

WEB ACCESSIBILITY

of Canadian banking/financial services



RESEARCH REPORT

It is easy to imagine the challenge that access to online banking/financial services can be for people living with disabilities. Simply paying bills, downloading monthly statements, sending Interac payments or even searching transactions can be major challenges.

However, with the appropriate accommodation technologies, people with functional impairments can navigate and interact on the Internet more easily when websites meet certain accessibility standards. However, although the Web Content Accessibility Guidelines (WCAG 2.0) have existed for more than 10 years, we see that the accessibility of online banking/financial services is still fraught with difficulties.

What is the purpose of our study?

We have produced a description of the accessibility of the main Canadian banking/financial institutions' online services to:

- educate their administrators on how to improve the accessibility of their online services;
- equip them with the tools they need to respond more adequately to the needs of people living with functional impairments.

Our study includes:

- an online service appreciation poll;
- compliance verification using automated web accessibility testing tools (WAVE and AXE DevTools);
- an analysis of functional and appreciation testing by a group of testers with disabilities;
- a recommendation guide.

Accessibility legislation

The *Accessible Canada Act* includes the requirement for banks to prepare and publish accessibility plans for recognizing, eliminating and preventing obstacles at several organizational levels (policies, programs, practices and services¹).

However, we see that the accessibility of information and transaction services still includes its share of difficulties, especially for people living with visual disabilities, but it can affect people living with hearing, motor and cognitive impairments as well. There is a law on the matter, so why are there still problems with the accessibility of online services? Adopted in 2019, the *Accessible Canada Act* is still new, so we have to give those running the banking/financial institutions time to adjust to it. Furthermore, despite the good intentions of its creators, it is currently not very constraining, which, in our opinion, is slowing down its application. By raising people's awareness of and promoting good accessibility practices, we with the RAAQ are now adding another block to the foundation of a more inclusive society.

¹ <https://www.canada.ca/en/employment-social-development/programs/accessible-people-disabilities/act-summary.html>

What do the people running banking/financial institutions think of web accessibility?

Most financial institutions have some kind of statement on their websites concerning their implemented efforts to promote and facilitate different aspects of universal accessibility². Specifically, that can include the accessibility of their buildings for people with reduced mobility, short stature and visual impairments (access ramps, ATMs with vocal assistance, etc.); accessibility to employment and training; accessibility of information and documents. For our purposes here, we will focus on policies that have to do specifically with the accessibility of online services (Internet and mobile).

The overall impression one gets from reading those policies is that several financial institutions do not seem to be sufficiently in keeping with the reality of accessibility issues. In some cases, the tenor of their statements on accessibility appears to indicate rather the language of façade rather than of real engagement to best serving people living with disabilities, but best practices have been observed and clearly show that the administrators of some banking/financial institutions seem to be more concerned about accessibility issues.

Among those best practices, we can point out:

- The methodologies used to test accessibility;
- Efforts to comply with accessibility guidelines;
- Access to resources facilitating the use of online services;
- Access to accessible alternative formats;
- Access to human technical assistance.

How did we conduct our testing?

To best understand the nature of the problems that people living with disabilities can face when using online banking/financial services, we used several data collection methods:

1. Poll with 65 respondents across Quebec;
2. Compliance tests using automated web accessibility testing tools;
3. Functional assessments involving people living with disabilities.



² https://en.wikipedia.org/wiki/Universal_design



Study results

1. Online banking/financial service appreciation poll results

What do people living with disabilities think about the quality of online banking/financial services? To answer that question, we conducted a poll allowing us to:

- ➔ identify the profile of our 65 respondents;
- ➔ learn about their appreciation of online banking/financial services;
- ➔ collect general and specific comments on those services.



Salient points



➔ AS FOR THE PROFILE OF OUR RESPONDENTS, THE POLL REVEALED THAT:

Nearly **75%** were **50** and older

More than **30%** are low income

Nearly **90%** do business with a group of **5** banking/financial institutions*

More than **85%** use speech synthesis (text-to-speech) as an assistive technology

➔ NOTABLY, OUR POLL TAUGHT US THAT:

More than **40%** have trouble finding information when they consult the website or mobile application of their banking/financial institutions

More than **20%** have trouble checking their balances

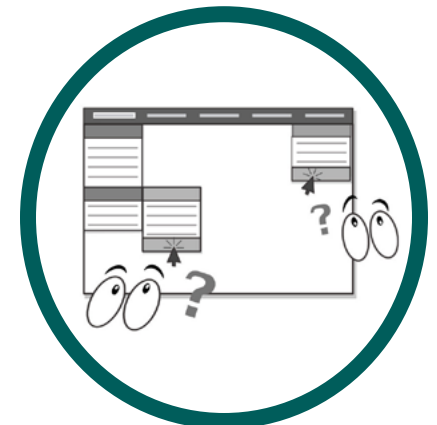
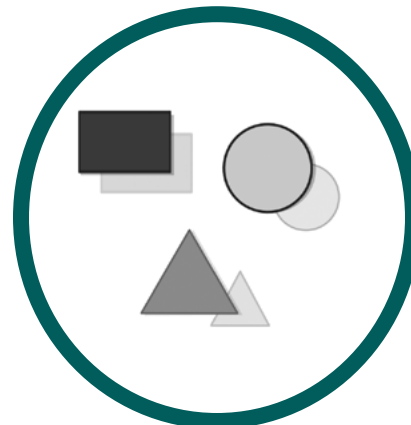
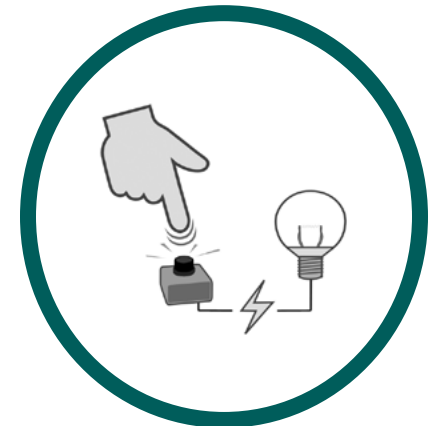
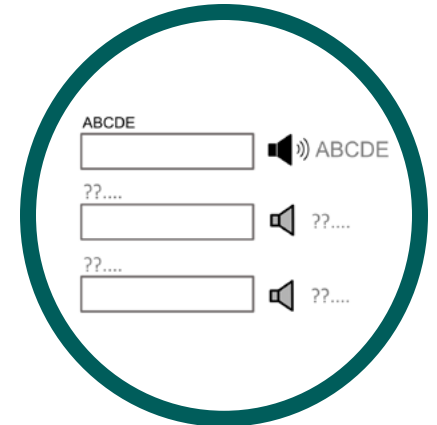
More than **25%** have trouble paying a bill or making a transfer between accounts, between people or with Interac

* In order of importance : Desjardins (42%), National Bank of Canada (20%), Royal Bank of Canada (12%), Toronto Dominion (7%), Bank of Montreal (7%).

Comments on problems encountered

Respondents' comments describe the problematic situations they experienced representing hindrances in the effective use of online banking/financial services in different locations and at different times. Here is a non-exhaustive list of perception problems:

- loss of focus on the screen;
- unlabelled or poorly labelled form fields;
- menus that are difficult to navigate;
- no feedback following an action;
- poor colour contrasts;
- too much informational content;
- too many links or other clickable areas;
- text that is difficult to understand.



WITH THE APPROPRIATE
ACCOMMODATION TECHNOLOGIES,
PEOPLE WITH FUNCTIONAL
IMPAIRMENTS CAN NAVIGATE
AND INTERACT ON THE INTERNET
MORE EASILY

2. Functional testing results

Our group of 21 testers was divided into three subgroups. The first one, made up of six testers (five blind people and one with low vision), conducted monitored functional testing on 10 Canadian online banking/financial platforms³. They tested the accessibility of informational pages, such as the FAQ, the procedure for reporting a lost or stolen card, opening an account or applying for home insurance. The 12 testers of the second subgroup (eight blind people, two with low vision and two with motor impairments) did non-monitored functional testing on the transactional pages of their own accounts. Those tests were intended to analyse the accessibility of simple transactions like paying bills, making transfers between accounts or via Interac, verifying balances and modifying personal profiles. The third subgroup, comprised of three people with cognitive impairments, participated in a series of discussions that allowed us to collect comments on the general usability of banking/financial sites.

Informational page testing results

Some of the problems we observed appeared to us to be major and primary because users were confronted with, for example, situations in which they could no longer continue the process of opening an account, or their user experience became annoying and tedious due to too many barriers. In fact, several testers said that those barriers created disorientation and cognitive overload for them and, if they had not committed to carrying out the testing for the project, those barriers would have led most of them to abandon the process of opening accounts, applying for insurance or searching for information.

On the other hand, some problems appeared to be less hindering because, although they impeded navigation process and were irritants limiting user experience quality, the testers said that they could still overcome them.

An experimental case: an attempt to open an online account

The context of opening an online account was created via a transactional process or tunnel requiring users to enter personal information to then be validated with a credit check. For security issues, we limited that experience to entering the information in the form up to the final step of consenting before sending the request. Here we present some examples of barriers (major and irritating) encountered during that testing.

³ Laurentian Bank of Canada, Bank of Montreal (BMO), National Bank of Canada (BNC), Canadian Imperial Bank of Commerce (CIBC), Desjardins, Hong Kong & Shanghai Banking Corporation (HSBC), Royal Bank of Canada (RBC), Scotiabank, Tangerine and Toronto Dominion (TD)

Examples of major obstacles

1

Non-functional interactive component

Finding

After activating the OPEN AN ACCOUNT link, a dialogue box appeared, but the screen reader did not recognize it, so it then became impossible to continue in the account opening process, automatically ending the experience.

Solution

Once the modal window opens, it is necessary to focus on it without being able to leave it before making a selection from the proposed options.

2

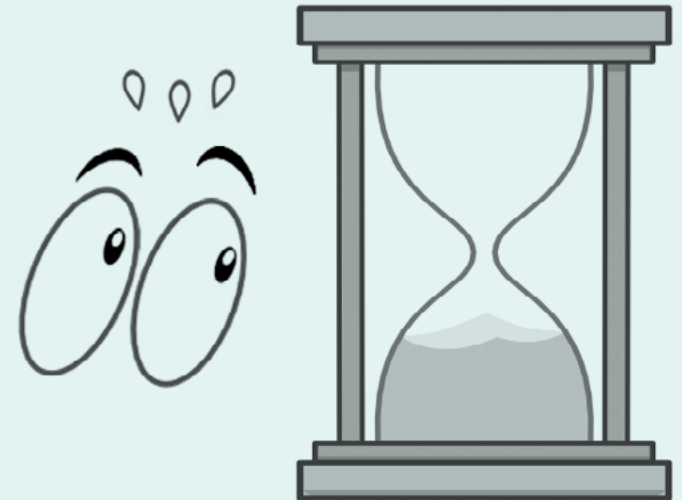
Insufficient time

Finding

On some banking/financial institution websites, once the Open an account button was activated, a timer started. If the form was not completed within a certain amount of time (about 45 minutes), the session would expire, and users would be automatically ejected from the form.

Solution

Instead of ejecting users after the time expires, it would be better to offer a dialogue box displaying an option to continue the task, for example, with a question such as, “Would you like more time to complete your request? YES/NO?”



3

Unannounced modal window/dialogue box

Finding

When a link or button activated a dialogue box, the screen reader fairly frequently did not announce the opening of that window.

Solution

ARIA role=dialogue would have to be added to announce a modal window, for example, a tooltip or “This link/button will open in a modal window.”



4

Poorly labelled/worded form field, button or link

Finding

When navigating among form fields, if they are in compliance with accessibility rules, it is enough to use the tab key to move from one field to another. However, if the form field labels are not explicit, users can get confused about the information required in them.

Solution

Labels and descriptions need to be explicit and appropriate. For example, instead of the typical case of “To learn more,” indicate the subject relating to that button or link, for example, “To learn more about use conditions” or “To learn more about this promotional offer,” etc.



5

Lost focused after modifying a form section

Finding

At the end of the account opening process, we wanted to modify a section at the beginning of the form and then return to the summary. In several cases, it was impossible to return to the summary, forcing us to review all the other sections of the form before reaching the summary.



Solution

After a modification is made, a mechanism should allow us to return to focusing on our starting point, the process summary.

6

Unannounced external links

Finding

Fairly frequently, links did not announce their opening contexts. A blind person would not know if the links were internal or opened in a new window or tab.

Solution

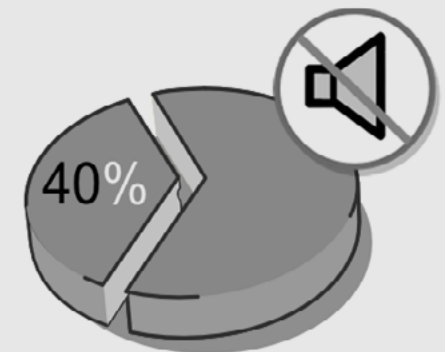
For each link, a message would have to be added indicating the expected result after activation, for example, "This link will open in a new window."

7

Non-textual content equivalents

Finding

We observed the pointless usage of text equivalents for decorative images. The information contained in those text equivalents is superfluous, and it unnecessarily overloads the reading of the interface.



Solution

Avoid using text equivalents for images that only have a decorative purpose.

8

Translation gaps

Finding

Despite the fact that French was the language tag, we frequently discovered that several passages contained in the webpages we analysed were not translated.

Solution

Conform to the page language by translating each element comprising the page without forgetting the image replacement text and all textual elements added specifically for screen readers and that are not visible on the screen.

9

Hard to use slideshows

Finding

On screen captures presented in slideshows, whether for bill payments or reporting a lost/stolen card, pulsing animations indicated where users had to click to proceed. Although those displays are technically accessible, they are difficult to use for blind people, and so they tend not to use them.

Solution

An alternative viewing method could be provided, for example, a numbered list of all the steps in the bill payment process. Accordions are completely appropriate interactive components to present that type of explanation.



Examples of irritating barriers

1

Lack of feedback between form sections

Finding

At the bottom of each form section, a button allows users to go to the following section. Once activated, the interface goes to the following section, but users are not notified, leading them to believe that nothing has happened after a few seconds of waiting.

Solution

When the button is activated, the interface should automatically announce the heading of the new form section.

2

Erroneous attribution of language tags (Francophone users)

Finding

The screen reader reads the page but with an Anglophone accent, which makes navigation irritating and even incomprehensible.

Solution

Modify attribute from lang="en" to lang="fr"

3

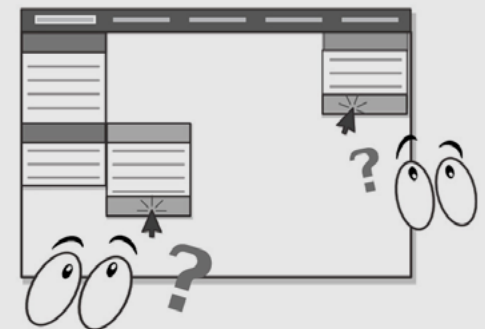
Instructions without navigation marker

Finding

Users are instructed to go to a location on the right side of the page, click on the button in the menu on the right or touch to manage their invoices. Several testers reported that that type of instruction did not allow them to find the location on the page.

Solution

Add the name of the interactive component to be accessed, for example, "Click on the button, link or XYZ tab." Users will then have a marker to activate the interactive component.



Transactional page testing results

For security/personal information protection reasons, our transactional testing was conducted via a questionnaire for respondents that asked them to report, based on the four accessibility principles (perceivable, operable, understandable and robust), their experience during real transactions they conducted in their respective accounts.

According to the assistive technologies the respondents used (JAWS, VoiceOver, TalkBack and ZoomText), the testing results show recurring accessibility problems for the four banking/financial institutions on which we performed transactional testing (NBC, Desjardins, RBC and Tangerine)⁴.

To identify the prevalence of the problems encountered, we decided to categorize the results based on the number of occurrences of accessibility rule violations our testers reported⁵. That categorization also provided a kind of action plan allowing us to prioritize the tasks to be accomplished to correct those problems and thereby help to improve interface accessibility.

- 2.4.6** Headings and Labels (22 occurrences)
- 2.4.3** Focus Order (10 occurrences)
- 1.4.3** Contrast (minimum) (9 occurrences)
- 1.3.1** Info and Relationships (8 occurrences)
- 2.1.1** Keyboard (5 occurrences)
- 1.3.3** Sensory Characteristics (4 occurrences)
- 2.4.2** Page Titled: (4 occurrences)
- 1.1.1** Non-text Content: (3 occurrences)
- 3.2.3** Consistent Navigation (3 occurrences)
- 3.2.4** Consistent Identification (3 occurrences)
- 3.3.2** Labels or Instructions (2 occurrences)
- 2.2.1** Timing Adjustable (2 occurrences)

THE TESTING RESULTS SHOW
RECURRING ACCESSIBILITY
PROBLEMS FOR THE FOUR
BANKING/FINANCIAL INSTITUTIONS
ON WHICH WE PERFORMED
TRANSACTIONAL TESTING

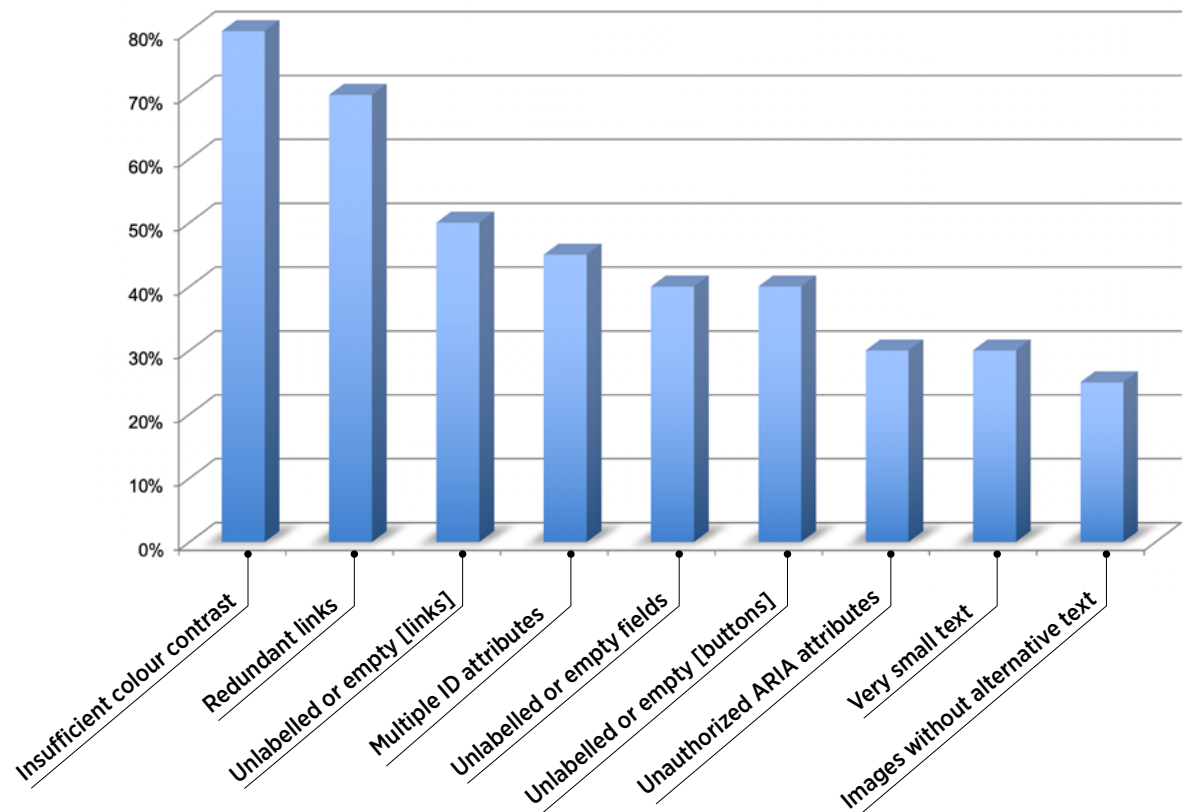
⁴ It was not possible to recruit enough testers in the context of the study to verify the functionality of all the sites' transactional pages.

⁵ Guidelines definitions: <https://www.w3.org/TR/WCAG20/>

Accessibility compliance testing results

Using two automated assessment tools (WAVE and Axe DevTools)⁶, for the 10 banking/financial institutions we studied, we tested six informational pages with similar functions on all those institutions' sites: Home, FAQ, To contact us, Lost or stolen card, Opening an account and Fees and interest rates⁷.

Our compliance testing allowed us to observe a major recurrence of some types of errors. For example, most of the pages presented colour contrast problems, absent or redundant alternative text and empty or unlabelled links and buttons. Furthermore, several pages seemed to contain an inadequate application of some ARIA attributes for content, which could make those pages inaccessible to assistive technologies. In the table below, readers can see an average of the most commonly encountered problems. For example, for all the pages we tested, 80% of them contained text with insufficient colour contrast.

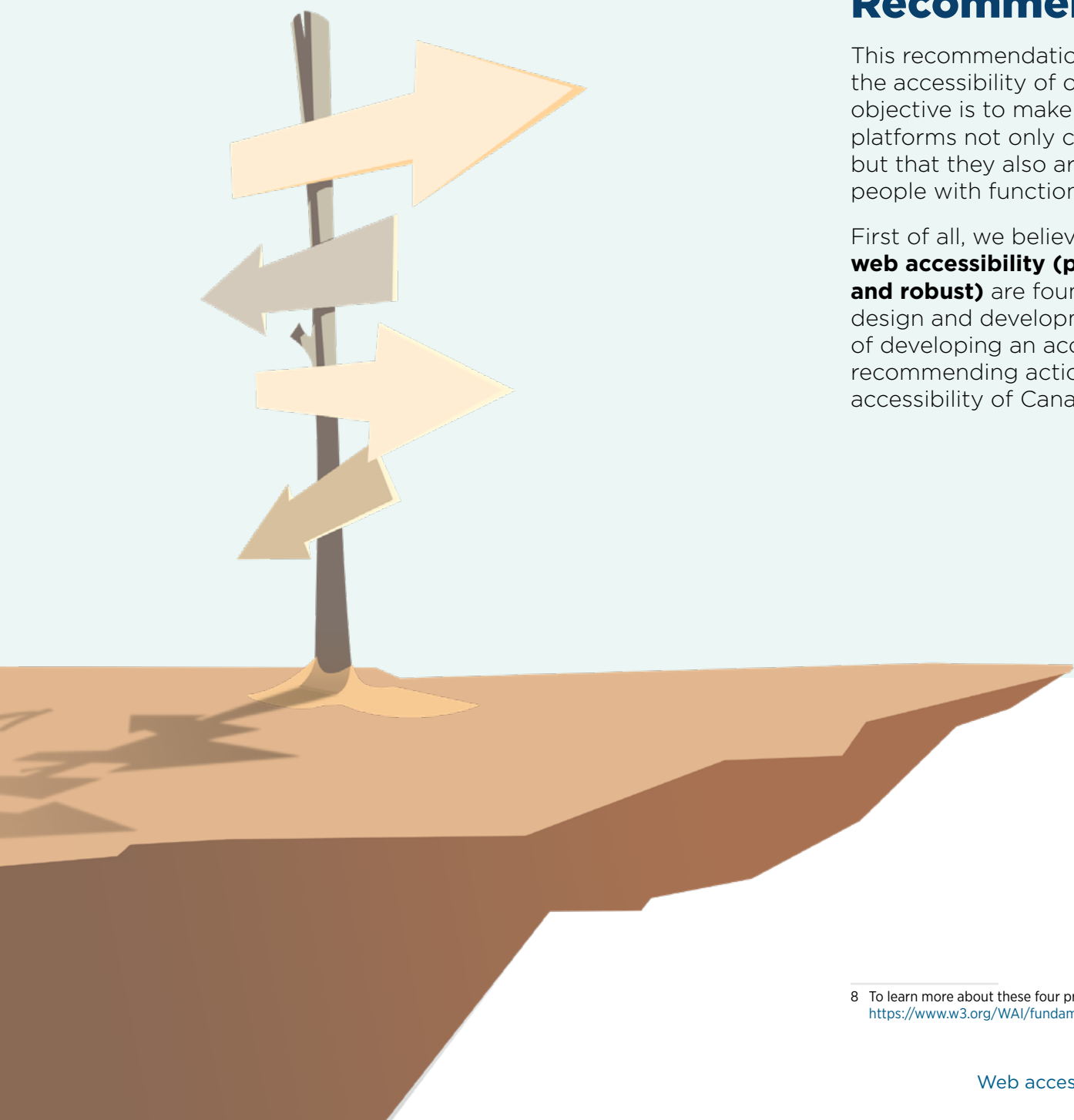


⁶ WAVE: <https://wave.webaim.org> ; Axe DevTools : <https://www.deque.com/axe-devtools-accessibility-testing/>

⁷ For security issues, no banking/financial institution administrators agreed to give us access to practice accounts, which would have allowed us to conduct compliance testing on the transactional part of their websites.



Recommendation guide



Recommendation guide

This recommendation guide is intended to be used to improve the accessibility of online banking/financial services. Our objective is to make sure that informational and transactional platforms not only comply with web accessibility standards, but that they also are easy and comfortable to use for all people with functional impairments.

First of all, we believe that the **four major principles of web accessibility (perceivable, operable, understandable and robust)** are foundations or guidelines facilitating website design and development⁸. Then, in the broader context of developing an accessible online service policy, we are recommending actions that can be taken to improve the accessibility of Canadian online banking/financial services.

⁸ To learn more about these four principles, consult:
<https://www.w3.org/WAI/fundamentals/accessibility-principles/>

The four major principles of web accessibility

1 PERCEIVABLE

Content and components of the user interface are presented so that they are easily recognized, perceived and interpreted. Users must be able to form a mental image

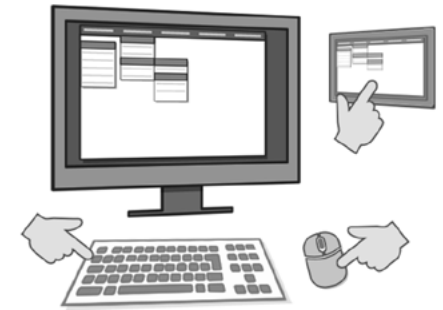
of an interface's composition, specifically, by using lists of headings (levels 1, 2 and 3), links, buttons, editing areas and [meaningful descriptions] for icons, images and form fields. Users must be able to perceive the big sections or areas of the page: banners, menus, main content, footers, etc.



2 OPERABLE

By using the mouse or keyboard, users can easily manipulate the elements of the interface. Several options may also be offered to facilitate navigation and the orientation of and access

to specific information: for example, a table of contents, content summary, signalling the steps in a process (1, 2 and 3 of 4), frequently asked questions section (FAQ), etc.



3 UNDERSTANDABLE

The language and information structure of user interfaces are consistent. For example, titles and text content are in simple language, and the interaction with forms, dialogue

boxes and other interactive components clearly presents what tasks that users are expected or required to do.



4 ROBUST

Whatever the environment (computer, tablet or telephone), the user experience must remain roughly the same. Robust interfaces can be interpreted reliably by a broad range of:

- computing devices (computers, tablets and telephones)
- browsers (Chrome, Firefox, Safari and Edge)
- assistive technologies (JAWS, NVDA, VoiceOver, ZoomText, etc.)



Our EIGHT RECOMMENDATIONS for improving web accessibility

The following recommendations are the result of analysing accessibility tests along with the discussions we have had, both with people living with functional impairments and with web accessibility experts. For example, we have observed that the training of work teams assigned to web development seems to be insufficient because most banking/financial platforms contain rather trivial errors that would be very simple to correct. Here we are thinking about the choice of language for the page, poorly labelled fields and even a lack of textual equivalency for non-decorative images.

As for computer programming, we have also observed that some platforms use interactive components (menus, tabs, calendars, slide shows, etc.) not programmed for accessibility. In our opinion, this is often an issue of a choice to prioritize cosmetic appearance at the expense of functional performance. Furthermore, we see that, for some platforms, there is a lack of robustness in rendering webpages whether consulted using a computer, tablet or telephone. In our opinion, that situation stems from a lack of accessibility testing in those different environments.

Furthermore, we have noticed that, to meet the requirements of the *Accessible Canada Act*, the administrators of most banking/financial institutions do have accessibility policies, but their recurring accessibility problems show that there is some mismatch between words and concrete actions facilitating a reduction of barriers for people living with disabilities.

For a deeper understanding, we suggest that the [Study Results] section of this report be read, along with the appendices that detail the results of the informational content, transactional and compliance testing conducted with people living with functional impairments.

THE TRAINING OF WORK TEAMS
ASSIGNED TO WEB DEVELOPMENT
SEEMS TO BE INSUFFICIENT
BECAUSE MOST BANKING/FINANCIAL
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SIMPLE TO CORRECT

Recommendation 1

That teams working on developing and maintaining websites are trained in web accessibility concepts, rules and techniques⁹.

When websites and tools are well designed and coded, people with disabilities can use them, but many of the sites and tools currently being developed contain accessibility problems, which makes them difficult or impossible to use for some people. Making the Internet more accessible would be a major benefit for users, businesses and society in general.

Recommendation 2

That web designers and developers are qualified to properly use WAI-ARIA¹⁰.

The Web Accessibility Initiative-Accessible Rich Internet Applications (WAI-ARIA) is a group of techniques facilitating the provision of users with information adaptation tools on the names, roles, conditions, properties and values of each interactive component¹¹. Due to the evolving and sometimes even fluctuating support of WAI-ARIA by various environments (combinations of browsers and screen readers), it is imperative to conduct functional testing in several environments. Furthermore, it is important to consider that adding WAI-ARIA attributes can turn out to be completely ineffective if they are not used at the right time and right place¹².

Recommendation 3

That web designers and developers refer to practical examples of interactive components adequately coded for accessibility.

In this regard, we recommend three websites with concrete examples:

- The WAI-ARIA Authoring Practices 1.2 page of the W3C Group:
<https://www.w3.org/TR/wai-aria-practices-1.2/>
- The Components section of the Ontario Design System:
<https://designsystem.ontario.ca/components/detail/accordions.html>
- The Web Experience Toolkit Practical Examples section:
<https://wet-boew.github.io/wet-boew/demos/index-en.html>

⁹ <https://www.w3.org/WAI/fundamentals/accessibility-intro/>

¹⁰ <https://labo.raamm.org/formation/aria-html5/> [French only]

¹¹ A WAI-ARIA authoring practices guide is here: <https://www.w3.org/TR/wai-aria-practices-1.2/>

¹² Top six WAI-ARIA mistakes to avoid are here: <https://www.deque.com/blog/wai-aria-top-6-mistakes-to-avoid/>

Recommendation 4

That web designers and developers pay particular attention to mobile device accessibility¹³.

People are accessing the Internet increasingly more frequently using a smart phone. The two major platforms with full-fledged accessibility tools are iOS: VoiceOver and Android: TalkBack. Because interactions with those devices are mainly via touch and not with a keyboard¹⁴, it is just as important to consider web content accessibility on those platforms.

Recommendation 5

That web designers and developers rely on the eight simple tips from the RAAMM Laboratoire de promotion de l'accessibilité du Web¹⁵.

It is not always possible to make a website completely accessible in the short term because that can require major changes or even a complete overhaul. The people with the RAAMM lab suggest a few simple actions to improve accessibility quickly and inexpensively.

Colour contrast ratios

Ensure sufficient colour contrasts using a downloadable tool free on the Internet¹⁶.

Images with alt text

Produce appropriate alt text in the webpage code for each image conveying a message and all images/links to know their destination.

JavaScript programming compatible with screen readers

Be sure that JavaScript is compatible with screen readers by conducting tests verifying that all functionalities are operable with JavaScript.

JavaScript programming compatible with screen readers

Establish a direct relationship between label text and form control in webpage coding.

Logical heading structure

Correctly code text display levels (Heading 1, Heading 2, etc.). Then screen readers and site crawlers will recognize headings, which will improve site ranking in Google.

¹³ <https://www.w3.org/TR/mobile-accessibility-mapping/>

¹⁴ Although VoiceOver users manipulate the phone interface mainly by touching it, it is possible to enrich the user experience by connecting a braille reader via Bluetooth. At the time this report was being written, however, TalkBack, the integrated Android OS screen reader, did not support that functionality.

¹⁵ <https://labo.raamm.org/documentation/comment-rendre-un-site-web-plus-accessible/> [French only]

¹⁶ <https://www.tpgi.com/color-contrast-checker/>

Correctly identified links

Be careful to create links [making life easier for] some users but also to increase the chances of site indexing in Google because site crawlers track significant words inside links.

Quick content access mechanism

Provide a link to the main content as soon as a page opens. A level 1 heading placed at the start of the main content is another simple access method. These techniques facilitate the quick discovery of main content without having to go through all the navigation menus each time.

Identification of the main language of the page

If the main language is incorrect, screen readers may read the displayed text in English with French syllabic stresses and intonation, which produces a disconcerting and unintelligible result. Therefore, the solution is to ensure appropriate language coding on each page of the website: for example, for the French section of the site, use the FR tag (instead of EN-US).

Recommendation 6

That web platform accessibility be periodically assessed¹⁷.

There are two crucial aspects to a complete assessment of web content accessibility: a functional assessment, with at least one screen reader, and a technical assessment. It is recommended that the functional assessment comes first, which puts assessors in the users' shoes by detecting various problems, the causes of which the technical assessment will then explain. The inclusion of one or more people living with disabilities, [such as people who are blind], on the work team also facilitates the discovery of problems that a sighted person, for example, would have trouble perceiving. For both occasional and regular evaluations, it is also necessary to conduct them with a variety of users.

Conducting a complete assessment of web content requires a great deal of time because there are numerous automated, semi-automated and manual verifications to be made. Because qualified experts must conduct this type of assessment, there is also the issue of significant cost, but it is generally enough to use a small representative sample of the pages to come up with an accurate picture of a website. On the other hand, an automated summary assessment and some manual verifications are often enough to get a general idea of the accessibility level.

¹⁷ <https://labo.raamm.org/formation/evaluation/> [French only]

Recommendation 7

That banking/financial institution personnel develop tools facilitating the secure testing of their transactional interface accessibility.

People living with visual and or cognitive impairments, especially people over 50, can be nervous about using transactional platforms because it involves entrusting machines with their personal data and money. We believe that making a secure environment available, for learning purposes, to assess the capacity of transactional interface support would encourage more people in this group to use those services.

Recommendation 8

That banking/financial institution personnel publicize their web accessibility business cases¹⁸.

Major returns on investments can be made and cover the cost of implementing web accessibility. To be ready to make that initial investment, the people running numerous organizations need to understand the social, technical, financial and legal/political factors in web accessibility and its expected benefits.

The social factors have to do with the equal opportunity that web accessibility gives people living with disabilities, but also with improving the experience of people without disabilities, including those using mobile devices, seniors, people with low literacy, people using older technologies and people who only use the Internet occasionally.

The technical factors have to do with website interoperability, quality, reduced site development and maintenance time, reduced server load, offering content in different configurations and being ready to keep up with evolving web technologies.

The financial factors have to do with the financial benefits of increasing website usage, savings, consideration of initial costs, costs during development and ways to reduce those costs by simultaneously developing web and mobile accessibility.

The legal and political factors have to do with the web accessibility requirements of governments and other organizations in the form of regulations, policies, laws, standards, directives and other types of documents.

¹⁸ The elements presented here are from <https://labo.raamm.org/>, a webpage initially based on The Business Case for Digital Accessibility. There are case studies in the form of best web accessibility practices.



**What else
we can do**

What else we can do

The data contained in this report clearly show that there are still many gaps in the accessibility of online banking/financial services. However, beyond our recommendations here, we believe that it is useful to enhance our study with a few thoughts on what else we can do.

First of all, although there are international standards on accessibility (WCAG) and Canadian regulations intended to reduce barriers to accessibility¹⁹, we do not have much control over their application and expected results. In fact, the Accessible Canada Act will only be constraining when the members of disability rights organizations and groups are successful in establishing, based on the harm caused to people living with disabilities, the provision of and interest in better accessibility to banking/financial services. Therefore, we have to continue to mobilize the stakeholders in this issue.

Moreover, the current provisions of the *Accessible Canada Act* do not concern the transactional aspects of websites, that is, when users are connected to their accounts, for example, to pay a bill or make a transfer. We believe that that situation creates serious harm toward people living with disabilities because it is exactly at the time one is making a transaction that the website should be fully accessible. We recommend that representations be made to expand the regulations of the *Accessible Canada Act* to cover the transactional aspect of websites.

Finally, we believe that the user experience of people living with disabilities would be greatly improved if web professionals were properly trained on the concepts, rules and techniques of web accessibility. First of all, that would happen with the continuous training of practising professionals and could be delivered at the collegiate level or through organizations such as the Académie de la transformation numérique au Québec²⁰ or the AccessForward program supported by the government of Ontario²¹. Ultimately, we believe that that training should lead to accreditation, ideally even a certificate demonstrating that the people trained are indeed qualified to intervene concretely in developing and applying web project standards. Furthermore, if we want to intervene upstream of the problem of web accessibility, the offer of basic training in collegiate and university institutions should include at least one 45-hour (3-credit) course on the subject.

¹⁹ <https://www.canada.ca/en/employment-social-development/programs/accessible-people-disabilities/act-summary.html>

²⁰ <https://transformation-numerique.ulaval.ca/> [French only]

²¹ <https://www.accessforward.ca/front/general/>

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