NatWest Group Digital Accessibility Standards

Version: 13.0
03/12/2023

Revision Summary

Date	Version	Revision Class	Comment
22/11/18	12.1	Major	WCAG v2.1 Guidelines included and simplified to be more user friendly for an external audience.
09/12/19	12.2	Minor	No changes to technical content.
17/08/20	12.2	Minor	Rebranded to NatWest
09/02/21	12.3	Minor	No changes to technical content. Revision summary table added.
21/02/22	12.4	Minor	No changes to technical content.
03/12/23	13.0	Major	WCAG v2.2 guidelines included

Summary

1. Introduction

This document sets out the NatWest Group Digital Accessibility Standards, what they are and where they apply. These standards support the achievement of the Groups Inclusion Policy Standard and Legal requirements such as the UK Equality Act 2010, Disability Discrimination Act 1995 (applies only in Northern Ireland) and USA Section 508/Americans with Disabilities Act (ADA). They support the Bank's vision to be a sustainable and inclusive bank that is purpose led. It is the Bank's intention that all systems and information provided both externally to its customers or internally to its staff are available to all irrespective of ability or disability. These standards include information and resources to help ensure that applications and systems are built to achieve this goal; including ensuring they are compatible with Assistive Technologies (AT) - equipment, software or product systems that are used to increase, maintain, or improve the functional capabilities of persons with disabilities. The Bank is committed to ensuring that all customer or staff-facing applications that are newly developed follow these standards.

2. Summary of Standards

Category	Standard	Comment
General	Perceivable, Operable, Understandable, Robust (POUR) Principles	The POUR principles should be considered in every change to help achieve the above fore mentioned goal
Browser based	Level AA of the WCAG 2.2	Browser based applications and systems should achieve Level AA of the Web Content Accessibility Guidelines (WCAG) edition 2.2 (as of Dec 2023)
Non-Browser based	• Non-browser based WCAG guidelines • POUR Principles • EN301549 • Other guidance by development regime	• Non-browser based application and systems should follow the non-browser based WCAG guidelines and POUR principles. • The EN 301 549 guidelines should also be followed. • And other guidance is available for individual development regimes
PDFs and other documentation	• WCAG PDF • POUR Principles	• All documentation delivered by web content should be accessible and follow the POUR Principles. • PDFs should follow the PDF techniques for WCAG 2.0
Changes to Platforms or Operating Systems	N/A	A new platform or operating system or changes to this should as a minimum leave the accessibility ecosystem and extent unaltered (i.e. the AT should have the same level of functionality)

3. Where these Standards apply

Accessibility is everyone's responsibility, and the Bank aims to ensure the applications or services designed or procured are fully inclusive and accessible to customers and staff.

Therefore, these NatWest Group Accessibility standards apply to:

• All applications built, managed or purchased by NatWest Group
• All content created documentation (Microsoft Word, PowerPoint, Adobe PDF)
• All customers, suppliers and staff who use the applications and systems
• Applications supplied by third party suppliers.

Agreements with third party suppliers must include accessibility requirements. Achieving the standards listed in section 2.0 is a mandatory requirement. Vendor verification of accessibility will only be acceptable to the Bank if it has been performed by an independent accessibility auditor or the Bank's accessibility partners. Any such assessment must also be in line with contract agreements.

Adherence to these standards is a universal way to ensure a practical result that suits a wide range of access needs and fits with a range of technology usage. These standards have been specifically produced to be global; i.e. must be applied in all countries, wherever users are located or where the application was built or purchased. This is particularly important as a person's access needs do not alter by country (for example a member of staff or customer who relies on a screen reader or certain font size has the same need wherever they are in the world).

Accessibility Standards in Detail

1. The Perceivable, Operable, Understandable, Robust (POUR) Principles

The World Wide Web Consortium (W3C), which promotes international accessibility with proven and universally accepted guidelines, publishes a set of guidelines for accessibility of web and mobile content. This is based around some general accessibility principles, referred to as the POUR principles. These form the basis of the NatWest Group Accessibility Standards.

Systems / Applications / Content must be:	Implementation
Perceivable	• Provide text alternatives for any non-text content so that it can be changed into other forms people need, such as large print, Braille, speech, symbols or simpler language. • Provide alternatives for time-based media • Create content that can be presented in different ways (for example simper layout) without losing information or structure • Make it easier for users to see and hear content including separating foreground from background
Operable	• Make all functionality available from a keyboard and ensure other popular input methods as such as pointer and touch are not compromised. • Provide users enough time to read and use content • Do not design content in a way that is known to cause seizures • Provide ways to help users navigate, find content, and determine where they are
Understandable	• Make text content readable and understandable • Make content appear and operate in predictable ways • Help users avoid and correct mistakes
Robust	• Maximise compatibility with current and future user agents, including assistive technologies

2. Systems / applications and content delivered via a browser

- W3C extended these general principles to some very specific guidelines for content and functionality delivered through a browser. Version 2.2 is the latest version of these guidelines (Oct 2023) and it is these that form the basis of the NatWest Group Accessibility Standards for browser-based content.
- There are three categories of accessibility for web content (A;AA;AAA) and NatWest Group require that Level AA of the Web Content Accessibility Guidelines (WCAG) 2.2 should be reached.
- The Web Accessibility Initiative (WAI) internet site provides information about understanding each of the principles and details techniques for achieving the Level AA Success Criteria:
    - Understanding WCAG 2.2
    - How to meet WCAG 2.2
    - WCAG 2.2 Techniques and examples of failure of success criteria
- It is strongly recommended that the techniques listed within the WAI internet site are used as these provide recognised and repeatable practices.
- Any failure at 'AA' level or below results in a failure to comply with these standards. It is important suppliers are transparent about where they don't meet these, and they collaborate with us to manage and agree a roadmap to resolve known issues.

3. Systems/applications and content not delivered via a browser

- There is no generally accepted set of standards for content developed/delivered using other technologies, e.g. Windows Forms and Java, though becoming more widely recognised in the UK is a European standard, EN 301 549, the Accessible ICT Procurement Toolkit, which details test procedures and evaluation methodologies for accessibility requirements for all technologies.
- The principles outlined the POUR principles include all the basic considerations for making applications of any type accessible.
- The WCAG guidelines are specifically for browser applications/content, however the principles covered within the WCAG guidelines can be applied to applications of any type and so are also used as the Bank's Accessibility Standards for non-web based systems/applications and content, indeed the WCAG guidelines have been tailored to cater for non-browser technologies.
- For most non-browser technologies there are also separate published resources detailing accessibility considerations when developing using those technologies:
    - JAVA Accessibility & the JAVA Access Bridge
    - MS Windows Forms
    - MSAA and the newer MS UI Automation API
    - MS Silverlight
    - Mobile Technology
    - iOS Technology and Android
    - Gaming Accessibility Guidelines

4. Portable Documents (PDFs) and Other Documentation

- While this section focuses on PDFs, any documentation delivered via web technologies must be accessible. Further, these guidelines apply to any such content delivered through both browser and non-browser technologies.
- Content provided in the form of PDF documents must be available to assistive technologies. This means that PDF documents have to be structured, comprehensible and navigable; achieved with a range of techniques including PDF tags and structures to provide assistive technologies with a representation of the content that it can interpret and relate to the user.
- These methods are used for accessibility purposes only and have no visible effect on the content or representation of the PDF file.
- A .pdf file must meet the following standards provided by the W3C:
  - [PDF Techniques for WCAG 2.0](#)

5. Changes to Platforms or Operating Systems

- The implementation of a new or updated platform or operating system, e.g. migration to a new version of Windows or introduction of virtual services, must, as a minimum, leave the accessibility ecosystem and extent unaltered. In other words, the assistive technology user must have the same level of functionality following the implementation as before. This will include:
  - Standard operating system accessibility tools, for example:
    - System Colour alteration
    - System Font alteration
    - In-built screen reading, magnification and dictation tools
  - Operation of all elements of assistive technology product functionality available prior to the implementation. (To the greatest extent possible the same set of assistive technology products should be available under the new platform as under the old. If different, but equivalent, products are made available then provision must be made for converting users, e.g. training, from the old product to the new.)
  - Conversion or importation of any user configurations to the new platform, for example
    - Dragon speech profiles
    - Magnification configurations
    - TextHelp Read&Write Setting
    - Jaws scripts
  - New physical hardware, for example
    - Office printers
    - Input devices (Keyboards/Mice)
    - Desktop monitors