



न्यायालय मुख्य आयुक्त

COURT OF CHIEF COMMISSIONER FOR PERSONS WITH DISABILITIES (DIVYANGJAN)

दिव्यांगजन सशक्तिकरण विभाग / Department of Empowerment of Persons with Disabilities (Divyangjan)

सामाजिक न्याय और अधिकारिता मंत्रालय / Ministry of Social Justice and Empowerment

भारत सरकार/ Government of India

Diary No. DNO/26/CCPD/6598

Dated: 06/10/2026

In the matter of

Mr. Prince Kumar

(Complainant)

Vs.

1. The Deputy Governor, Reserve Bank of India
2. The Managing Director & CEO, Kotak Mahindra Bank

(Respondents)

1. Background of the Case

1.1 The Complainant, a person with 100% visual impairment, has filed a complaint alleging denial of equal and independent access to the Digital KYC process of Kotak Mahindra Bank Ltd., failure to provide reasonable accommodation and discrimination on the ground of disability, under the Rights of Persons with Disabilities Act, 2016 (RPwD Act, 2016).

1.2 The Complainant stated that he relies entirely on the Android TalkBack screen reader for independent access to digital banking services. He opened a Kotak 811 Digital Savings Account on 06.02.2026 and attempted to complete the mandatory Video Customer Identification Process (VCIP) independently. However, the Video KYC interface contained inaccessible controls, unlabelled interface elements, inaccessible camera functions, focus traps and mandatory visual interactions during liveness verification. Essential controls such as Switch Camera, Mute and End Call could not be accessed independently through screen-reader navigation. As a result, he could not complete Digital KYC despite repeated attempts.

1.3 The Complainant further stated that, after reporting these barriers through the Bank's grievance mechanism, he approached the RBI Ombudsman. In its written reply dated 20.05.2026 in those proceedings, the Bank admitted that it did not possess the technology or system enabling visually impaired customers to independently complete Video KYC. Despite this, the RBI Ombudsman closed the complaint by treating offline doorstep verification as sufficient, without addressing his grievance regarding equal and independent digital access.

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1.4 The Complainant stated that, solely to prevent his account from becoming inoperative on expiry of the Limited KYC period, he accepted the Bank's doorstep Full KYC process under protest. On 14.07.2026, a field executive of the Bank visited his residence, completed Aadhaar OTP authentication and captured his biometric fingerprint, and he was informed that all required details had been uploaded. However, his account continued to remain under Limited KYC status and no confirmation of conversion to Full KYC was received.

1.5 On 21.07.2026, the Branch Manager and other Bank representatives again visited the Complainant's residence with the Bank's official tablet but the KYC process failed once again.

2. Notice of Admissibility

2.1 A notice dated 24.08.2026 under Sections 75 and 77 of the RPwD Act, 2016, was issued to the Respondent for a hearing on 03.09.2026 to determine the admissibility of the case and find out if this can be resolved without further quasi-judicial intervention of this Court.

3. Hearing

3.1 A preliminary hearing was conducted on 03.09.2026. The following parties/representatives were present during the hearing:

Sl.No.	Name of the parties/Representatives	For Complainant/Respondent	Mode of Attendance
1.	Mr. Prince Kumar	Complainant	Online
2.	Mr. Amit Shah, Principal Nodal Officer, Mr. Atul, and Ms. Archana Shukla Nodal Officers, Kotak Mahindra Bank Ltd.	For Respondent No. 2	Online
No one appeared on behalf of Respondent No. 1 i.e. Reserve Bank of India			

4. Record of Proceedings

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4.1 Respondent No. 2 expressed regret for the inconvenience caused to the Complainant. Respondent No. 2 submitted that as per the Master Direction of the Reserve Bank of India (RBI) on KYC, the VCIP requires certain mandatory steps, including face match of the customer's live image with the photograph available on the Aadhaar, capture of the image of the PAN card and live signature in the presence of the video KYC official, and that the Master Direction does not permit any exception or deviation for persons with disabilities. It further submitted that the Bank faces this problem not only with visually impaired customers but also with customers having other disabilities.

4.2 Respondent No. 2 submitted that the Bank had recently made a formal representation to the RBI seeking relief or deviation in the Master Direction so that such customers could be onboarded on digital channels, and that the same is under consideration of the RBI.

4.3 Respondent No. 2 submitted that the Bank was ready to complete the Full KYC and provide full banking services to the Complainant without discrimination through the physical mode, either by a Bank official visiting the Complainant or by the Complainant visiting the branch.

4.5 The Complainant reiterated that the attempts to complete Full KYC at his doorstep by the Bank officials had not succeeded, and pointed out that the requirement of mandatory retina scanning and biometric capture in the KYC process was a hurdle for him. The Respondent acknowledged a technical glitch in the doorstep process, stated that the Bank would look into the issues internally, and requested that it be permitted to complete the Full KYC of the Complainant.

5. Observations & Recommendations

5.1 The Court observed that visiting the doorstep of a complainant may be done in an individual case, but cannot be a permanent solution and cannot be extended to each and every person on a public platform. The permanent solution lies in designing the Bank's digital systems to be accessible to all.

5.2 The Court further observed that Sections 42 and 46 of the RPwD Act, 2016 require that infrastructure and services in the digital domain be made accessible to persons belonging to all categories of disabilities, within the time frame prescribed under the Rules notified in 2017. Nearly a decade after the enactment of the Act, the feasibility of digital accessibility is still being discussed, which is not expected of a reputed bank known for its efficiency.

5.3 In view of the above, Respondent No. 2 is recommended to:

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- (i) Provide relief to the Complainant by completing his Full KYC at his convenience, at his doorstep or otherwise, without further delay and in any case within thirty (30) days from the issuance of this Order;
- (ii) Ensure full digital accessibility of its public domains and applications, including the Video KYC process which is the subject matter of this complaint, for all persons with disabilities within ninety (90) days from the issuance of this Order;
- (iii) Submit, within the same period of ninety (90) days from the issuance of this Order, proof of the accessible nature of its public domains and applications along with an accessibility audit report certified by well-qualified external auditors and not by internal sources; and
- (iv) Not to adhere to conventional and fixed criteria for authentication and, where fingerprint or face recognition cannot be captured in the case of a person with disability, provide alternates such as Aadhaar-based OTP for confirmation, take a decision on the feasibility of such alternates expeditiously and be more attentive to the requirements of persons with disabilities.

5.4 In view of the above observations and recommendations, the case is disposed of.

Yours faithfully,

**(S. Govindaraj)
Commissioner**

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