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"Towards an accessible information society"

**Report on the
Public Consultation on web accessibility and other e-accessibility issues**

**{COM(2008) 804 final}
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Public consultation on web accessibility and other e-accessibility issues

1. EXECUTIVE SUMMARY

The issue of accessibility of information and communication technologies (ICTs), and of public websites in particular for people with disabilities and other groups who are affected in general has had high EU-level policy visibility and attention for a number of years. In 2005, the Commission Communication on e-accessibility[1] drew attention to the importance of EU policies in this field and took stock of the overall situation in Europe. It concluded that the level of accessibility of ICTs in Europe remained unsatisfactory and that to redress this, existing measures should be built upon and new measures should be considered, including the prospect of new legislation.

Reflecting on the outcomes of a benchmarking study,[2] the Commission's 2007 Communication on eInclusion concluded that insufficient progress had been made on e-accessibility in Europe and that further steps were needed. In particular, the Communication called on Member States to agree on a roadmap for accessibility of public websites and stated that it would assess the need to propose new legislation in 2008. The prospect of horizontal legislation on e-accessibility was also considered.

A public consultation was launched on 2 July 2008 through the European Commission's interactive Internet platform "Your voice". It closed on 7 September 2008 and focused on two core themes: firstly, to explore a common European approach to web accessibility and secondly to elicit public opinion on other aspects of e-accessibility that go beyond the World Wide Web and possible action at European level.

Overall, 161 responses were received. They represent various stakeholder groups, including individual citizens with and without disabilities (12% each), research experts and centres (30%), public authorities (14%), business and industry associations (16%) and user organisations (12%). Some stakeholders also sent position papers.[3]

Among those who responded to this consultation, the support for a common European approach to web accessibility was almost unanimous. Overall, 96.9% of respondents agreed that a common approach was needed to facilitate a high level of availability of accessible web sites, and 95.6% stated that this should be equally motivated by the desire to improve the situation of people with disabilities and the competitiveness of European companies.

Concerning the type of websites that should be covered by a common European approach, a clear majority (93%) agreed that such an approach should not merely cover public websites but also other websites providing services of general interest to citizens, although industry and public authority respondents were somewhat less affirmative. 94.9% of respondents agreed

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[1] COM(2005) 425.

[2] Study on Measuring Progress of e-accessibility in Europe (referred to as MeAC), Report on the assessment of the Status of e-accessibility in Europe, available at http://ec.europa.eu/information_society/activities/einclusion/library/studies/meac_study/index_en.htm.

[3] Such as UMIC, ONCE, ANEC-EDF, BSkyB, RNIB, Technosite. The position papers are available at: http://ec.europa.eu/einclusion.

that intranet websites should also be accessible. According to 87% of respondents, web content authoring tools should also be covered by a common European approach to web accessibility.

More than nine out of ten respondents (94.3%) agreed that Member States should seek alignment with international web accessibility standards. The majority would also welcome accompanying measures. These concern capacity building by supply side actors (95.6%), provision of information and guidance to users (94.3%), exchanging best practice (95.6%) and collation of user input (94.9%). Regarding the perceived need to establish national contact points for web accessibility issues, there was overall agreement by 83.2% of respondents, with industry being less positive at 60%.

In relation to ICT domains other than the web, again a majority would welcome further EU action. Less than one out of ten respondents stated that none of the ICT domains mentioned to the respondents should be covered by EU action. Regarding the question as to how these should be addressed, a more diverse picture emerged from the responses received. Binding legislation was considered a high priority approach by 55.3%, whilst non-binding legislation was given high priority by 24.2%. High support for binding legislation was given by only 30% of industry and public authority respondents, whilst 64% overall considered this a high priority.

Apart from legislation, 67.7% of the respondents stated that standardisation and technical specifications should be high priority. 48.4% cited benchmarking and good practice specification as high priority, whereas 52.1% and 56.5% respectively stated that high priority should be given to further support for research and deployment.

Overall, the outcomes of the public consultation indicate a strong level of support for a more cross-cutting EU approach to e-accessibility. The high number of comments made revealed, however, considerably different views of respondents when it comes to expectations associated with such an approach. This concerns, for instance, particular issues to be covered by the various ICT domains and the specific means by which these should be addressed.

2. INTRODUCTION

The aim of the first part of the public consultation launched in mid 2008 was to explore a common European approach to web accessibility, for the following reasons.

Disabled users continue to face great difficulties in accessing websites. The development of the information society has led to the creation of websites and online services that are an essential part of daily life for citizens, yet significant numbers of people, including people with disabilities, still face difficulties in using these websites due to accessibility barriers, despite current technical solutions to overcome these barriers.

Different policy approaches to web accessibility in the Member States are fragmenting the market: an increasing number of countries and EU Member States are taking action to improve web accessibility, including through legal obligations. However, a patchwork of national approaches is leading to increased fragmentation in the internal market. This causes legal uncertainty, particularly for technology providers, and makes it difficult for persons with disabilities to use online services freely across Europe.

Regarding previous commitments and current opportunities, European institutions have debated web accessibility in recent years and EU Member States have committed to improving web accessibility. In particular, the "Ministerial Declaration on an inclusive information society" (Riga, June 2006) included the commitment to make all public websites accessible by 2010.

The aim of the second part of the public consultation was to elicit public opinion on other aspects of e-accessibility that go beyond the World Wide Web and possible action at European level. This aim stems from the fact that e-accessibility challenges clearly go beyond providing access to websites. Despite various schemes by stakeholders (including industry operators, authorities and user organisations) the overall level of e-accessibility in Europe remains relatively poor (e.g. for digital television, or self-service terminals[4]).

Although European legislation contains a number of provisions on e-accessibility, it does not deal with the issue in a comprehensive way. Thus the secondary aim of the consultation was to explore the potential for extending current EU-level measures to promote overall e-accessibility (while taking into account that further EU action on e-accessibility may be constrained by existing obligations, such as legal obligations on copyright).

The results of the public consultation are set out below. It starts with a brief description of the respondents' profile and goes on to set out the responses received on a common European approach to web accessibility. The feedback received in relation to other aspects of e-accessibility and action at EU level is then presented and further inputs are described. Lastly, a conclusive summary statement is provided.

3. PROFILE OF RESPONDENTS

Overall, 161 responses were received. As summarised below, the survey covered a wide range of stakeholder groups. Research experts in the field of ICT and disabilities comprised the largest group of respondents at 30%, followed by industry associations and business. Together the latter groups cover 16% of the respondents. Almost all of these are active in the ICT domain (**Table 1**). Only one response was received from a business not providing any ICT product and or service. Public authorities are represented to a similar extent (14%). With 12% each, individual citizens with and without disabilities and user organisations are represented equally.

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[4] As seen in the MeAC report (*op.cit.*)   .

User organization; 20; 12%

Expert or academic on disability and/or ICT; 48; 30%

Public authority; 23; 14%

Person without disability ; 20; 12%

Person with disability; 19; 12%

Other; 6; 4%

Industry/Enterprise; 25; 16%
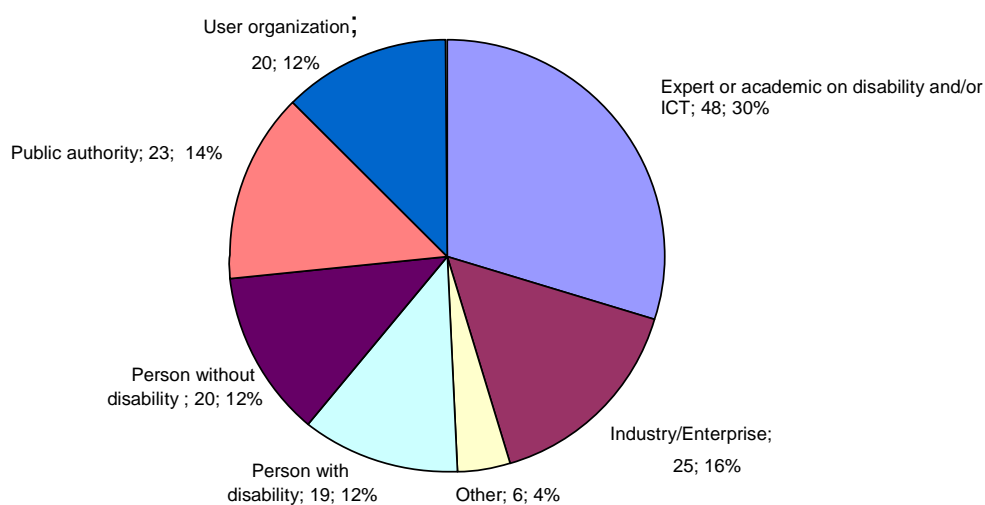
Table 1: Profile of respondents (n=161)

• **Private individuals**		**24,2%**	
	among which... ▪ Persons with disability		48,7%
	▪ Persons without disability		51,3%
▪ **Institutional respondents (Academics, organisations, public authorities, Industry/Enterprises)**		**72%**	
▪ **Academics**		**29,8%**	
	among which... ▪ An expert/ academic on disability and/ or ICT		81,3%
	▪ An academic institution or research centre		18,8%
▪ **Organisations of ICT users**		**12,4%**	
	among which... ▪ An organisation of users with disability		85%
	▪ An organisation of ICT users in general		15%
▪ **Industry/Enterprises**		**15,5%**	
	among which... ▪ An enterprise (providing ICT products/services)		80%
	▪ An enterprise (non ICT)		4%
	▪ An industry association (of ICT providers)		16%
	▪ An industry association (non ICT)		---
▪ **Public authorities**		**14,3%**	
▪ **Others**		**3,7%**	

In terms of geographic coverage, respondents were located in 18 European Members States, Israel and the United States. In addition, responses were received from European organisations (Table 2)

Table 2: Location of respondents (n=92)

European level	Eight contributions
More than 10 contributions	United Kingdom, Italy
More than 5 contributions	France, Germany, Spain, Ireland
More than 2 contributions	Slovenia, Belgium, Greece, United States, Austria, Portugal
One contribution	Sweden, Slovakia, Israel, Malta, Cyprus, Netherlands, Denmark, Lithuania

Note: This table covers the responses that could be assigned to a geographic location (which was not compulsory).

4. OPINION ON A COMMON EUROPEAN APPROACH TO WEB ACCESSIBILITY

Responses received in relation to a common European approach to web accessibility are set out below, according to the sub-themes specified in the public consultation. These include:

- Experience of web accessibility

- A European approach

- Websites concerned

- Implementing web accessibility

- Website authoring tools

- Accompanying measures

- Cooperation with stakeholders

4.1. Experience of web accessibility

The public consultation included a question on problems encountered in web accessibility *from the perspective of a person with disability* and the extent to which such problems act as a barrier to using websites for one's own purposes. The majority of respondents stated that websites were either totally (10.4%) or partially (47.9%) inaccessible.

Regarding the impact of no accessibility, 72.6% stated that it would result in exclusion from important information, facilities or services, either severely (29.7%) or moderately (42.9%). About 7% stated they would find other ways to access relevant information, facilities and services.

Table 3: Web accessibility experienced from the perspective of a person with disability

What kind of accessibility problems do you encounter when using a website?	(n=96)
• Total inaccessibility	10,4%
• Partial inaccessibility: I can only use some parts of the websites	47,9%
• I do not generally have any problems accessing the websites I use	28,1%
• Other	13,5%
Do problems with website accessibility exclude or prevent you from accessing information, facilities and services that are important to you?	(n=91)
• Yes, severely	29,7%
• Yes, moderately	42,9%
• No, I find other ways to access the information, facilities or services	6,6%
• No, the websites I visit are accessible	19,8%
• No, I don't use the internet	1,1%

Note: The percentages apply to all respondents who did not answer "not concerned"

From the perspective of a website owner, questions were asked about the level of awareness of the issue of accessibility and its implications for users, as well as concrete steps taken to improve accessibility of their websites. 82% of respondents stated they were fully aware of these issues and 14.8% reported at least partial awareness. As for steps taken to improve the accessibility of their websites, 90.5% of respondents stated that they had taken concrete steps.

The comments submitted suggest that the web content accessibility guidelines (WCAG 1.0) developed by the W3C consortium are widely used as a key reference point for this purpose.

Table 4: Web accessibility from the perspective of a website owner

Are you aware of the issue of accessibility and of the implications for persons with disabilities using your website?	(n=126)
• Yes, I am fully aware	82%
• Yes, I am partially aware	14,8%
• No, I am not aware	3,1%
Have you taken steps to improve the accessibility of your website?	(n=126)
• Yes	90,5%
• No	9,5%

Note: The percentages apply to all respondents who did not answer "not concerned"

From a technology provider's perspective, the consultation included a question on the current provision of technologies or services that are accessible to people with disabilities. 86.4% of respondents stated that they provided accessible solutions, either as a standard offering (69.1%) or on request (17.3%). When it comes to barriers experienced when dealing with accessibility issues from the perspective of a technology provider, lack of demand (23.7%) and lack of a harmonised European approach to web accessibility (21.7%) were equally cited.

In addition, 29.6% reported practical difficulties in implementing technical specifications concerning web accessibility as a barrier, while 10.3% mentioned the lack of suitable technical specifications. Implementation costs were cited as a barrier by 9.3%.

Table 5: Web accessibility from the perspective of a web technology provider

Do you provide accessible technologies/do you include accessibility in your services?	**(n=81)**
• Yes, we always propose it to our clients	69,1%
• Yes, when the clients request it	17,3%
• No	13,6%
What is the main barrier for you when dealing with web accessibility?	**(n=97)**
• The lack of demand	23,7%
• The lack of harmonised approach at European level	21,7%
• The difficulty in implementing the technical specifications	19,6%
• The lack of technical specifications	10,3%
• The extra costs	9,3%
• Other	15,5%

Note: The percentages apply to all respondents who did not answer "not concerned"

4.2.   A common European Approach

As specified in the public consultation, the aim of a common approach to web accessibility by EU Member States is to improve access to websites for people with disabilities. The Riga Ministerial Declaration target was for 100% of public websites to be accessible for persons with disabilities by 2010. However, according to the study "Measuring e-accessibility in Europe", in 2007 only 5% of public websites and 3% of private websites were accessible.

As it was also stated in the consultation, a common European approach to web accessibility would also aim to stimulate the internal market by:

- Enabling more users to access websites and services across Europe;

- Offering sellers access to a larger market across the EU and

- Giving providers of web-based ICT solutions access to a more coherent internal market that is not fragmented due to different web accessibility requirements.

If Member States adopt a common approach to improving the accessibility of websites across the European Union, this could:

- Help all citizens, in particular persons with disabilities, use the Internet to improve their participation in society and the economy and

- Improve the competitiveness of European businesses in accessible information and communication technologies by removing barriers to the provision of enabling technologies and services for web accessibility, thereby also stimulating the market in services provided over the internet as well as offering better access for potential online customers across the EU.

Following these comments, the consultation asked questions on the perceived need for a common European approach to web accessibility.

A clear majority of the respondents agreed that a common European approach was needed to facilitate a high level of availability of accessible websites (Table 6). Merely 3.1% held that this was not the case. This opinion was widely shared across the different respondent groups (Table 7).

Table 6: A European Approach

Do you agree that a common European approach is needed to facilitate a high level of availability of accessible websites?	**(n=161)**
• No	3,1%
• Yes	96,9%
Do you agree that a common European approach should be motivated by improving the situation of people with disabilities, and at the same time by improving the competitiveness of European companies?	**(n=161)**
• No	4,4%
• Yes	95,6%

Also, a clear majority (95.6%) stated that a common European approach in the field of web accessibility should be motivated by the aim to improve the situation of people with disabilities and — at the same time — to improve the competitiveness of European companies. Again, this opinion was widely shared among the different respondent groups (table 8).

Table 7: Agreement that a common European approach is needed to facilitate a high level of availability of accessible websites according to respondents groups

Do you agree that a common European approach is needed to facilitate a high level of availability of accessible websites?	Person with disability	Person without disability	Academic	User organisation	Public authority	Industry/ Enterprise	Other	Total
No	0%	0%	4,2%	0%	0%	12%	0%	3,1%
Yes	100%	100%	95,8%	100%	100%	88%	100%	96,9%
Total (n)	19	20	48	20	23	25	6	161

Table 8: Agreement that a common European approach should be motivated by improving the situation of people with disabilities, and at the same time by improving the competitiveness of European companies according to respondents groups

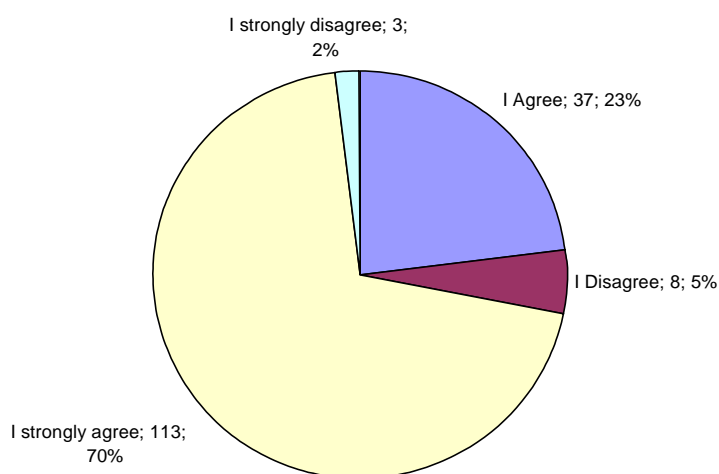| *Do you agree that a common European approach should be motivated by improving the situation of people with disabilities, and at the same time by improving the competitiveness of European companies?*								
	Person with disability	Person without disability	Academic	User organisation	Public authority	Industry/ Enterprise	Other	Total
No	0%	10%	2,1%	0%	8,7%	8%	0%	4,4%
Yes	100%	90%	97,9%	100%	91,3%	92%	100%	95,7%
Total (n)	19	20	48	20	23	25	6	161

4.3. Websites concerned

As stated in the consultation, although the Riga Ministerial Declaration focused on public websites only, many other websites are essential for the daily life of European citizens. Websites providing services of general interest such as education, health and social services and telecommunication services can be provided by both the public and the private sectors.[5]

If Member States take action to improve accessibility, it could cover public websites, namely websites of public authorities at national, regional and/or local level that provide information or services to citizens, as well as websites intended for the general public and providing online information and interactive services relating to services of general interest to citizens, whether or not provided by public authorities.

Respondents were then asked for their opinion on the range of websites that should be covered by policy intervention. Overall, most respondents held that if Member States take action in this regard, it should cover not only public websites, but also other websites providing services of general interest to citizens (Chart 2). In total, seven out of ten respondents strongly agreed with this statement, whilst 23% agreed and only 7% disagreed.

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[5] See Commission Communication on Services of general interest (COM (2007) 725).

Chart 2: **Do you agree that if Member States take action, this should cover not only public websites, but also other websites providing services of general interest to citizens? (n=161)**

I strongly disagree; 3; 2%

I Agree; 37; 23%

I Disagree; 8; 5%

I strongly agree; 113; 70%

Table 9: Type of web sites to be addressed by a common European approach according to stake holder groups

Do you agree that if Member States take action, this should cover not only public websites, but also other websites providing services of general interest to citizens?								
	Person with disability	Person without disability	Academic	User organisation	Public authority	Industry/ Enterprise	Other	Total
I Strongly agree	89,5%	75%	79,2%	95%	34,8%	40%	100%	70,2%
I Agree	5,3%	25%	20,9%	5%	47,8%	36%	0%	23%
I Disagree	5,3%	0%	0%	0%	13%	16%	0%	5%
I Strongly disagree	0%	0%	0%	0%	4,4%	8%	0%	1,9%
Total (n)	19	20	48	20	23	25	6	161

As regards individual stakeholder groups, the responses received from public authorities and business were clearly more negative about covering other websites as well (Table 9). 24% of businesses disagreed or even strongly disagreed. 17.4% of public authorities disagreed.

Position papers revealed that many respondents felt that people with disabilities should in principle be able to access the same range of websites as the average user and derive the same benefits from the Internet. On the other hand, it was stressed by some respondents that business should not be forced by legislation to make their websites accessible but rather be incentivised and stimulated to do so on a voluntary basis, e.g. following good practice in the public sector.

4.4. Implementing web accessibility

As stated in the consultation, a common approach to web accessibility would mean that action is taken by all Member States to prepare for the introduction and implementation of modern specifications on web accessibility.

In order to contribute to making the websites of public authorities accessible by 2010, Member States are expected to take into account in their schemes the work to achieve widely recognised international and European specifications. In particular they should seek alignment with the results of international standards on Web Content Accessibility and follow the outcomes of the work on Mandate 376 granted to the European Standardisation Organisations, thereby supporting accessibility of websites deploying modern web technologies and applications.

Specific schemes for the Member States could comprise:

- making available, updating and publishing technical guidance relating to web accessibility requirements, translating where appropriate relevant documentation;

- identifying websites concerned, setting targets and milestones;

- allocating responsibilities for implementing the schemes;

- providing references for training, schemes for knowledge sharing and awareness measures;

- assessing and monitoring progress and publishing progress reports;

- pooling experience in the implementation of technical guidance for web accessibility;

- promoting the accessibility of intranet websites in line with the Employment Equality Directive.

Similarly, Member States could promote the accessibility of websites that are not provided by public authorities that provide services of general interest to citizens.

Member States could encourage website owners to include an accessibility statement in their websites which provides supporting information such as an outline of the accessibility policy of the institution concerned; degree of compliance with relevant legislation and/or reference specifications and support for persons with disabilities.

The feedback received on these comments reveals that most respondents agreed that the above-mentioned action would contribute to a high level of availability of accessible web sites. While 83.4% generally agreed with this statement (38.5% strongly agreed), only 4.9% disagreed. However about one in ten respondents (11.8%) had no opinion on this (Chart 3).

Chart 3: Agreement to Statements regarding implementation of web accessibility (n=161)
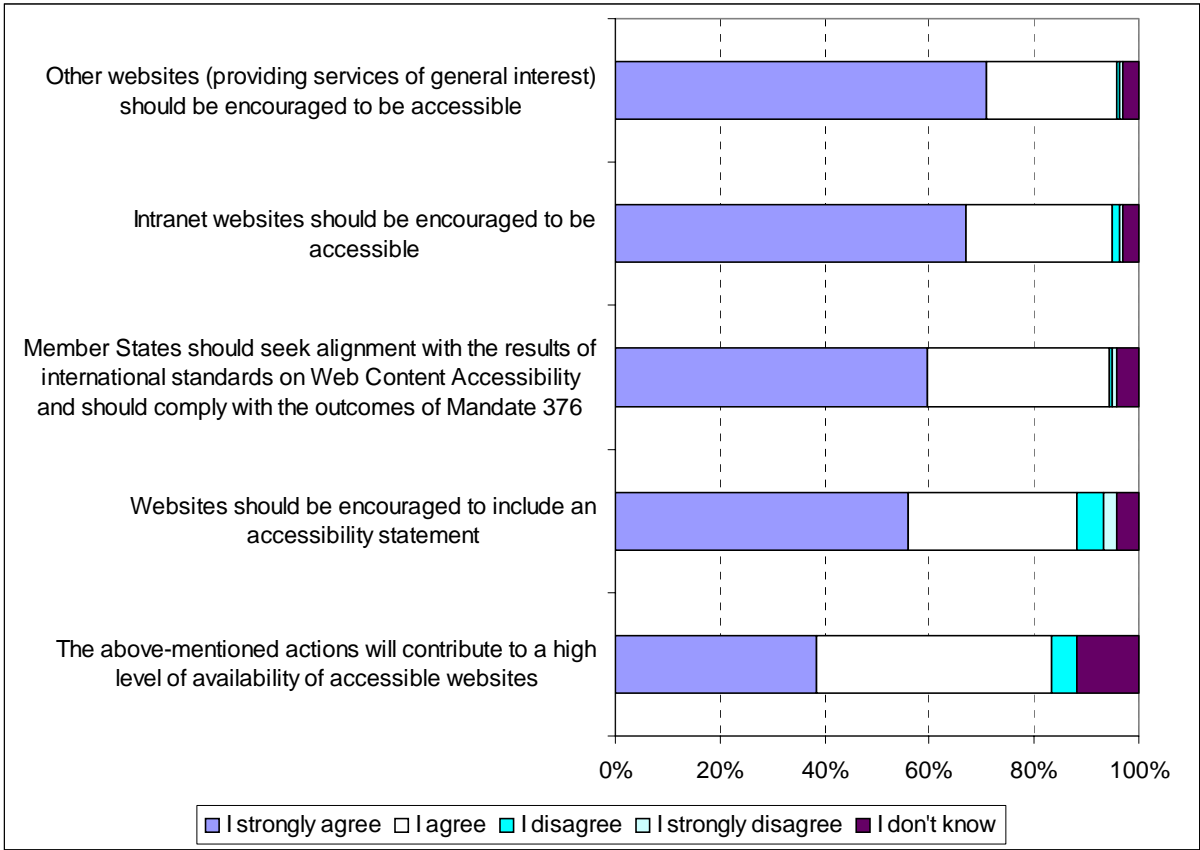
Question: Do you agree with the following statements?

A clear majority of the respondents also perceived the need to encourage the accessibility of intranet websites. Here overall agreement reached 94.9%, 67% strongly agreed, only 1.8% disagreed and 3.1% had no opinion.

All in all, 94.3% of the respondents agreed with the statement that Member States should seek alignment with international standards. Here, more than half (59.6%) agreed strongly while only 1.2% disagreed. All in all, 4.3% did not have an opinion.

The response was similar on the perceived need to encourage websites to post an accessibility statement. Here, overall agreement reached 88.2%, 55.9% strongly agreed and 7.1% disagreed.

Comments from position papers received in this context were manifold. To sum up, the following common threads can be identified:

- Some comments concerned the issue of appropriateness of legal intervention when it comes to different types of website owners. It is for instance stressed that compliance with compulsory accessibility requirements may cause an undue burden for some website owners, such as small organisations. Also, it is stressed that retrofitting accessibility into existing websites may become very costly in certain cases. Various options are proposed to cater for such situations, e.g. helping particular parties, such as small companies, to comply with accessibility requirements by means of tax incentives or requiring only new content and features to be accessible rather than old content. Also concerns were raised that e-

accessibility may be problematic for some services and hinder the interaction of other users.

- Another set of comments addressed the type of intervention needed to achieve the desired outcomes. The argument was put forward that binding legislation and appropriate enforcement mechanisms (e.g. clearly specified deadlines, fines for non-compliance, black lists and refusal of public funding) would yield real results. Also, the value of an accessibility statement posted on a website was questioned in some comments, at least whilst the website owner had no cause to the consequences of non-compliance the statement.

- Another set of statements concerned the general thrust of provisions that intervention could include. Here it was stressed that any downloadable documents such as PDF-files should also be accessible. Moreover it was argued that web accessibility required a holistic approach balancing standards compliance with understanding of user needs, e.g. through disabled user testing — or at least assistive technology testing — adding code compliance to the web accessibility guidelines. Some respondents expressed concern over the complexity of current web accessibility guidelines (and forthcoming WCAG 2.0) and that more practical guidance was needed, while others argued that there was need to create a market for accessible tools and support services and ensure a level playing field for all stakeholders. Other respondents highlighted the need for capacity building among different stakeholder groups (e.g. website developers, website owners, tool developers and government agencies).

- Lastly some comments concerned the sustainability of intervention. This concerns, for instance, a perceived need to consider accessibility requirements, as a general principle, when developing new technologies and applications.

4.5. Website authoring tools

As specified in the consultation, to best safeguard and efficiently implement web accessibility, website authoring tools can be used to automatically provide (most) accessibility. Authoring software tools are any software, or collection of software components, explicitly used to create, design or update websites. If Member States target web accessibility, they could also tackle website authoring tools in order to address the whole process of website development and operation.

Member States could encourage public administrations to use and procure website authoring tools that are designed to specifically assist with the production and maintenance of accessible websites, in accordance with the public procurement Directives.

Table 10: Authoring tools

Agreement that authoring tools should also be addressed by the common approach of the Member States	(n=161)
• No	11,8%
• Yes	87%
• No reply	1,3%

In response to this statement, a clear majority of respondents (87%) held that if Member

States target web accessibility, they should also tackle website authoring tools in order to address the whole process of a website development and operation (Table 10). However, one in four (25%) respondents representing industry associations or business thought that this should not be the case (Table 11). A similar number of public authorities,17.4%, disagreed.

Table 11: Agreement that authoring tools should also be addressed by the common approach of the Member States

Should authoring tools also be addressed by the common approach of the Member States?								
	Person with disability	Person without disability	Academic	User organisation	Public authority	Industry/ Enterprise	Other	Total
No	10,5%	0%	14,6%	0%	17,4%	25%	0%	
Yes	84,2%	100%	85,4%	100%	82,6%	75%	100%	
No reply	5,3%	0%	0%	0%	0%	0%	0%	0,6%
Total (n)	19	20	48	20	23	24	6	160

4.6. Accompanying measures

As described in the consultation, accompanying measures could aim at stepping up action by the Member States and extending their impact by sharing knowledge and awareness of web accessibility at various levels. Training and awareness are essential to ensure that web accessibility is taken into account at the earliest design stage. Training schemes can be put in place at different levels (web managers, web masters, web content developers…) and deployed at national**,** regional and local levels. Likewise exchanges of good practices at European level would greatly facilitate a common approach.

A single contact point in each Member State may also be useful to provide information and guidance to users, and to allow information on accessibility to be coherently collected. As accessibility of information and communication technologies is also relevant beyond the web, it may be useful to concentrate e-accessibility information and guidance in one location.

Thus accompanying measures of Member States could include:

- Supporting training schemes for those involved in web accessibility, whenever possible directly involving persons with disabilities.

- Providing information and guidance to persons with disabilities on accessibility of websites and, where relevant, assistive technologies (assistive technology means any ICT equipment, product, system, hardware software or service that is used to increase, maintain or improve functional capabilities of people with disabilities, in close interoperation with a user agent).

- Supporting exchange and publication of best practices for stakeholders.

- Collecting input from users, including through surveys of their experience of accessibility.

- Assigning a national Contact Point for web accessibility that can take up the above-described functions. This Contact Point could also be used for other relevant accessibility issues concerning the information society.

Overall, a clear majority of the respondents would welcome the implementation of the measures set out in the introductory statement to the online consultation (Chart 4). In relation to capacity building on the supply side, 95.6% agreed with the provision of training for those involved, 67.7% agreed strongly and only 3.1% disagreed.

A similar picture emerges in relation to exchanging best practice. Here 95.6% agreed, 65.2% agreed strongly and only 1.2% expressed disagreement.

On the user side, 94.3% agreed with the provision of information and guidance to people with disabilities, 60.8% agreed strongly and 4.3% disagreed.

Measures to pool user experiences, e.g. through surveys, received strong support. Here 94.9% agreed, 63.9% agreed and only 1.8% disagreed.

Chart 4: Agreement to Statements regarding accompanying measures (n=161)
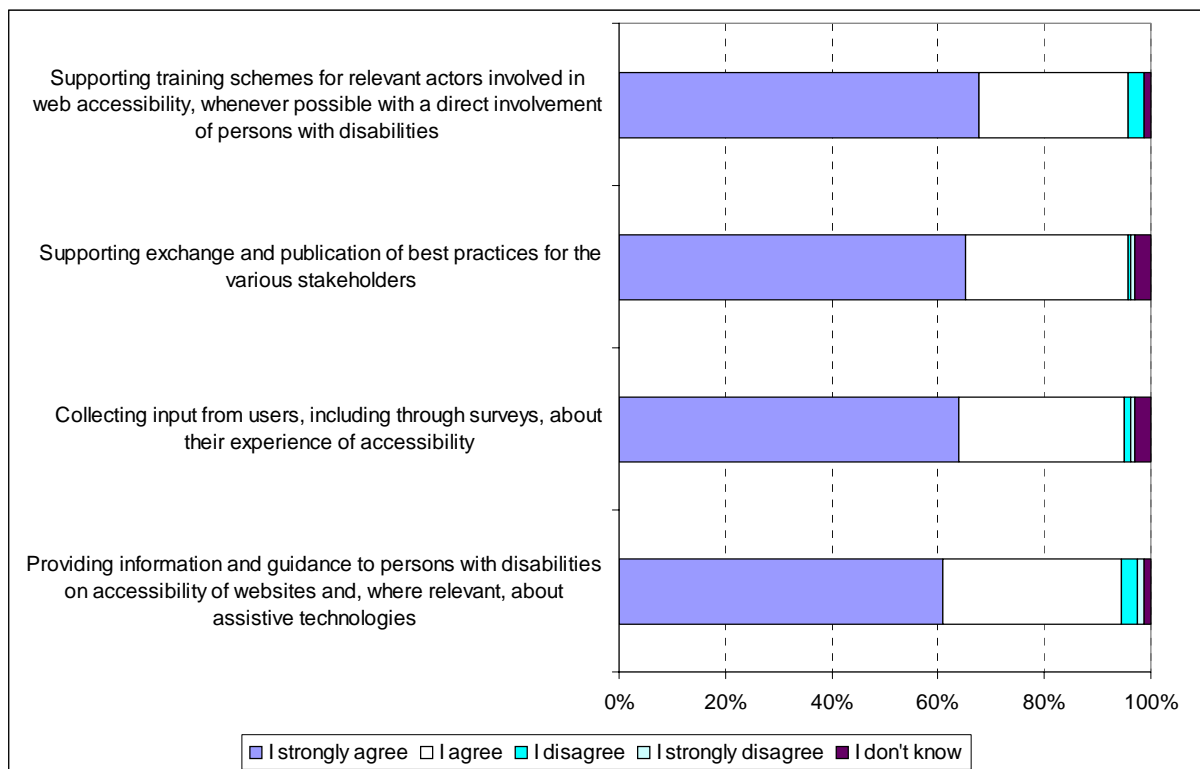
Question   Do you agree with the following accompanying measures of Member States?

When compared with these measures, there is slightly less overall support for establishing national web accessibility contact points, at 83.2% (Table 12). It is striking that the share of respondents not supporting this option is comparatively high among business (40%), though still a minority.

Table 12: Support for the creation of a national contact point

Do you support the creation of a national web accessibility contact point?								
	Person with disability	Person without disability	Academic	User organisation	Public authority	Industry/ Enterprise	Other	Total
No	10,5%	20%	8,3%	5%	26,1%	40%	0%	16,8%
Yes	89,5%	80%	91,7%	95%	73,9%	60%	100%	83,2%
Total (n)	19	20	48	20	23	25	6	161

Concerns were expressed regarding various aspects such as:

- the risk of shifting responsibilities from website owners to a centralised body;

- the danger of overlapping responsibilities, particularly in countries where information and guidance is already provided by NGOs, government agencies and the like;

- the risk of increasing bureaucratic overheads, lobbying and profiteering;

- assignment of higher value to facilitate and support an ongoing dialogue between all levels of government, industry, NGOs and consumers.

Apart from this, a large number of comments were received regarding further issues that could be addressed by accompanying measures. The common threads are set out below:

- A number of comments concerned the issue of awareness rising and capacity building. Different bodies would need to be addressed (e.g. content producers, publishers, technicians, web developers, users) and a European award scheme could help raise current levels of awareness. There is also a need for employers to be able to measure and recognise web-accessibility related skills.

- Other comments concerned user involvement, confidence and empowerment. For instance, a proposal was put forward to launch a system similar to the European Consumer Centres Network (ECC-Net) which — as a network of consumer advice centres — helps consumers specifically with cross-border disputes. Other proposals concern launching joint projects and involving users in functionality testing and certification on a voluntary basis (because of the costs involved).

- A further set of statements concerned mentoring of achievements and the need for continuous monitoring.

4.7. Cooperation

As mentioned in the consultation, cooperation between Member States and other stakeholders could include:

- Supporting European cooperation with industry and users to follow and obtaining advice on the changes to accessibility requirements and implementing web accessibility in the Member States.

- Contributing to the collation and establishment of best practices in web accessibility measurement, monitoring, training, assessment and certification at European level, involving both users and industry.

Overall, the responses received indicate a high level of support when it comes to the need for stakeholder cooperation. While 90% agreed, only 2% of respondents disagreed and 8% had no opinion.

5. OPINION ON OTHER ASPECTS OF E-ACCESSIBILITY AND ACTION AT EUROPEAN LEVEL

As described in the public consultation, e-accessibility challenges go beyond web accessibility. Disabled persons have reported difficulties in accessing and using television, mobile or fixed phones, public announcement systems, self-service terminals such as cash-dispensing and ticketing machines, health monitoring devices and more.

European legislation contains some provisions on e-accessibility, but it does not deal with the issue in a comprehensive way. Europe also supports research and innovation, promotes best practices and stakeholder cooperation. E-accessibility is also dealt with by some ICT providers who have taken action to include accessibility features early in the ICT design process through inclusive universal design or 'design for all' approaches.

The MeAC study reported that the overall level of e-accessibility in Europe remains relatively poor and progress is rather limited, as analysed in the recent European Communication on e-Inclusion. Given these observations, and taking into account the recent United Nations Convention on the rights of persons with disabilities and the proposals of the European Commission for a Renewed Social Agenda, this part of the consultation explores the need for further EU action on e-accessibility in general (beyond web accessibility as covered in the first part of this consultation).

As the consultation also mentioned, the purpose of this part of the consultation was not to review existing European action, but rather to explore the potential for further action to better promote overall e-accessibility (whilst acknowledging that it may be constrained by existing obligations, such as legal obligations on copyright).

The responses received in relation to a European approach to other aspects of e-accessibility are set out below by sub-theme, including:

- Experiences of e-accessibility,

- Priority areas for EU action,

- Preferred approach,

- Legislative action,

- Expected impacts.

5.1.   Experience of e-accessibility

Respondents were asked for their opinion on a number of statements outlining perceived barriers to e-accessibility *from the perspective of a person with disability*. As shown in Chart 5 below, more than three out of five respondents agreed that lack of awareness among ICT providers (62.6%) acts as a barrier, whilst 5.5% did not agree and 31.6% had no opinion.

Regarding the lack of information on the availability of accessible ICT among users, 61.5% agreed that it acts as a barrier to e-accessibility, whilst 8% disagreed and 30.5% had no opinion.

A similar picture emerges in relation to information on how to use accessibility features that are, in principle, available. Here, a lack of instructions was perceived by 58.9% as a barrier, whilst 10.6% disagreed and 30.4% had no opinion.

A more diverse picture emerges concerning the question of extra costs of accessible ICTs being a concern for the user. Overall, 54.6% of respondents agreed with this statement, whilst 12.5% disagreed and 32.9% had no clear opinion.

In total 55.5% of respondents agreed with the statement that a lack of interoperability of mainstream ICTs and assistive technology would constitute a barrier and 7.3% disagreed.

The statement that ICT does not have features to deal with accessibility challenges received the lowest level of agreement (41.6%). Here 24.8% explicitly disagreed and 33.6% had no opinion.

A closer look at the distribution of responses across different groups of respondents reveals that user organisations in particular are comparatively critical of e-accessibility features provided by current ICTs (Table 13). 75% of user organisations agreed with the statement that ICT does not have features to deal with disability challenges (Table 13).

Chart 5:   **Perceived main barriers to e-Accessibility from the perspective of a person with disability (n=161)**
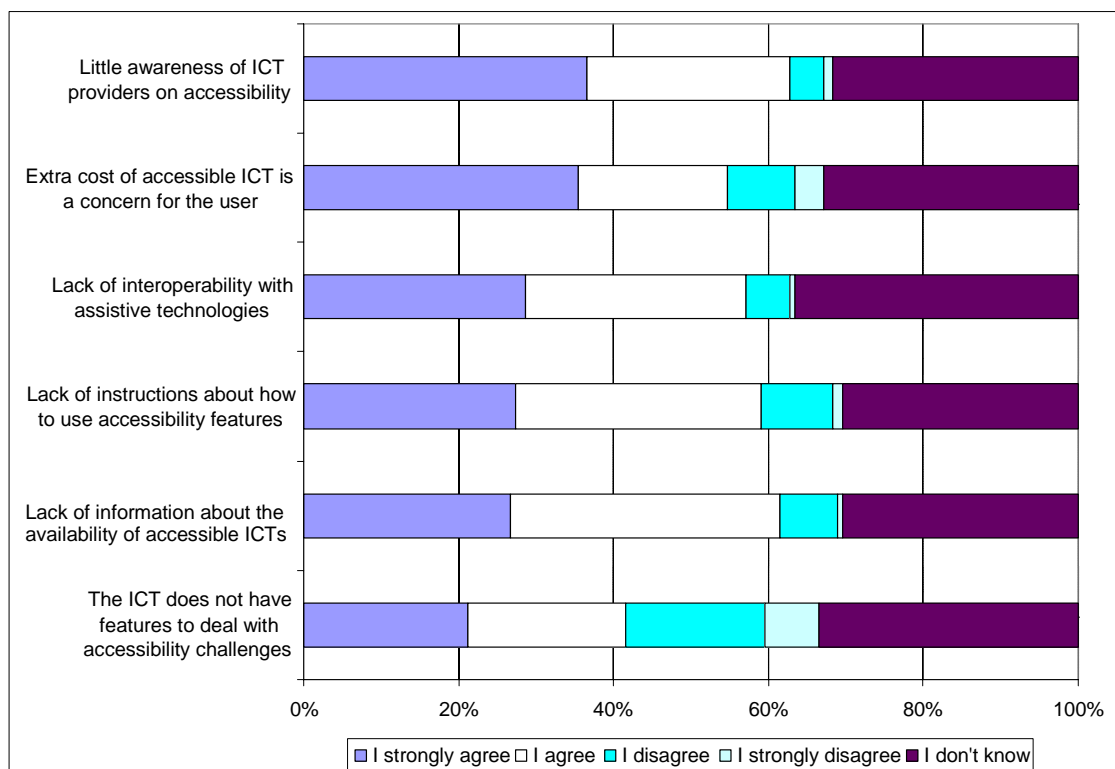
Question: What are the main barriers to e-accessibility?

Table 13:   **The ICT does not have features to deal with accessibility challenges?**

The ICT does not have features to deal with accessibility challenges?	Person with disability	Person without disability	Academic	User organisation	Public authority	Industry/ Enterprise	Other	Total
Strongly agree	26.3%	35.0%	14.6%	65.0%	4.3%	0.0%	16.7%	21.1%
Agree	10.5%	10.0%	33.3%	20.0%	21.7%	16.0%	0.0%	20.5%
Disagree	31.6%	5.0%	22.9%	5.0%	21.7%	16.0%	16.7%	18.0%
Strongly disagree	10.5%	10.0%	4.2%	0.0%	8.7%	12.0%	0.0%	6.8%
Don't' know	21.1%	40.0%	25.0%	10.0%	43.5%	56.0%	66.7%	33.5%
Total (n)	19	20	48	20	23	25	6	161

Over and above these aspects, further issues that may warrant attention were indicated in the comments made. Some common threads are given below:

• Some comments concerned unequal consideration of different types of disability and a perceived lack of sufficiently deep knowledge of the user situation and related requirements.

- Other statements concerned specific ICTs that are perceived as being particularly inaccessible, such as mobile/handheld devices and devices with visual interfaces.

- A number of statements concerned an additional cost burden for disabled users, e.g. assistive technology. Apart from affordability, the lack of information on the availability of upgrades and lacking skills to use these is also perceived as a barrier.

From the perspective of an ICT provider, questions were asked on the current provision of accessible products and services, and on the main barriers when addressing e-accessibility issues. As summarised below (Table 14), a clear majority of respondents stated that accessible products and services were on offer, either as a standard feature (65.3%) or on request by the client (17.4%).

When asked about the factors acting as a barrier to addressing e-accessibility from the perspective of an ICT provider, by comparison responses were quite evenly distributed across the various options given to respondents. These were extra costs (20.8%), lack of demand (19.7%), difficulty to implement technical specifications (18.0%), lack of a harmonised European approach (16.4%) and lack of technical specifications (13.7%).

Table 14: **eAccessibility from the perspective of an ICT provider**

Do you provide accessible technologies/do you include accessibility in your services?	**(n=98)**
• Yes, we always propose it to our clients	65,3%
• Yes, when the clients request it	17,4%
• No, because there are few requests from the clients	7,1%
• No, we don't have accessible solutions	10,2%
What are the main barriers for you when dealing with e-accessibility?	**(n=96)**
(multiple answers possible)	
• The lack of technical specifications	26,0%
• The difficulty to implement technical specifications	34,4%
• The lack of harmonised approach at European level	31,3%
• The lack of demand	37,5%
• The extra cost	39,6%
• Other barrier	21,9%

Note: The percentages relate to all respondents that have not answered "not concerned"

The comments submitted by some respondents mentioned a number of other aspects that may merit attention when it comes to identifying barriers to addressing e-accessibility from a supply-side perspective. Some common threads are given below:

- Lack of clarity about the business case for accessibility;

- Lack of open standards;

- Lack of intra-organisational knowledge and capacities concerning e-accessibility;

- Lack of design tools that are easy to use;

- Difficulties in evaluating conformity with accessibility requirements.

From the perspective of an organisation applying ICT for the purposes of its own operations, the online consultation included questions about the level of awareness and perception of main barriers to address e-accessibility issues. The level of awareness of respondents was comparatively high as summarised in Table 15. Only 4.8% stated that they were not aware of e-accessibility issues and implications for people with disabilities using goods and services.

When asked about the factors acting as a barrier to addressing e-accessibility, responses were again quite evenly distributed across the various options. Slightly more than one out of three (36%) respondents considered that the costs of accessible ICT were a barrier. Lack of interoperability of accessible ICTs with other technologies was cited as a barrier by 29% whilst 25.4% considered lack of availability of accessible ICT as a major barrier.

In addition to these barriers, the corresponding comments revealed that the lack of awareness and knowledge among the various parties involved in organisations was a major barrier to extending the deployment of accessible ICT within organisations.

Table 15:　　　　**E-accessibility as a company/organisation using ICT**

Are you aware of the issue of e-accessibility and of the implications for persons with disabilities using your goods/services?	**(n=124)**
• 　Yes, I am fully aware	74,2%
• 　Yes, I am partially aware	21%
• 　No, I am not aware	4,8%
What is the main barrier/difficulty to use accessible ICTs in your products and services?	**(n=114)**
• 　Lack of availability of accessible ICT	25,4%
• 　Cost of accessible ICT	36%
• 　Lack of interoperability of accessible ICT with other technologies	29%
• 　Other	9,7%

Note:　　The percentages apply to all respondents who did not answer "not concerned"

5.2.　　Priority areas for EU action

As mentioned in the consultation, many ICT-enabled products and services may pose accessibility challenges to persons with disabilities. As regards prioritising ICT sectors for further policy intervention at European level, 85.7% stated that high priority should be given to the Internet in general and the World Wide Web in particular (Chart 6).

Mobile communications should be given high priority according to 65.2% of respondents and personal computers were cited by 59% as a high priority ICT domain. 48.4% stated that self-service terminals should receive high priority attention and 47.2% stated that domestic equipment was a high priority domain. ICT in general should be high priority according to 45.9%. According to 39.7%, digital TV should be high priority for EU policy intervention.

It is striking that less than one out of ten respondents stated that no attention at all should be given to any of these ICT domains. Although the internet would appear to be a priority for most respondents, the comments received indicate a widely perceived need for EU action to cover various ICT domains. Common threads to the comments are given below:

- Many responses highlighted that a range of ICT based products and services would play an important role in daily life for an increasing share of the population.

- Some comments concerned the trend in technological convergence and the risk that any legislation based on today's technology divides may soon become obsolete.

- Some comments highlighted accessibility challenges perceived in specific ICT domains such as mobile communications and e-books.

- On the other hand, it was stressed that considerable action was being taken on market-driven standards concerning ICTs, meaning that further action might become redundant.

Chart 6:   Opinion for which technologies/equipment possible further action at European level should be a priority (n=161)
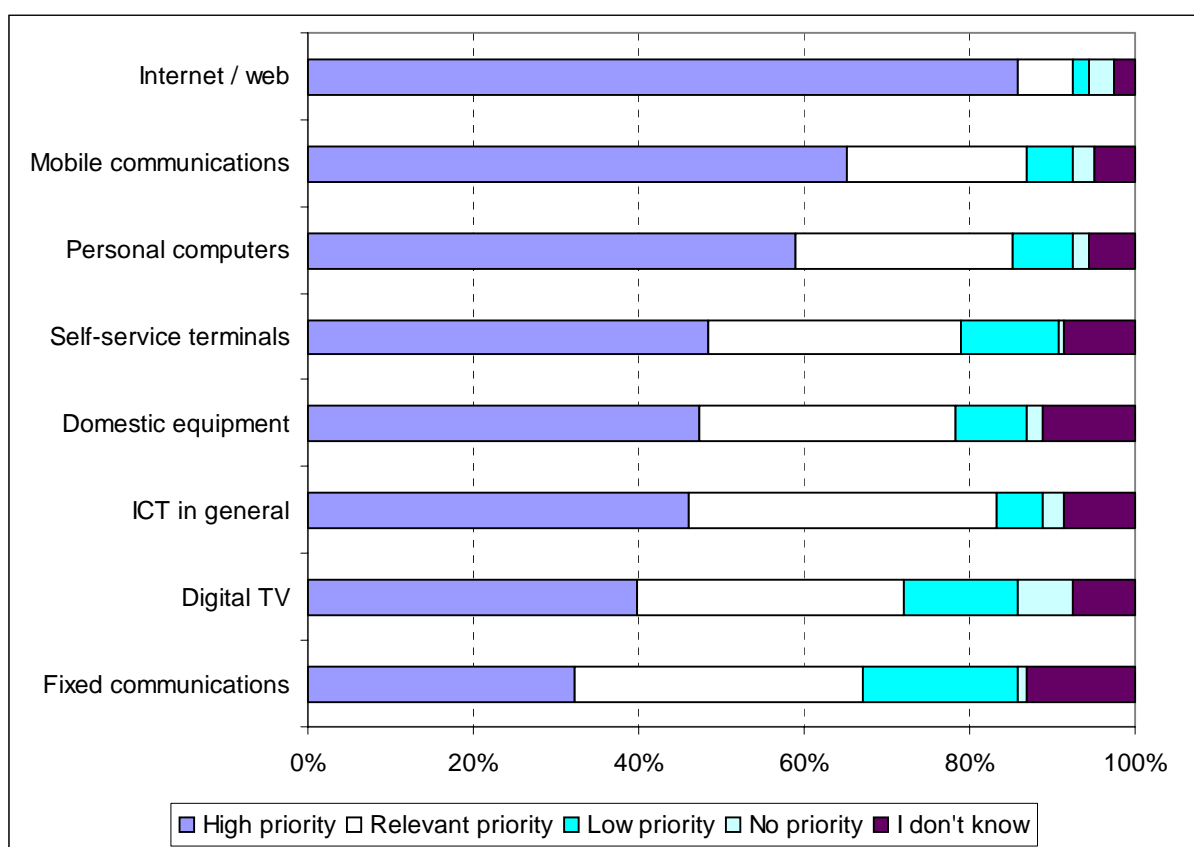
Question: For which technologies/equipment should possible further action at European level be a priority and why?

In addition to the ICT sectors discussed above, a specific question was asked on prioritising particular ICT-based services in the framework of EU policy (Chart 7). Here again a comparatively small proportion of respondents stated that no priority at all should be given to any of the service domains mentioned.

Consumer banking was considered to be an area for high priority attention according to 66.4%, and 53.4% said so for consumer retail services. Audiovisual services and travel services were considered by 49.6% and 41.6% respectively to merit high priority.

Similarly to ICT product domains, many comments received concerned ICT-based services to be considered for further EU action, such as the following aspects:

- service domains in addition to those mentioned above, such as education and professional guidance services, social services, e.g. linked to family and health matters and social networking services.

- Some comments stressed the lack of accessibility of particular services as currently provided, e.g. in broadcasting and banking.

Chart 7:   Opinion for which services that is based on ICT possible further action at European level should be a priority (n=161)
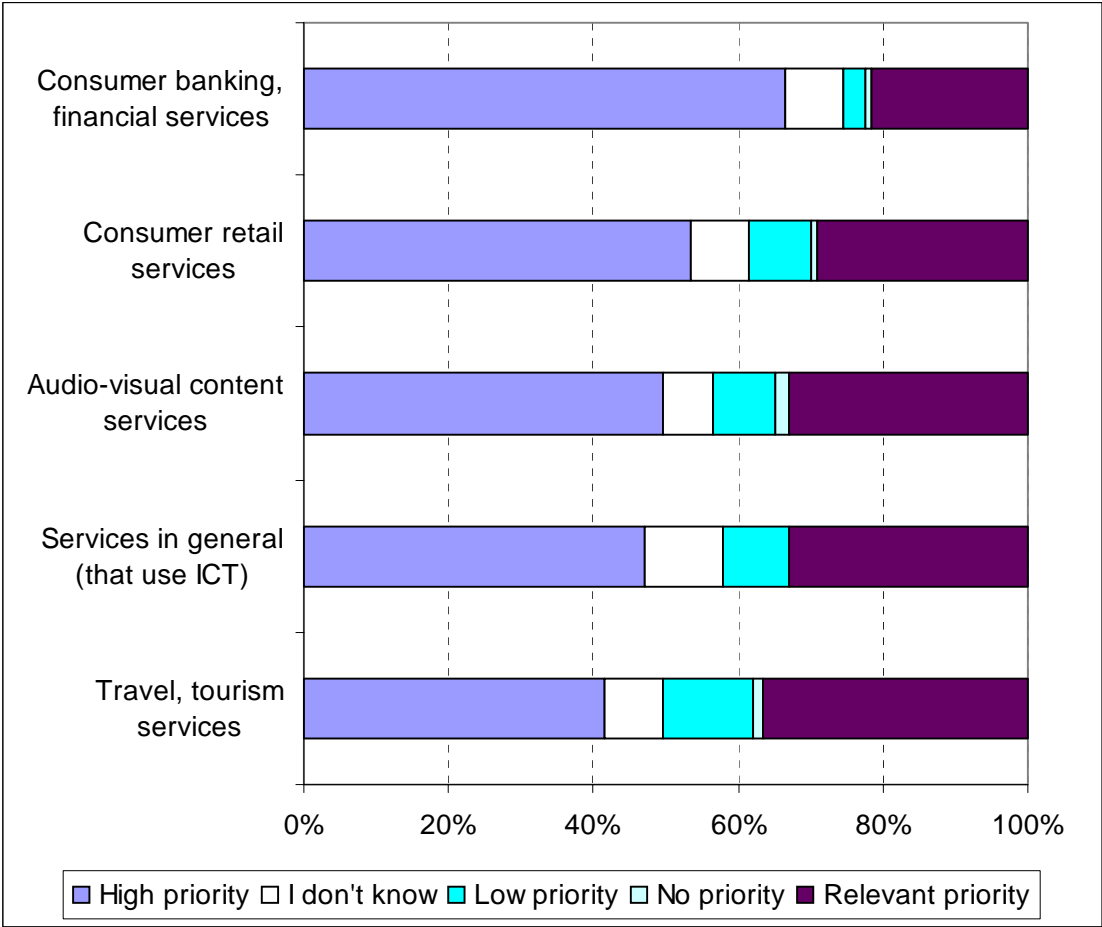
Question: For which services that are based on ICT should possible further action at European level be a priority and why?

5.3.   Preferred approach

As explained in the consultation, action at European level to promote e-accessibility can take many forms. It is necessary to define the most effective and necessary action, such as binding legislation, non-binding legislation (recommendations), standardisation and reference technical specifications, enhanced benchmarking and good practice exchange and increased support for R&D and innovation.

Binding legislation was considered a high priority approach by 55.3%, whilst non-binding legislation was highly prioritised by 24.2%. However, it is interesting to note that 40% of the businesses that participated in this consultation regarded binding legislation as an approach to which no priority should be given at all. On the other hand, 90% of user organisations regarded binding legislation as a high priority approach. Regarding non-binding legislation, the responses received were even more varied. Overall, no more than 43% assigned high priority to this approach from any of the respondent groups.

Table 16:   **Opinion whether priority should be given to non binding legislation**

Should non binding legislation be a priority at EU level?								
	Academic	Industry/Ent erprise	Other	Person with disability	Person without disability	Public authority	User organisation	Total
High priority	26.3%	30.0%	18.8%	43.5%	10.0%	20.0%	33.3%	24.2%
Relevant priority	42.1%	30.0%	37.5%	43.5%	10.0%	32.0%	33.3%	33.5%
Low priority	15.8%	25.0%	29.2%	13.0%	75.0%	24.0%	33.3%	29.8%
No priority	10.5%	10.0%	8.3%	0.0%	5.0%	20.0%	0.0%	8.7%
Don't' know	5.3%	5.0%	6.3%	0.0%	0.0%	4.0%	0.0%	3.7%
Total (n)	48	25	6	19	20	23	20	161

Other than legislation, 67.7% of respondents stated that standardisation and technical specifications should be a high priority. Benchmarking and good practice specifications were given high priority by 48.4%, whilst 52.1% and 56.5% stated that high priority should be given to increased support for research and deployment respectively.

Chart 8: Opinion on possible future EU action for e-accessibility (n=161)
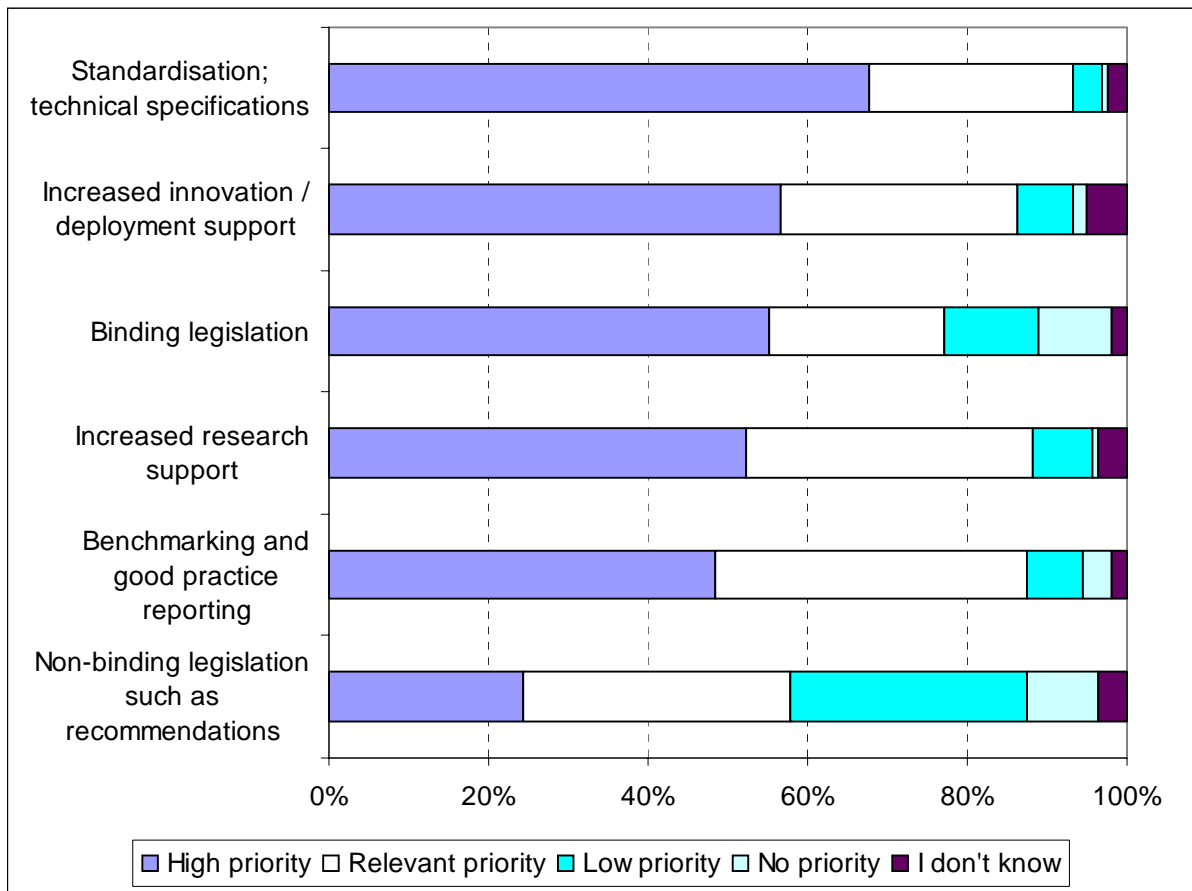
Question: What should be the possible future EU action for e-accessibility?

A wide range of comments were received on this issue. Some common threads are given below:

- A number of comments concerned the perceived need for a binding legislative approach (e.g. an EU Directive) that would need to be enforced to yield the desired impact (e.g. broader implementation of e-accessibility, level playing field for actors involved). On the other hand, some respondents expressed their concerns that the introduction of binding legislation would have rather negative effects, e.g. due to perceived difficulties to agree on e-accessibility or because some organisations (or countries) may not have the capacity to actually comply with compulsory requirements.

- Another common theme that emerged concerns e-accessibility standards. Some respondents stressed the need for relying on common international/global standards where they exist. Some comments highlighted a perceived need to involve disabled users in the development of standards, while others stressed that the focus should be on encouraging the use of existing standards and the development of appropriate market-lead and voluntary standards were necessary.

- Some comments concerned the perceived need for open source solutions and the role the EU can play in this regard, e.g. by RTD funding.

- Also some comments addressed a perceived need for a more holistic approach to the issue of non-access to ICTs for people with disabilities, e.g. by stressing that technology features are only one aspect of supporting a user-oriented approach to accessibility. More generally, a perceived lack of a common understanding of concepts and terms that are used in the e-accessibility debate was also cited.

5.4.   Legislative action

As explained in the communication, a number of countries have legislation in place to promote e-accessibility. Some legal provisions on e-accessibility also already exist at EU level. If further legislation is considered at EU level, without prejudice to the current *acquis communautaire*, several questions must be addressed, first and foremost which e-accessibility requirements to comply with and the criteria for selecting the ICT technologies and services concerned.

The consultation then asked a question on the relevance of different types of e-accessibility requirements to further EU policy intervention.

As shown in Chart 9, 67% regarded compliance with e-accessibility standards as a very important requirement, which is comparatively high. Apart from this, interoperability with assistive technology is a very important requirement according to 60.8% and 55.2% agreed on interoperability with other ICTs to ensure end-to-end accessibility. Overall, 55.9% stated that offering alternative ways of user interaction (e.g. audio output next to text) would be very relevant, and 49% stated that provision of information on e-accessibility features was very relevant. Offering at least one accessible model within a product range was regarded as very relevant by 47.8% of respondents. At 34.1%, comparatively few respondents felt that the provision of alternative solutions to the standard product/services (e.g. operator assistance) was an important requirement.

Only 6.2% of the respondents considered all of these requirements as irrelevant.

Chart 9:   Most relevant types of e-accessibility requirements (n=161)
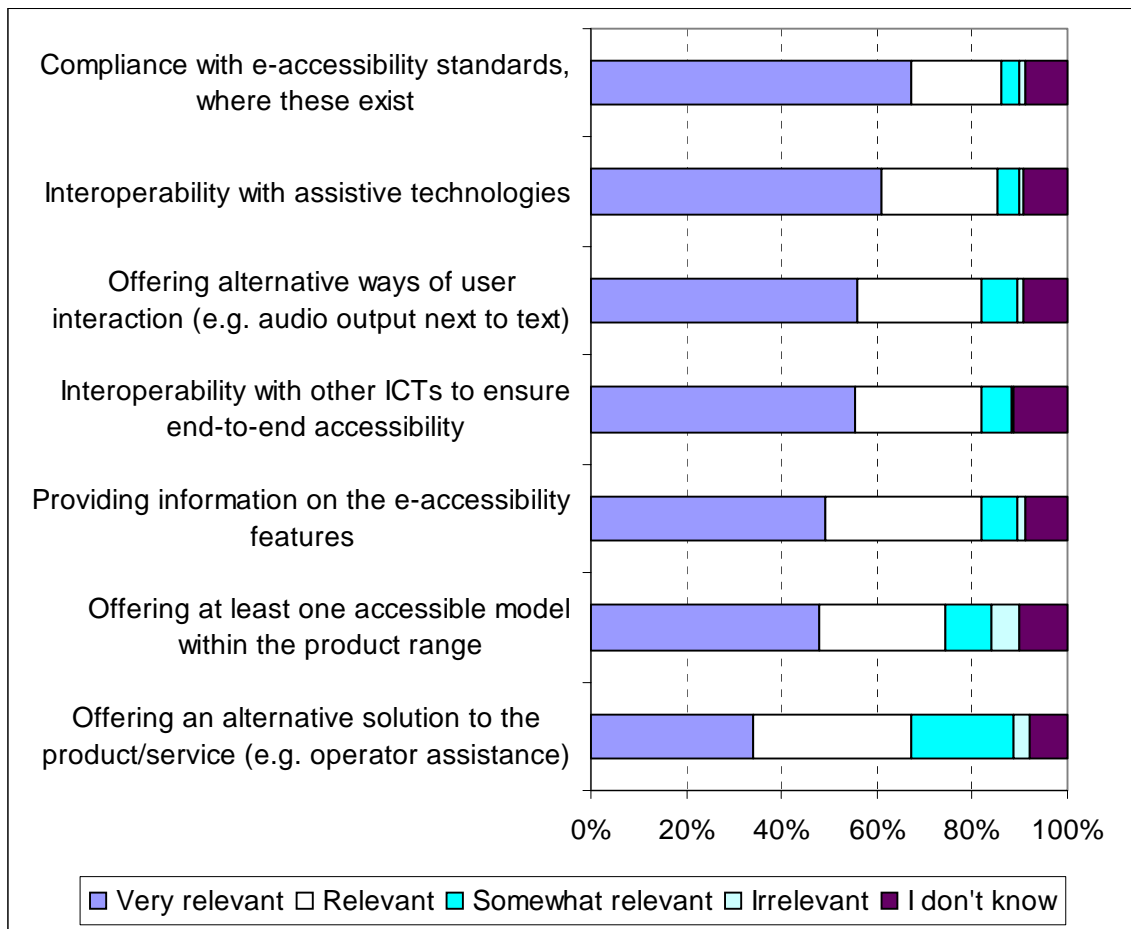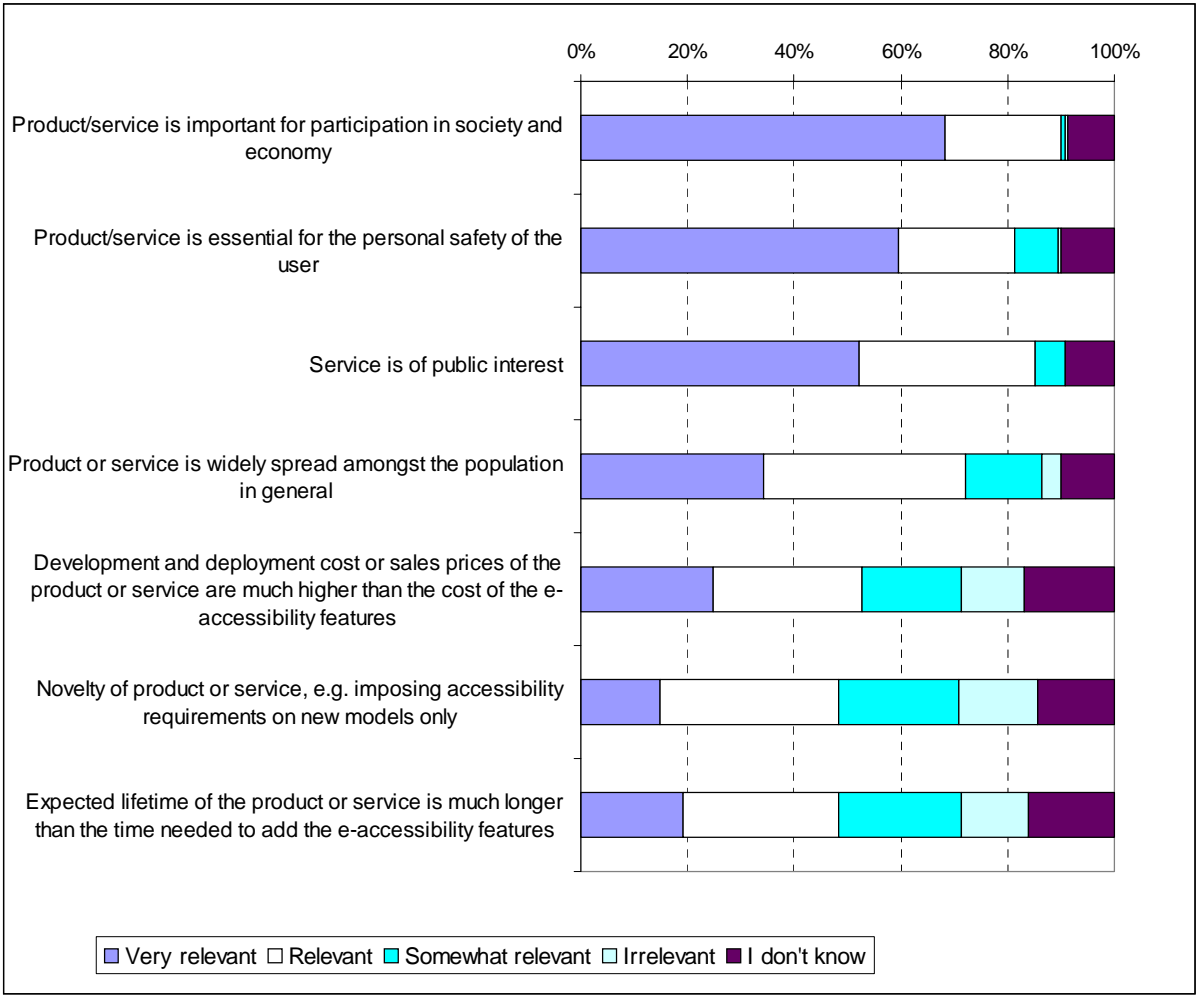

Question: Which types of e-accessibility requirements are most relevant?

As regards the criteria that could be used to select specific products, the responses received were more varied (Chart 10). 68.3% considered it very relevant to cover technologies, products and services that are of particular importance to participate in society and the economy, which is comparatively high. Similarly, 59.6% and 52.1% considered technologies, products and services that are essential for personal safety and services to be of particular public interest. A very small minority, less than 1%, regarded these criteria as being entirely irrelevant.

The fact that a particular technology or service has widely spread among the general public was regarded by 34.2% of the respondents as a very relevant selection criterion. The same response was given by 24.8% for the relative amount of costs for e-accessibility features when compared with the overall cost/price of the product and services in question. 3.6% and 11.8% respectively considered these criteria as entirely irrelevant.

Regarding the expected lifetime of a product (e.g. when compared to the time needed to add accessibility features) or service and novelty (e.g. imposing requirements only on new products), overall 19.3% and 14.9% respectively considered these aspects to be very relevant selection criteria. Similarly, 14.9% and 14.9% of respondents considered these criteria as entirely irrelevant.

Chart 10:   **Criteria relevant to guide the selection of products, technologies and services that need to comply with e-accessibility requirements (n=161)**

Question: Which criteria are relevant to guide the selection of products, technologies and services that need to comply with e-accessibility requirements?

The comments received reveal some common threads in relation to further EU legal action to improve e-accessibility in general:

- A number of comments focused on the need to address ICT domains that are currently not covered by existing EU legislation, e.g. by means of a general e-accessibility Directive. Also the need for horizontal approach was stressed in relation to the ongoing blurring of existing domain boundaries, due in part to the convergence of current technologies and services.

- Other comments referred to the perceived need to enforce and supervise the implementation of any new legislation, e.g. by setting up an independent agency specifically responsible.

- Some comments concerned the risk of fragmentation due to the perceived emergence of differing guidelines and requirements, with negative impacts on the mainstreaming of design for all and the economic viability of accessible solutions.

5.5. Expected impact

The final subsection of the consultation provided free text space to respondents to explain in more detail the potential impact in terms of costs and benefits of a more general EU approach to e-accessibility. Although the comments received in this regard were quite diverse, some common threads can be identified as follows:

- Some comments highlighted a range of potential benefits of a more general EU approach for people with disabilities and other users who are unable to participate equally in all aspects of social, economic and cultural life.

- Other respondents highlighted the benefits for society as a whole from better access to ICT for people with disabilities, such as realising their creative and economic potential and less effort required for other forms of support. However it should be noted that several respondents stressed that policies on e-accessibility should not be driven solely by a cost/benefit consideration but as an issue of equal rights, as reflected in existing EU policies such as the Lisbon Strategy.

- Some comments concerned the benefits for the ICT industry, e.g. competitive advantages through improved overall usability, extended outreach of services, extended markets and skills pool and soft factors such as improved image. On the other hand, some respondents expressed doubts as to whether commercial companies would be able to draw sufficient economic benefits from making their products accessible to people with disabilities, so they need to be duly incentivised.

- A number of comments concerned additional costs in connection with general e-accessibility legislation. Some respondents expressed their concern that additional costs would be substantial, e.g. when it comes to meeting the needs of small user populations, legal costs, cost for certification and the like. Other comments highlighted that any additional costs involved in implementing e-accessibility would need to be offset against benefits gained at individual and societal level (e.g. through increased participation in common cultural, social and economic processes). Some comments concerned possible incentives for those unable to bear additional costs, e.g. public subsidies, while others referred to potential savings stemming from international harmonisation of e-accessibility policy and standardisation.

6. CLOSING REMARKS

Overall, a common European approach to web accessibility received very strong support. Almost unanimously, respondents agreed that this approach was needed to facilitate a high level of availability of accessible web sites, and it should be equally motivated by the desire to improve the situation of people with disabilities and improve the competitiveness of European companies. When it comes to particular types of websites that should be covered by a common European approach, a clear majority agreed that this approach should not merely concern **public websites** but also **other websites providing services of general interest to the citizen.** Also, there was strong support for making intranet **websites** accessible and **web content authoring tools** should also be covered by a common European approach to web accessibility. In doing so, **meeting international standa**rds was deemed important by a clear majority. Finally, a clear majority would also welcome **accompanying measures**.

In relation to other ICT domains, again **a clear majority would welcome further EU-level action**. Regarding how this should be addressed, the responses received were more varied. About half of the respondents considered binding legislation as a high priority approach, whereas non-binding legislation was highly prioritised by about one quarter. Other than legislation, various other measures such as standardisation, benchmarking, exchanging good practice and research received comparably high levels of support from respondents.

Overall, the results of the public consultation indicate **strong support for a more cross-cutting EU-level approach to e-accessibility**. From the large number of comments received it emerges, however, that respondents hold very different views concerning expectations on this approach, in terms of the particular issues to cover in relation to various ICT domains and specifically how these issues would be addressed.