



About the CNIB Foundation

Celebrating 100 years in 2018, the CNIB Foundation is a non-profit organization driven to change what it is to be blind today. We deliver innovative programs and powerful advocacy that empowers people impacted by blindness to live their dreams and tear down barriers to inclusion. Now, as CNIB enters our second century of operation, we're going to be even bolder in tackling the issues before us.

Background

The CNIB Foundation thanks the Advisory Committee to the Open Banking Review for an opportunity to provide recommendations regarding a Canadian Open Banking system. Our recommendations are intended to provide the committee with an understanding of potential barriers that would limit access to open banking for all Canadians if interfaces are not designed with accessibility at their core.

This submission represents one of several made by the CNIB Foundation over recent years. Our goal in each of these public consultations is to provide the government with suggestions for removing the barriers that exist within the financial services sector for Canadians who are blind or partially sighted.

The Finance Canada public consultations to which CNIB has provided input include:

1. Disability Component to the Official Development Assistance Accountability Act – January 2011
2. The Development of a Comprehensive Financial Consumer Code – February 2014
3. Balancing Oversight and Innovation in the ways we pay – 2015
4. Positioning Canada's Financial Sector for the Future – November 2016

We consent to this submission being shared publicly without any reservation.

Sight Loss in Canada

According to the 2017 Statistics Canada Survey on Disability, five percent of Canadians report a vision related disability. Many Canadians with sight loss rely on screen readers or screen magnification software to access electronic information.

Assistive technologies including screen magnification and text to speech software have leveled the playing field for Canadians who are blind or partially sighted. These technologies have broken down the barrier created by a paper based financial system, but barriers persist in accessing e-commerce and online banking information securely and independently.

Accessibility in Open Banking

The conception of an open banking business model is an opportunity for government to ensure that accessibility is built in to any application programming interfaces. CNIB recommends that interface agreements between third party and conventional financial institutions clearly stipulate that the user interface must be both usable and accessible for all Canadians, including those who rely on assistive technologies.

Well-defined guidelines already exist for ensuring accessibility in both websites and mobile applications, including W3C standards¹ and Apple and Google standards². CNIB recommends that any user interface be created with these standards in mind and tested by competent users of assistive technology to ensure full accessibility. This advisory committee has a unique opportunity to ensure that all consumers, including those who access digital services with assistive technology, are provided with equitable access to products and services.

CNIB encourages the advisory committee to go beyond conventional application programming interfaces that facilitate machine to machine exchange of data. To fully realize and benefit from an open banking system, Canadians who are blind or partially sighted must be able to comprehend all aspects, including terms of service, agreements, and any customer interface. CNIB recommends accessibility in all aspects of user interfaces be mandated, as voluntary adoption by service providers often leaves Canadians who are blind or partially sighted unable to manipulate graphical depictions of their transactional data.

International Regulatory Framework

In 2010, Canada ratified the United Nations Convention on Rights of Persons with Disabilities (CRPD) meaning Canada is committed to ensuring that people with disabilities have full enjoyment of all programs and services offered by the government. In preparing a recommended course of action to Finance Canada, this committee has an obligation to ensure that their final recommendations include full accessibility and usability considerations.

Bill C-81, the Accessible Canada Act

Bill C-81, as it is currently written, sets accessibility expectations for federally regulated entities and administrative monetary penalties for non-compliance. If passed, the Accessible Canada Act and the CRPD will lay a solid regulatory expectation on digital

¹ These guidelines are called Web Content Accessibility Guidelines (WACG). As of June 2018, version 2.1 of these standards are available. <http://www.w3.org/TR/WCAG21/>

² These guidelines represent best practices, which if followed by application developers, will provide improved experiences for persons who are blind or partially sighted. When ensuring accessibility, CNIB recommends comprehensive user testing by competent users of assistive technology at all phases of development on both web and mobile applications.



accessibility. CNIB recommends an open banking policy framework be well aligned with the Accessible Canada Act in ensuring that marginalized groups are no longer excluded from full participation in emerging digital platforms.

Recommendations

1. CNIB recommends that interface agreements between third party and conventional financial institutions clearly stipulate that the user interface must be both usable and accessible for all Canadians, including those who rely on assistive technologies.
2. CNIB recommends that any user interface be created with these standards in mind and tested by competent users of assistive technology to ensure full accessibility.
3. CNIB recommends accessibility in all aspects of user interfaces be mandated, as voluntary adoption by service providers often leaves Canadians who are blind or partially sighted unable to manipulate graphical depictions of their transactional data.
4. CNIB recommends an open banking policy framework be well aligned with the Accessible Canada Act in ensuring that marginalized groups are no longer excluded from full participation in emerging digital platforms.