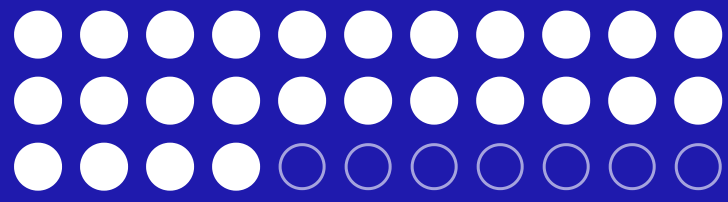
CORPOWID RESEARCH REPORT

Germany Insurance Sector Digital Accessibility Report

33 insurance website homepages · WCAG 2.2 · October 2026

Accessibility barriers were detected on **26 of 33** insurance websites.



● Site with barriers detected ○ Site with no barriers detected

Data is based on insurer homepages only · Scan date: 17 October 2026

02

What is digital accessibility?

Digital accessibility means websites, mobile apps and digital documents can be used by everyone, including people with visual, hearing, motor or cognitive differences.

According to the World Health Organization, 16% of the world's population, about 1.3 billion people, experience significant disability. Add age-related vision and mobility limits, and temporary situations such as a broken arm or a screen unreadable in sunlight, and accessibility becomes a matter for a large share of customers, not a minority.

The common yardstick is the Web Content Accessibility Guidelines (WCAG), published by the W3C. The current version, WCAG 2.2, groups its success criteria into three levels: A, AA and AAA. Most regulations require A and AA.

In Germany, the European Accessibility Act was transposed by the Barrierefreiheitsstärkungsgesetz (BFSG), in force since 28 June 2025. Insurers are covered where their websites and apps serve as e-commerce services, such as online quotes, contract conclusion or appointment booking. Statutory health insurers, as public bodies, have long been subject to separate accessibility rules (BGG and BITV 2.0).

Vision	Hearing	Motor	Cognitive
Screen readers, magnification, high contrast	Captions, text alternatives	Keyboard, voice control, large touch areas	Plain language, consistent navigation, clear errors

Source: WHO, Disability and health, March 2023

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Executive summary

HOMEPAGE ONLY

Most insurers in Germany have at least one accessibility barrier on their homepage. Low-contrast text dominates, and a handful of sites carry most of the problem.

26/33
sites with at least one A/AA barrier

384
automatically detected barriers

59%
of barriers are low-contrast text

65%
of barriers sit on the 7 sites with the most

1 **Contrast is the sector's main problem.**

228 of 384 barriers (59%) are low-contrast text. 15 of 33 sites are affected, and five of them hold three quarters of these barriers.

2 **Barriers concentrate in a few insurers.**

The 7 sites with the most barriers account for 65% of the total, while 7 sites showed no A/AA barrier at all.

3 **88% of barriers are the same error repeated.**

On 18 of the 26 affected sites, a single error type makes up at least half of the barriers; one fix goes a long way.

4 **Screen reader users get stuck on 13 of 33 sites.**

Unnamed buttons and links, and ARIA attributes that do not fit their role, account for 53 barriers.

5 **Touch areas are tight on mobile.**

At AA level, small touch targets appear on 4 sites; at the stricter AAA level, 31 of 33 sites have targets below 44×44 px.

SCOPE NOTE

The accessibility data in this report is calculated from the homepage of each company operating in the sector only. Pages behind login, subpages, mobile apps and documents are out of scope; results do not represent a company's digital channels as a whole.

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Methodology

1 Select
33 insurers operating in Germany, including 6 statutory health insurers.

2 Scan
Each homepage was scanned automatically against WCAG 2.2 on 17 October 2026, with the same tool version.

3 Classify
Each barrier was tagged by criterion, principle and level; error density was calculated.

4 Analyse
Barriers were grouped by topic and sector. No company is named.

SCOPE NOTE

The accessibility data in this report is calculated from the homepage of each company operating in the sector only. Pages behind login, subpages, mobile apps and documents are out of scope; results do not represent a company's digital channels as a whole.

What we measured

- Text alternatives for images
- Coded page structure
- Colour contrast
- Touch target size
- Names of buttons and links
- Page language and title

Not measured in this report

- Pages behind login (internet banking)
- Subpages, mobile apps and PDF documents
- Keyboard navigation and screen reader behaviour
- Clarity of content (requires manual review)

Independence and transparency

Independent
Prepared on our own initiative; no organisation requests, pays for or approves it.

Anonymous
No organisation, brand, domain or sample list is published.

Point in time
Results reflect each homepage at the time of scanning.

Repeatable
Same period, same page type, same tool version.

Conflict of interest
Corpowid provides accessibility solutions; the report contains no product promotion.

Scanned by
Corpowid's digital resources and scanning infrastructure.

STANDARD DISCLOSURE

Automated testing in this study detects only a subset of WCAG 2.2 failures. A clean automated result does not mean a site is accessible or conformant. Barriers under the Understandable principle, such as unclear instructions or unhelpful error messages, and the real behaviour of interactive components can only be assessed through manual review, which is outside the scope of this report. Findings describe detectable barriers, not legal compliance.

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Overall results

Barriers were detected on 26 of 33 sites. A typical insurer homepage has 5 barriers across 2 WCAG criteria, and 80% of all barriers are Perceivable.

26/33
sites with at least one barrier

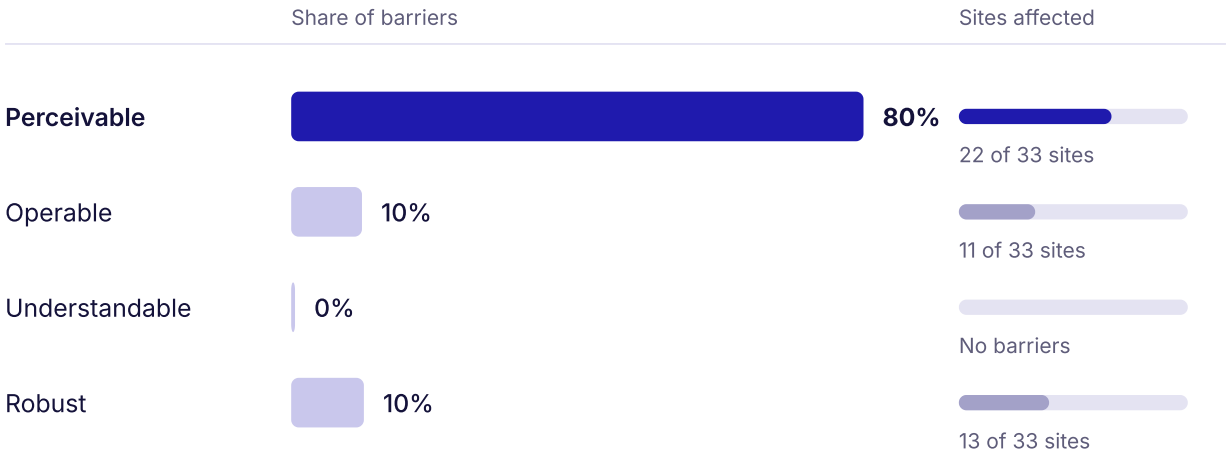
384
barriers in total

5
median barriers per site

2
median criteria per site

80% of barriers are in the Perceivable principle

Distribution of 384 barriers across principles, and number of sites affected



64% of barriers are Level AA



Level A · 137 AA · 247

247 of 384 barriers sit at Level AA, and 228 of those are contrast. The other 137 are Level A, led by page structure and accessible names.

7 sites with no barriers

7 / 33

These sites still carry AAA-level warnings (66–112 per site), such as touch targets below 44×44 px. No automated barrier does not mean accessible.

Finding no Understandable barriers reflects the limits of automated testing; this principle largely requires manual review.

Findings by topic

Nearly half of insurers have contrast barriers

Sites failing the criterion, rounded to a 10-site unit

Topic · WCAG	How many in 10	Exact count
Contrast 1.4.3	**5/10**	15 / 33
Name, role, value (screen reader) 4.1.2	**4/10**	13 / 33
Page structure 1.3.1	**3/10**	10 / 33
Alt text 1.1.1	**2/10**	6 / 33
Unnamed link 2.4.4	**2/10**	5 / 33
Touch targets 2.5.8	**1/10**	4 / 33
Bypass blocks 2.4.1	**1/10**	4 / 33
Keyboard 2.1.1	**1/10**	2 / 33
Input purpose 1.3.5	**0/10**	1 / 33

Contrast

228 contrast barriers make up 59% of all barriers. They appear on 15 sites, but 174 of them sit on just five.

Page structure

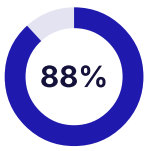
45 of the 64 structure barriers come from elements given a "presentation" role that still hold meaningful content.

Screen reader

53 barriers on 13 sites: unnamed buttons and links, and ARIA attributes that do not fit their role. A screen reader announces them only as "button" or "link".

Depth: how close are the fixes?

Repetition effect



88% of barriers are the same error repeated on the same site. On 18 of 26 sites, one error type makes up at least half of the barriers.

AAA contrast

Aa
Typical
5.6:1

Aa
AAA 7:1

27 sites have text that passes AA but falls short of the AAA 7:1 threshold; the median example is 5.6:1.

Touch target



Of 18 targets failing AA, 9 are wide enough but under 24 px tall. The other 9 are tiny controls such as 10×10 px.

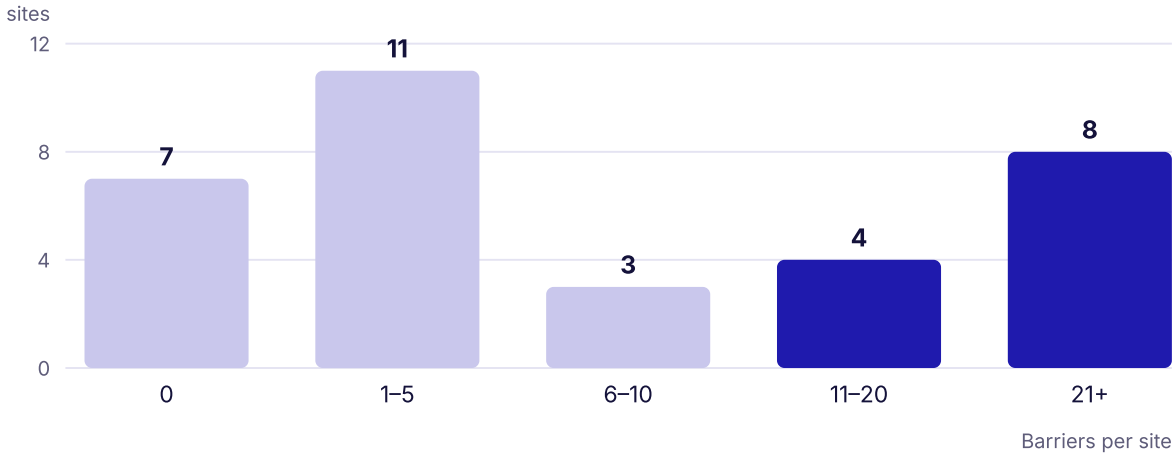
07

Distribution across sites

A sector average alone misleads: barriers concentrate in a few insurers and are absent from others.

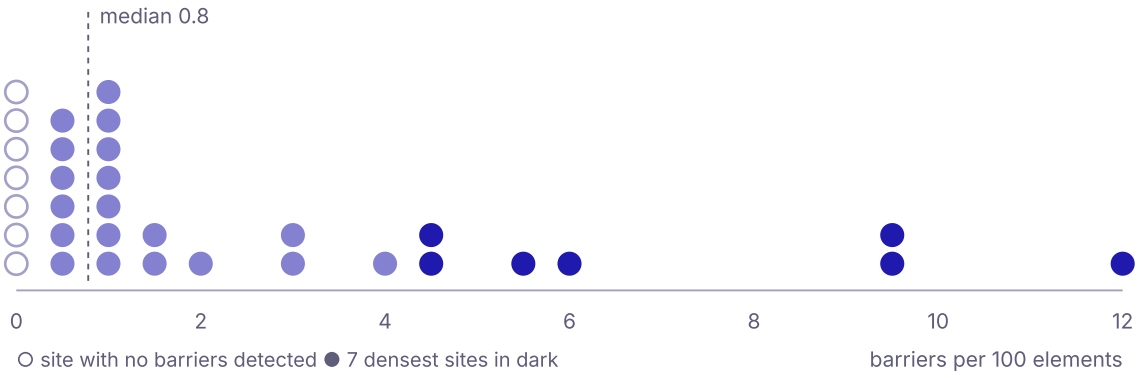
7 insurers show no barriers, 8 have more than 20

Sites by number of A + AA barriers detected per site



Barrier density ranges from 0 to 11.8 across insurers

A + AA barriers per 100 elements examined, in steps of 0.5; each dot is an anonymous insurer website



The median insurer homepage has 0.8 barriers per 100 elements across 2 WCAG criteria. 7 sites have none; the 7 densest have between 4.2 and 11.8 barriers per 100 elements.

Quick wins and their value beyond compliance

Five targeted fixes cover 377 of the 384 detected barriers. The same fixes also pay off in search visibility and user experience.

	Fix	Why first	Who benefits	Beyond compliance
1	**Fix weak contrast** WCAG 1.4.3	228 barriers, 15 sites; 76% on five sites	Low vision, older users	No SEO effect; readability improves for everyone in sunlight and at low brightness.
2	**Code page structure correctly** WCAG 1.3.1	64 barriers, 10 sites; 45 from one pattern	Screen reader users	Heading and list structure helps search engines parse the page; skimming users find things faster.
3	**Give buttons and links an accessible name** WCAG 4.1.2 · 2.4.4	53 barriers, 13 sites	Screen reader users	Meaningful names help software tools interpret the page correctly.
4	**Make touch targets at least 24 px** WCAG 2.5.8	18 targets, 4 sites; half are tiny controls	Mobile, motor impaired	Not a direct ranking signal; it improves mobile page quality and cuts mis-taps and abandoned tasks.
5	**Add text alternatives to images** WCAG 1.1.1	14 barriers, 6 sites	Blind users	Google also understands images from alt text; image search visibility improves.

Situational barriers

Accessibility is not only for permanent disabilities. Every customer using a phone one-handed on a crowded bus, without their glasses, or watching video on mute benefits from the same fixes.

Source: Google Search Central, SEO Starter Guide. Search effects are directional, not measured traffic impact.

Advanced level: AAA

AAA is not required by most regulations, so it is kept out of the main figures. It does answer whether a site that passes AA is truly comfortable to use.

31/33
sites have touch targets below 44×44 px (AAA 2.5.5); 1,302 targets in total.

7/7
sites with no barriers still have AAA warnings (66–112 per site).

29
sites have links that open a new tab without warning (AAA 3.2.5).

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Regulatory context

Insurance is not named in the European Accessibility Act, but in Germany the BFSG reaches insurers through their digital sales channels. Statutory health insurers follow a separate, older regime for public bodies.

From public bodies to digital sales channels



Barrierefreiheitsstärkungsgesetz (BFSG)

BGBl. I 2021 p. 2970 · since 28.06.2025

Transposes the EAA. Insurers count as e-commerce service providers where websites and apps lead to a consumer contract: quotes, online applications, appointment booking. Purely informational pages and existing-customer portals are generally out of scope. Fines of up to EUR 100,000.

Market surveillance

MLBF, Magdeburg

The joint market surveillance body of the German states began work on 26 September 2025. It acts on consumer complaints and runs its own checks; in serious cases a service can be prohibited.

Statutory health insurers

BGG · BITV 2.0

As public bodies, statutory health insurers follow the rules for public-sector websites under the EU Web Accessibility Directive, implemented federally by the BGG and BITV 2.0. 6 of the 33 sites in this report are statutory health insurers.

HOW THIS REPORT CONNECTS

Whether a homepage falls under the BFSG depends on what it offers, so this report makes no compliance judgement. But insurer homepages are usually the entry point to quotes and contracts, and 26 of 33 have automatically detected barriers at Levels A and AA, the levels EN 301 549 builds on.

Sources: Bundesfachstelle Barrierefreiheit, BFSG FAQ for insurers (May 2025); BFSG, BGBl. I 2021 p. 2970; axes4, 4 June 2026; TK accessibility statement; AccessibleEU, 7 September 2026.

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Implications for executives

Accessibility is a management decision, not an IT task. The data points to five areas for decision.

1 **Map the pages in scope**

The BFSG covers the pages and apps that lead to a contract: quotes, calculators, online applications, appointment booking. Map these journeys and measure them first; the homepage is only the entry point.

2 **Name a single owner**

Barriers are spread across design, content and engineering. Without an executive owner and a quarterly target, fixes lose out to the campaign calendar.

3 **Start with contrast**

59% of barriers are low-contrast text. One update to the colour palette in the design system removes most of them across every page.

4 **Put WCAG 2.2 AA in supplier contracts**

Campaign agencies and third-party components (chat, cookie banner, calculators) are a major source of barriers.

5 **Make measurement continuous**

Automated scans on every release and at least one expert audit a year. Two board-level indicators are enough: error density and the completion rate of critical tasks.

The first 90 days

Days 0–30

Measure and own

Independent scan, owner named, priority list

Days 31–60

Fix the templates

Menu, icon button and touch target components

Days 61–90

Verify and embed

Expert test, contract clauses, board indicator

Three questions for the board

1. When did we last measure the accessibility of our digital channels independently?
2. Who owns accessibility, and what is the target?
3. Can a new digital product go live without passing an accessibility test?

Appendix

A · Metric definitions

Barrier	An automatically detected finding that fails a WCAG 2.2 A or AA criterion.
Error density	Barriers ÷ elements examined × 100.
Repetition rate	Barriers from repeats of the same error type on a site ÷ all barriers.
Warning	AAA checks and possible barriers needing review; not in the main figures.
Share of sites affected	Sites with at least one barrier on the criterion ÷ 33.
Criteria breadth	Number of distinct WCAG criteria a site fails.
Concentration	Share of all barriers held by the sites with the most.
Median	The middle value when sites are sorted; unaffected by outliers.

B · WCAG criteria reviewed

Criterion	Name	Level	Principle	Sites	Barriers
1.1.1	Non-text content	A	Perceivable	6 / 33	14
1.3.1	Info and relationships	A	Perceivable	10 / 33	64
1.3.5	Identify input purpose	AA	Perceivable	1 / 33	1
1.4.3	Contrast (minimum)	AA	Perceivable	15 / 33	228
2.1.1	Keyboard	A	Operable	2 / 33	2
2.4.1	Bypass blocks	A	Operable	4 / 33	4
2.4.4	Link purpose	A	Operable	5 / 33	14
2.5.8	Target size (minimum)	AA	Operable	4 / 33	18
4.1.2	Name, role, value	A	Robust	13 / 33	39
	Total				**384**

C · Scan parameters

Scan date	17 October 2026
Page type	Homepage (landing page after redirect)
Sample	33 insurers in Germany, incl. 6 statutory health insurers
Tool	Corpowid scanning infrastructure, version 2.0.2
Level	Barriers: A and AA · warnings: incl. AAA
Language	German; 1 site in its English version

D · Glossary

Screen reader	Software that reads screen content aloud or sends it to a Braille display.
Touch target	The area of a button or link pressed with a finger.
Assistive technology	Tools such as screen readers, magnifiers and voice control.
Alt text	The text equivalent of an image for users who cannot see it.
Contrast ratio	Luminance difference between text and background; AA needs at least 4.5:1 for normal text.
Component / template	A piece of interface reused across many pages.



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