

# **Accessibility deficiencies on the Financial Supervisory Authority's electronic services website**

## **Critical**

### **Text alternatives (WCAG 1.1.1)**

There are deficiencies in the text alternatives of visual elements, which prevents users of screen readers receiving necessary information about them.

For example

- The Help icon (question mark) has no text alternative
- The Info icon (i-icon) has no text alternative
- The Delete icon (trash basket) has no text alternative
- The meaning of page break icons is not described

### **Quality of HTML code (WCAG 4.1.1)**

There are serious deficiencies in the quality of HTML code, which might result in the website not working as intended on all devices and browsers.

For example

- All pages have two nested HTML documents
- After the body element, there is script code that does not belong in it
- Element nested rules have not been followed
- The start and end tags of elements are missing

### **Keyboard navigation (WCAG 2.1.1)**

Some functions cannot be used with the keyboard alone.

For example

- The link to 'Search company's e-services authorisations' found under own name
- On the management transactions form, adding a person discharging managerial responsibilities in an issuer
- The 'Add below' button of an investment fund's rule change form and fitness and propriety notification
- The search function's 'Select advanced search criteria' button

### **Own name menu (WCAG 2.4.7, 3.2.1, 2.4.4)**

The own name button/link does not have a visible keyboard focus indicator, as a result of which the user, when navigating using the keyboard alone, does not see which element the focus is on. The menu link does not have a descriptive name or role description. When you the menu is opened, moving the focus from the menu causes the page to reload. Loading resulting from moving the focus is prohibited in the accessibility guidelines. The menu contains a link to "Search company's e-services authorisations". If you want to perform transactions on behalf of a company, you will not be able to do so by clicking this link; you will have to choose your own name instead. Thus, the name of the link does not correspond to its purpose.

### **Form field labels (WCAG 3.3.2)**

Form field labels are missing or incorrectly linked to the field.

For example

- In the home page search field
- From 'Own information' page check boxes
- From a number of form input fields (excl. the most common text fields)

## **Important**

### **Web page titles (WCAG 2.4.2)**

Page titles remain the same on many pages and thus do not describe the content of the page. As a result, users do not receive feedback from the page title as they move from one page to another and are unable to distinguish pages from each other on that basis. When a page loads after the selection of a company, the title is "oauth2", and when a form loads, the title is "unknown". The page title is read to screen reader users first when they move to a new page, and sighted users see the title in the page tab bar or in the browser window title.

### **PDF files (WCAG 4.1.2)**

Downloadable PDF files have some accessibility deficiencies, such as

- Titles are not marked as titles
- Icons do not have text alternatives, so the status of check boxes is not known
- Tables are not marked as tables

### **Visual layout of forms (WCAG 1.3.1, 1.3.2)**

The visual appearance of a form does not always correspond to its programmatic structure.

For example

- In places where many rows can be added (e.g. on the management transactions form), the field title appears in a column title, but the relationship is not expressed programmatically
- Instructions related to fields are not linked to the fields programmatically.
- The reading order does not always correspond to the visual and logical structure (for example, a pop-up menu is at the end of a page)

### **Automatic movement of focus (WCAG 2.4.3, 1.3.2)**

When a form page is opened in the service, the keyboard focus is automatically moved to the first form element. As a result, screen reader users are taken past all of the content located before the first field. For example, the title of the form, the completion instructions at the beginning and the title of the form field will remain unnoticed

### **Reading sequence (WCAG 1.3.1, 1.3.2)**

The reading sequence on the summary page (e.g., customer complaints) does not match the logical order. Content placed under different titles in different columns is read row by row.

### **Feedback and error messages (WCAG 2.2.1, 4.1.3)**

Users are notified on a separate page visible for a few seconds when the submission or sending of a form is incomplete. The user is then directed to the home page. Error messages are displayed on

the form page. System feedback messages are not implemented so that the 3 (3) 13.5.2022 content of a message is automatically read to a screen reader user as soon as the message appears; the user must navigate to the message. The user, moreover, does not have enough time to read the message, because the browser moves automatically to the home page regardless of the user's actions. As a result, the message is likely to bypass most users.

## **Moderate**

### **Mark-up of navigation elements (WCAG 2.4.4)**

Service navigation elements are not labelled.

- Main menu of the service
- Navigation functions used for browsing an e-services folder (paging)
- Bar showing progress of a form
- Breadcrumb trail in e-services transaction data

### **Purpose of form fields (WCAG 1.3.5)**

The purpose of form fields that collect users' personal information is not marked programmatically, which would facilitate the completion of the fields. For example, own contact information.