



REPORT

on results of monitoring

physical identification of internally
displaced pensioners in Oschadbank
locations in Dnipropetrovsk, Donetsk,
Zaporizhzyha and Luhansk oblasts

INTRODUCTION

In accordance with the 5 November 2014 decision of the Cabinet of Ministers of Ukraine Number 637, «On the implementation of social benefits for internally displaced persons»,¹ internally displaced persons (IDPs) of a pensionary age must undergo physical identification (PI) with their electronic pension certificates at offices of Oschadbank. At first, IDPs undergo PI at 6 month intervals two times. After, they must undergo PI once per year. If the IDP doesn't have an electronic pension certificate, he must undergo PI every 3 months.

Electronic pension certificates and regular payment cards are valid for 3 years.² If an IDP doesn't undergo PI, Oschadbank blocks the IDP's account until the IDP undergoes PI.³ The bank also informs government organs such as the Office of the Pension Fund of Ukraine about blocking the IDP's account.⁴

In late February and early March of 2017 IDP pensioners started receiving text messages informing them of the need to undergo PI. These messages were received by pensioners with electronic pension certificates as well as those without (the latter use regular payment cards). As a result, huge queues were observed at Oschadbank branches, particularly in Donetsk and Luhansk Oblasts.⁵

On 1 May 2017 the government announced the timeframe for the first PIs.⁶ Oschadbank informed the NGO «Right to Protection» (R2P) that the bank sends text messages to IDPs recommending dates to undergo physical identification. These measures are done to avoid lengthy queues and overworking bank staff.⁷

However, there is no legal framework determining what specifically personal identification entails for an IDP pensioner. Further, Oschadbank has not provided special guidelines for PI of persons with disabilities. In fact, the disabled are subject to the same general PI requirements as the able bodied, with Oschadbank not taking into account circumstances which would prevent such people from undergoing PI.

¹ 5 November 2014 decision of the Cabinet of Ministers of Ukraine Number 637, «On the implementation of social benefits for internally displaced persons», link: <http://zakon2.rada.gov.ua/laws/show/637-2014-%D0%BF>

² In accordance with paragraph six of clause 1 of the Resolution of the Cabinet of Ministers of Ukraine dated 5 November 2014, No. 637 «On the Implementation of Social Payments for Internally Displaced Persons», link: <http://zakon2.rada.gov.ua/laws/show/637-2014-%D0%BF>; According to the «My Account» Tariff package Oschadbank, which provides for IDPs to receive pensions and/or monthly cash aid, link: https://www.oschadbank.ua/ua/private/paycards/moja_kraina/

³ Rules for conducting individual Oschadbank account transactions, link: <https://www.oschadbank.ua/upload/Pravila%20chinny%20z%202016.12.30.pdf>. According to the third paragraph of paragraph 13 of the Procedure for Issue of Payment Cards, which at the same time is a pension certificate, approved by the Resolution of the PFU «On Implementation of the Resolution of the Cabinet of Ministers of Ukraine dated 14 March 2016, No. 167» On Amendments to certain Resolutions of the Cabinet of Ministers of Ukraine, link: <http://zakon2.rada.gov.ua/laws/show/z0633-16/paran5#n5>

⁴ In accordance with the resolution of the Cabinet of Ministers of Ukraine dated 8 June 2016, No. 365 «Some issues of the implementation of social benefits for internally displaced persons», link: <http://zakon2.rada.gov.ua/laws/show/365-2016-%D0%BF/paran66#n66>

⁵ According to R2P monitors, in the middle of March in Kostiantynivka and Pokrovsky 200-300 people were in Oschadbank queues; in Volnovakha 650 IDPs were in the queue (!), queues in the Luhansk region were observed in Severodonetsk, Stanitsa-Luhanska, Rubizhne, Lisichansk, Belovodsk. On 20 and 21 March, up to 500 people were observed in the Bilivodsk queues and the same number of people were in line at Stanislana-Luganska on 22 and 23 March while up to 100 people were observed in queues in Lisichansk. 24.03.17 in Severodonetsk - up to 40. On 13 March a man died in the 100 person Severodonetsk queue.

⁶ In accordance with the Government resolution dated 22 March 2017, No. 186 «On Amendments to Item 1 of the Resolution of the Cabinet of Ministers of Ukraine dated 5 November 2014 No. 637», link: <http://zakon2.rada.gov.ua/laws/show/186-2017-%D0%BF/paran5#n5>

⁷ Letter of Oschadbank No. 53 / 5-16 / 615 of 29 March 2017.

Oschadbank stipulates that to pass physical identification, the following conditions must be met:

- The IDP should visit any Oschadbank office in person with their passport or another document replacing the passport and a bank card
- The person should present 1) a regular payment card or digitized pensioners' ID and 2) A passport or another document replacing the passport
- Use the payment card or digitized pensioners' ID to complete an operation such as cash withdrawal or account balance review⁸

R2P has recorded numerous obstacles preventing IDP pensioners from receiving their pensions, including PI. Thus, PI was chosen as the topic for this thematic monitoring.



Monitoring was carried out in various parts of Dnipropetrovsk, Donetsk, Zaporizhzhya and Luhansk Oblasts from March 27 to March 31, 2017.

GOALS OF MONITORING:

- Determining IDP awareness regarding the need for PI
- Identifying problems preventing IDPs from completing PI
- Assessing the feasibility of IDPs with disabilities undergoing PI

METHODS OF MONITORING:

- Interviewing IDPs (629 in total) who intend to undergo PI or have already undergone PI
- Interviewing Oschadbank employees (103 in total)
- Supervising the process of PI in Oschadbank departments (92 departments, including at entry/exit checkpoint Novotroitske)

The information received from this monitoring has been used to formulate recommendations. R2P considers mandatory PI incompatible with the rights and freedoms of Ukrainian IDPs as stipulated by the Ukrainian constitution. Recommendations have been provided to Oschadbank as they are the only institution carrying out PI.

⁸ Letter of Oschadbank No. 53 / 5-16 / 615 of 29 March 2017.

SURVEY OF IDP PENSIONERS

A total of 629 people were interviewed at Oschadbank branches. Of the 629 interviewees 123 (19.6%) had disabilities. 403 women (64.1%) and 226 men (35.9%) were interviewed.



- 87,4% have already passed PI
- 3,5% have visited Oschadbank to complete PI, but did not pass for various reasons
- 9,1% have not yet visited Oschadbank for PI

The respondents indicated that they receive the following types of pensions:

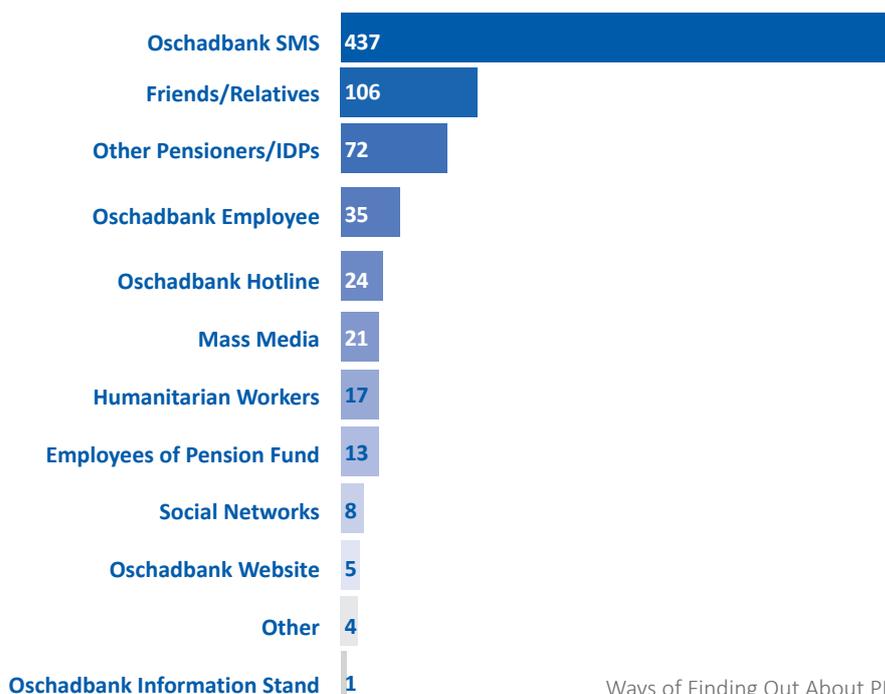
- 79,8% – Old age pensions
- 14% – Disability pensions
- 5,1% – For length of service
- 0,6% – For loss of husband/primary breadwinner
- 0,5% – Lifelong pension

36.2% of interviewees already received a Digitized Pensioners' ID, while the remaining 63.8% have not yet received a Digitized Pensioners' ID and must undergo PI every 3 months.

Among those without the Digitized Pensioners' IDs, only 38.4% indicated that they have completed applications to receive a Digitized Pensioners' ID.

IDP pensioner awareness of the PI timeframe, locations, and requirements:

96.2% of respondents were aware of the need for PI. 69.5% reported that they were informed via a text message from Oschadbank.



74,2% of respondents reported that they had been informed by Oschadbank (through text message or phone call) about the need to undergo PI while 25.8% were not informed by Oschadbank.

Respondents reported the following deadlines to undergo PI:

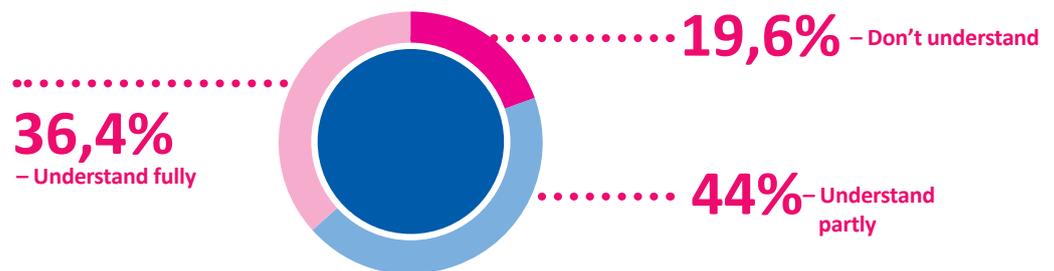
- 39,3% – By 3 April 2017
- 30,7% – By 1 May 2017
- 10,7% – As soon as possible
- 4,8% – Other, including specific dates in April, as well as within 6 months due to having recently received Digitized Pensioners' ID
- 14,2% – Unaware of any PI deadlines

About subsequent PIs:

- 20,7% of respondents who passed PI did not know when must next undergo PI
- 79,3% of respondents reported that they were aware of the timeframe for their next PI. The following timeframes were named for respondents next PIs:
- 44,1% – After 3 months
 - 27,2% – After 6 months
 - 26,9% – After receipt of a text message from Oschadbank
 - 0,5% – The next time they withdraw funds
 - 1,4% – Other

IDP Awareness regarding the details of PI (terms, locations and timeframe):

- 45,3% reported that they had no information about the details of PI
- 54,7% reported receiving information about the details of PI from the following sources (respondents could provide multiple answers):
- 34,2% – Text message from Oschadbank
 - 33,6% – Other IDPs
 - 29,9% – Relatives/friends
 - 11,6% – Oschadbank hotline
 - 48,3% – NGOs and volunteers
 - 6,3% – Media (websites, newspapers, radio, television)
 - 3,7% – Social media
 - 2% – Staff of the Ukrainian Pension Fund or Department of Social Protection
 - 0,3% – Official Oschadbank website
 - 0,3% – Employees of Oschadbank
 - 0,3% – Information stand at Oschadbank branches
 - 0,3% – On Public Transport



IDP understanding of PI process

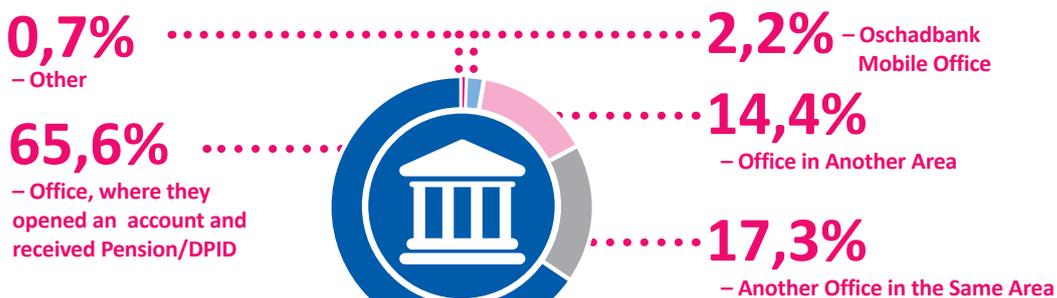
PI PROCESS

Reasons for not passing PI:

- 36,4% – Did not complete PI due to long queue
- 13,6% – Leaving the queue for health reasons
- 9,1% – No passport/card/pension certificate
- 9,1% – Absence of other documents required by Oschadbank (IDP certificate, etc)
- 9,1% – Did not have enough funds to carry out PI (a significant number of respondents were told that they would have to pay for certain banking services to complete PI)
- 22,7% – other (damaged Digitized Pensioners’ ID, etc)

Details of the PI procedure:

Regarding the details of conducting PIs, only IDPs who had already undergone the process were interviewed. (87.4% of the total respondents)



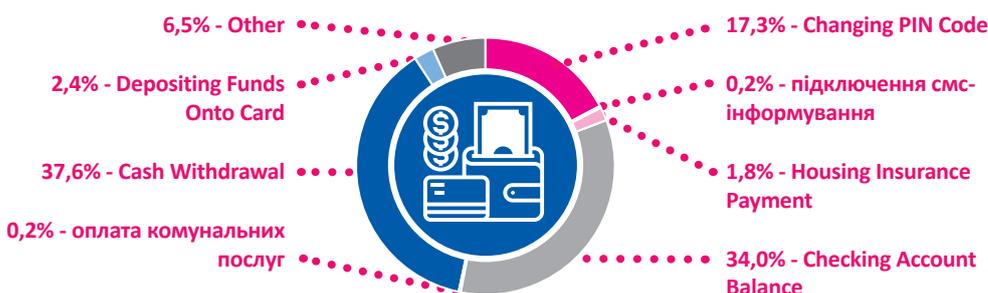
PI locations

Respondents reported that the following actions occurred during PI (respondents could give multiple answers):

- 91,5% – Presenting a passport
- 76,9% – Presenting a payment/bank pension card
- 70,2% – Using the card at the bank’s cash desk or payment terminal to complete a banking transaction
- 62,4% – Photographing the IDP with their passport and bank card
- 12,4% – Presenting the IDP certificate
- 5,8% – Presenting the pension certificate
- 5,6% – Photographing the IDP with their passport
- 3,3% – Using the card to make payment at an ATM
- 2% – Using the card at an Oschadbank branch ATM
- 1,6% – Taking pictures of the IDP with their card
- 4,5% – Other

Other actions occurred during PI included presenting a tax payer number, presenting a residence permit (instead of a passport for non-citizens), photographing the IDP with the ID card or badge of an Oschadbank employee.

According to the procedure announced by Oschadbank, the PI procedure involves a banking transaction which requires entering a PIN code with one’s payment card or Digitized Pensioners’ ID. Such an operation should be free of charge. The IDPs provided the following answers regarding the actions undertaken during PI.



Banking Operations Performed During PI

Some IDPs had to undertake a transaction which required payment of a fee to complete PI

- **58,4%** of IDPs stated that they voluntarily selected one of the various standard options for PI
- **31,8%** of IDPs stated that an operation chosen by a bank employee was compulsory for PI
- **7,4%** of IDPs stated that the operation was done without the employee explaining it to them or without the IDP understanding it
- **2,4%** – stated other (they did not understand which option was carried out, do not remember, etc)

Difficulties during the PI process (the respondents could give multiple answers):

- **39,8%** – reported lengthy queues and long waiting times
- **8,5%** – reported stuffiness inside Oschadbank buildings
- **12,7%** – mentioned a lack of a separate queue for PI
- **10,9%** – mentioned a lack of furniture in the waiting room
- **19,8%** – mentioned insufficient seating capacity
- **2,7%** – reported that Oschadbank employees were rude
- **27,8%** – reported that they weren't given enough information on the procedure
- **7,5%** – mentioned that bank employees were unable to explain the procedure
- **19,8%** – mentioned the lack of printed information
- **29,5%** – reported difficulty getting to an Oschadbank branch (due to living far from Oschadbank branches)
- **4,5%** – reported other, including lack of toilets or drinking water, unseemly behavior of others in the queue, transportation costs, etc
- **19,5%** – stated that they did not have any difficulties

PI of IDPs with disabilities:

36,6% of the polled IDPs with disabilities contacted Oschadbank to request an alternate way to conduct PI (without the IDP having to visit a bank branch). Oschadbank was contacted in the following ways:

- **40%** – by an IDP representative with power of attorney personally visiting the bank
- **26,7%** – by calling the Oschadbank hotline
- **20%** – by calling a local Oschadbank branch
- **13,3%** – other, including having relatives speak to the bank representatives

The second paragraph of Article 1 of Government Resolution no. 637 «On the Implementation of Social Payments for Internally Displaced Persons» dated 5 November 2014 provides a legal basis for a special mechanism for disabled IDPs. When inquiring about the special mechanism the disabled IDPs, IDPs reported receiving the following answers from bank staff:



Bank responses regarding availability of special PI mechanism for disabled IDPs

Despite the lack of a special procedure for disabled IDPs, 78% of interviewed disabled IDPs managed to undergo PI in the following ways:

- In the vast majority of cases, disabled IDPs came to the nearest bank branch by taxi or other type of private hired transport. The bank staff would service them on the street. If there were no mobile payment terminals in the bank office, or if the IDPs came without relatives, they had to divulge sensitive information to complete the transaction, such as PIN codes. This forced bank employees to violate some of the company's principles
- Some Oschadbank employees carried out PI at IDPs' residences using mobile payment terminals. In most of these cases the IDPs had to pay for the bank employee's transportation
- Some PIs were carried out by the IDP's representative (usually utilizing power of attorney or medical documents confirming the IDP's disability)

CONCLUSIONS

Almost half of the respondents reported that they had no information on the details of the PI (timeframes, places, requirements). The surveyed IDPs reported various sources of information on the PI, indicating that the authorities and Oschadbank lack a centralized information policy. 63.6% of those polled indicated that they did not fully understand the PI procedure.

IDPs' responses indicate insufficient understanding regarding the terms of subsequent PIs, particularly relating to the Digitized Pensioners' IDs. There are inconsistencies regarding the frequency IDPs must undergo subsequent PIs: some who have a Digitized Pensioners' ID are told to undergo PI again after 3 months (when it should be 6 months) and some who lack Digitized Pensioners' IDs are told to come back after 6 months (when it should be 3 months). Still others are yet to receive notification of when to come back for the next PI. If an IDP's phone number changes, there is no system in place for them to update this information, putting them at risk of missing their next PI appointment and temporarily losing access to their pensions.

Most interviewees (80.5%) indicated that they encountered some kind of difficulty in the process of undergoing PI. The most common reported difficulties were long queues (39.8%), difficulties getting to an Oschadbank branch (29.5%), lack of information on the PI procedure (27.8%) and insufficient seating at the Oschadbank branch (19.8%).

The survey also indicates inconsistencies in carrying out PIs at various Oschadbank branches, complicating the process.

Some IDPs reported that they were forced to undergo additional procedures not mentioned in the PI rules published by Oschadbank and had to perform banking services for a fee. For example, 62.4% of interviewees reported that they had to go through the PI by taking a photograph with their passport and ID, while the PI procedures do not call for this.

17.3% of IDPs who successfully passed PI claimed that funds were withdrawn from their account, ranging from 1 to 25 UAH. Apparently, these funds were withdrawn as a fee for additional verification of account balance, changing PIN codes, and connecting IDPs to the SMS-based information system. 51.6% of interviewees said that they were not warned that such a charge would be incurred, believing (as per the information provided by Oschadbank) that the PI procedure is free of charge.

All respondents in Dnipropetrovsk Oblast and the majority in Zaporizhzhya Oblast reported that their PI process took under 30 minutes. In Donetsk and Luhansk Oblasts, some of the interviewees stated that they were forced to spend more than a day trying to complete PI, and multiple days in some cases. This forced them to spend the night at railway stations and hotels. Such cases were particularly common among respondents in Pokrovsk, Kostiantynivka and Volnovakhyay in Donetsk Oblast.

IDP pensioners with disabilities usually had to undergo the same procedure as non-disabled IDPs due to the risk of losing access to pension funds in spite of great inconvenience and the additional cost of visiting the bank. However, despite the lack of a special process for such individuals, 78% of disabled IDPs reported that they managed to pass PI. Most of them did this by going to the bank with a taxi or some other kind of private transport. Others either had Oschadbank employees visit their residences at their personal expense, or had a duly authorized representative undergo the process for them.

POLL OF OSCHADBANK EMPLOYEES

103 Oschadbank employees were interviewed in 4 oblasts

75,7% – noted that they were personally involved in the PI process

24,3% – stated that they were not involved

Availability of PI instructions:



1,9% – Instructions Unavailable

7,8% – No Answer

90,3% – Instructions Available

Availability of PI instructions

According to Oshchadbank employees the following actions were required to complete PI (multiple answers can be given):

- 91,3% – presenting a passport
- 77,7% – presenting a payment card/pension card
- 71,8% – conducting a transaction using a card
- 64,1% – being photographed with a passport and card
- 15,5% – presenting an IDP certificate
- 7,8% – presenting a pension certificate
- 3,9% – being photographed with a card
- 2,9% – being photographed with a passport
- 1,9% – Using the card at an ATM
- 0,9% – Using the card at a self-service terminal
- 5,8% – other
- 5,8% did not answer

In cases when PI was not completed at a cash desk, the employee also took a photograph of the IDP with the employee's badge visible. The employees who stated that using a card at a cash desk payment terminal was obligatory also mentioned that the IDP could perform the following transactions in the course of PI: verifying account balance, withdrawing or adding funds – any transaction requiring a PIN code.

Bank employees noted that in the course of completing PI, the following transactions were the easiest to perform:

2,9%

– Other

3,9%

– Did not Answer

55,3%

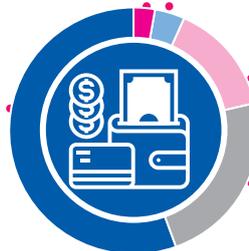
– Checking of Account Balance

14,6%

– Changing PIN Code

23,3%

– Withdrawal of Cash from Card



Easiest transaction an IDP can undertake to complete PI

When asked if PI could occur without IDPs incurring cost, bank employees responded:

- 81,6% – it is possible
- 2,9% – it is not possible
- 15,5% did not respond

63,1% of employees reported difficulties in carrying out PI, including (respondents could give more than one answer):

- 40,8% – lack of IDP knowledge
- 36,9% – too many IDPs at the location, overwhelming employee ability to provide service
- 14,6% – understaffed banks
- 2,9% – insufficient logistical support (such as dearth of payment terminals)

Bank employees reported that they lacked clear instructions on PI.

Oschadbank Employees were interviewed regarding PI of IDPs with disabilities:



Availability of Special PI Mechanism For Disabled IDPs, According to IDPs

Oschadbank employees’ responses on ways for IDPs with disabilities to complete PI (respondents could give multiple answers):

- 54,8% – employees visiting IDPs’ residences with a mobile terminal
- 3,2% – bringing the bank’s mobile unit to the disabled IDP’s settlement
- 19,4% – the disabled IDP’s legal representative visits an Oschadbank branch
- 35,5% – other, including employee visits IDP’s home for photographing, redirecting the IDP to the central bank office, and bringing a mobile branch to the IDP’s settlement

CONCLUSIONS

It is clear from Oschadbank employee responses that a significant number of IDPs (40.8%) were unaware of the PI procedure. This fact is evidenced by the IDP poll: 45,3% of IDP pensioner respondents were not aware of the PI timeframe, location and requirements prior to undergoing PI.

A positive fact is that most polled employees (68.9%) indicated that they would inform pensioners of their next PI appointment, usually scheduled in 3 months for regular payment card holders and in 6 months for digitalized pensioners' ID holders, 12,6% did not inform IDPs of the next PI appointment, 18,5% did not respond. Some employees stated that text messages would be sent to IDPs reminding them of their appointments.

The survey also shows that banks do not have a unified approach to PI. 64.1% of employees said that IDPs had to be photographed with their passport and cards, despite this not being a requirement.⁹ Some also said that additional documents, such as IDP and pension certificates had to be submitted.

It can also be concluded that the banks are understaffed and overwhelmed during PI periods. Since March 2017, R2P has recorded acute problems of IDP demand for service overwhelming Oschadbank staff in Donetsk and Luhansk Oblasts.

Almost half of polled employees stated that there is no special PI mechanism for disabled IDPs, despite this being necessitated by Resolution no. 637.¹⁰ About a third of employees polled mentioned alternative methods of performing PI for disabled IDP pensioners: conducting PI at the IDP's residence or with a duly authorized IDP representative visiting the bank.

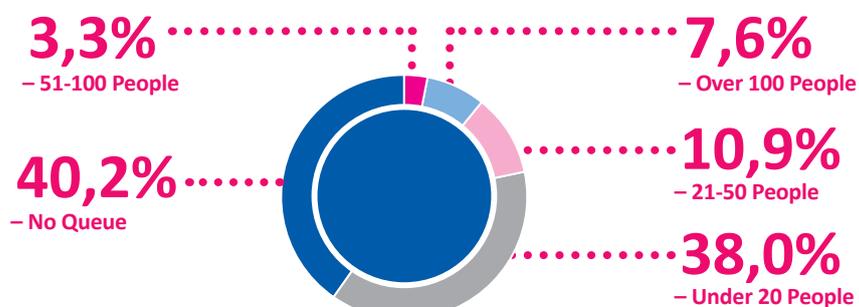
⁹ At the time of monitoring, HSP advice was published on the Oschadbank website at the following link <https://www.oschadbank.ua/ua/Quality%20ta%20%20%20%20EPP.pdf>. In particular, it stated that the pensioner must activate the EPP to unlock UPS's expense transactions in the part of the payment card on the day of obligatory physical identification. For this, a pensioner must carry out any transaction (cash withdrawal, balance check, etc.), which involves the introduction of PIN-U through the payment terminal in the office of the Bank. «On 22 March an announcement was posted on the website of Oschadbank, www.oschadbank.ua/ua/press-service/news/4337532/, according to which «for physical identification it is necessary: - to contact ANY department of Oschadbank with a document certifying Person, and card or EPP; - to carry out any operation using a card or electronic payment system at the POS-terminal of the Savings Bank (review of account balance, receipt of funds, etc.). None of these sources list a requirement for taking pictures of the IDP, providing additional documents, etc.

¹⁰ According to the paragraph of the second paragraph of the Resolution No. 637 «On the Implementation of Social Payments to Internally Displaced Persons» No. 637 of 5 November 2014 payments may be made by Oschadbank on written declarations of persons with Category 1 disabilities and persons who are not capable of self-service and who require permanent third-party assistance free of charge with home deliver at their actual place of residence/stay.

OBSERVATIONS AT OSCHADBANK BRANCHES

92 Oschadbank branches were visited in different settlements across four oblasts.

Queues were observed in many branches due to the necessity of performing PIs for a large number of IDP pensioners in a short timeframe.



Length of Queues For PI

The queues in Dnipropetrovsk and Zaporizhzhya Oblasts were no longer than 20 persons. However, large queues were observed in Donetsk and Luhansk Oblasts. The largest queues were observed during monitoring in Volnovakha (more than 1000 people).

Queues extending to the street were observed in 15 institutions in Donetsk and Luhansk Oblasts. Overcrowded offices were observed in 13 institutions, mainly in Donetsk Oblast.

Measures taken in case of long queues

Branches 10004/063 (Kostiantynivka, Donetsk Oblast) and 10004/0271 (Kramatorsk, Donetsk Oblast) organized free transfers of IDPs to other, less crowded branches. This allowed for faster PI processing and eased employee workload.

In most branches with long queues employees used the following methods to reduce queue length:

- Providing addresses of other branches
- Opening additional windows or involving additional employees
- Appointing an employee to organize the queue and provide information
- Bringing a mobile office to the overloaded branch

Often, Oschadbank offices had 6-10 seats. However, some lacked even this number of seats (Volnovakha, Novotroitskaya, Mariupol, Bogatyr, Kurakhove, Kryvyi Rih). In offices with large queues, seating was insufficient.

Often, Oschadbank offices were equipped with only 6-10 seats, but some branches had even less seats or no seats at all (Volnovakha, Novotroitske, Mariupol, Bohatyr Village, Kurakhove of Donetsk Oblast, Kryvyi Rih, Dnipropetrovsk Oblast, and also at the mobile branch located at EECP Novotroitske). Seating was certainly insufficient at offices with large queues seats.

The Oschadbank branches had the following characteristics: (multiple answers possible)

- **28,3%** – renovated or new office
- **7,6%** – toilets for visitors
- **42,4%** – drinking water for visitors
- **59,8%** – stairs at building entrance
- **13%** – stairs inside the building
- **22,8%** – wheelchair ramps
- **54,3%** – high-quality indoor lighting

Branch 10012/026 in Kreminna, Luhansk Oblast is located on the third floor of a building with steep stairs and no elevator, making access impossible for people with limited mobility.

In only 25% of Oschadbank branches was printed information on PI available on information stands.

In 59 branches (64.1%) all bank visitors were received together, regardless of the purpose of their visit. In the remaining 33 branches, separate entry was provided for people undergoing PI.

In 69.6% of Oschadbank branches, 1-2 employees were involved in PI; in 21.7%, 3-4 employees were involved; in 8.7% 5-8 employees were involved (in Selydovey, Kostiantynivka, Toretsk, Kurakhove, Hirnyk of Donetsk Oblast, Kryvyi Rih and Synelnykove of Dnipropetrovsk Oblast).

In half the visited branches, a consultant was present in the hall. The consultant would advise clients and assist them in using the terminals and ATMs, as well as regulate the queue. Such a role is particularly important as there are a large number of visitors in many locations.

During monitoring visits, the following extraordinary processes were observed:

1. Pensioners who had not been able to undergo PI were forced to stay overnight in State Emergency Service tents at the entry/exit checkpoint Novotroitske.
2. The Oschadbank branch in the city of Vuhledar in Donetsk Oblast artificially created a queue for more than 2000 people (at the time of the monitoring visit, there were about 12 persons there for PI) and some people asked for bribes to hasten the IDPs' PI process. The head of the branch was suspended after it was revealed that he was involved in this illegal activity.

CONCLUSIONS

A significant proportion of the visited departments have taken measures to reduce queues. However, despite these efforts,¹¹ there were still large queues in Oschadbank branches in Luhansk and Donetsk Oblasts.

Only 22.8% of the visited departments were accessible for people with limited mobility. The absence of ramps at most locations is a major obstacle for disabled IDPs.

Only 7.6% of branches visited have toilets. This is a basic requirement, particularly when there are long queues and 7.6% is an abysmal figure.

Only 25% of the banks had written information on PI in their lobbies. According to the survey, 40-50% of IDPs were unaware of the PI procedure. There should be a way to provide uniform instructions and information to ease the PI process and prevent abuse.

¹¹ According to Oschadbank Letter No. 53 / 5-16 / 615 dated 29 March 2017 as of 24 March 2017, SMS messages were sent recommending PI dates. Indeed, R2P has addressed the HPE, which received such reports.

To the Cabinet of Ministers of Ukraine

- To exclude provisions of the 5 November 2014 decision of the Cabinet of Ministers of Ukraine Number 637, On the implementation of social benefits for internally displaced persons, which concern the need for regular (once every 6 months, once a year, once every 3 months) physical identification in institutions at offices of Oschadbank as a mandatory condition for servicing payment cards of these persons by making appropriate changes.

Recommendations to Oschadbank:

- Provide a uniform and easily understood guide to undergoing PI;
- Create a framework for facilitating PI for IDPs with disabilities and those who require third-party assistance in accordance with the second paragraph of the Resolution 637 of the Cabinet of Ministers of Ukraine;
- Ensure building accessibility (by installing ramps and such);
- Clearly inform IDPs about the duration, location and requirements for PI;
- Provide access to basic amenities such as toilets, drinking water, and seats at bank branches;
- Increase the number of stationary and mobile branches in Luhansk and Donetsk Oblasts;
- Increase the number of staff employed in Donetsk and Luhansk branches;
- Provide professional training to bank employees concerning PI in order to smooth out and enhance the process.