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# WEB ACCESSIBILITY THROUGH VET



WEAVE Best Practices Report





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## 1 INTRODUCTION

### 1.1 PROJECT INTRODUCTION

The WEAVE project seeks to advance digital inclusion by promoting web accessibility, aligning with key international and EU standards. The specific goals include equipping Vocational Education and Training providers with resources on accessible web design, fostering online inclusion of individuals with disabilities, enhancing professional competences of web developers, and preparing stakeholders for the European Accessibility Act (EAA) implementation. This initiative stands firmly on the pillars of Europe's Digital strategy and relevant EU directives, championing a digitally inclusive Europe.

Access to information and communications technologies, including the Web, is defined as a basic human right in the United Nations Convention on the Rights of Persons with Disabilities. The European Union is committed to making life better for its citizens and actively promotes inclusion. Due to the digital transformation, coupled with the effects of the COVID-19 pandemic an increasing part of everyone's life takes place online. As highlighted by the EU Commission (2019) "Web accessibility is an inclusive practice that allows everybody, in particular persons with disabilities or some form of impairment, to perceive, understand, navigate, and interact with the online environment."

According to the EU Commission, an estimated 100 million people in the EU have some form of disability. Accessible websites allow for a more inclusive society and facilitate independent living for persons with disabilities. To promote online accessibility, the EU has adopted specific legislative measures:

- The Web Accessibility Directive (WAD) (Directive (EU) 2016/2102), which concerns only the public sector's websites and mobile applications, with the aim to make them more accessible
- The European Accessibility Act (EAA) (Directive (EU) 2019/882) on the accessibility requirements for products and services.

Therefore, the overall objective of WEAVE is to contribute to increasing digital inclusion by promoting web accessibility. To achieve this, it sets the following specific objectives:

1. Equip post-secondary VET providers with resources on accessible web design
2. Increase and encourage the inclusion of people with any kinds of disabilities online
3. Enrich the professional competences and the employment prospects of web developers
4. Increase the readiness of the stakeholders for the implementation of the European Accessibility Act (EAA)

The project is designed according to the pillars of Shaping Europe's Digital Europe strategy, the Web Accessibility Directive (EU) 2016/2102 and the European Accessibility Act (EAA) (Directive (EU) 2019/882).

### 1.2 DELIVERABLE INTRODUCTION





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### 1.2.1 PURPOSE OF THE DELIVERABLE

The present deliverable, titled "WEAVE Best Practices Report," serves as a culmination of Activity 2 of the WEAVE project, specifically focusing on research & best practices mapping. This deliverable aims to fulfill multiple functions that cater to a broad spectrum of stakeholders involved in web accessibility.

#### Multi-Dimensional Objectives

1. **Knowledge Dissemination:** The report aims to be a centralized repository for information on web accessibility, collating various best practices, guidelines, and regulatory frameworks that shape the accessibility landscape at the European Union level.
2. **Legislative Navigation:** The deliverable offers an exploration of European Union legislation related to web accessibility, primarily the Web Accessibility Directive (WAD) and the European Accessibility Act (EAA), simplifying their content and outlining their practical implications.
3. **Practical Implementation:** By providing case studies and examples, the report strives to convert theoretical knowledge into practical wisdom. It elucidates how the legal requirements can be pragmatically translated into accessible web designs.
4. **Raising Awareness:** The report serves as an advocacy tool for accessibility best practices, intending to sensitize various stakeholders to the needs of individuals with disabilities.

#### Intended Audience

1. **VET Providers and Web Developers:** The report functions as an educational manual, aiding these professionals in implementing EU web accessibility standards effectively in their projects and curricula.
2. **Individuals with Disabilities and Advocacy Groups:** The deliverable can be utilized to promote awareness about accessible online environments and to lobby for more inclusive digital practices.
3. **Public and Private Sector Stakeholders:** This resource serves as a guidebook for organizational decision-makers and web administrators, assisting them in integrating accessibility features seamlessly into their existing infrastructures.
4. **Policy Makers and Regulatory Bodies:** The report can inform further legislative development, providing empirical data and practical insights.

#### Accessibility Constraints

In an endeavor to make this deliverable as accessible as possible, efforts have been made to incorporate easy-to-understand language and appropriate color contrasts. However, it is acknowledged that due to resource constraints, the report may not cover the full spectrum of accessibility features that cater to all types of disabilities.

The inclusion of visual aids, such as screenshots, serves a dual purpose. Firstly, they provide a practical dimension to the theoretical guidelines, enabling stakeholders to visualize the tangible benefits of implementing accessibility features. Secondly, these visual elements serve to highlight the often-





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unrecognized utility and importance of accessibility features for those who do not experience disabilities.

### 1.2.2 STRUCTURE OF THE DELIVERABLE

The deliverable is structured as follows:

**Section 2** presents the *methodology* followed. It covers the research design, data collection strategies, and analytical tools utilized during the development of the deliverable.

**Section 3** presents the *results of the research activities*. Herein, the outcomes of various research activities are synthesized. The section incorporates the following sub-sections:

- **Focus Group Results:** These insights contribute to a nuanced understanding of what constitutes a best practice in web accessibility as perceived by direct stakeholders.
- **Public Sector Survey Results:** Employing a different approach aimed at a distinct target group, this segment reveals perceptions and patterns about web accessibility in the public sector.
- **Web Examination Results:** This part provides an empirical examination of various websites to assess their adherence to accessibility guidelines and standards.

Collectively, the outcomes from the focus groups and surveys aid in determining what constitutes a best practice, identifying emergent needs in web accessibility, and uncovering existing knowledge gaps. The analysis of the websites further supplements these findings.

**Section 4** presents the *best practices identified* and selected during the examination of the websites. Each entry in this section will encompass:

- **Website Citation:** The URL of the website deemed to be an exemplar of best practice.
- **Rationale:** An elaborative reasoning to justify why the particular website was selected, referencing the criteria laid out in the Methodological Framework.
- **Visual Documentation:** Screenshots or other visual aids will be provided to offer practical examples of how these best practices manifest in real-world settings.

**Section 5** presents the *key recommendations* formulated as a result of the research findings. This section serves as a roadmap for stakeholders, helping to bridge the gap between research and implementation, and ensuring that the insights gained from the study translate into meaningful action.

## 1.3 INTRODUCTION TO EU LEGISLATION ON ACCESSIBILITY

The legislative framework governing digital accessibility within the European Union is extensive and multifaceted, addressing not only websites but also a broad array of other digital platforms and services. This comprehensive approach to digital accessibility extends well beyond the realm of websites, encompassing various other facets of the digital experience as elaborated in subsection 1.3.3. It signifies the EU's holistic commitment to ensuring that all citizens, especially those with disabilities, can fully participate in an increasingly digitalized society.

The WEAVE project focuses on the requirements raised by the Web Accessibility Directive and the European Accessibility Act, and how they could be best implemented on websites. The Web







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Accessibility Directive is narrowly tailored to focus on enhancing the accessibility of websites and mobile applications, but its scope is limited to public sector entities. In contrast, the European Accessibility Act takes a more comprehensive approach, mandating accessibility requirements for a diverse range of products and services across both the public and private sectors.

Both are based on four principles of accessibility:

1. Perceivability, meaning that information and user interface components must be presentable to users in ways they can perceive;
2. Operability, meaning that user interface components and navigation must be operable;
3. Understandability, meaning that information and the operation of the user interface must be understandable;
4. Robustness, meaning that content must be robust enough to be interpreted reliably by a wide variety of user agents, including assistive technologies

Both WAD and EAA are instrumental in the EU's overarching agenda to foster a socially inclusive 'Union of equality.' They resonate with the principles laid out in international frameworks such as the United Nations Convention on the Rights of Persons with Disabilities, which the EU and its Member States have ratified. They not only aim to enhance the user experience for persons with disabilities but also drive home the idea of digital inclusion as a civil right.

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### 1.3.1 WEB ACCESSIBILITY DIRECTIVE (WAD)

The Web Accessibility Directive ([Directive \(EU\) 2016/2102](#)), has applied since 22 December 2016 and had to become law in the Member States by 23 September 2018. It applies to the **public sector** of the EU.

The directive aims to make public sector **websites and mobile applications more accessible**, and to **harmonise varying standards** within the [European Union](#) (EU), reducing barriers for developers of accessibility-related products and services. This allows EU citizens, particularly those with a disability, to gain easier access to public services<sup>1</sup>.

The rules laid down in the Directive reflect the Commission's ongoing work to build a social and inclusive European 'Union of equality', where all Europeans can play a full and active part in the digital economy and society.

The Directive obliges websites and apps of public sector bodies to be “more accessible”. There are a limited number of exceptions that include broadcasters and live streaming. A technical standard supports the directive, clarifying what is expected by the term “accessible”.

The Directive requires:

- an accessibility statement for each website and mobile app, stating non-accessible content and alternatives as well as contacts;

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<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=LEGISSUM%3A4314916b>





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- a feedback mechanism so users can flag accessibility problems or request information published in a non-accessible content;
- regular monitoring of public sector websites and apps by Member States, and reporting on the results to the Commission every three years.<sup>2</sup>

EU [Member States](#) must ensure that websites and mobile applications of public sector bodies are ‘more accessible’, particularly for people with disabilities, by making them ‘perceivable, operable, understandable and robust’. The **accessibility standard** is set out in the harmonised European standard [EN 301 549 v3.2.1 \(2021-03\)](#). The parts of this standard that are relevant to this directive are listed in Annex A of the standard.

Implementing Decision (EU) [2018/1523](#), an [implementing act](#) adopted by the [European Commission](#), establishes a **model accessibility statement**.

Member States must also:

- facilitate the **application of the accessibility requirements** to other types of websites and mobile applications covered by existing national laws;
- facilitate **training programmes** on the accessibility of websites and mobile applications;
- **raise awareness** of the accessibility requirements;
- **share best practice**, facilitated by the Commission;
- ensure the availability of an **effective enforcement procedure**.

Member States may maintain or enact legislation which goes beyond the minimum requirements of this directive.

### Exclusions

This directive does not apply to public service broadcasters or non-governmental organisations that do not provide services that are essential to the public or specifically to people with disabilities. In addition, it does not apply to the following **content elements**:

- office file formats published before 23 September 2018, unless needed for administrative processes by the public sector body concerned;
- audio or video published before 23 September 2020;
- live audio or video;
- online mapping, as long as essential navigational information is provided in an accessible manner;
- third-party content not under the control of the public sector body concerned;
- reproductions of heritage items or manuscripts in certain circumstances;
- extranet and intranet content intended for a closed group of people, published before 23 September 2019, until they have a major update;
- content of websites and mobile applications not updated or edited after 23 September 2019 (archives), if their content is not needed for administrative processes.



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The timeline for the implementation WAD's measures, since its transposition in the Member States by 23 September 2018 is as follows:

- from 23 September 2019 for websites published after 22 September 2018;
- from 23 September 2020 for all other websites of public sector bodies;
- from 23 June 2021 for mobile applications of public sector bodies.

It has to be noted that while the Directive also includes provisions about mobile applications of public sector bodies, they are beyond the scope of the project and therefore relevant best practices are not included in the present report.

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### 1.3.2 EUROPEAN ACCESSIBILITY ACT (EAA)

The [European Accessibility Act](#) (Directive 2019/882) is a landmark EU law which **requires some everyday products and services to be accessible for persons with disabilities**. It follows a commitment on accessibility made by the EU and all Member States upon ratifying the [United Nations Convention on the Rights of Persons with Disabilities](#).

While the emphasis of WEAVE is on the accessibility of websites, it is important to mention that the EAA is much wider. Firstly, it is not limited to the public sector, but includes private businesses and companies as well. The inclusion of the private sector in EAA's ambit allows for a more comprehensive approach to accessibility, extending its reach to everyday products and services that are integral to modern life. Consequently, the EAA has the potential to bring about systemic change, shaping a more inclusive digital landscape that benefits everyone, including those with disabilities.

The Act covers the following products and services<sup>3</sup>:

#### Products

- Computers and operating systems
- Smartphones and other communication devices
- TV equipment related to digital television services
- ATMs and payment terminals (e.g., card payment machines in supermarkets)
- E-readers
- Ticketing and check-in machines

#### Services

- Phone services
- Banking services
- E-commerce
- Websites, mobile services, electronic tickets and all sources of information for air, bus, rail and waterborne transport services
- E-books
- Access to Audio-visual media services (AVMS)

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<sup>3</sup> <https://ec.europa.eu/social/main.jsp?catId=1202&intPageId=5581&langId=en>







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- Calls to the European emergency number 112

The European Accessibility Act identifies the product features and service features that must be accessible for persons with disabilities. **The Act uses functional EU accessibility requirements.** The functional criteria used by the EAA are the following:

- Usage without vision
- Usage with limited vision
- Usage without perception of colour
- Usage without hearing
- Usage with limited hearing
- Usage without vocal capability
- Usage with limited manipulation or strength
- Usage with limited reach
- Minimising the risk of triggering photosensitive seizures
- Usage with limited cognition
- Privacy

It **does not impose detailed technical restrictions to make products and services accessible.** This allows room for innovation and flexibility. This is the rationale behind the project's choice to focus on identifying best practices; it serves both as a source of inspiration and as a guiding framework for those who seek to implement these accessibility features in the most effective manner, ensuring the diverse needs of end-users are adequately met.

Further, the Act requires websites to display information about the accessibility features of services. Users must be able to consult a website's content and structure and to navigate through webpages, also when using assistive devices.

### Timeline

The EAA was originally proposed in 2011 to complement the EU's Web Accessibility Directive, which was passed in 2016.

The EAA came into effect in April 2019.

Transposition deadline: June 28, 2022

As of 28 June 2025, companies must ensure that the newly marketed products and services covered by the Act are accessible.

As of 28 June 2025, customers will be able to file complaints before national courts or authorities if services or products do not respect the new rules.

The reporting and review period must be completed by June 28, 2030, and every five years thereafter.

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### 1.3.3 OTHER EU LEGISLATION ON DIGITAL INCLUSION





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While not directly tied to the scope of the project and the present report, which is focused on website accessibility, it is important to note that the European Union has enacted a broad spectrum of legislative frameworks to facilitate digital inclusion across various platforms and sectors. Promoting digital inclusion, the European Union has taken measures in a variety of areas including electronic communications, digital public services, audio-visual media services, ebooks, eCommerce and ICT equipment:

1. The European Electronic Communications Code ensures that everyone has access to affordable electronic communications services, including emergency services.
2. The recently revised [Audiovisual Media Services Directive](#) (AVMSD) covers the means to achieve accessibility such as with sign language, subtitling for the deaf and hard of hearing and audio descriptions for both television broadcasting (i.e. linear services) and video on demand (VOD).
3. The [eIDAS Regulation](#) (on electronic identification and trust services for electronic transactions in the internal market) requires that trust services provided and end-user products be accessible for persons with disabilities, such as with eSignatures which aid in signing legal documents and email in a paperless manner.
4. The [Marrakesh Directive and Regulation \(2017\)](#) aim to facilitate the access to print works, including e-books, in formats adapted for persons who are blind, visually impaired or those who have difficulties reading.<sup>4</sup>

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<sup>4</sup> <https://digital-strategy.ec.europa.eu/en/library/accessibility-essential-some-useful-all>





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## 2 METHODOLOGY

The methodology employed in the development of the "WEAVE Best Practices Report" is a multi-faceted approach aimed at providing a holistic understanding of web accessibility in alignment with the principles of the Web Accessibility Directive (WAD) and the European Accessibility Act (EAA). It integrates a variety of research methods ranging from legislative reviews to qualitative and quantitative data collection activities. Below is an elaboration of each key component that forms the research architecture of this deliverable.

### Legislative and Policy Review

The initial phase involved an exhaustive review of relevant European Union policy documents, including WAD, EAA, and other official publications such as public consultations and regulatory guidelines. The aim was to establish a firm conceptual understanding of the legal parameters that define web accessibility "best practices" and to develop the survey and focus group questions in that context.

### Criteria Formulation for Best Practice Identification

Upon completing the legislative review, an interdisciplinary team of partners finalized the criteria that would serve as the yardstick for identifying best practices. The criteria were mapped to existing EU legislation to ensure relevance and comprehensibility.

### Qualitative Research

#### Focus Groups

Two online focus groups were organized with the objective of capturing the lived experiences and viewpoints of diverse stakeholders affected by web accessibility legislation.

1. **Stakeholder Types:** The focus groups engaged two primary cohorts:
  - Persons with disabilities and their representative organizations.
  - Public sector representatives.
2. **Structure:** The structure of the focus group discussions included the following components:
  - Welcome and Introductions
  - Contextualization of legislative framework
  - Engagement Questions to stimulate discussion
  - Exploration Questions for in-depth analysis
  - Best Practice and Suggestions Questions
  - Exit Questions and Summary
3. **Objectives:** To extract nuanced insights about what constitutes a best practice from both the demand and supply side of web accessibility.

#### Stakeholder Surveys





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Targeted surveys were distributed to public sector representatives, particularly those active in ministries expected to offer online services to people with disabilities. The survey instrument comprised questions aimed at gauging their existing knowledge, challenges, and suggestions regarding web accessibility.

The survey was specifically designed for public sector representatives of different ministries in Cyprus. The goal was to gauge existing awareness and perspectives on web accessibility, relevant legislation, and the challenges involved. The respondents are primarily from departments expected to deliver online services to individuals with disabilities. This targeted approach provides us with critical insights into the current implementation of the Web Accessibility Directive (WAD), and it will offer valuable context for the forthcoming implementation of the European Accessibility Act (EAA). A detailed list of participating ministries and departments is provided in a subsequent section of this report.

### Best Practices Mapping

A detailed examination of at least 100 websites from various sectors was carried out based on the criteria formulated. Categories of websites examined included:

- Public Sector Websites
- Large Corporations
- Non-Profit Organizations representing people with disabilities
- Mass Media Outlets
- Local Government Websites
- Educational Institutions (e.g., universities)
- Cultural Institutions (e.g., museums)

The rationale for these selections was rooted in the scope, reach, and potential impact these platforms have on various user demographics.

Large corporations like Microsoft and Amazon were chosen because they are resource-rich entities that have the financial capability and technical expertise to invest in web accessibility features. These companies also cater to a global audience, making it imperative for them to adopt inclusive practices that can accommodate millions of diverse users, including those with disabilities.

The inclusion of mass media websites like BBC and Le Monde was based on their role as mass communicators whose purpose is to disseminate information as widely as possible. These platforms utilize a variety of multimedia tools—ranging from articles and podcasts to videos—that can inadvertently isolate specific demographic groups if accessibility features are not thoughtfully implemented. Assessing their practices could provide valuable insights into how accessibility intersects with broader communication strategies.

Public sector platforms are pivotal for this study for two major reasons. First, they were the initial entities legally mandated by the EU through the Web Accessibility Directive to incorporate web accessibility features. Second, they provide essential services to a vast and diverse populace, including persons with disabilities, making the assessment of their web accessibility features both urgent and significant.

Organizations and associations working with or representing persons with disabilities were specifically chosen due to their presumed heightened sensitivity to accessibility issues. Given their close





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collaboration and frequent interaction with people with disabilities, these organizations are ideally situated to receive authentic feedback on what constitutes a true best practice, rather than merely complying with guidelines for compliance's sake.

To ensure a well-rounded view, the study also incorporated educational and cultural institutions such as universities and museums. These platforms are important as they are centers of knowledge and culture that should be accessible to all, regardless of physical or cognitive abilities. Evaluating their accessibility features offers a lens into how well educational and cultural information is disseminated inclusively.

### **Geographical Scope**

While the focus was predominantly on EU-based websites, a select number of international websites were also reviewed to gather insights on best practices from other, also technologically advanced regions, outside the EU.

### **Participatory Approach**

This methodology was designed to be participatory and inclusive, effectively capturing the voice of the key target groups and stakeholders, thereby ensuring that their experiences and needs directly shaped the identification of best practices.

Through this comprehensive methodology, the report aspires to provide a multi-dimensional view of the challenges and opportunities related to web accessibility, substantiated by data and enriched by a variety of perspectives. The information gathered not only serves to identify and understand best practices but also provides a robust foundation for shaping policy recommendations and future initiatives.





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### 3 RESEARCH RESULTS

#### 3.1 FOCUS GROUPS RESULTS

##### Overview

Two focus groups were carried out in total, one by JOIST and one by Inercia Digital, with 12 participants in total. The focus group discussions served as an invaluable platform for capturing the lived experiences, challenges, and recommendations related to web accessibility for individuals with disabilities. Participants included stakeholders with disabilities, individuals from organizations representing people with disabilities and participants who have experience in public-sector web accessibility. The discussion spanned across various topics including current European Union laws on web accessibility, best practices, and needed improvements. In this section, we will elaborate on these aspects, synthesizing insights from the participants, and offer an analysis that not only presents a snapshot of the current state of web accessibility but also suggests pathways for future action.

##### Ethical Considerations

It is worth noting that informed consent was obtained from all participants before the commencement of the focus group discussions. This ethical precaution ensured that each participant was fully aware of the purpose and use of the information they shared, thereby establishing a framework of trust and transparency.

##### Gender Balanced Groups

Efforts were made to maintain a balanced gender representation within the focus groups. This approach aimed to collect a diverse range of experiences and perspectives, enhancing the comprehensiveness of the data and ensuring that the insights generated do not marginalize any gender-specific issues related to web accessibility.

##### Limitations in Participant Diversity

While the focus group discussions were rich in insights, it is crucial to acknowledge the limitations in terms of the spectrum of disabilities represented. Given logistical constraints, it was not possible to include participants with every type of disability. As a result, the perspectives shared should be considered as part of a larger array of experiences, and additional research may be needed to encompass the diverse needs and challenges faced by individuals with other forms of disabilities.

##### Awareness and Knowledge Gap

A lack of comprehensive knowledge concerning European Union regulations like the Web Accessibility Directive (WAD) and the European Accessibility Act (EAA) was evident among the participants. While most were aware of the general framework, they lacked a nuanced understanding of specific rules and developments. This highlights the urgent need for educational initiatives targeted towards different stakeholders, especially those directly affected by web accessibility.

##### User Experiences and Challenges







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Participants expressed a range of challenges they face during their online interactions. These challenges are not limited to smaller companies or organizations but are pervasive across platforms regardless of the size or resources of the entities that manage them. The challenges include:

1. **Inadequate Screen Reader Support:** Websites often lack proper coding and structuring, making them incompatible with screen readers, which are essential tools for visually impaired individuals.
2. **Unreliable Automatic Captions:** Video platforms like YouTube offer auto-generated captions, but the technology is often imprecise, making it unreliable for people with hearing impairments.
3. **Poor Contrast and Color Selection:** Websites commonly make poor choices in color schemes, negatively affecting users with contrast perception issues.
4. **Inconsistent Standards:** The enforcement of accessibility regulations varies significantly, leading to a lack of standardization across different platforms.
5. **Device-Specific Challenges:** Participants with hearing difficulties also mentioned the inconvenience of using prostheses and headphones together, highlighting the need for more inclusive hardware solutions.

### Best Practices

Best practices for specific EAA functional criteria were identified based on the discussion, which are mentioned in section 4. Due to the limitations in participant diversity, it was not possible to uncover best practices for every functional criterion. Those criteria for which it was not possible were: i) Usage with limited vocal capability, ii) Minimizing the risk of photosensitive triggers, iii) Usage with privacy. Therefore, what qualifies as best practice was determined through desk research carried out for these specific criteria.

Examples of websites adhering to good accessibility practices were shared, which were added to the. The Greek governance website (<https://www.gov.gr/>) and "AMEA CARE" (<https://www.amea-care.gr/>) stood out for their inclusive features like alternative text descriptions for images, clear navigation, and adherence to the WCAG 2.0 AA standards, both of which are included as best practices for certain functional criteria in this report as the consortium research also confirmed their excellence.

Another interesting outcome was the commendation of certain streaming services for their effective accessibility features, which stood in stark contrast to the shortcomings observed in other popular platforms in the same domain.

### Recommendations for Improvement

Based on the discussions, the focus groups made several recommendations that encompassed:

1. **Education and Training:** Increase awareness among developers through targeted educational resources about WAD and EAA guidelines.
2. **User-Centered Design:** Collaborate with individuals with disabilities and advocacy groups to inform design decisions.





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3. **Regular Monitoring and Feedback:** Implement ongoing accessibility tests and encourage user feedback to continuously improve website functions.
4. **Incentivization through Government Support:** Advocate for financial and regulatory support from the government to ensure compliance and raise the general standard of web accessibility.

### Streaming Services

While certain platforms like Netflix, HBO, and Disney+ received commendation for their accessibility features, Amazon Prime was noted for its lack of adequate services, emphasizing the need for uniform accessibility standards across all platforms.

### Conclusion

The focus group discussion revealed a complex landscape of challenges and opportunities in the field of web accessibility. There is a clear gap between the regulatory framework and its practical implementation. However, there are also examples of best practices that can serve as models for future development. The recommendations provided offer a multi-pronged approach to bridging these gaps, emphasizing the importance of collective action that includes education, user-centered design, and government intervention to achieve true digital inclusion for individuals with disabilities.

## 3.2 SURVEY RESULTS

The survey was active from July 4, 2023 until August 10, 2023. A total of 98 questionnaires were distributed using Google Forms, 13 responses were received, marking a response rate of 13.2%. The survey involved 13 respondents from select ministries and deputy ministries:

- Ministry of Education, Sport and Youth
- Deputy Ministry of Research, Innovation and Digital Policy (including the Department of Electronic Communications)
- Deputy Ministry of Social Welfare (including the Department of Social Integration for Persons with Disabilities)
- Ministry of Labour and Social Insurance

Thus, the respondents came from ministries highly relevant for the project, as they are actively involved in the integration of people with disabilities, the ministry responsible for the digital services of the public sector, and the field of education. The findings reveal some critical issues that require attention.

### Demographics and Background of Respondents

Most of the respondents were well-tenured within their organizations, with 85% having worked for over five years. This long-term employment should, theoretically, contribute to a more nuanced understanding of institutional needs and challenges. Participants came from diverse age groups, with the majority (53.6%) falling into the 36-45 age bracket, an age range generally considered to be digitally literate.

### Awareness and Implementation of WAD





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Alarming, despite their roles and the specific departments they represent—86.9% of which offer online services to people with disabilities—76.9% of the respondents were not aware of the Web Accessibility Directive (WAD). This indicates an urgent need for awareness-raising and information dissemination initiatives.

### User Feedback and Accessibility Evaluation

Concerning user feedback on website accessibility, 38.5% reported no complaints, while 61.5% were unaware of any. This inconclusive data presents multiple interpretations: it could signify either effective accessibility features, or that issues do go unreported due to a lack of user awareness or communication inefficiencies. When asked to evaluate their organizations' website accessibility features, responses varied across the board, from "Excellent" to "Inadequate," indicating a lack of consensus on the current state of accessibility.

### Challenges and Barriers

The survey highlighted two main obstacles in implementing web accessibility features: technical difficulties (46.2%) and inadequate training (46.2%). Limited resources were cited by only one respondent, potentially indicating that the primary challenges are not financial but rather concern expertise and awareness.



### Suggestions for Improvement

Feedback for improvement was diverse, encompassing the need for better information dissemination, simplification of service delivery processes, utilization of existing accessibility tools, provision of technical support, and the creation of mobile-friendly websites.

### Summary and Implications

Overall, the survey provided invaluable insights into the current state of web accessibility in the Cypriot public sector. The results confirm initial concerns identified during the proposal stage and through consultations on the Web Accessibility Directive—that technical difficulties and lack of adequate





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training constitute significant barriers. Given this, the WEAVE initiative aims to address these gaps by offering specialized training and technical resources, thereby augmenting the skills and awareness needed for effective implementation of web accessibility standards.

### 3.3 WEBSITE EXAMINATION RESULTS

#### Objective

In order to gain comprehensive insights into web accessibility, a review of 100 websites was undertaken. These sites were chosen from a range of categories and countries to offer a diverse sample that would be beneficial to Vocational Education and Training (VET) providers, among other stakeholders. The evaluation aimed to corroborate the best practices that had been previously identified during the focus groups and desk research phases of this project.

#### Best Practices and Multifunctional Accessibility Features

Interestingly, websites demonstrating best practices in one criterion, such as accessibility for users with limited vision, often excelled in other criteria as well, such as accessibility for those with limited hearing. However, for the sake of providing a varied array of solutions and to avoid redundancy, each website was cited only once and for a single criterion.

#### Expected and Unexpected Outcomes

Some findings were unsurprising, aligning with the prevalent expectations. However, certain results were startling, especially concerning international organizations and entities explicitly working to promote the rights of people with disabilities. Despite their advocacy, many such websites were found lacking in essential accessibility features. While the study did not delve into the underlying reasons for these omissions, possible contributing factors might include prohibitive costs and lack of awareness or expertise among web developers.

#### The Inconsistency of Resources

Contrary to common belief, the availability of resources did not always correlate with the implementation of accessibility features. Several large enterprises with ample resources were noticeably lacking in this regard. Conversely, some smaller organizations surpassed expectations, serving as best practice examples for specific fields or types of disabilities. This inconsistency underscores that the issue often goes beyond mere resource availability and may involve factors such as organizational awareness, expertise, and commitment to inclusivity.

#### Importance of Accessibility Statements

An overarching criterion for all reviewed websites was the presence of a clear accessibility statement. This emerged as a critical factor both from focus group discussions and the practical experience of website evaluations. Websites lacking an easily discernible accessibility statement made it considerably more challenging to identify existing features, thereby substantiating the importance of such statements.

#### Infrequent Use of Alt Text





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Another noteworthy observation was the rare utilization of alt text image descriptions. Notably, it's essential to differentiate between images that are central to understanding the content and those that are merely decorative. While the former requires alt text, the latter can suffice with an empty alt tag, signaling to assistive technologies that the image is not integral to the page content.

### Underutilized Voice Command Features

One of the least encountered accessibility features was voice commands for website navigation. The scarcity of this feature is particularly concerning for individuals with limited reach and limited manipulation or strength capabilities, as it represents a critical avenue for enhancing digital accessibility for this demographic.

### Exemplary Performers

In some instances, websites not only met but exceeded the predefined criteria, showcasing innovative approaches to accessibility that could serve as inspirational case studies for VET providers and web developers alike.

### Implications for VET Providers

The comprehensive study of these websites serves as a catalogue of practical examples, challenges, and innovative solutions, invaluable for VET providers. The findings can be incorporated into curricula to provide a real-world context, aiding in the development of a workforce skilled in creating accessible digital environments. Moreover, the study aids in identifying specific training needs, such as creating awareness about the importance of accessibility statements and educating about best practices in areas like alt text usage.

### Summary

In summary, the investigation into the 100 websites offers a balanced view of the current landscape of web accessibility. It not only highlights best practices but also pinpoints the areas where even organizations with the best of intentions may falter, thereby emphasizing the ongoing need for awareness, education, and practical training. Given these insights, VET providers have a pivotal role to play in shaping a more accessible digital future.

**Disclaimer:** While this report is produced in 3 language versions (English, Spanish and Greek) the screenshots are only provided only in the original language of the website or its English translation, when available. Nonetheless, the visual content remains effective in conveying the intended message.





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## 4 WEB ACCESSIBILITY BEST PRACTICES

The current section begins by presenting the requirements that websites should fulfill to be considered a best practice, for each functional performance criterion included in the EAA. The criterion of usage without vision and usage with limited vision have been consolidating into one, respecting their differences in identifying best practices, as well as usage without hearing and usage with limited hearing.

For each of those criteria, we have dedicated a distinct subsection. Within these subsections, we spotlight a website exemplifying the best practice for that specific criterion, elaborating on the reasons behind its selection. Screenshots are included for every website to provide practical examples on how each best practice is being implemented.

The requirements each website should fulfill to qualify as a best practice was determined through the results of the focus groups, survey and desk research for 6 out of the 9 total functional criteria examined. As mentioned, it was not possible to determine best practice requirements for the following criteria through the focus groups:

i) Usage without vocal capability, ii) Minimizing the risk of photosensitive triggers, iii) Usage with privacy.

Therefore, the requirements for the above criteria were determined solely based on desk research. The functional performance criteria, their description provided by the EAA, and the best practice requirements for each, are presented as follows:

**1. Usage without/limited vision:** Where the product or service provides visual modes of operation, it shall provide at least one mode of operation that does not require vision/ that enables users to operate the product or service with limited vision.

Best Practice requirements to be fulfilled:

- Alternative text descriptions for images
- Clear headings and well-labeled form elements
- Options for resizing text
- Screen readers

**2. Usage without perception of colour:** Where the product or service provides visual modes of operation, it shall provide at least one mode of operation that does not require user perception of colour.

Best Practice requirements to be fulfilled:

- Enhanced Contrast, avoiding the use of subtle color gradients for visual elements.

**3. Usage without/limited hearing:** Where the product or service provides auditory modes of operation, it shall provide at least one mode of operation that does not require hearing/ one mode of operation with enhanced audio features that enables users with limited hearing to operate the product or service.

Best Practice requirements to be fulfilled:







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- **Accurate captions**

**4. Usage without vocal capability:** Where the product or service requires vocal input from users, it shall provide at least one mode of operation that does not require vocal input. Vocal input includes any orally-generated sounds like speech, whistles or clicks.

While the primary barriers in this criterion consist of web-based services that exclusively rely on voice-only interaction and websites that offer phone numbers as the sole means of communication, it should be noted that these barriers are relatively uncommon.

Therefore, the Best Practice requirements to be fulfilled are:

- Alternative methods for user interaction, such as contact forms, email addresses, and live chat features, mitigating the potential issue of voice-only dependency.

**5. Usage with limited manipulation or strength:** Where the product or service requires manual actions, it shall provide at least one mode of operation that enables users to make use of the product through alternative actions not requiring fine motor control and manipulation, hand strength or operation of more than one control at the same time.

Best Practice requirements to be fulfilled:

- Keyboard friendly navigation
- Vocal Commands

**6. Usage with limited reach:** The operational elements of products shall be within reach of all users. Where the product or service provides a manual mode of operation, it shall provide at least one mode of operation that is operable with limited reach and limited strength.

Best Practice requirements to be fulfilled:

- Keyboard friendly navigation
- Vocal Commands

**7. Minimising the risk of triggering photosensitive seizures:** Where the product provides visual modes of operation, it shall avoid modes of operation that trigger photosensitive seizures.

Best Practice requirements to be fulfilled:

- Disabling content that flickers, flashes, or blinks

**8. Usage with limited cognition:** The product or service shall provide at least one mode of operation incorporating features that make it simpler and easier to use.

Best Practice requirements to be fulfilled:

- Use of fonts that facilitate navigation for people with Dyslexia

**9. Privacy:** Where the product or service incorporates features that are provided for accessibility, it shall provide at least one mode of operation that maintains privacy when using those features that are provided for accessibility.





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All of the websites in the following subsections fulfill every best practice requirement for the specific functional criterion they were selected.

#### 4.1 CRITERION 1: USAGE WITHOUT/LIMITED VISION

##### Website selected:

Portal of the Greek Public Administration's Digital Public Services

[www.gov.gr](http://www.gov.gr)

##### Description of Best practice implementation:

The site doesn't merely offer a one-size-fits-all approach; instead, it provides a range of customizable features that allow users to tailor their browsing experience according to their specific needs. Below is a more in-depth look into the various features that exemplify best practices in accessibility:

##### Multiple Accessibility Profiles:

The site offers distinct accessibility profiles, each designed to cater to a variety of visual impairments. By doing so, the site doesn't just fulfill the minimum criteria but stands out as a best practice model.

##### Descriptive Text Alternatives:

Descriptive text alternatives are available for both auditory and visual content, making the site inclusive and ensuring that every user can access and benefit from its content, regardless of their visual abilities.

##### Customizable User Experience:

- **Screen Reader:** An embedded screen reader is available, with the option to control the reading speed across three distinct levels.
- **Text Resizing:** Users can choose how large they want the text to appear, based on three selectable levels, thereby enhancing readability.
- **Legible Fonts:** The site uses easy-to-read fonts, further aiding users who have difficulty reading standard typefaces.
- **Adjustable Cursor:** An enlarged cursor option is available, with sizing also adjustable across three levels, making navigation more manageable.
- **Animation Control:** Users have the choice to enable or disable animations, providing control over potentially distracting or uncomfortable visual elements.
- **Color Saturation:** Users can adjust the level of color saturation according to their needs, with three different levels to choose from.





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- **Tooltips:** Context-sensitive tooltips provide extra information when hovering over elements, offering additional guidance and clarification.

User Control:

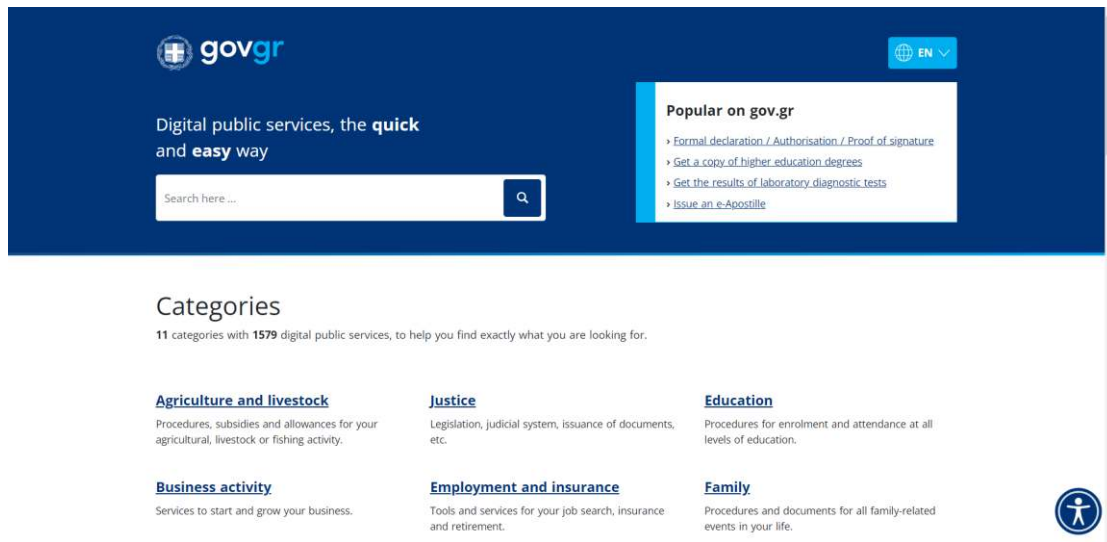
The features are not bundled into a single package, enabling users to easily select which accessibility tools they wish to enable or disable. This allows for a more personalized user experience.

Visibility and Ease of Access:

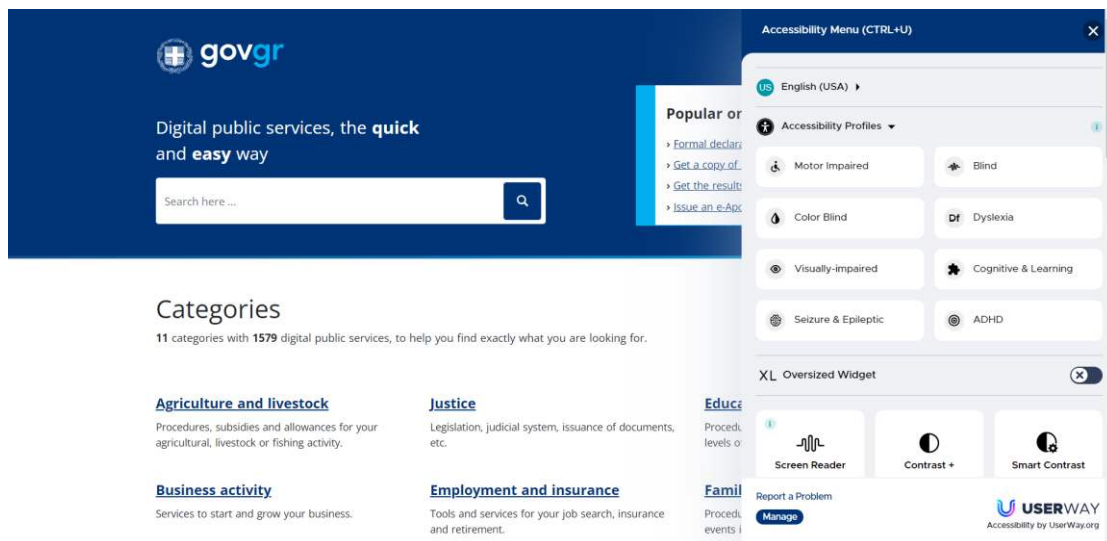
An accessibility button is prominently displayed on every page, making it readily accessible and easy to locate, even for users unfamiliar with the website's layout.

Screenshots:

Display without accessibility features on:



Accessibility profiles:





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Accessibility options for the visually impaired & blind enabled:

The screenshot shows the gov.gr website interface with an accessibility menu overlaid on the right side. The menu is titled 'Accessibility Menu (CTRL+U)' and contains various options for users with visual impairments or blindness, such as 'Read Normal', 'Contrast', 'Smart Contrast', 'Highlight Links', 'Bigger Text', 'Text Spacing', 'Play Animations', 'Hide Images', 'Legible Fonts', 'Big Cursor', 'Tooltips', 'Page Structure', 'Line Height', 'Text Align', 'Dictionary', and 'High Saturation'. The website content includes a search bar, a 'Popular on gov.gr' section with links to formal declarations, higher education degrees, laboratory results, and e-Apostille issuance, and a 'Categories' section listing 11 categories with 1579 digital public services.

Text description for images:

This screenshot shows the same gov.gr website interface as the previous one, but with text descriptions for the images. The descriptions include: 'gov.gr logo', 'Search here ...', 'Popular on gov.gr' section with links to 'Formal declaration / Authorisation / Proof of signature', 'Get a copy of higher education degrees', 'Get the results of laboratory diagnostic tests', and 'Issue an e-Apostille', and 'Categories' section with links to 'Agriculture and livestock', 'Justice', and 'Education'. The text descriptions are placed over the corresponding visual elements in the screenshot.

## 4.2 CRITERION 2: USAGE WITH LIMITED PERCEPTION OF COLOUR

### Website Selected:

Spanish Confederation of People with Physical and Organic Disabilities

<https://www.cocemfe.es/>

### Description of Best practice implementation:





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Versatile Contrast Options:

The website stands apart by offering multiple options for adjusting visual contrast. Unlike most sites that offer only a single option, COCEMFE provides three distinct modes:

- **Grayscale:** This mode strips the site of all colors, rendering it entirely in shades of gray, thereby ensuring that color contrast is not a barrier to understanding content.
- **High Contrast:** This mode significantly boosts the contrast between the text and background, making the content more readable for those who struggle with regular contrast settings.
- **Negative Contrast:** This mode inverts the colors, thereby providing another layer of customization for users with unique color perception needs.

User-Friendly Design:

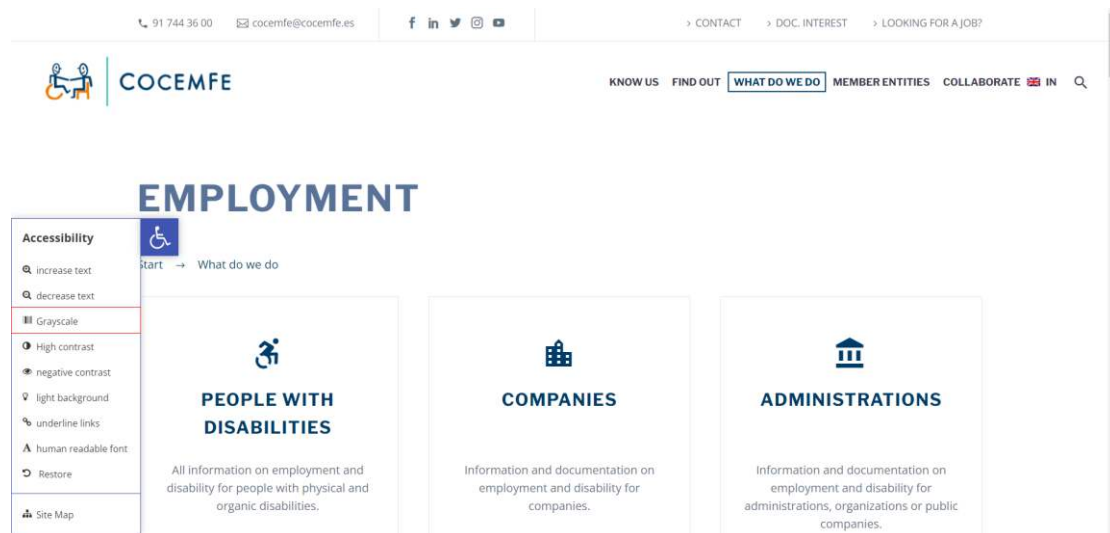
Each of these contrast options can be easily activated or deactivated, providing users with the flexibility to tailor the site to their specific needs. This multi-faceted approach makes it evident that the website is designed to accommodate a wide array of users, facilitating an inclusive browsing experience.

Visibility and Ease of Access:

Similar to the best practice described for the previous criterion, an accessibility button is prominently displayed on each page of the COCEMFE website. This ensures that the accessibility features are not just available but also easily discoverable, which is often a significant hurdle on many other websites.

Screenshots:

Original colours:



Grayscale:





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91 744 36 00

cocemfe@cocemfe.es



CONTACT

DOC. INTEREST

LOOKING FOR A JOB?



COCEMFE

KNOW US FIND OUT WHAT DO WE DO MEMBER ENTITIES COLLABORATE IN

## EMPLOYMENT

**Accessibility**

- increase text
- decrease text
- Grayscale**
- High contrast
- negative contrast
- light background
- underline links
- human readable font
- Restore
- Site Map



start → What do we do



### PEOPLE WITH DISABILITIES

All information on employment and disability for people with physical and organic disabilities.



### COMPANIES

Information and documentation on employment and disability for companies.



### ADMINISTRATIONS

Information and documentation on employment and disability for administrations, organizations or public companies.

High contrast:

91 744 36 00 cocemfe@cocemfe.es

CONTACT DOC. INTEREST LOOKING FOR A JOB?

KNOW US FIND OUT WHAT DO WE DO MEMBER ENTITIES COLLABORATE IN

## EMPLOYMENT

start → What do we do

**PEOPLE WITH DISABILITIES**

All information on employment and disability for people with physical and organic disabilities.

**COMPANIES**

Information and documentation on employment and disability for companies.

**ADMINISTRATIONS**

Information and documentation on employment and disability for administrations, organizations or public companies.

Negative contrast:







### 4.3 CRITERION 3: USAGE WITHOUT/LIMITED HEARING

**Website:**

British Broadcasting Corporation

[www.bbc.com](http://www.bbc.com)

**Best practice description:**

Customized Captions and Subtitles:

BBC distinguishes itself by offering highly accurate and carefully tailored captions and subtitles for its multimedia content. Unlike rudimentary captioning services that merely transcribe spoken words, BBC's captions reflect a keen awareness of the nuances involved in spoken communication.

- **Color-Coded Speakers:** To enhance comprehension and viewer engagement, the subtitles use different colors for different speakers, thereby enabling easier tracking of dialogue.
- **Dynamic Placement:** The subtitles are also dynamic in nature. They reposition themselves on the screen to ensure that important elements like facial expressions, on-screen text, or critical actions are not obstructed, enriching the overall viewing experience.

Sign Language Integration:

What sets BBC apart from other websites is its inclusion of sign language options. This addition expands accessibility beyond standard practices like subtitles and closed captions, catering to the unique needs of the Deaf community.

Universal Design Principles:





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BBC not only excels in the domain of auditory content but also integrates these features seamlessly into its overall design ethos, creating an intuitive user interface. This makes navigating through its substantial volume of multimedia content a streamlined experience, irrespective of one's auditory capabilities.

However, it's important to note that implementing sign language features necessitates considerable resources and expertise; this is not something that can be easily executed by developers on their own.

#### Screenshots:

Subtitles, sign language and audio description accessibility statement:

**Subtitles, sign language and audio description**

The vast majority of our on-demand content is subtitled and can be accessed from within the media player once playback has started by selecting the speech bubble icon. You can toggle on/off subtitles, Audio Description and Signed (if available). You can choose the size of subtitles if using the BBC iPlayer website or TV app. You can read more about this here: **How do I turn subtitles on or off?**

We're trialling subtitles on our live TV channel streams on the BBC iPlayer website (except on Internet Explorer) and our TV app. They're available on all channels apart from BBC Parliament, BBC Alba and S4C. We hope to roll out this functionality to the BBC iPlayer mobile/tablet apps in the future.

Sign language and audio described programmes can be found in the **Signed** and **Audio Described** categories accessed via the BBC iPlayer Categories menu. You can also search for your favourite programme and select the Sign Language or Audio Described toggle underneath the playback area. The speech bubble on the TV and mobile/tablet app will also show AD and Signed options.

Learn more about what devices support subtitles, sign language and audio described programmes in the following page: **What devices support accessibility features?**

Subtitles guidance and explanation:





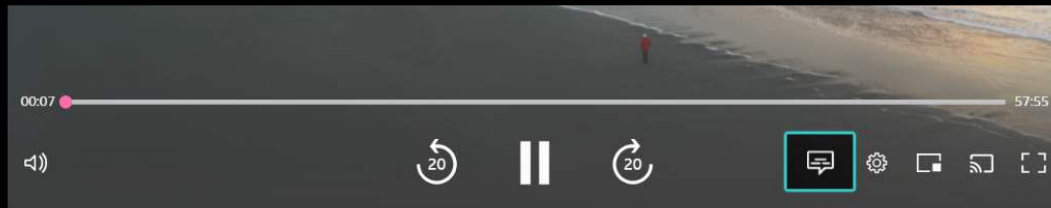
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### Subtitles, audio description and sign language

We aim to provide subtitles, audio description and programmes in British Sign Language for as much content as possible across as many devices as possible. This will vary according to the product (i.e. News, iPlayer, Sport etc.) and is also dependent on device support. Currently, subtitles are offered for on-demand programmes across BBC iPlayer and for live programmes on the BBC iPlayer website and TV app.

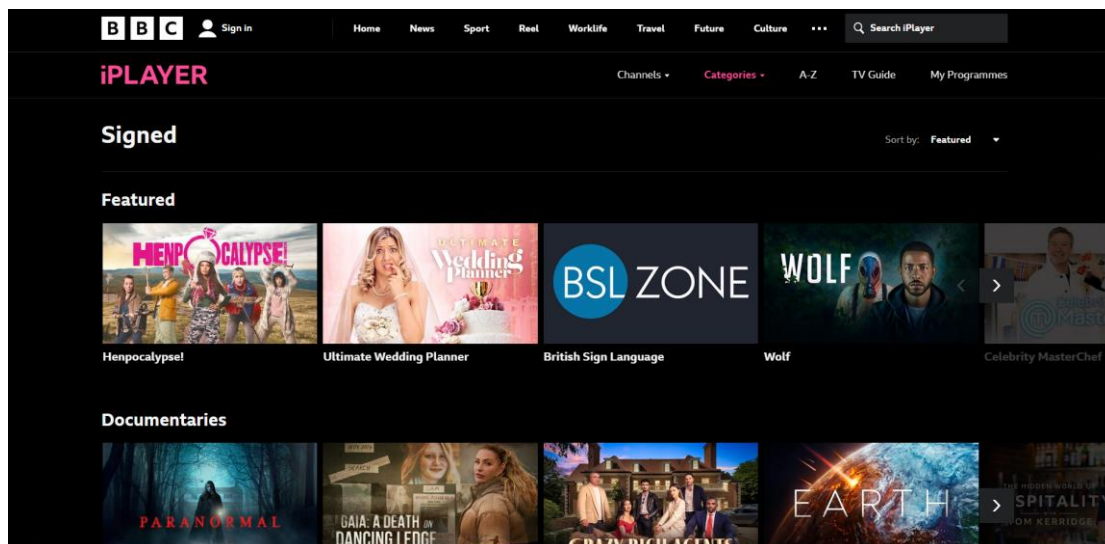
When subtitles are available, look for the **Speech bubble icon** in our apps and on the BBC iPlayer website. It's located within the player control bar. Just select the icon to switch them on and off. You can choose the size of subtitles if using the BBC iPlayer website and TV app.



When subtitles are switched on you can expect to see them at all times including when more information is presented at the bottom of the screen such as 'More episodes like this' or 'More news items like this'. Also, when available, you can expect to see different colours used for different speakers making it easier to follow the conversation. Subtitles may move around to allow important parts of the video to remain visible, such as faces, text, or action that is important to see when watching the programme.

Audio description and BSL content can be accessed from links in the page outside the player when they are available. BBC iPlayer has dedicated categories where you can find **Audio Described** and **Signed** content, and on the mobile/tablet app they can be accessed, where available, using the speech bubble icon on the playback page. **BBC iPlayer accessibility help** provides more information around subtitles, audio description and signed content.

Content available in sign language:



#### 4.4 CRITERION 4: USAGE WITHOUT VOCAL CAPABILITY





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#### Website:

European University of Cyprus

<https://euc.ac.cy/en/>

#### Best practice implementation description:

As previously stated, this criterion established by the EAA is generally more applicable to products and services other than websites. Our research has infrequently come across websites that exclusively rely on voice-dependent communication options, like telephone calls. It's noteworthy that most websites generally provide some form of non-vocal communication such as email, hence minimizing barriers in this aspect.

The selected website was identified as a best practice because it goes several steps beyond by incorporating a diverse range of non-vocal, interactive features to accommodate users who may face challenges in using vocal communication. Specifically, it offers a variety of communication options that do not require vocal input, namely:

- **Email:** A standard yet vital offering that enables users to initiate detailed, asynchronous conversations.
- **Contact Form:** Enables visitors to submit inquiries or feedback without the necessity of email access, thus streamlining the interaction process.
- **Messaging Applications:** The inclusion of various written communication options such as WhatsApp, Viber, and Telegram amplifies the accessibility by tapping into platforms that users may already be familiar with.
- **Live Chat:** Integrated directly into the website, this feature allows for real-time, text-based dialogue between the user and the organisation's representatives.

Collectively, these options not only provide alternative means for users who cannot utilize vocal communication but also create a robust ecosystem for all visitors to interact with the website in a manner that is most convenient to them, thereby exemplifying a best practice in this criterion.

#### Screenshots:

Alternative forms of user interaction:





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European University Cyprus

6, Diogenous Str, 2404 Engomi, Nicosia  
P.O. Box: 22006, 1516 Nicosia-Cyprus  
Tel: +357 22 713000  
Fax: +357 22 662051  
Email: [info@euc.ac.cy](mailto:info@euc.ac.cy)

+357 99912157  
+357 99912157  
+357 99912157

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First name \*      Last name \*

Email \*      +30 • 691 234 5678

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Live chat:

Welcome to EUC

Welcome to our LiveChat! Please fill in the form below before starting the chat.

Name: \*

E-mail: \*

Phone:

I understand that my personal data disclosed herein to the organisation EUROPEAN UNIVERSITY CYPRUS will be processed in strict confidentiality by EUC in the manner described in the Privacy Notice (<https://www.euc.ac.cy/en/legal/privacy-notice-gdpr>) and in accordance with the provisions of Regulation (EU) 2016/679 on the Protection of Personal Data

Powered by LiveChat

#### 4.5 CRITERION 5: USAGE WITH LIMITED MANIPULATION/STRENGTH

Website selected:

Red Cross Spain

<https://www2.cruzroja.es/>

Description of best practice implementation:

Comprehensive Navigation Options:







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- **Keyboard-Friendly Navigation:** The website offers a robust keyboard-based navigation system. This means users can effortlessly tab through links, forms, and buttons without relying on a mouse. This is a crucial feature for those who may find it challenging to use a standard pointing device due to physical limitations.
- **Vocal Commands:** Red Cross Spain goes a step further by incorporating vocal commands into its web interface, allowing users to navigate the website solely through voice instructions. This adds an additional layer of convenience for those unable to use traditional input methods and showcases the organization's commitment to maximizing accessibility.

Innovative Push Button Navigation:

What truly sets Red Cross Spain apart from its peers is its inclusion of push-button navigation as an additional accessibility feature.

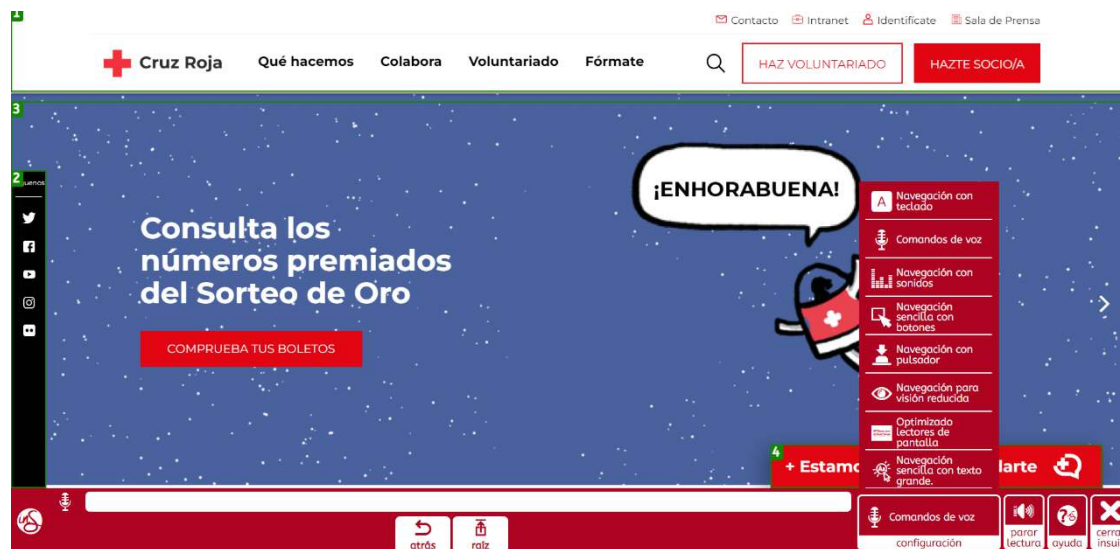
- **Push-Button Navigation:** This unique element enables users to navigate the website through simple hardware-based button pushes, thereby offering a convenient alternative to traditional input devices. This navigation style is particularly beneficial for individuals who may struggle with fine motor control but can exert broader movements.

Going Beyond the Standard:

By incorporating not just one but three separate methods of navigation—keyboard-friendly navigation, vocal commands, and push-button navigation the website not only fulfills but surpasses the criteria outlined for best practices.

### Screenshots:

Navigation with vocal commands:



Keyboard-friendly navigation:







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[Contacto](#)
[Intranet](#)
[Identifícate](#)
[Sala de Prensa](#)

[Cruz Roja](#)
[Qué hacemos](#)
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# LA FUERZA V

Descubre una energía inmensa que nace de las personas y está por todas partes. Descubre la Fuerza del Voluntariado.

Push button navigation:

[Contacto](#)
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[Sala de Prensa](#)

[Cruz Roja](#)
[Qué hacemos](#)
[Colabora](#)
[Voluntariado](#)
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Qué hacemos » Inclusión social

## Inclusión social

Actuamos con las personas que están en riesgo de pobreza y exclusión para que tengan las oportunidades y recursos necesarios para participar en la vida económica, social y cultural disfrutando un nivel de vida y bienestar que se considere normal en la sociedad en la que ellos viven

+ Estamos aquí para ayudarte

#### 4.6 CRITERION 6: USAGE WITH LIMITED REACH

Website:

Handsfree web

<https://www.handsfreeforweb.com/en/>

Description of best practice implementation:





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While keyboard-friendly navigation has more common, when it comes to implementing integrated voice commands, websites such as that examined in the previous criterion are the exception and not the rule, when it comes to having integrated voice commands. For that reason, in this criterion we opted to present a browser extension that universally extends voice command capabilities across all websites. However, it's important to note that this solution is limited by its compatibility exclusively with the Google Chrome browser.

The extension offers a plethora of functionalities, enabling users to conduct a wide range of actions using vocal commands. These include:

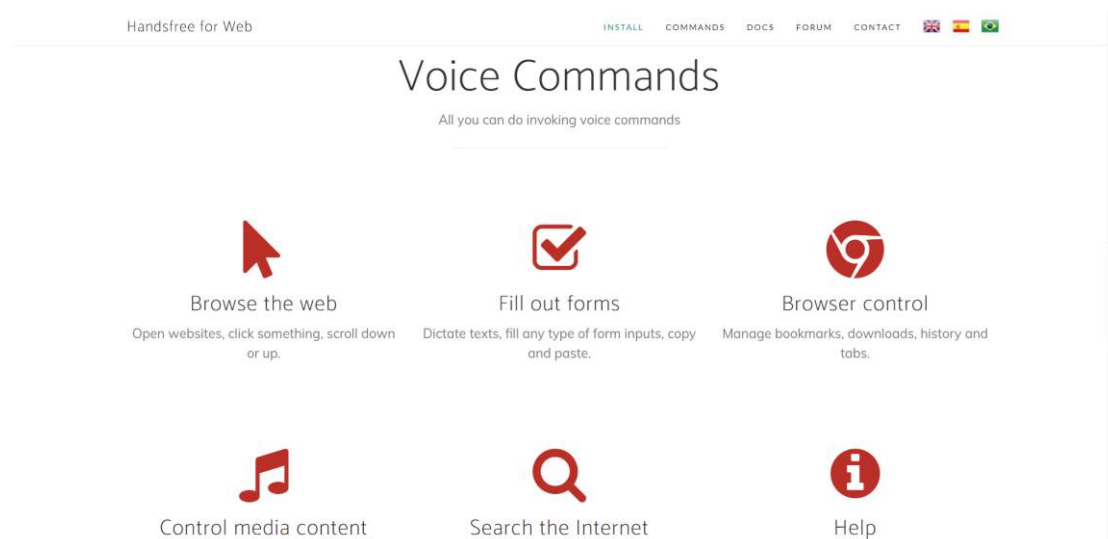
- Navigating the web
- Filling out forms
- Browser management, such as controlling bookmarks, downloads, browsing history, and tabs
- Controlling media content like play, pause, and volume adjustments
- Searching the internet
- Accessing contextual help and an enumerated list of permitted voice commands

Although browser extensions can be somewhat less intuitive than built-in website features, Handsfree for Web ameliorates this challenge by providing a comprehensive, easy-to-follow guide delineating the available commands and usage procedures. This is particularly useful for users who may not be familiar with navigating extensions for accessibility features.

For those with more technical acumen, the website takes it a step further by offering a detailed guide that empowers users to create and customize their own set of voice commands. This can be done either through creating a new voice command module for personal use or, for website owners, embedding these custom commands into their own website code. In doing so, Handsfree for Web allows for a more individualized and tailored user experience, acknowledging the varying needs and preferences among those who require voice-operated functionalities.

### Screenshots:

Voice commands options:





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Voice commands guide:

Voice commands guide

Voice commands supported by default

- User assistance
- Open a website
- Search the Internet
- Click something
- Select something
- Scroll a page
- Zoom
- Browser control
- Enter text
- Play media content
- Tab management
- Downloads management
- History management
- Bookmarks management
- Top site list
- Navigation

The following is a summary list of the main voice commands grouped by their purpose.

User assistance

The following commands could be invoked in order to know the available actions.

Command	Description
help	Displays a the list of available commands
help bar	Displays a the list of available commands in a right side bar
exit	Leaves the current session

Open a website

In order to be able to load a website, the command "open" could be spoken followed of the desired site name.

Command	Description
open	Requests the website name to load

## 4.7 CRITERION 7: USAGE WITH LIMITED COGNITION

### Website:

ΑμΕΑ Care

<https://www.amea-care.gr/>

### Description of best practice implementation:

Font Options:

- **OpenDyslexic Font:** One of the standout features of ΑμΕΑ Care is the inclusion of OpenDyslexic, a font specifically designed to increase readability for users with dyslexia. This font alleviates some of the common challenges faced by this demographic, such as letter swapping, mirroring, or flipping, thus facilitating a more effortless reading experience.
- **Additional Accessible Font:** Besides OpenDyslexic, the website also provides an additional dyslexia-friendly font (Comic Sans). The presence of multiple font options provides users the flexibility to choose the typeface that they find most comfortable, thereby further customizing their browsing experience.

Complementing its font options, ΑμΕΑ Care also features a prominently displayed accessibility button. Positioned to be immediately visible, this feature enables quick and effortless activation of the





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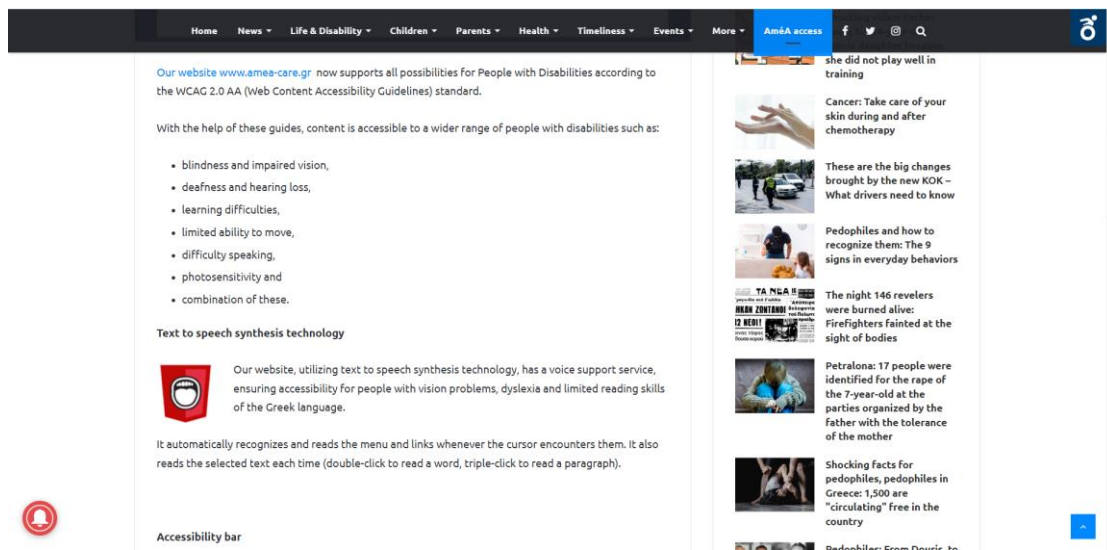


website's various accessibility options, including the aforementioned font changes. This is especially beneficial for users who may have trouble navigating a complex user interface.

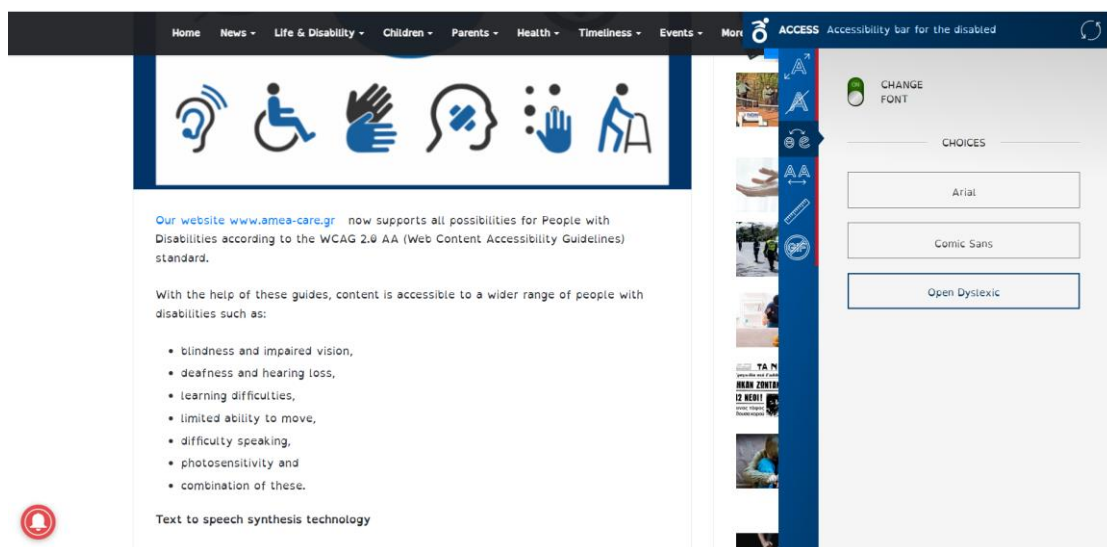
In addition, the link that leads to the page describing the accessibility features of the website is located in three distinct places: at the top and bottom of the page, as well as within a dedicated tab. This strategic placement further facilitates the ease with which users can locate and utilize these essential resources. By diversifying the points of access to information about its accessibility features, the website reinforces the likelihood that users will take advantage of them.

### Screenshots:

Detailed description of accessibility options and features (using the relevant tab):



### Font Options:





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#### 4.8 CRITERION 8: USAGE MINIMIZING THE RISK OF PHOTOSENSITIVE TRIGGERS

**Website:**

Barilla

[www.barilla.com](http://www.barilla.com)

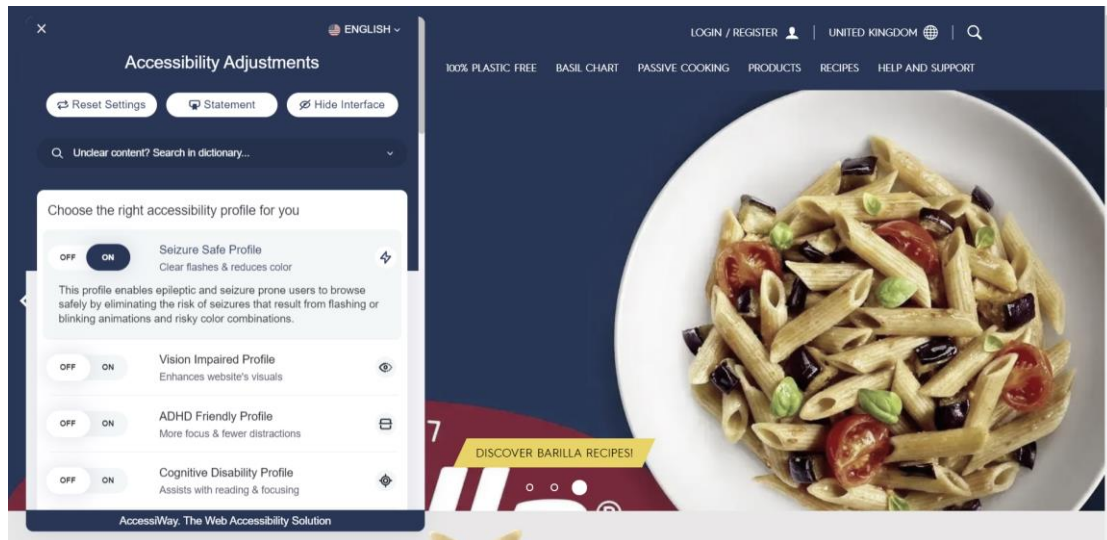
**Description of best practice implementation:**

A distinct 'Seizure Safe Profile' is provided within the range of accessibility profiles available on the website. This particular profile is meticulously designed to safeguard users prone to epilepsy and seizures. It accomplishes this by eliminating flashing or blinking animations and hazardous color combinations that could potentially trigger a seizure.

Beyond the protective features automatically activated by the 'Seizure Safe Profile,' users have the flexibility to further customize their experience. They are not restricted to the default settings of the profile and have the option to enable additional accessibility features from the wide array available on the site. This multi-layered approach to accessibility ensures a safer, more personalized browsing experience without compromising user choice.

**Screenshots:**

Seizure safe profile:



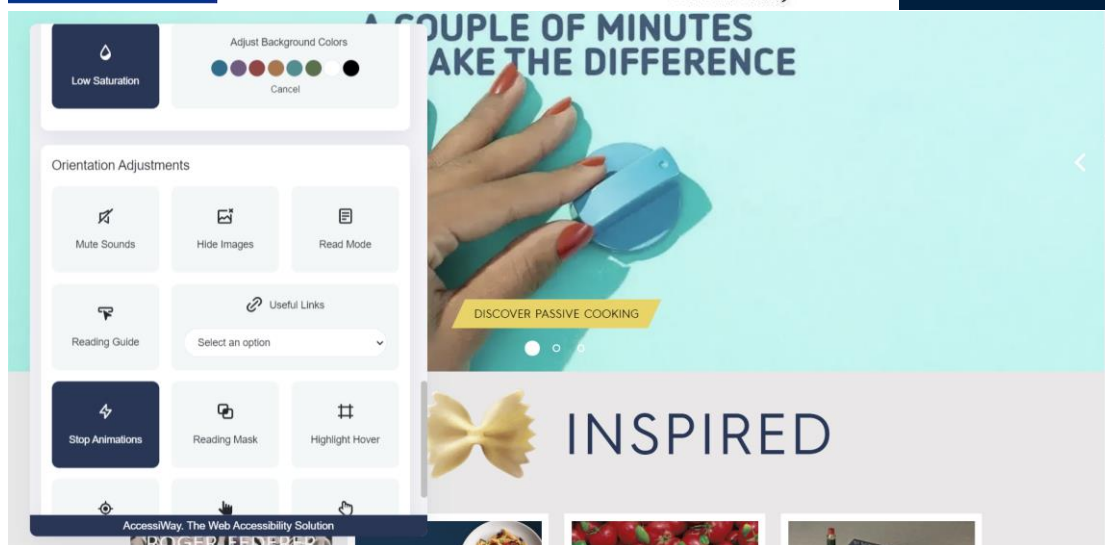
Low saturation & Stop animations:







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#### 4.9 CRITERION 9: USAGE WITH PRIVACY

##### Website:

UserWay

<https://userway.org/privacy/>

##### Best practice identified:

###### User Data Privacy:

- **No Data Collection from End Users:** At the heart of UserWay's best practices is the complete absence of end-user data collection. Unlike some other platforms, UserWay does not track or store information regarding which accessibility features or profiles are activated by users. This offers an unparalleled level of privacy, as users can tailor their browsing experience to their needs without fear of their choices being logged or analyzed.

###### Transparency and Clarity in Privacy Statements:

- **Comprehensive Yet Understandable Privacy Policies:** UserWay goes to great lengths to ensure its privacy statements are both thorough and user-friendly. Written in plain language, these policies are segmented into distinct, easily navigable sections. The clear articulation enhances comprehension, making the information accessible even for users with cognitive impairments.

###### Enhanced by Widget's Accessibility Features:

- **Synergistic Interplay with Accessibility Functions:** Adding another layer to its best practice in privacy is the widget's own range of accessibility features. These can be employed to further







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simplify the reading and understanding of the privacy policies, making it a fully rounded experience in terms of both accessibility and privacy.

Adherence to GDPR:

- **Compliance with Legal Standards:** Complementing its unique features, UserWay maintains strict adherence to existing privacy laws, most notably the General Data Protection Regulation (GDPR). This ensures that users not only have a private but also a legally secure browsing experience.

Screenshots:

Clear description of the privacy policy:

**1. WHAT INFORMATION WE COLLECT**

First of all, its really important to us that you know that UserWay does not collect any personally identifiable information about end-users. This applies to the end users visiting websites that host our services, such as the UserWay AI\_Powered Accessibility Pro Widget. Such information is invisible to UserWay and therefore is not collected, and cannot be shared by UserWay with any third parties, even under duress.

UserWay does collect the minimum information about the website owner it requires to provide the service and may, under certain situations and very selectively, disclose such information to third parties, when absolutely necessary, and as described below.

This Privacy Policy addresses two kinds of information: (1) Personal Information (as such term is defined below); and (2) Anonymous Information (as such term is defined below).

Personal Information. Limited personal information (contact information) is or may be collected by UserWay during the website owner's signup process for our Services such as purchasing the Widget, applying for access to UserWay APIs or when paying (the "Owner's Personal Information"). It may identify a website owner as an individual or a company, and may include first name, last name, email address and telephone number.

Anonymous Information. UserWay collects data in order to monitor and ensure correct operation. This data is designed to *not* include personal information, and is not correlated with other web browsing information that could lead to revealing personal information. This includes metrics on the number of times the widget or its individual features were activated on a website. For website Owners that customize widget color, language, size, position, icon type, etc., on behalf of their end users, UserWay stores those widget UI preferences too (the "Anonymous Information").

**2. HOW DO WE COLLECT INFORMATION**

Clear sections, simple and easy to understand language:





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## 2. HOW DO WE COLLECT INFORMATION

- UserWay may collect Personal Information of website owners that engage UserWay's Service in the process of registering to the Service.
- UserWay collects billing and account information from website owners such as credit cards, payment cards or other payment methods from website owners, and shares this information with the billing and payment processors. UserWay does not store credit card or payment card numbers after they have been forwarded to our billing and payment processors.

## 3. HOW WE USE YOUR INFORMATION

UserWay uses Personal Information and Anonymous Information, internally, to understand its users' needs and improve its Service and support, and in particular:

- Internal record keeping: to establish and update user
- Answering questions: to respond to queries sent to
- Improving or expanding UserWay's accessibility content and offerings, including software and services.
- Promotion: should you choose to accept, we may periodically send promotional emails about UserWay's new products or features, special offers or other
- UserWay analyzes data about widget loads and usage to improve the UserWay accessibility product in order to better tailor it to end users' needs.





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## 5 KEY RECOMMENDATIONS

In light of the comprehensive analysis presented in this deliverable, which delineates the best practices in web accessibility as exemplified by various websites across functional performance criteria, the following key recommendations are proposed. These suggestions aim to bridge the identified gaps in implementation, foster a greater understanding among stakeholders, and ultimately contribute to the creation of a more inclusive digital landscape. By taking into account not just the technical aspects but also the human and financial dimensions of web accessibility, these recommendations serve as a strategic roadmap for stakeholders and policymakers alike.

1. **Expand Awareness and Education on WAD and EAA Principles:** Given the pivotal role of the Web Accessibility Directive (WAD) and the European Accessibility Act (EAA) in guiding best practices, it's imperative to amplify their reach and understanding. This can be achieved through targeted training programs for stakeholders, as well as by organizing events specifically geared towards associations of people with disabilities to disseminate key information and foster dialogue.
2. **Integrate Web Accessibility into Vocational Education and Training (VET) Curricula:** There's a noticeable gap in expertise when it comes to web accessibility. One avenue to bridge this gap is through the integration of web accessibility modules into VET courses. This would not only educate future professionals but also ensure a more inclusive digital landscape.
3. **Consider the Use of Comprehensive Widgets:** Widgets that encapsulate a range of accessibility features can be incredibly useful in simplifying the task of making a website accessible. Organizations should consider incorporating or learning to work with these all-encompassing widgets as part of their web accessibility strategy.
4. **Collaboration Beyond Technical Measures:** Accessibility isn't solely a technical issue; it also requires close collaboration with specialists such as sign language interpreters. Leveraging these experts' knowledge can maximize the impact of accessibility measures, reaching a wider and more diverse audience.
5. **Evaluate the Feasibility of Subsidies for High-cost Implementations:** True best practices in web accessibility can be resource-intensive. Financial incentives, possibly in the form of subsidies or tax breaks, should be considered to encourage organizations to go above and beyond minimum requirements.
6. **Regular Monitoring and Feedback Loops:** Establish mechanisms for periodic reviews of web accessibility features to ensure their effectiveness over time. This can include user surveys or third-party audits.
7. **Legal Framework Updates:** Keeping abreast of legal developments related to web accessibility is crucial. Stakeholders should advocate for policy changes where gaps or ambiguities exist in the current regulations.
8. **Encourage Public-Private Partnerships:** Given that resources can be a significant hurdle, forging partnerships between public and private sectors could pool resources and expertise, thereby accelerating the implementation of best practices.





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9. **Accessibility by Design:** Rather than treating accessibility as an add-on, organizations should aim to incorporate it into the design phase of any new digital project. This not only streamlines the implementation process but also saves costs in the long run.





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## 6 ANNEX

### 6.1 FOCUS GROUP REPORT JOIST

**Objective:** To explore and understand the participants' experiences, challenges, and insights regarding EU web accessibility, with a focus on the Web Accessibility Directive (WAD) and European Accessibility Act (EAA). The findings will inform the best practices mapping and development of the WEAVE best practices report.

**Date and Duration:** 12/07/2023, 1:00-4:00 PM, Joist Innovation Park

Participant ID	Age	Gender	Organization (if applicable)
P1	29	F	Association of People with Vision Problems, Larissa
P2	29	F	Association of People with Vision Problems, Larissa
P3	19	F	Greek Sign Language Centre, Thessaloniki
P4	21	F	Municipality of Larissa
P5	29	M	Greek Sign Language Centre, Thessaloniki
P6	23	M	Municipality of Larissa

#### Agenda:

##### 1:00-1:30 Welcome and Introduction (30 minutes)

- Greet participants and provide a brief overview of the Weave project.
- Introduce the purpose and goals of the focus group discussion.
- Allow participants to introduce themselves and briefly share their backgrounds and expectations.
- Overview of the ground rules
- Reminder of accessibility options and practices

##### 1:30-2:00 Theoretical Background (30 minutes)

- Present the theoretical framework.
- Brief overview of the WAD and EAA principles, and the associated EU legislation
- Introduction of the EAA functional performance criteria
- Questions

##### 2:00-3:45 Open Discussion (approximately 2 hours)

#### Facilitation Questions:





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#### Engagement Questions

- "Tell me about your experiences interacting with websites, especially those with accessibility features."
- "What are some of the challenges you face with websites that lack accessibility features?"
- "How familiar are you with the WAD and/or the EAA?"

#### Exploration Questions

- "How do the 4 accessibility principles (perceivability, operability, understandability, robustness) affect your online experiences?"
- "Discuss your experiences related to the EAA functional performance criteria."
- "What, in your view, are the primary gaps in current web accessibility implementations?"

#### Best Practice and Suggestion Questions

- "Can you recall any positive experiences where websites have exceeded your expectations in terms of accessibility?"
- "What constitutes a 'best practice' for you in web accessibility?"
- "What suggestions would you give to improve the accessibility of websites in line with the WAD and EAA principles?"

#### Exit Questions

- "Of all the things we've discussed, what is most important to you?"
- "Is there anything else you would like to add or emphasize that we haven't covered?"

#### 3:45-4:00 Closing Remarks (15 minutes)

- Summary of key points raised during the discussion.
- Information about next steps and the WEAVE best practices report
- Appreciation and thank you to participants for their time and input.

#### Discussion

As soon as the participants arrived, they were welcomed, and the purpose of the focus group was explained. There was a presentation of the WEAVE project, an introduction to the partners and the objectives of the project. Then we set out the rules of the focus group and how we would proceed. The participants had time to introduce themselves and say a little about their organizations. They were also asked about their expectations of the focus group. The participants wanted to learn more about European web accessibility for people with disabilities and how other organizations work. They wanted to learn new information and exchange new ideas and good practices.

During the "Theoretical background" section of the focus group discussion, we presented the fundamental ideas and principles that formed the basis of our topic. We gave a brief explanation of the principles of Web Accessibility Directive (WAD) and the European Accessibility Act (EAA), together with the relevant EU legislation. This helped participants to understand the legal framework and guidelines that influenced accessibility considerations. We also presented the EAA's functional performance







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criteria, which served as benchmarks for assessing the accessibility of products and services. Participants had the opportunity to ask questions and to request extra clarifications.

After the Theoretical section, an open debate followed, facilitated by the above questions.

Engagement questions:

During the focus group discussion, participants, including those working in organizations supporting individuals with disabilities, expressed a lack of awareness about important European Union laws like the Web Accessibility Directive (WAD) and the European Accessibility Act (EAA) that address web accessibility for people with disabilities. They know the general framework but are not familiar with all the regulations and developments. As regards their personal experiences with web accessibility, they shared both positive and negative experiences. One participant shared his personal experience, mentioning the challenges faced when using websites that include shortcuts without proper explanations, especially when relying on screen readers. The participants highlighted the importance of designing websites in a way that screen readers can understand the content, as many sites either don't work at all or become inaccessible with the use of screen readers. The participants also noted the difficulties faced by individuals with visual impairments due to inadequate contrast perception. They suggested that web designers should consider this factor while selecting color schemes and avoid using small color gradients. Overall, it was evident that participants valued websites with accessibility features but recognized the need for greater awareness and improvements in web accessibility. Another point that was emphasized is that many video platforms, such as YouTube, are capable of automatically generating captions. However, these automatically generated captions are not always reliable, as speech recognition technology may incorrectly detect words. This makes it difficult for individuals with hearing impairments to have easy access. In the end, the participants agreed that there has certainly been significant progress regarding the web accessibility of people with disabilities. However, they acknowledged that more work and advancements are needed to ensure equal access for all users, just like any other user.

Exploration questions:

The participants agreed that the four accessibility principles (perceivability, operability, understandability, and robustness) have a significant impact on online experiences. They recognized the importance of perceivability, which ensures that content is visible or detectable, particularly for individuals with visual impairments. Participants also emphasized the value of operability, which allows them to navigate and interact with websites using different input methods to meet their specific needs. They appreciated the understandability principle, as it ensures that information and interface elements are clear and easily comprehensible, facilitating effective navigation and usage of websites. Additionally, participants highlighted the significance of robustness, which guarantees that websites are compatible with various technologies and assistive devices, enabling a seamless user experience for individuals with disabilities. These insights from the participants emphasize the essential role of accessibility principles in shaping positive online experiences.

P6, who has visual difficulties and is familiar with the European Accessibility Act (EAA), shared his experiences regarding the EAA functional performance criteria. He mentioned that these criteria have significantly improved web accessibility. For instance, he was pleased to come across websites that provided alternative text descriptions for images, which helped him understand the visual content despite his visual impairment. Additionally, P6 appreciated websites that had clear headings and well-





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labeled form elements, as they made it easier for him to navigate and interact with online forms. Their experiences highlighted how the EAA functional performance criteria positively impact web accessibility for individuals with different disabilities.

All the participants in the focus group discussion agreed that there is a significant gap in current web accessibility implementations. They emphasized the lack of awareness and understanding among website developers and designers as a primary issue. Many websites still do not prioritize accessibility, creating barriers for individuals with disabilities. The participants also highlighted the inconsistent enforcement and monitoring of accessibility regulations, leading to varying standards across different websites. To address these gaps, they emphasized the need for increased education and training for developers to integrate web accessibility from the start of the development process. The participants suggested that more emphasis should be placed on user testing and feedback to identify and address accessibility issues effectively. They also mentioned that some e-commerce websites still do not use tools to make them accessible to people with disabilities, despite the availability of such tools. Overall, the participants stressed the importance of creating more user-friendly and accessible web experiences that respond to the diverse needs of individuals with disabilities.

#### Best Practice and Suggestion Questions:

From the participants' perspective, a best practice in web accessibility involves the implementation of inclusive principles right from the start of website design and development. They agreed that websites should prioritize clear and concise content, ensuring that information is easily understandable. Proper color contrast to enhance readability, along with options for resizing text, were also considered important aspects of web accessibility. The participants emphasized the significance of websites being compatible with assistive technologies, such as screen readers, and having keyboard-friendly navigation to accommodate diverse user needs.

One best practice that P1 shared during the focus group discussion was the website of the Greek governance (<https://www.gov.gr/>). She found it to be easy to use and inclusive for individuals with disabilities. The website responds to different needs, such as dyslexia and achromatopsia etc. P1 particularly appreciated that the website provided alternative text descriptions for images. This feature allowed her to fully understand and engage with the visual content. Moreover, P1 found the website's navigation to be clear and consistent, with well-structured headings that made it effortless for her to find the information she needed. Overall, the Greek governance website stood out as a positive example of accessibility in terms of its inclusive features and user-friendly design.

Another excellent example that P5 mentioned is the website "AMEA CARE," (<https://www.amea-care.gr/>) which adheres to the WCAG 2.0 AA (Web Content Accessibility Guidelines) standards. The website provides accessibility for a broader range of individuals with disabilities, including Visual impairments and low vision, Hearing impairments and low hearing, Learning disabilities, Limited mobility etc. The website caught P5's interest because it utilizes text-to-speech synthesis technology, offering a voice support service. This ensures accessibility for individuals with visual impairments, dyslexia, and limited reading abilities in the Greek language.

The recommendations as participants for improving web accessibility based on the WAD and EAA principles are as follows:





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- Websites should provide clear and comprehensive accessibility statements that communicate the available accessibility features and accommodations.
- Educational resources should be readily available for website developers and designers to increase awareness and understanding of accessibility guidelines.
- User feedback and accessibility testing should be integrated throughout the website development process to identify and address barriers effectively.
- Collaboration with individuals with disabilities and advocacy groups is crucial for creating user-centered and inclusive web accessibility practices.
- Government support, including financial resources, can incentivize organizations to prioritize web accessibility and provide benefits to encourage compliance.
- For individuals with visual impairments, we recommend the utilization of screen readers, audio descriptions, and screen magnification tools to enhance website accessibility. It is important for web designers to consider this factor during the color design of a website and avoid using small color gradients, as it can pose difficulties for those with visual challenges.
- It is important to consider the needs of individuals with dyslexia when selecting fonts for websites. Sans Serif fonts, such as Verdana, are generally considered more legible for people with dyslexia. Providing options for users to customize the website's formatting and use their preferred settings can greatly enhance accessibility and accommodate individual preferences.

Afterwards, we concluded the focus group by summarizing the discussions we had above and thanking the participants. The participants expressed that they found the topic of discussion very interesting and valued the exchange of perspectives. It was agreed that there are still steps that need to be taken, but there is hope of evolution.

## 6.2 FOCUS GROUP REPORT INERCIA DIGITAL

**Objective:** To explore and understand the participants' experiences, challenges, and insights regarding EU web accessibility, with a focus on the Web Accessibility Directive (WAD) and European Accessibility Act (EAA). The findings will inform the best practices mapping and development of the WEAVE best practices report.

**Date and Duration:** Tuesday 11/07/2023 from 13:00 to 15:00

**Location:** Online. We decided to choose Google Meet due to its accessibility features such as audio quality adjustments, live captions and automated transcripts. These will make it easier for the participants with hearing limitations to follow the conversation.

### Participants:

We had two different types of participant profiles. To begin with, we had different stakeholders either with documented and recognized hearing disability between 35% and 65%, or with a context nearby in which a relative has a hearing disability. On the other hand, we invited experts with experience in the public sector that would provide us with the needs and challenges they encountered in regard to the implementation of the WAD and the EAA. Since it was a small group, we had a quite high ratio of interaction, all the participants participated very frequently during the whole event.





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Participant ID	Age	Gender	Organization (if applicable)
P1	47	F	INERCIA DIGITAL SL
P2	33	M	INERCIA DIGITAL SL
P3	29	M	INERCIA DIGITAL SL
P4	26	F	INERCIA DIGITAL SL
P5	28	F	INERCIA DIGITAL SL
P6	31	M	INERCIA DIGITAL SL

## Agenda

### 0. Gathering of the participants - 12:45

#### I. Welcome and Introduction - 13:00

- Introduction of the facilitator(s) and participants
- Brief explanation of the project and the purpose of the focus group
- Explanation of the structure and duration of the focus group
- Overview of the ground rules
- Consent confirmation
- Reminder of accessibility options and practices

#### II. Context Setting - 13:15

- Brief overview of the WAD and EAA principles, and the associated EU legislation
- Introduction of the EAA functional performance criteria

#### III. Engagement Questions – Indicative List - 13:20

- "Tell me about your experiences interacting with websites, especially those with accessibility features."
- "What are some of the challenges you face with websites that lack accessibility features?"
- "How familiar are you with the WAD and/or the EAA?"

#### IV. Exploration Questions – Indicative List - 13:40

- "How do the 4 accessibility principles (perceivability, operability, understandability, robustness) affect your online experiences?"
- "Discuss your experiences related to the EAA functional performance criteria."
- "What, in your view, are the primary gaps in current web accessibility implementations?"

#### V. Best Practice and Suggestion Questions – Indicative List - 14:10





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- "Can you recall any positive experiences where websites have exceeded your expectations in terms of accessibility?"
- "What constitutes a 'best practice' for you in web accessibility?"
- "What suggestions would you give to improve the accessibility of websites in line with the WAD and EAA principles?"

#### VI. Exit Questions - 14:40

- "Of all the things we've discussed, what is most important to you?"
- "Is there anything else you would like to add or emphasize that we haven't covered?"

#### VII. Closing - 14:50

- Summary of key points raised during the discussion
- Information about next steps and the WEAVE best practices report
- Appreciation and thank you to participants for their time and input

### DISCUSSION

In this part of the report, we will write down the minutes of the event taking into account the agenda provided and all the topics that have been covered. In spite of the event having been delivered in Spanish due to participants' features, we will provide an English report:

#### I. Welcome and Introduction

In this very first part of the focus group, we introduced ourselves and the different Google Meet accessibility features for them to turn them on in case they needed to. Moreover, we told them about the structure we were going to follow during the following 2 hours of the event and thanked everyone for sending us the signed informed consent prior to the focus group.

Last but not least, in this section we also introduced WEAVE as a project to the different attendees.

This part was pretty much like a monologue.

#### II. Context Setting

We missed this step on purpose since we wanted to ask them how familiar are you with the WAD and the EAA before going through the different principles and associated EU legislation. It can be found below.

We decided we would like to know their current knowledge before telling them any information in regard to the same topic so their opinions and comments would not be influenced.

#### III. Engagement Questions – Indicative List

- "Tell me about your experiences interacting with websites, especially those with accessibility features."

P1 (hearing disability) says that she really appreciates when she navigates through a website with accessibility functions because she really struggles when she tries to watch videos or recorded tutorials without captions. Indeed, she says that the vast majority of the times, the videos she needs to watch





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for her continuous training in her field of work either they have no captions or the captions cannot be read due to their senseless transcription (has nothing to do with the real conversation or what the speaker is saying).

“By the way, I have to use headphones because it is easier for me to hear what I am watching on the computer. And it is quite annoying because the prosthesis I have to wear, and the headphones are all the time producing feedback and making unbearable noises. But I don't have the option not to use either the prosthesis or the headphones because I could not hear anything”

P2 (expert): he tells us that we cannot afford having videos without captions within websites. That is real, that is happening but we must change that as soon as possible because that is not inclusive at all. Also, regarding blind people, they have worked more than once in adding accessibility features for them, for example, they have added the function that when you put the mouse over any place of the screen when navigating through the website, suddenly a voice-over speaks saying where you are.

Those were the most important comments all over this part of the section, although the rest of the participants agreed on everything due to their own experience.

- "What are some of the challenges you face with websites that lack accessibility features?"

P3 (expert): Also the visual and graphic design of the website is paramount, there has to be a clear differentiation between the different colors that must be used to create the website, otherwise it may be annoying to navigate through for people with some kind of visual impairment such as color blindness. For example, never use light font colors when using a white or light background.

Other participants agreed that also the size of the font is quite important, although we can always use CTRL+Mousewheel to zoom in or out, the website should be well prepared by itself.

- "How familiar are you with the WAD and/or the EAA?"

Except for the experts, for the rest of the participants with disabilities or involved in a context where they have a relative or a quite close person with any kind of impairment, they never heard of the WAD and the EAA. So we took the opportunity to show them the official website of both and gave them information about which are the different features of each, their principles and the functional performance criteria.

#### IV. Exploration Questions – Indicative List

- "How do the 4 accessibility principles (perceivability, operability, understandability, robustness) affect your online experiences?"
- "Discuss your experiences related to the EAA functional performance criteria."
- "What, in your view, are the primary gaps in current web accessibility implementations?"

First of all, we wanted to give a brief explanation of each principle, saying that perceivability means that the information and user interface components should be displayed to users in ways they can understand. Operability means that the website must be manageable. Understandability means that the information and user operations must be understandable and robustness means that the content must be robust enough to be well interpreted by a wide variety of user agents, including assistive technologies.







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They said that regarding robustness, the theoretical information and what they mean and want by implementing this principle is perfect, but reality is quite different, it is not enough. Sometimes people add simultaneous translators to websites but you realize that half of the information is missing or wrong translated, it also happens that complete sentences are “eaten” or missed. So from the point of view of all the participants, that concrete principle is not being fulfilled. But not only in websites but also in the news on TV, *“it is almost impossible to watch some live news with correct subtitles, they are always wrong. They are not synced, they are sometimes translating the previous news for you when the one presented is already two news ahead. And the same thing happens on websites”* Patricia said.

For that audience that has not any limitation it may be even funny to read those crazy captions or translations, but we must be aware that those captions or translations may be the only resource some people may have to watch or use that resource.

So we concluded that these 4 principles are enough. But the different institutions in charge of it, should put a lot more emphasis on becoming real. They should be applied much more frequently, because the reality is quite different from the theoretical principles and this way, reality is not inclusive at all.

#### V. Best Practice and Suggestion Questions – Indicative List

Some of them are now being trained through the program KIT DIGITAL which is an initiative from the Ministry of economic affairs and digital transformation of Spain for small and medium enterprises thanks to the European Union funds. And they said that in this particular website, it is way less frequent what we commented above about the wrong captions, transcription or translations. Maybe it is because it is not live and they previously added the text, but it works very well, they are happy with it.

The experts told us that apart from what has been previously said about accessibility features for people with hearing impairments, they have also experience with blind people. They are aware of a plugin called Sonoweb, which is a very simple system to listen to the texts written in a blog through an audio player. It can be used either by inserting a text to generate an MP3 or as a plugin for WordPress or as a template for Blogger. It automatically converts the text into audio and offers the option of placing a player to listen to it right there.

Also they mentioned an important thing about the keyboards we usually use, there are two dots in the different keys of the keyboard for blind or partially sighted people to be able to know exactly which keys they are pressing.

From their point of view, in order to become a good practice (apart from all the aforementioned issues that should be corrected in reality), a website should have a very well organized menu (and its different categories), as less confusing as possible. Because for us, if we click on the wrong button, we will last 1 second to come back and click the correct button, but for some people with impairments, it may be a huge problem. They remarked that in case you want to add any video to your website, please, take into account that it should have correct captions and transcription that correspond to the content that is being watched.

We also discussed a little bit about the different streaming platforms such as Netflix, HBO, Disney+, Amazon Prime and even Youtube. They told us that their experience using those platforms was excellent except when using Amazon Prime, which is the less accessible one (with more issues in regard to the hearing impairment accessibility features we mentioned before). The rest work almost perfectly.





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## VI. Exit Questions

- "Of all the things we've discussed, what is most important to you?"
- "Is there anything else you would like to add or emphasize that we haven't covered?"

Everyone agreed that the most important thing is to really apply the 4 principles we talked about at the beginning of this event. They are more than enough to make all the websites accessible, but it really must be applied (not only theory). In conclusion, websites should reach as many people as possible, and to achieve that, all the 4 principles must be applied correctly with the website smoothly running. However, they all recognized how difficult it is to cover all the impairments and types of disability when programming a website (visual, hearing, intellectual, motor disability...), because they are aware that the main purpose of a website is to open that content and reach everyone with it. In spite of this, we cannot omit this in the process of the creation of the website otherwise there will be some people that will always be behind us.

## VII. Closing

To sum up, we concluded that we are happy to hear that the European Union is moving forward with the accessibility of the websites, but we are still unsatisfied with the result because there is still a very high percentage of websites which do not fulfill these requirements. If only the institution in charge of pushing in this field put more emphasis on this so we could have a brighter future.

Lastly, we thanked the participants for their attention and told them about WEAVE next steps (Creation of the Accessible Web Design VET Toolkit). Doing these kinds of events, you feel understood and not alone when you find out that some of the reflections you made yourself connect with others.

## 6.3 SURVEY QUESTIONS & RESPONSES

The survey was active from July 4, 2023 until August 10, 2023. A total of 98 questionnaires were distributed using Google Forms, 13 responses were received, marking a response rate of 13.2%.

### Organisation & Department

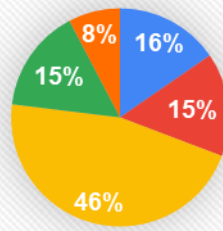




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### Organisation & Department



- Deputy Ministry of Social Welfare/ Department of Social Integration of Persons with Disabilities
- Deputy Ministry of Social Welfare
- Ministry of Education, Sport and Youth
- Deputy Ministry of Research, Innovation and Digital Policy/Department of Electronic Communications
- Ministry of Labour and Social Insurance/Department of Labour

### What is your current role in the organisation?

- ASSISTANT SOCIAL INTEGRATION OFFICER
- Social Integration Officer
- Officer
- Administrative Officer A'
- Officer
- ASSISTANT OFFICER
- Electronic Communications Technician
- Officer A'
- Executive Secretary of the Director of Department
- OFFICER OF LABOUR AFFAIRS
- HEAD OF ICT
- Inspector
- Senior Programming Officer

### How long have you been working in your current organisation

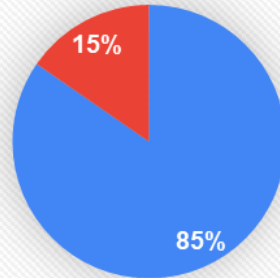




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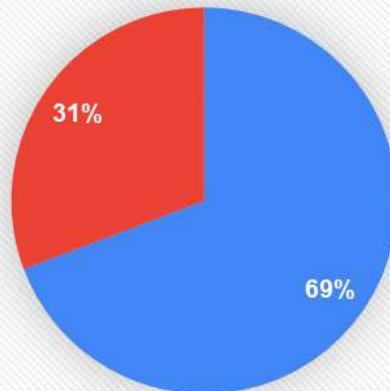
## How long have you been working in your current organisation?



■ More than 5 years ■ 3-5 years

### Gender

## Gender



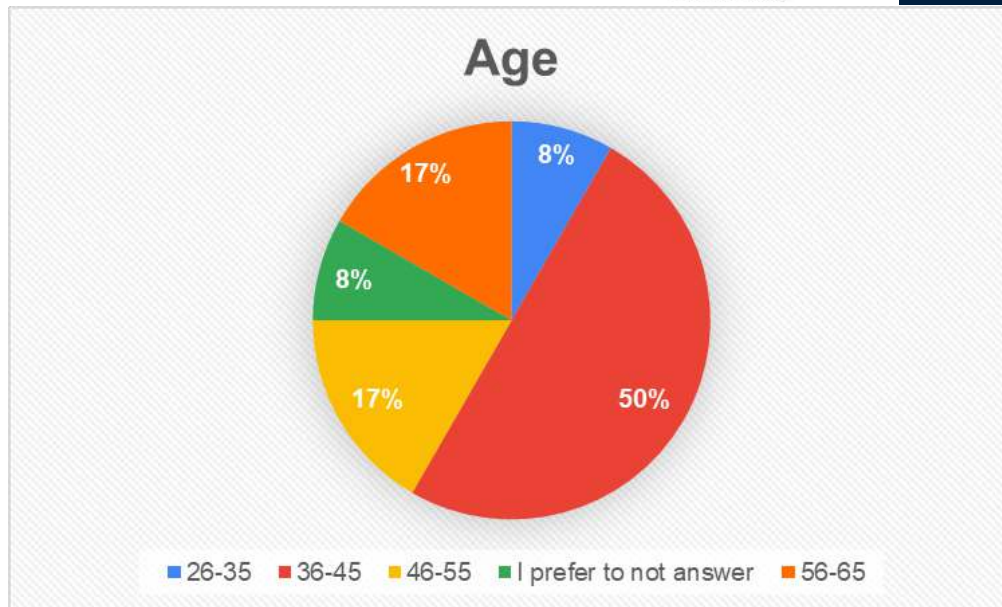
■ Female ■ Male

### Age

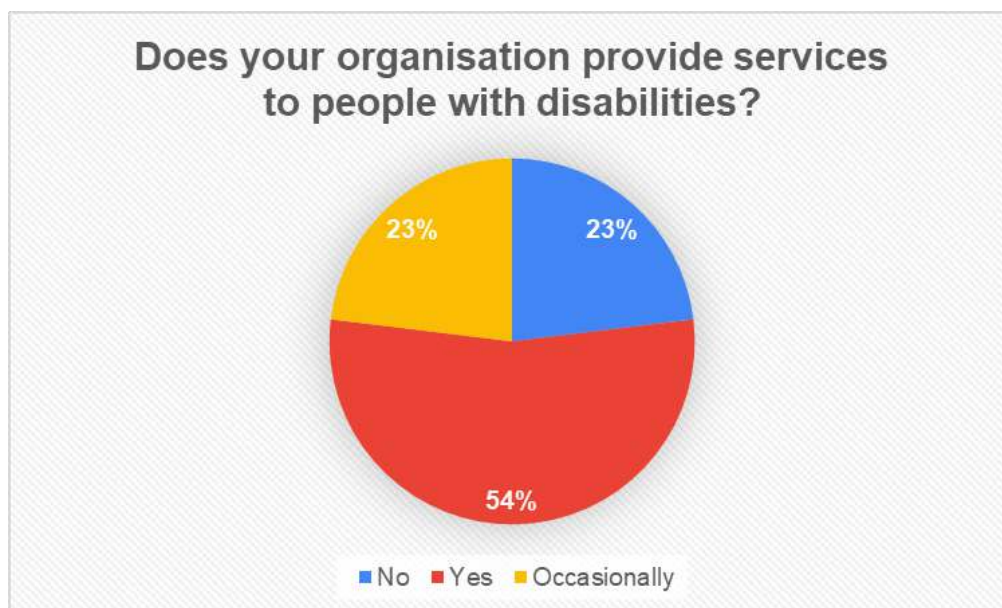




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Does your organization provide services to people with disabilities?



Are you aware of the Web Accessibility Directive (WAD)?



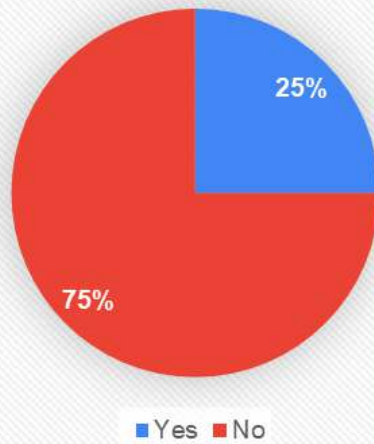




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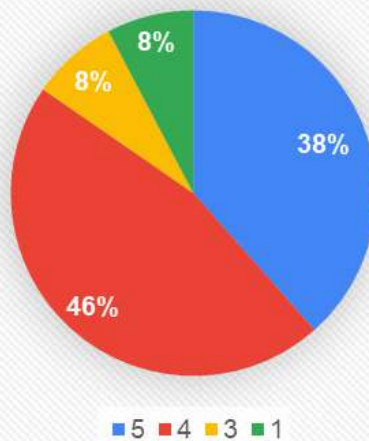


### Are you aware of the Web Accessibility Directive (WAD)?



On a scale of 1-5, with 5 being very experienced, how would you rate your understanding of the principles of web accessibility?

### On a scale of 1-5, with 5 being very experienced, how would you rate your understanding of the principles of web accessibility?



Does your organization receive complaints regarding the accessibility of its website(s)?



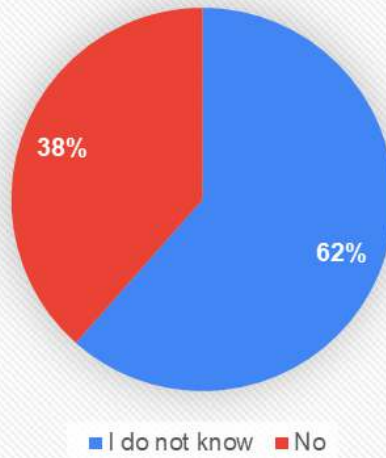




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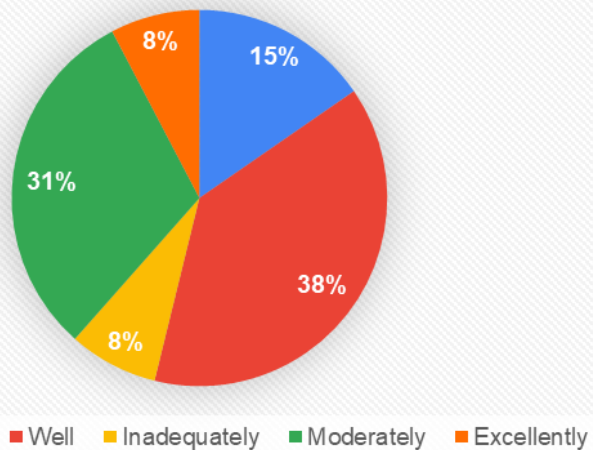


Does your organisation receive complaints regarding the accessibility of its website(s)?



In your opinion, how well does your organization implement web accessibility features on its website?

In your opinion, how well does your organization implement web accessibility features on its website?



What challenges, if any does your organization face in implementing web accessibility?

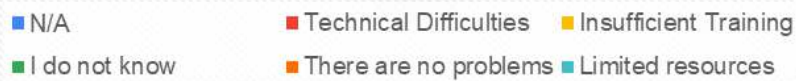
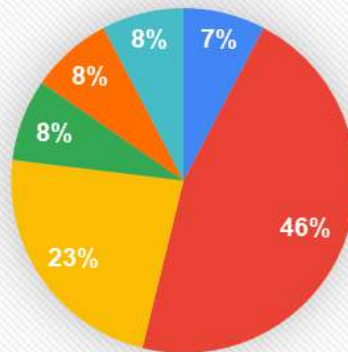




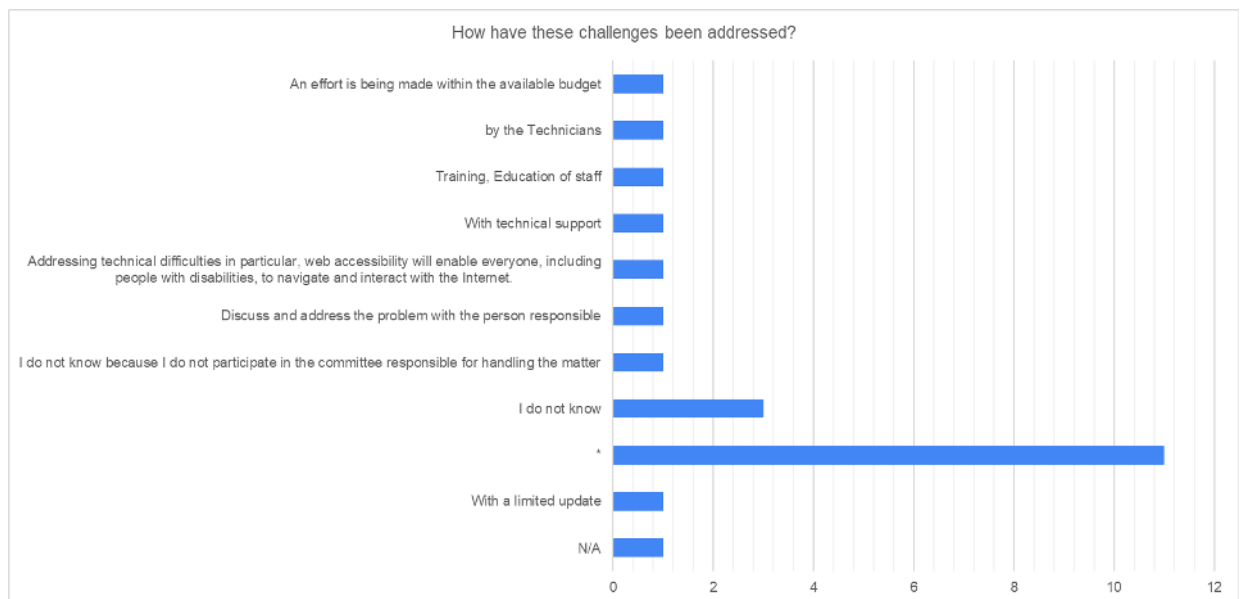
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What challenges, if any, does your organization face in implementing web accessibility?



How have these challenges been addressed?



In your opinion, what constitutes a best practice in web accessibility?

- N/A
- simplification for access of people aged 50 and over
- I do not know
- THE SAFE AND EASY ACCESS OF ANY ORGANISATION OR ORDINARY CITIZEN

What other insights or suggestions do you have for improving web accessibility in the public sector?

- N/A
- Create links to share e.g. Facebook
- \*





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- I do not know
- Informing and raising awareness of the staff of the Public Service.
- I DO NOT KNOW
- the procedures should not be complex e.g. filling out an application
- I do not know
- Using tools conducive to web accessibility to improve accessibility in the public sector.
- TECHNICAL SUPPORT + UPGRADE OF WEB SERVICES
- Upgrading websites to ensure easy access for all individuals
- Greater coverage from providers
- Mobile friendly sites

