**ING Bank and Sia Partners**

# Research Paper

## The impact of the European Accessibility Act on European banking services

**28th of January 2024**

# Executive Summary

As of the 28th of June 2025, the European Accessibility Act will be enforced. It is designed to ensure that persons with disabilities have equal access to (digital) products and services within the EU. In this paper, the impact and potential for the banking sector is assessed.

Accessibility is important for banks to implement, now more than ever. This importance was always because of the Corporate Social Responsibility angle. The EAA now adds a requirement to comply with legislature surrounding accessibility. Furthermore, there are economic benefits for compliance with the EAA. In this whitepaper these benefits are explored, as well as the risks and challenges coming from EAA compliance. Finally, there is also some attention for the current, underwhelming, state of accessibility in banking apps.

In the conclusion, recommendations and quick wins are given to support in the process towards EAA compliance. Key is to include your own employees with disabilities, to create either local or global centers of expertise, and to start as soon as possible. There is a lot of work that needs to be done, and June 2025 is approaching rapidly.

## Reading Guide

Not all readers will have the time to read the entire white paper. For this purpose, this short reading guide will quickly highlight some chapters, and why these are recommended reading.

- Introduction: The purpose and scope of the paper.
- Disability Economics: introducing disability demographics and the economic value of the disability community
- Risks and challenges: three chapters highlighting the main risks of not acting on the upcoming legislation and how to navigate these.
- Answers to the 2023 Accessibility Benchmark: The current state of banking apps accessibility.
- Conclusions: The main takeaways, as well as the central recommendation and some quick wins.

For a full picture and full understanding of the white paper and it's takeaways, it is recommended to read the entire document.

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# Contents

## Introduction

In June 2025, EU banking services as we know them will be changed. This change is through new legislation known as the European Accessibility Act (EAA). The EAA is designed to consider persons with disabilities[1] and their requirements, to ensure that they have equal access to (digital) products and services within the union. The goal of this act is to transpose itself into local legislature in every EU member state. While the EAA affects many industries and sectors, in this white paper we focus exclusively on its impact on the banking sector. The impact of the EAA on (digital) banking must not be underestimated by the financial sector.

With this white paper we, ING Bank and Sia Partners, wish to provide European banks with an introduction into disability inclusion and accessibility.

## Background

Accessibility is about taking away barriers for persons with disabilities. Accessibility can be defined as:

*the degree to which a product, device, service, environment, or facility is usable by as many people as possible, including by persons with disabilities[2].*

When we speak about making things more accessible, especially in the case of persons with disabilities, it is about removing barriers. To illustrate: in German, the term for accessibility is *Barrierefreiheit*, or 'freedom from barriers' when translated directly into English. These barriers can be digital, physical, social, and economic. Within this whitepaper, we primarily focus on persons with disabilities, as with improving their access, the access of many others is also improved. This is known as the *solve for one, extend to many* principle[3].

Disabilities are often only associated with people in a wheelchair or people who are blind or deaf. However, these are just a few of the disabilities that exist. There are numerous disabilities spread across all ages, all genders, all ethnicities, and all continents in the world. According to different international organizations, between 70-80% of the disabilities are invisible or not directly noticeable, such as a hearing impairment. According to international organizations, this is one of the reasons that persons with disabilities are one of the largest underserved minorities in the world. Traditionally society viewed persons with disabilities as individuals who need fixing and/or need care. Since the 1950s this approach has slowly been changing, starting in the United States. This change started with veterans coming back after the second world war, followed by persons with disabilities claiming their rights following the Civil Rights Movement. The first disability advocates who pushed for legislation in support of equal opportunities and fought discrimination and stigmatization of persons with disabilities were known as the Disability Rights Movement. The disability movement stood at the base of the first recognition of the civil rights of persons with disabilities. The US Rehabilitation Act of 1973 was the first disability legislation in the world. Up to this day, the United States remain a frontrunner in accessibility legislation, with the Americans with Disabilities Act (ADA).

In the EU, legal recognition and support has accelerated since the introduction of the UN CRPD (Convention on the Rights of Person with Disabilities) in 2006. This resulted in the Disability 2030

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[1] Regarding persons with a disability, there are two ways to refer to them. Firstly, there is PFL (People First Language), whereas the other way is IFL (Identity First Language). Within this white paper we use PFL, as the majority of the disability communities prefer this style. This is in line with the EAA.

[2] https://accessibility.iu.edu/understanding-accessibility/index.html

[3] https://inclusive.microsoft.design/tools-and-activities/Inclusive101Guidebook.pdf

Strategy and the more recent European Accessibility Act (EAA). This is at least partially thanks to the European Disability Forum (EDF), the EU interest group for persons with disabilities. EDF has been working closely with the European Commission on Social Affairs, drafting legislation, and is actively involved in drafting the EU standards accompanying the EAA.

There are two main reasons why the EU has decided to introduce the EAA. First, the core values of the union. Two of these are human dignity and equality. These values highlight that everyone within the union should have access to basic utilities and necessities. In 2023 the internet can genuinely be considered one of these. It is vital in accessing many government and other services, such as digital identification, banking, and medical information. Secondly, the EU has signed the UN Convention on the Rights of Persons with Disabilities. This treaty resulted in the EU Disability Strategy, which has already seen a new iteration. The UN treaty mandates the EU meets and upholds the principles of human rights for persons with disabilities. The EAA is the products and services for private individuals' directive to serve that purpose with regards to persons with disabilities as individual consumers.

# No only a regulatory focus

The European Accessibility Act will legally enforce accessibility for persons with disabilities. Yet accessibility is more than a compliance risk: it is also a business opportunity for banks. The economic potential deriving from an accessible environment can be seen in the United States today. This is why this whitepaper goes beyond the legal perspective. The whitepaper also discusses the economic perspective and social benefits for European banks. This is not to say that one should ignore the legal implications. So, later on in this paper, we return to the legal and compliance related risks for banks. These are drawn from the experiences and lessons learned by the ING Accessibility program.

## The purple value

The economic benefits of including the disability community in banking lies in a combination of the demographics and the economic growth opportunities. These benefits are often underestimated. Therefore, this chapter provides insights and data into the economic potential of disability inclusion, also known as the purple value or purple spending power.

## Demographics of the disability community

Defining the population of persons with disabilities is not without challenges. This is because not all governments use the same parameters to measure disability. For example, governments measure the population of persons with disabilities by welfare status (receiving disability related welfare) and/or registration as care receivers (living in facilities, using personal care at home, etc.), resulting in various outcomes in the World Health Organization (WHO) Report on Disability (2011). Some government bodies like the CDC, in the United States, measure differently. The CDC developed the Disability Health Data System (DHDS), which is based on a set of behavioral risk factor surveillance questions concerning the experience of living with disabilities. This lead to the statistic that 26% of the adults in the United States are experiencing a disability. This is a noticeable difference to the WHO statistics, which find that 13% of the world population has a disability.

Adopting a similar approach as the CDC, Eurostat estimated that 27% of the population in the EU in 2022 had some form of a disability. This ranges from 14.6% in Bulgaria to 38.3%

in Latvia. In the illustration below the various levels between EU nations have been illustrated.



30+

10% - 19,9%: ■

20% - 29,9%: ■

30%+: ■

EU Average: 27%
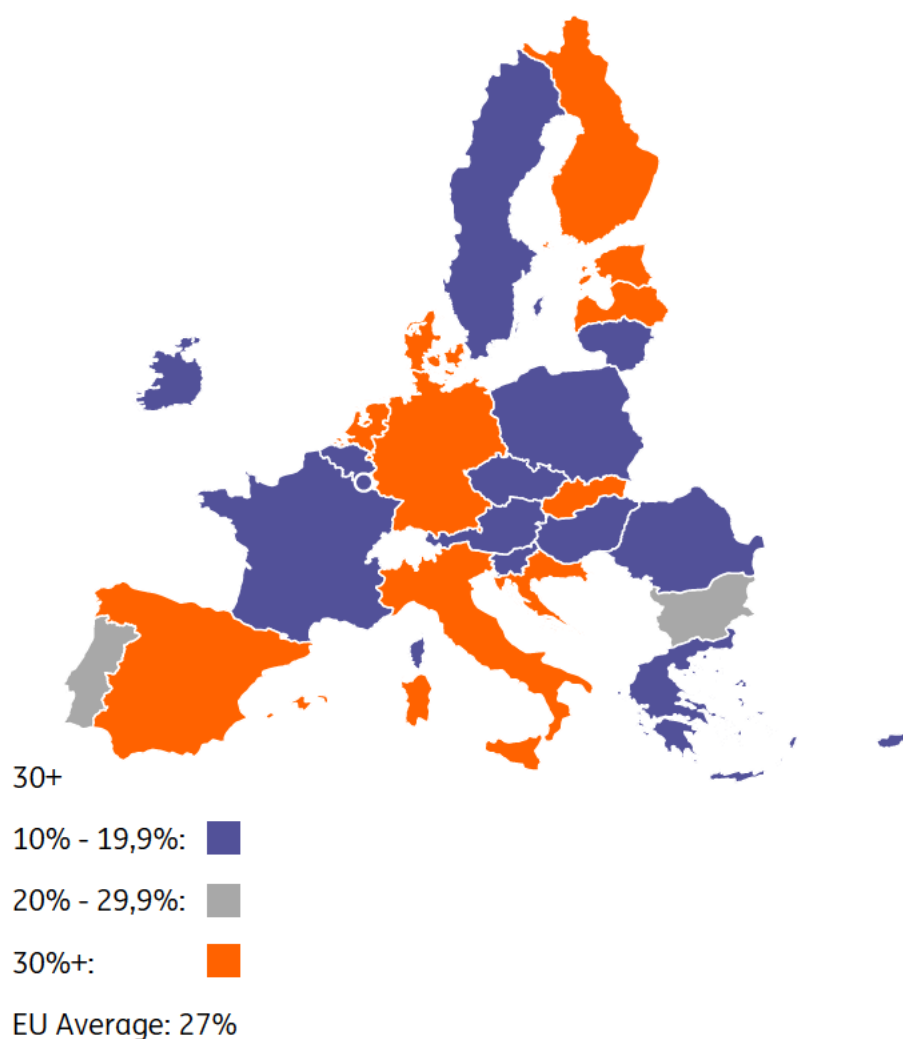
The inconsistencies and differences in the ways that the data is gathered make it particularly challenging to establish an accurate and comprehensive understanding of the disabled population. For this paper we use the Eurostat statistics combined with the economic statistics provided by ROD-Group (Return on Disability Group).

Highlighting the size of the disability economy leads to the following statistics:

- Worldwide 1.85 billion Persons with disabilities
- European Union 120.6 million Persons with disabilities

## Disability economics

The RoD-Group assesses the global disability market to be worth 13 trillion USD, including persons with disabilities, their family and friends spending their income on accessible products and services in support of their loved ones. An overview of the size of the global and European disability market can be found below:

| Disability economics[4] | 2020 Europe | 2020 Global |
|---|---|---|
| Population persons with disabilities | 123.9 million persons with disabilities | 1.85 billion persons with disabilities |
| Income | 1.17 trillion USD | 3 trillion USD |
| Disposable income | 547 billion USD | 1.9 trillion USD |

With these numbers in mind, the business case for accessibility becomes much more evident. On top of this, the disability community is a growth economy. An ever increasing number of persons with disabilities find their way to education and thus find better jobs. The ILO (International Labor Organization) assessed in 2010 that ignoring disability from the labor force results in a GDP loss between 3 – 7% annually. This highlights the large economic benefits investing in accessibility has.

# The legislative environment and its consequences

The EAA aims to standardize the minimum accessibility requirements for vital consumer products and services across the EU, in line with the UN CRPD. The EAA has been transposed by all EU countries in local accessibility legislation. These are implemented through local accessibility acts, guidelines, or laws (depending on the country). This means that there are many different approaches, such as one accessibility act covering all products and services (e.g., in Germany with the Barrierefreiheitsstärkungsgesetz) or it has been embedded in specific existing legislation for products and services (e.g., in the Netherlands with the Toegankelijkheidsrichtlijn). This last approach results in multiple ownership and monitoring authorities of accessibility requirements, which depends on the products, service and/or digital components of the EAA.

The EAA impacts products and services such as smartphones, computers, e-commerce, and includes specific requirements for banking services. The EAA places demands on various actors in the supply chain, from manufacturers to service providers. Each actor needs to ensure that their products conform to the EAA requirements, and specifically to the laws of the nations in which they operate. In case of incompliance with these EAA requirements the ultimate action can be market retraction of the product till the accessibility requirement is fixed. This needs to be in accordance with and approved by the monitoring authority.

As for what the EAA requires from each product or service to be compliant: most requirements are similar for most products and services. The accessibility requirements named in the act can be put into three categories, which are:

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[4] https://www.rod-group.com/research-insights/annual-report-2020/. The ROD-group includes more nations in Europe than solely the EU member states. This data is used as it is verified.

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1) the provision of information,
2) user interface and functionality design, and
3) support services such as helpdesks, training services and technical support.
All products need to be designed with accessibility in mind, through these three categories.

With these insights in mind, we move forward to the risks and challenges the EAA brings to the banking sector. Afterwards, we will make a suggestion on an approach that could be used for the purpose of compliance.

## POUR

The consequences of the EAA for banks are significant, as all channels of contact between the bank and the customer are given additional legal requirements. In order to reach compliance, an approach must be defined. A helpful way to approach accessibility, and one used in the EAA itself, is the "POUR" approach. This approach is to ask of every feature four distinct questions: 1) is it perceivable, 2) is it operable, 3) is it understandable, and 4) is it robust? For banking we translated the POUR principles as follows:

| Perceivable | Operable | Understandable | Robust |
|---|---|---|---|
| Multimodality in communication channels, no information can get lost using assistive technologies | Digital channels/information must be accessible using assistive technology, including enough time to digest content. | Digital platforms should minimize errors and provide for clear navigation, simple language, small page size and clear paths to information. | Content and design should maximize compatibility with current and future devices |

It is recommendable to make use of POUR or a similar approach in order to ensure compliance with the legislation. These concepts then need to be integrated into the audits and the international or national approach chosen, keeping in mind the timeline to ensure timely compliance with the EAA.

## Risks and challenges

Recently ING Bank initiated its EAA Compliance Program. As part of the program ING has been assessing the risks for banking regarding the EAA and accessibility for persons with disabilities within EAA compliance. Three of the twelve identified risks are of particular significance for European banks. These we will discuss in this white paper. They are:

- Different interpretations and transpositions per country
- Timeline
- Audit of accessibility (fit for purpose)

Next to these specific risks, the other risks refer to operational risks and missing capabilities, both in terms of skills and resources, for an effective implementation of the EAA.

## Transposition and implementation

We start with the variance in interpretation and implementation in EU countries, which creates a challenge for banks with operations in multiple EU countries. With various interpretations of the EAA, it becomes harder for banks to provide unified EAA compliant services in all EU countries where the bank operates. This challenge means all banks have a

decision to make: *"Do we approach the EAA on local or international level?"* For either approach the knowledge, the accessibility skill level and local requirements must be met. This is to ensure compliance delivery, meaning that we do find a difference in the scale and required resources for both approaches.

When deciding on which approach to take, there are a few considerations that must be made. These can be listed as follows:

| *Local Approach* | | *International Approach* | |
|---|---|---|---|
| **Advantages** | **Key Success Factors** | **Advantages** | **Key Success Factors** |
| 1. Close to the local customer and supervisory authority | Board support/sponsorship, including budget and resources for delivery, in all countries individually. | 1. Effective resource allocation | Board support/sponsorship, including budget and resources for delivery. |
| 2. Strong knowledge on local application of the EAA transposition | Coordination, from a local Center of Accessibility Expertise, serving as a primary content owner of accessibility, who can build a knowledge base for accessibility. They will have a clear mandate supporting local compliance. | 2. Effective cost allocation | Central coordination, for example a Center of Accessibility Expertise as a primary content owner of accessibility, who can build a knowledge base for accessibility and take responsibility for the coherent approach. |
| 3. Strong focus on local risks and data management | Risk management must be organized locally by an accessibility risk owner and in support of auditing processes to develop/source proving compliance. Data needs to be comparable internationally for auditing purpose, for which shared requirements must be set. | 3. A harmonized risk and data management approach. | Risk management must be organized internationally by an accessibility risk owner and in support of auditing processes to develop/source proving compliance. Data needs to be comparable internationally for auditing purpose. |

| | | | |
|---|---|---|---|
| 4. Possibility to build strong relations with local interest groups | Stakeholder management, build a relationship with local and internal representatives (e.g., an internal Accessibility Guild / Business Resource Group / Test Panel) representingthe disability community. This can support the bank in better understanding the requirements and the expectations of the disability community. Secondly, it is vital to build a good relationship with the national supervising authorities, to ensure collaboration and the sharing of best practices. | 4. A harmonized approach building strong relations with local and internal interest groups | Stakeholder management, the team must build a relationship with local and internal networks e.g., an internal Accessibility Guild/ Business Resource Group / Test Panel) representing the disability community. This can support the bank in better understanding the requirements and the expectations and cultural differences of the disability community. Secondly, it is vital to build a good relationship with the national supervising authorities, to ensure collaboration and the sharing of best practices. |

Based on the above, it is for each bank to decide what approach fits best. We do advise keeping in mind that accessibility programs require bank-wide coordination to be successful. And in extension, we strongly suggest including the employee perspective in this approach as well. This assures that accessibility is pursued both on the customer as well as the employee side, in support of disability inclusion.

## Timeline

In the experience of rolling out the EAA program within ING, we found that timelines are extremely short. Accessibility is a mostly new topic for most banks, as till now it has usually been a bottom-up 'nice to have'. To achieve accessibility compliance, it is crucial to assess the baseline. For this purpose, the WCAG (Web Content Accessibility Guidelines) 2.1 accessibility audits on digital channels must be performed. Through this, the work to be done to achieve compliance can be assessed. Furthermore, conversations with the monitoring authorities must be held on what the requirements for accessible bank products are. To ensure that the work can be performed, the training of staff must start next. Assuring the staff is equipt to deliver accessible digital products and services within EAA compliance. This training can be for example in the application of WCAG 2.1 for digital applications. This training, and others such as disability awareness training for staff in contact centers, will require a significant amount of time. And time is scarce, as the EAA will be in full effect by June 28, 2025.

## Audit of accessibility (fit for purpose)

Is the audit approach based on automated WCAG compliance, or is the audit approach supportive of user experience? The last is time consuming, still essential since automated testing is cheaper, faster and easy to repeat, this form of testing only shows about (depending on which expert you talk to) 20-50% of accessibility issues. This is due to false positives as WCAG guidelines are written based on human evaluation. And even automated testing calls for experts to interpret the results and provide adequate follow up. This shows

there is no easy, fast and cheap solution for accessibility testing. Hence to make sure your audit fits it purpose, because automated testing might leave extensive legal liabilities in regard to EAA compliance.

Last but not least, most audits are based on web applications, instead of mobile applications. Knowing banks provide banking services on mobile apps, automated testing of web only does not fit the purpose of accessible banking services.

## Digital Banking

In 2023 internet access can easily be considered an important human need in the EU. It is near impossible to participate in Europe without internet access. Digitalization, which skyrocketed during COVID, makes it near impossible to access many vital services without internet access. Financial affairs are no exception to this.

Banks serve as a prime example of the importance of internet access in the financial sector. Customers use a mobile app to access their savings, money transfers and insights. The banking app has become the primary channel for a private customer for handling their financial affairs. This is illustrated by the fact that in the Netherlands, since 2000, over 93% of all banking branches have been closed.

Unfortunately, as with many other sectors, the online banking experience of today was not designed with accessibility as a core pillar. In fact, the online banking focus has created new barriers that stop persons with disabilities and persons facing digital illiteracy from accessing important services. The EAA aims to reduce or remove these barriers as much as possible. In order to assess the current state of accessibility in digital banking, an accessibility benchmark on banking apps has been done.

### Answers of the 2023 accessibility benchmark: Benchmarking the accessibility of banking apps 2023

To effectively identify the current state of accessibility in banking apps, a benchmark was launched. Information from 37 banks from countries such as Belgium, France, the UK, and Hong Kong was gathered. In these assessments, about 40% were done on Android phones, whereas 60% used iOS.

The assessment determined the compatibility of the phone's accessibility features with the banking apps. Specifically, the Zoom, Voice Over, Contrast (dark mode), and the ability to increase text size functionalities were studied. In addition, it was also assessed whether a banking app had a dedicated accessibility menu in-app and whether the app could be operated with vocal commands. The results were interesting, albeit in an underwhelming manner. The table below shows the results gathered.

| Accessibility feature | Zoom | Voice Over/Talk Back | Contrast (dark mode) | Increase text size | Voice directed | Dedicated accessibility menu in app |
|---|---|---|---|---|---|---|
| Percentage supportive | 88% | 74%* | 68% | 50% | 3 out of 37 tested apps | 2 out of 37 tested apps |
| Via Phone settings | Yes | Yes | Yes | Yes | Yes | Not applicable |

\* Less than half of the apps include compatibility of voice over with images in the app

The apps that supported voice direction were Banx (Belgium), BNP Paribas (France) and Intesa Sanpaolo (Italy). The dedicated accessibility menu could be found in the apps of Halifax (UK) and Intesa Sanpaolo (Italy). This assessment highlights the somewhat underwhelming prevalence of the compatibility of the accessibility features offered by the phone itself.

## Conclusions

This whitepaper took us through the next steps lying ahead for the banking sector in Europe's accessibility journey. This was done based on extensive research by ING's first Global Head of Accessibility and Sia Partners' Accessibility & Inclusive Design Experts. This research was combined with ING's experiences on its own accessibility journey, which started in 2017, and with SIA Partners experience in beyond banking. To recap the key insights of this paper:

- There are significant economic advantages in making banking services more accessible, which goes beyond legal compliance and upholding human rights principles.
- The legislative impact of the EAA is extensive and demands coordinated action and significant resources. In this, banks must decide whether to go for a local or international approach.
- The accessibility benchmark showed us that:
  - Most of the banking apps currently support accessibility features incorporated in the mobile phone's operating system.
  - Accessibility functionalities within the mobile banking apps need to get more attention from virtually all banks.
  - Almost all banks depend entirely on operating systems for any form of accessibility in their banking apps.
- Our research and experiences identified three key risks: a) Different transposition and implementation per country, b) Time is noticeably short given the impact of the EAA and the current state of digital banking, c) accessibility audits must be fit for purpose to achieve a successful implementation of the EAA in daily (mobile) banking services.

### Quick wins

In addition to the key insights that were stated just before, there are some quick wins that can be aimed for in the path towards accessibility inclusion and EAA compliance.

- Allow customization, and assure this is possible before logging into the banking app.
- Maintain a portion of physical branches, at leat till digital banking is accessible and inclusive for all
- Add audio description and captioning to videos.
- Agents in contact centers with accessibility knowledge
- Proactive collaboration with 3rd party service partners, like partly online payment services and POS terminal developers

### Recommendation: Approach to compliance

For most banks and organizations, accessibility and disability inclusion are driven by Corporate Social Responsibility. This white paper provided various insights to support a shift towards a business and risk driven approach. Given the economic potential of the disability community and upcoming legislation in support of accessibility for persons with disabilities, both are approaches that will become highly important in the coming years.

Based on these findings our recommendations list as follows:

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1) The most important lesson we would like to add from the ING experience is to include your disability employee resource group in the development and delivery of the Accessibility program right from the start. This will support interactions with stakeholders and provide insights into their user experience.
2) Decide on a local or global/EU approach for EAA compliance within the Bank and acquire management board support to support pushing delivery.
3) Appoint an international or local Head for the accessibility (compliance) program.
4) Provide the program with an adequate budget (based on outcomes from 1-3) to build a center of expertise and acquire necessary training programs. Ensure this center includes a multidisciplinary team of Risk managers, R&D, UX Design, Marketing and Accessibility experts, and that it is installed with clear roles & responsibilities and governance relating Accessibility of products and services.
5) Source training as soon as possible, considering the pressure to ensure timely implementation. To do this, it is our suggestion to train product and services designers on the concept of inclusive design and embedded inclusive design principles in the way forward. Thus, it can be ensured newly developed products are accessible from the start.
   - Furthermore, it is also important to pay attention to train staff in topics such as:
   a. Digital accessibility
   b. Disability etiquette
   c. Accessible products provided by your bank.
6) Start conversations with the appointed supervisory authority and learn about their knowledge level and approach.
7) Compare your performance with other banks. Not to make it a race, but to learn from better practices and get inspiration for making banking easier for the disabled community
8) Start today. June 2025 might seem far away, but the implementation of the EAA will take significant time. The earlier your assessment is started, the better.

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