

## AFM launches compliance review and emphasises the importance of clear non-conformity notifications

**In short** - In this third EAA update, we address the accessibility requirements, focusing specifically on the following:

- WCAG: key focus points
- Embedding accessibility within the organisation
- Upcoming compliance review

In addition, we provide further guidance and examples on how to apply a non-conformity notification via the AFM Portal. We ask institutions to take this guidance into account when submitting a notification.

# Accessibility requirements: AFM expectations and upcoming review

The AFM expects financial institutions to structurally safeguard accessibility and comply with the [WCAG criteria](#). To assess the level of compliance in the sector, we will conduct a compliance review on accessibility in the coming quarter.

## WCAG: Key focus points

The WCAG criteria are an important foundation for meeting accessibility requirements. We expect institutions to prioritise level A criteria. Four of these are especially important, specifically the non-interference criteria:

- [Audio Control](#) (1.4.2)
- [No Keyboard Trap](#) (2.1.2)
- [Pause, Stop, Hide](#) (2.2.2)
- [Three Flashes or Below Threshold](#) (2.3.1)

If any of these criteria are not properly applied, the entire website may become inoperable for certain groups of users, or in some cases even cause harmful physical reactions. These criteria therefore always qualify as 'critical'.

We also expect institutions to be able to comply with level AA criteria. Furthermore, with the introduction of WCAG 2.2, [new criteria](#) will become mandatory. Start working toward these requirements now, so that you are well prepared for these upcoming obligations.

## Embedding accessibility within the organisation

The AFM emphasises that accessibility is more than WCAG compliance alone. We expect institutions to have insight into the major accessibility risks within their services and to have processes in place to make and keep websites, apps and digital services accessible. Key points include:

- **An accessibility audit helps identify bottlenecks, risks and violations of accessibility requirements.** This provides clear insights into issues such as insufficient text contrast, missing alt texts, buttons or links without text, missing form labels or poor keyboard navigation. An audit is the basis for targeted improvements.
- **Accessibility must be structurally safeguarded through consistent guidelines, periodic checks and clear accountability.** Institutions should be able to explain how accessibility is continuously monitored and ensured. New content, updates or functionalities may introduce new barriers, reducing accessibility. Therefore, accessibility should be incorporated from the very beginning of design and development. Additionally, it's important to have adequate procedures in place to receive and resolve complaints from consumers with a disability.
- **Involve people with disabilities from the outset in the development and testing of your information, website, app, or other online applications.** This makes it immediately clear whether solutions are practically usable (and therefore truly accessible). This leads to more effective design and prevents costly and time-consuming corrections later on.

## Upcoming compliance review

In the coming quarter, the AFM will conduct a compliance review on the digital accessibility of financial institutions. We will assess the extent to which institutions' websites comply with the WCAG criteria, paying specific attention to level A criteria. We will focus on sectors and services most frequently used by consumers. The findings will be used to determine targeted interventions and, where necessary, to address institutions on identified shortcomings.

# Additional instructions for clear EAA notifications to the AFM

Financial institutions are required to notify us when they do not comply with the EAA (notification of non-conformity). We are pleased to see that many institutions have submitted a notification to the AFM and demonstrate that they are taking steps to improve accessibility. However, we notice that the notifications often lack sufficient specificity when submitted. As a result, we are unable to properly assess what the exact accessibility issues are and where they are located.

To clarify the EAA notifications, we have included additional instructions below for several questions in the notification form. We ask institutions to follow these instructions when submitting a notification. The instructions can also be found on [the AFM website](#).

## Question 1: Which part of the service does this notification concern?

Indicate which parts of the service do not comply with the requirements. For example:

- Specify the brand or trade name to which the notification applies.
- Do not only describe the service (e.g. 'insurance' or 'mortgages') but also specify which components are affected, such as website(s), app(s), documents (PDF, Word, letters), emails or physical products
- Specify the function of the webpage, app, documents, emails or physical product for the consumer.

**Important:** If the same issue applies to multiple brand names or parts of the service, these can be combined into one notification. It is important to specify which aspects of the service are affected, as described above.

### Example – Question 1

This notification applies to the trade name 'Institution B.V.' and concerns the online customer portal on the webpage 'Submit an application'. It specifically concerns the function 'Upload document' during the application process.

## Question 2: In what manner are the services you provide not compliant with the requirements specified in the EAA?

Specify exactly what the accessibility issues are and where they are located. You can do this, for example, by indicating which WCAG criteria are involved, or, in the case of an app, whether the issue applies to iOS or Android.

### Example – Question 2

- WCAG 2.1 – Criterion 2.1.1 (Keyboard – A): The 'Upload document' button cannot be reached via keyboard navigation.
- WCAG 2.1 – Criterion 1.4.3 (Contrast – AA): Text labels in the upload screen have insufficient contrast. This applies to the website, iOS app and Android app.

## Question 3: How many consumers may be affected as a result of this?

Indicate the number of people who visit or use a website or app. Be sure to include the number of people who are not yet customers.

### Example – Question 3

- The webpages receive approximately 12,000 visitors per month.
- Around 3,000 users actively complete product applications using the app each month.

**Question 4: What is the associated level of impact on consumers? (critical, significant, moderate, minor)**

As a guideline, the impact can be determined based on the level of the WCAG criteria. A level A criterion has a significant or critical impact, and a level AA criterion has a moderate or minor impact.

**Example – Question 4**

The impact is significant, as a level A criterion is affected and keyboard users are prevented from completing the application independently.

**Question 5: What actions are being taken to correct the non-conformity?**

Specify what actions are being taken to meet the requirements and which departments within the organisation are involved. For example, indicate in which processes this will be incorporated to ensure it is permanently embedded.

**Example – Question 5**

- The IT department is adjusting navigation, button lay-out, and colour contrast.
- The UX team is testing the solution with a panel of users with visual impairments.
- Accessibility is being systematically integrated into the development process using a WCAG checklist.
- Solutions will be rolled out within 8 weeks; Department X is monitoring progress.

**Question 6: Are there equivalent accessible alternatives that can be employed to use the service (e.g. an email address)?**

We see that institutions suggest, for example, that customers can visit a physical office as an alternative solution. This is not an equivalent alternative for people with disabilities, as not everyone is able to visit an office.

**Example – Question 6**

- Customers can submit their requests via our email address. These emails are fully accessible for screen readers and are handled with the same priority as other digital requests.
- Customer service provides support when customers encounter difficulties. Staff members are trained to carry out actions on behalf of the customer and can be contacted by phone and chat.
- If a customer gets stuck, an alternative channel is offered, such as the option to use a phone number or email address, or to switch from the app to the web environment to complete the task there.