (“work on this task”) to a specific goal (“try for a score of 62 correct on this task within the next 30 minutes”). With regards to this study, the goal is that all public buildings, in this case bank buildings, are made accessible to persons with disability. The Persons with Disability Act 715 states this as: “A person who provides service to the public shall put in place the necessary facilities that make the service available and accessible to a person with disability.”

This requirement would fall under a vague goal such as “work on this task”. This is because it does not explain how exactly this is to be achieved neither does it define what facilities for accessibility is. This vagueness contributes towards the finding in branches that were not accessible, where the explanation given was that they find alternative methods of helping PWDs access the service. A respondent mentioned that in one of their branches, there is no ramp at the main entrance to ensure accessibility for PWDs. Due to this, PWDs are usually redirected to the basement where there is a lift. They use this longer route to gain access into the bank to gain their services.

Respondent 3 Bank C explained that: “sometimes there are physical constraints to carrying it out, so if it is justified, you can look at alternatives.” An example of this physical constraint could be a lack of space. When this happens and the owners are able to explain this problem to the authorities and provide an alternative means by which PWDs will be able to access the building or the service, they are not penalized. The vagueness of the

Disability Act contributes to this because accessibility is not clearly defined and is left to the discretion of the various stakeholders. In addition, many accessibility standards can be used; however, since the Disability Act does not refer to any specific standard, this leaves compliance at the discretion of architects and other stakeholders. In Tudzi, Danso, & Ashigbi (2011), they assessed the accessibility of the buildings in the University of Ghana, Legon, using the British Standards and Ghana's National Building Regulations (LI 1630, 1996). In Kumasi, Yarfi, Ashigbi, & Nakua (2017), used the Abridged form of the Americans with Disabilities Act Accessibility Guidelines (ADAAG 1990) to assess different public buildings. The National Building code is used by architects as well and it was developed by the Ghana Standards Authority and revised to include disability criteria. However, the Metropolitan Assemblies use the National Building Regulations to guide their operations. The lack of a specific standard referenced in the Disability Act contributes towards the vagueness of the objective of total compliance in public buildings.

### *Goal Acceptance*

Acceptance of rules by key stakeholders plays a significant role in practical implementation. When subjects were given a choice, they rejected impossible goals and accepted the easy ones. (Locke & Latham ,1991). Simply assigning goals to organization members may not result in their commitment to those goals, especially if it will be challenging to accomplish. (Lunenburg, 2011). Findings from the research show that participants have accepted the requirements of the Disability Act because it influences the decisions they make in selecting or constructing new buildings. Even though the difficulty level is quite high due to the challenges that obstruct implementation, the self-efficacy of



construction professionals and managers was high and balanced out the difficulty. In this case, self-efficacy is the internal belief regarding how competent one feels about his or her job. The higher it is, the higher the tendency of staff to set high goals to achieve their target. From this analysis, the stakeholders in the banking industry have accepted the goal to make their buildings accessible by the Disability Act, however, it does not fully reflect in their implementation. Other factors such as the commitment to the achievement of this goal will be looked at.

### *Goal Commitment*

Commitment is described as the degree to which the company or industry is attached to the goal, considers it as important and is determined to meet it regardless of the obstacles that it will face (Locke & Latham ,1991). Evidence from literature and findings exposed the lack of urgency to make older branches accessible and revealed that not all branches are compliant, making the commitment of the Banking industry questionable. Goal commitment falls under “Intensity” as an attribute of a goal (Locke & Latham ,1991). This is a broad term referring to scope, clarity and mental effort (Rand, 1990).

From the definition of intensity, it becomes obvious that the specificity of the goal influences the level of commitment of the company. In this case the clarity and scope of the goal are not clearly defined in the Disability Act. Thus, the gap between the goal acceptance of the banks and their level of commitment could be attributed to the poor specificity of the Disability Act. This is because as explained in the findings, the accessibility requirements have been left to the discretion of the various stakeholders.

They implement it based on how they understand accessibility to their buildings. Thus, the degrees of accessibility differ across various banks depending on the standards they have. This is as a result of the vagueness of the Disability Act, which also does not specify the body in charge of enforcing it. Since the older branches have been used for years and accessed by different types of people, they are perceived as accessible resulting in the lack of urgency to modify them.

The competitive nature of the Banking industry is another factor that influences its commitment to achieving compliance. Architect D, bank F mentioned that because of competition within the Banking industry, it is important for banks to stand out. If one's bank is not accessible, the customer will find a different one. This is consistent with Owusu Hemeng's (2015) study where a respondent explained that she changed her bank because the ramps were inaccessible.

In addition, the regulatory body for the Banking industry; the B.o.G considers accessibility factors before issuing branch licenses. However, their primary focus is more on security in the branch and less on accessibility for customers. When these three factors are brought together, they greatly impact the effort the company (bank) makes towards achieving an all-inclusive space for PWDs. The vagueness of the Disability Act contributed towards the commitment, acceptance and difficulty of achieving the goal. Thus, these factors affect the effort the banks could have made in working towards accessible branches for PWDs.

#### *Goal Difficulty*

According to Lunenburg (2011), Goals must not be easy, they must be difficult but attainable. In this case, the goal is to ensure that all banks are accessible by PWDs.

However, challenges with implementation such as spatial constraints, financial constraints and stakeholder management (engaging with landlords) hinder the ease of achieving this goal. Since banks prefer to rent buildings instead of building, a challenge they face is getting permission for the owners of the property to remodel the buildings to meet their standards. In addition, the vagueness of the Disability Act leading to the poor enforcement of it also contributes towards the ease of achieving this goal. According to Locke & Latham (1991), “specific and challenging or difficult goals lead to a higher level of performance than vague but challenging goals”. Thus, the vagueness of the goal here, combined with the obstacles that obstruct its implementation contribute towards the compliance level in the Banking industry.

## 2. Performance

The goal-based efforts of the company contribute directly towards their performance. Several studies show a positive relationship between effort and performance. An analysis of sales representatives in three different companies by Brown and Leigh (1996), showed a positive fit between effort levels and performance. Thus, the factors analysed above under goal-based effort of banks would contribute towards their performance in attaining compliance. Factors such as institution support and the abilities and traits of the Banking industry in Accra are also variables that affect their overall performance in achieving full accessibility.

### *Institution support*

The environment the banks are in contribute towards their performance. According to Respondent 1 Bank A, “Banks operate in a highly regulated environment, so they will

always be more complaint.” Architect A also mentioned that “everyone is afraid of the Bank of Ghana; they issue heavy fines for non-compliance and they won’t issue your branch license if you don’t meet their standards.” In each interview, the B.o.G was mentioned more times than the A.M.A. This could be because banks work more closely with them as compared to the A.M.A. Findings from interviews show that each bank has an Internal Risk and Compliance department where the requirements of the B.o.G are communicated. Even though these requirements are geared towards security, the department is in constant communication with the B.o.G. Thus, their requirements have more clarity and implementation is more efficient. Some of the things the B.o.G looks out for are the location of the vault where money will be kept, access for the bullion van and the security of the staff.

In addition, the B.o.G is more forthcoming with penalties because if banks are not compliant with their building standards, their licences will not be issued. This is very different from the Assemblies which do not enforce the law because they simply lack the power to do so, as stated in the findings. The B.o.G, is said to look out for accessibility features before issuing the branch licenses which helps with the implementation of the act. This is because according to Architect D “Risk is important to the bank. They face reputational risk and can easily be sued”. Thus, findings from the interviews reveal that the B.o.G tries to ensure that banks follow the laws of the country to reduce risk.

#### *Abilities and traits*

Battle (1966) found that the relationship between goals and performance is stronger in high ability subjects than in low ability subjects. In this case, subjects refer to the banks.

The abilities and traits could include human resources, financial resources, bureaucracy, norms and more. According to the respondents, banks usually hire architects with experience and credibility in the design of their buildings. This reflected their high knowledge of the Disability Act and its requirements during the interviews.

Also, cost was one of the challenges associated with the implementation of the Disability Act, however, findings from Architect D reveal that even though incorporating the additional features could be costly, it is not a major issue for banks. Their strict regulation by the B.o.G also contributes towards improved performance in the implementation of the Disability Act in new branches especially.

Finally, the branch book, used by each bank outlines how the branch should look to ensure uniformity and for branding purposes. Accessibility facilities for PWDs are encompassed in the design principles in this book. It is a standard each bank has which contributes towards their compliance to the Disability Act.

### *Intrinsic Rewards*

Rewards include different types of benefits such as cash payments and working conditions (Eric, 1994). According to Ozutku (2012), a strategically designed rewards system is one that is linked to activities, attributes and work outcomes that support the organization's strategic direction and goals. Intrinsic rewards promote self-esteem and accomplishment and include status, recognition, personal satisfaction and growth (Mahaney & Lederer, 2006). Good standing with the regulatory bodies and the improved ambience of the bank facility were some of the intrinsic rewards given by managers and architects who were interviewed. Managers noted that one benefit of being compliant was

that it the banks felt good knowing they are in good standing with the B.o.G and A.M.A. This can be linked to the point about the avoidance of reputational risk by banks. Also, the facilities that enable mobility for PWDs were said to contribute towards the atmosphere in the bank. This aids in improving the customers experiences.

#### *Extrinsic rewards*

Some of the main extrinsic rewards mentioned by the managers in the banks included goodwill between the bank and their customers as well as a boost in the bank's reputation. The managers mentioned that for their branches that had accessibility features, they noticed that it improved the relationship between the bank and their customers and promoted word of mouth marketing for the branch. These rewards result in the retention and increase of the customer base which is positive for the bank. One respondent mentioned that "non-compliance means you are denying the customers access to vital services and denying the bank business as well". Another extrinsic reward was that improved accessibility in the banks could contribute towards an increase in the employment rate of PWDs in these facilities.

Overall, the intrinsic and extrinsic rewards, serve as a motivating factor for banks to increase compliance in their branches.

### 3.Satisfaction

Combining the goal-based effort of banks with their resultant performance contributes towards the overall achievement of the goal which results in satisfaction.

However, the foundation of the goal, which is the requirement that all public spaces be made accessible to PWDs is vague. It is also accompanied by other challenges which contributes towards the level of compliance of the banks and results in a low level of satisfaction because there is a lot of room for improvement.

## CHAPTER 5: CONCLUSIONS & RECOMMENDATIONS

### 5.1 Conclusions from Research

Based on the findings and analysis above, the following conclusions were drawn.

1. What factors influence the design and selection of bank branches in Accra?
  - I. Standards such as the design principles of each bank contained in its branch book contain features which consider mobility for PWDs. The National Building Code also guides the design of bank branches; however, it was only recently revised to include accessibility features for PWDs.
  - II. Banks employ experienced and credible architects to work on their buildings. These architects are knowledgeable on the Disability Act and use the National Building Code as a guide.

Thus, there is some evidence of consideration of PWDs in the design of bank branches.

However, the following challenges were observed:

2. What challenges does the Banking industry face with compliance since their branches are not 100% accessible to PWDs?
  - I. There is poor accessibility for PWDs in some bank branches because they are old buildings which have been used for years. Thus, there is a lack of urgency to remodel them.
  - II. The lack of space in existing buildings is an obstacle to the inclusion of features like ramps in bank branches.
  - III. Most banks prefer to rent instead of constructing branches. This presents a challenge when landlords or building owners do not want their buildings remodelled or modified.



- IV. The basic problem with implementation is the vagueness of the provision in the Disability Act. This is because it does not explicitly state what accessibility is, thus leaving it to the discretion of architects and building owners.
- V. The Act also does not explicitly state who is in charge of enforcing this law.
- VI. The National Building Regulations is the legal document used by the Metropolitan Assembly to assess buildings. It however has not been revised to include disability features. Thus, the revision of the building code is insufficient because it does not give power to the Assembly to enforce the law.
- VII. The Bank of Ghana and the metropolitan assembly do not inspect buildings undergoing construction early enough, which makes it difficult to pull down an existing structure.

## 5.2 Recommendations

Based on the findings of the research the vagueness of the Disability Act can be attributed as the cause of many of the challenges banks face with implementing the requirement. The Disability Act must be revised to include a reference to a specific guideline or standard that can be used to design all public buildings. This will help promote uniformity in the accessibility of public buildings especially in banks in Accra. The Act should also be revised to specify the body in charge of enforcing compliance to it.

The National Building Regulations must also be revised to include accessibility features for PWDs in buildings. This would empower the Assemblies in the country to enforce the requirement in the areas under their jurisdiction..

Finally, the bank of Ghana and Metropolitan Assembly must supervise the construction of public buildings at the initiation stage of the project, during construction and at the completion stage. This will help promote compliance to the building regulations and would bridge the gap in the difference between drawings submitted to the assembly and the actual buildings.

### 5.3 Recommendations for future research

The poor communication of the body responsible for enforcing the Disability Act has brought to light the importance of stakeholder involvement in policy making and implementation. For future research it would be important to look into the relationship between law enforcement bodies and effective policy implementation in Ghana.

Future works can also analyse the process of policy creation and implementation as it may expose some bottlenecks which can be addressed to improve policy implementation in the country. Also, Yarfi et al's research (2017) revealed that very few religious buildings in Kumasi were wheelchair accessible. Due to the highly religious climate in the country it would be good to investigate the compliance of religious buildings to the PWDs Act. Finally, in the Bank of Ghana's quest to increase its Financial Inclusion rate, future works can investigate the compliance of other financial institutions in the micro-finance sector to the Disability Act.

In order to have inclusive and sustainable cities, the community must work on integrating all groups of people into social activities and business. This would improve the quality of service in the country and make life easier for all parties.

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## APPENDICES

## Appendix 1

Table 1: Results from field data on accessibility of the built environment in the University of Ghana.

FACILITY	No Restriction		Mild Restriction		Moderate Restriction		Severe Restriction*		Total
	No.	%	No.	%	No.	%	No.	%	
1. Car Parks	-	-	9	19.6	15	32.6	22	47.8	46
2. Access Routes	7	17.5	22	55	10	25	1	2.5	40
3. Entrances	9	25	5	13.9	14	38.9	8	22.2	36
4. Doors	31	39.7	13	16.7	28	35.9	6	7.7	78
5. Vertical Circulation	10	30.4	8	24.2	7	21.2	8	24.2	33
6. Horizontal Circulation	31	66	7	14.9	8	17	1	2.1	47
7. Signage	23	54.8	9	21.4	7	16.7	3	7.1	42
8. Sanitary Areas	-	-	1	6.7	4	26.7	10	66.6	15

Source: Tudzi, E., Danso, A. K., & Ashigbi, E. Y. K. (2011). *Mobility Challenges of Persons with Disabilities (PWDS) At the University of Ghana*. 17.



Table 2: Respondent Characteristics

<b>Category</b>	<b>Respondent I. D</b>	<b>Role</b>
Foreign banks	Bank A Respondent 1	Head of Business Support Services
	Bank B Respondent 2	Projects and Facilities Officer
	Bank C Respondent 3	Physical Facilities and Management Manager
	Bank D Respondent 4	Facilities Officer
Locally owned banks	Bank E Respondent 5	Head of Leasing and Contract Administration
	Bank F Respondent 6	Health and Safety Manager
State owned bank	Bank G Respondent 7	Facilities Officer
Architects	Architect A Respondent 8	Architect for multiple Banks
	Architect B Respondent 9	Architect for Bank D
	Architect D Respondent 10	Architect for Bank F
Regulator	Accra Metropolitan Assembly Respondent 1	Project Supervisor

