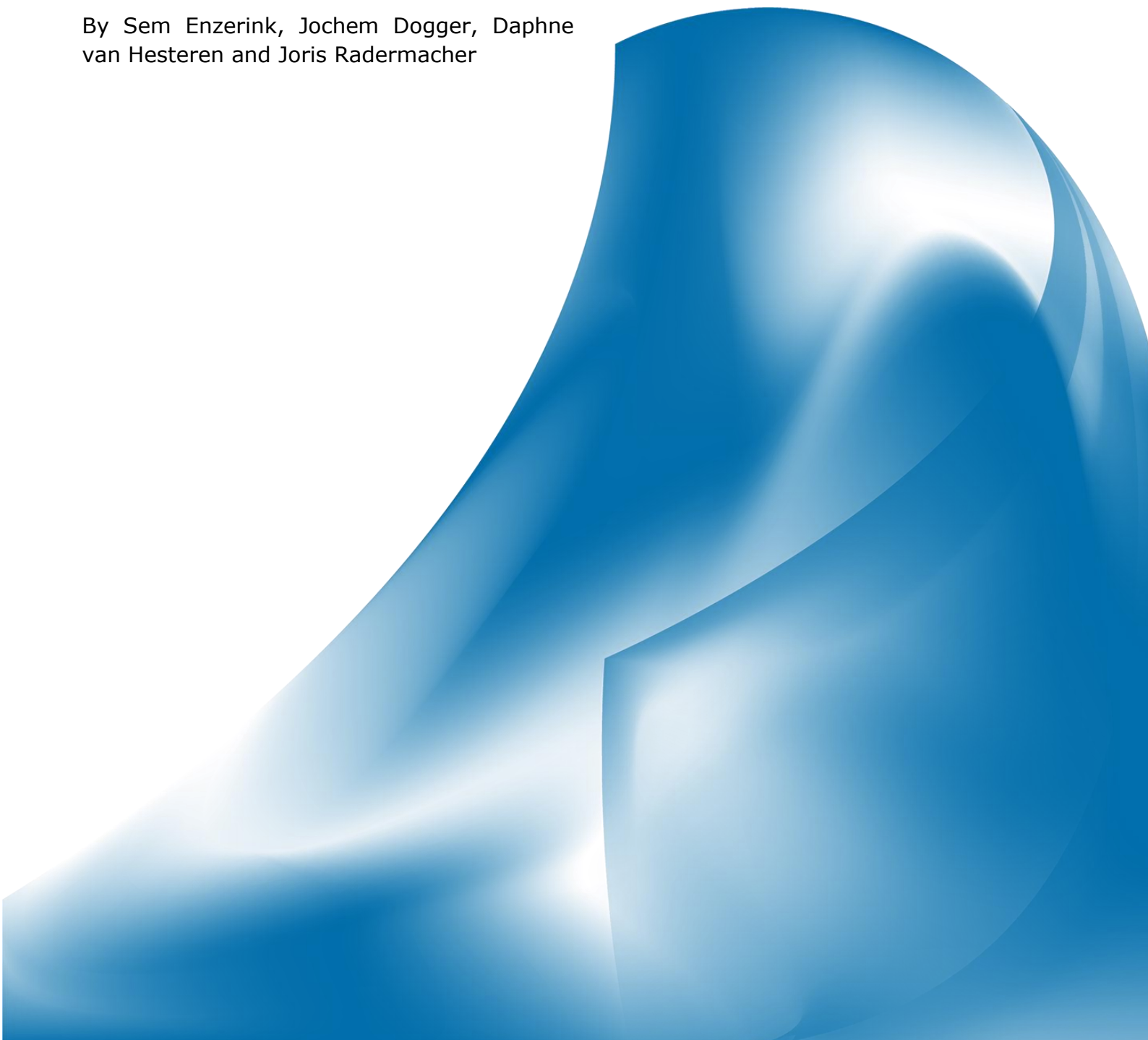


THE WEB ACCESSIBILITY CLOCK IS TICKING

**An analysis on the availability and quality
of accessibility statements in Europe**

By Sem Enzerink, Jochem Dogger, Daphne
van Hesteren and Joris Radermacher






Time to publish an accessibility statement

The accessibility clock is ticking. Nearly **90 million Europeans** have a disability. Some of us may see, hear, move or memorize in a way that deserves attention. Amid the coronavirus crisis, many public sector procedures cannot be applied for in person any longer. Therefore, it's important that the alternative online channels are accessible to all of us.

The **Web Accessibility Directive** is the European Union's response to safeguard accessible websites and mobile apps of public sector bodies like ministries, tax agencies and municipalities. In less than two months, by **23 September 2020**, all public sector websites should have a so-called accessibility statement and comply with accessibility standards to secure color contrast, subtitles, etc. Without these measures, authorities risk formal complaints, administrative sanctions and political blame.

Accessibility statements are key instruments to inform users on the accessibility status of the website. They tell users whether the website is compliant with the European standard or an equivalent like WCAG 2.1 AA and when the declaration was published. By listing non-accessible website parts and when these will be resolved, the statement also serves as an action plan. Statements should also include a feedback and enforcement mechanism.

Figure 1. *Example of accessibility statement from the city of Brussels*

<h3>Accessibility statement</h3> <p>The City of Brussels is committed to making its website www.brussels.be accessible, in accordance with the Regional Ordinance transposing Directive (EU) 2016/2102 of the European Parliament and of the Council. This accessibility statement applies to the website www.brussels.be.</p> <p>Regional Ordinance:</p> <ul style="list-style-type: none">• Ordinance on the accessibility of websites and mobile applications of regional authorities and municipalities (in French)• Ordinance on the accessibility of websites and mobile applications of regional authorities and municipalities (in Dutch) <h3>Compliance status</h3> <p>The website www.brussels.be is partially compliant with the Web Content Accessibility Guidelines 2.1 level AA due to the non-compliances listed below.</p> <h3>Non-accessible content</h3> <p>The content listed below is non-accessible for the following reasons:</p> <p>Non-compliance with the Regional Ordinance</p> <ul style="list-style-type: none">• E-desk• Make an appointment• Some PDF files	<h3>Preparation of this accessibility statement</h3> <p>This statement was prepared on 7 January 2019.</p> <p>The method used in the preparation of this declaration:</p> <ul style="list-style-type: none">▪ an evaluation carried out by Anysurfer <p>The statement was last reviewed on 4 June 2020.</p> <h3>Feedback and contact information</h3> <p>For all questions and remarks about the accessibility of the website of the City of Brussels, please contact:</p> <ul style="list-style-type: none">▪ Web Unit City of Brussels Boulevard Emile Jacqmain 95 1000 Brussels cellule.web@brucity.be <h3>Enforcement procedure</h3> <p>To be decided.</p> <p>  </p>
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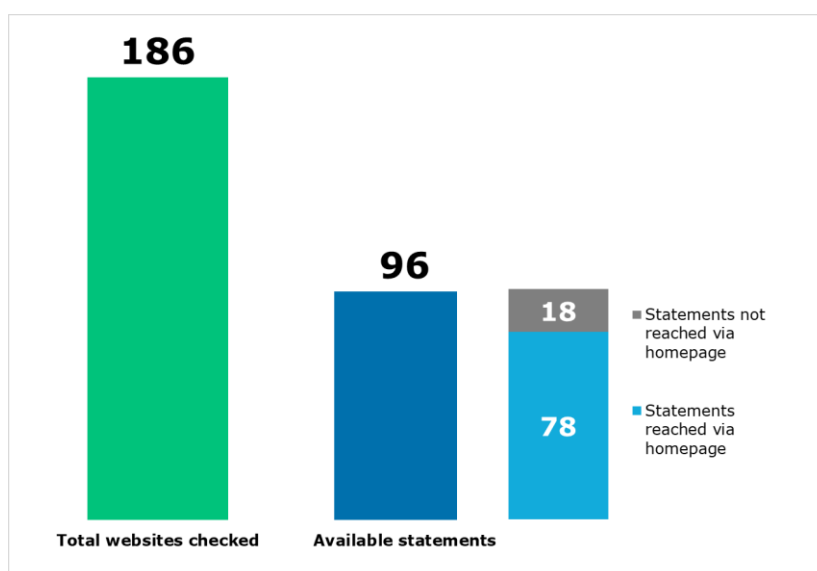
We studied the **availability and quality of accessibility statements** in the 27 EU Member State countries, plus Iceland, Lichtenstein, Norway and the United Kingdom. Our analysis is based on **desk research**, looking into the six largest and most relevant public sector body websites per country, covering different administrative levels. The method precisely mirrors the analysis carried out under the European Commission's [Monitoring, Reporting and Evaluation Study](#), so that the 2020 results can be compared with the 2018 figures.

Availability: half of the websites has an accessibility statement

We inspected 186 websites, 6 websites per country, and checked for the presence of accessibility statements. We found that **only half (51%) of the public sector websites published an accessibility statement**. In 2018, this number sat at 46%. Given the slow progress, it's doubtful whether organizations are able to prioritize the legal obligation to publish a complete accessibility statement in time. On a more positive note, we observe that users can often reach accessibility statements directly via the homepage (83%, versus 81% in 2018). Four out of five statements (78%) were published in 2019 or 2020, one-fifth were published in 2018 or before (22%).



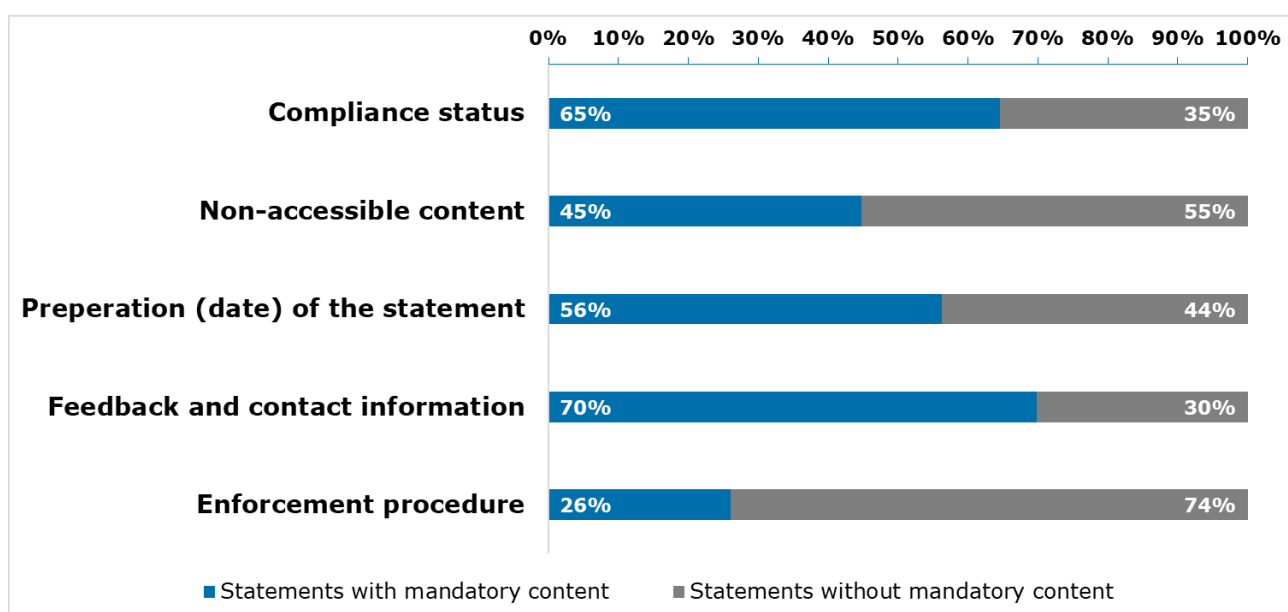
Figure 2. Number of websites and available statements with an indication of statement webpage



Quality: only a handful of statements declare all mandatory content

Is well begun half done? Those organizations that published a statement made a good start, but their accessibility statements were far from complete. The European Commission's [Implementing Act](#) defines five mandatory content requirements. Just one-fifth of the statements (21 out of 94) provided users with all **mandatory content** (compared to 1 out of 86 in 2018 though). From the incomplete statements, feedback and contact information was most often declared, in 7 out of 10 statements. This helps users to share experiences and request help. The official enforcement procedure to file a legal complaint was missing most often, in almost three quarters of the statements (74%).

Figure 3. Percentages of statements with or without mandatory content

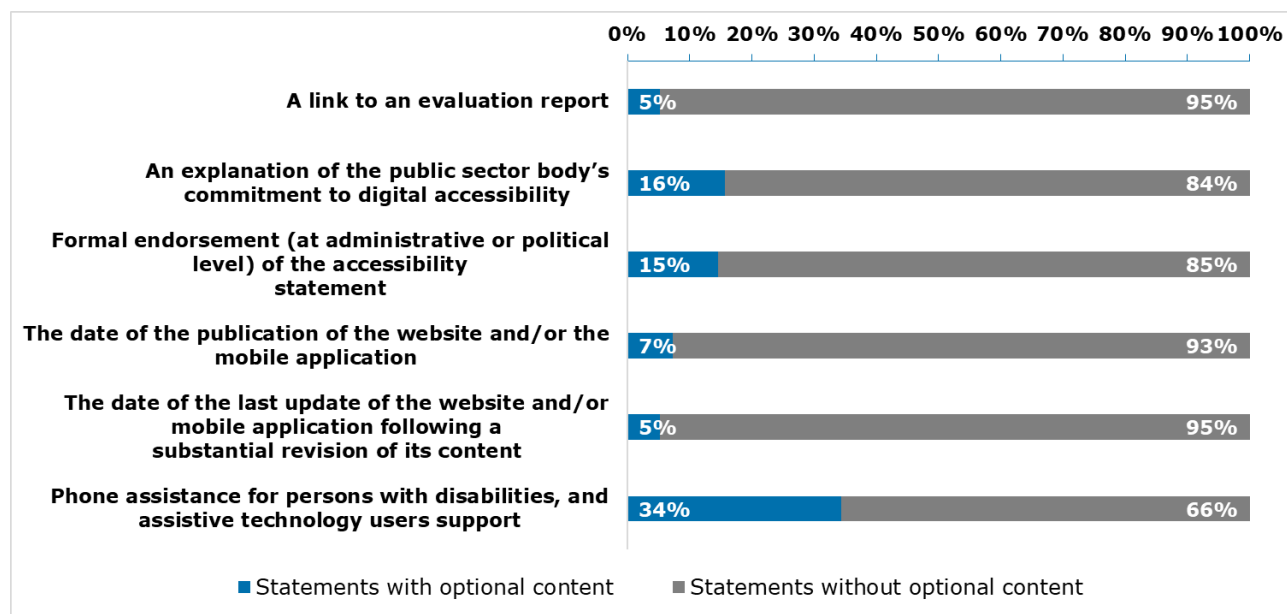


Publishing a complete accessibility statement is an important first step in the right direction. The question remains, can users expect these websites to be accessible? From the statements that mention the compliance status, only less than one-third websites (28 out of 61) indicates that the website is fully accessible. The remaining public entities declare **partial compliance**. Organizations that report their compliance do at least know where they stand and can initiate steps to improve.



Next to the five mandatory statement components, the European Commission has set forth a list of [optional content to declare](#). From these **optional contents**, user guidance is reported on a voluntary basis most often (34%). Information on how to navigate on the website and use accessibility features, like a bigger font size, helps users to find their way more easily. On the contrary, test results are barely covered (5%). To back-up the compliance status of the website, evaluation reports are crucial though. More transparency would enable users to know how thorough and serious the public organization is working on its digital accessibility.

Figure 4. Percentages of statements with or without optional content



Standardization patterns: countries and sectors are far apart

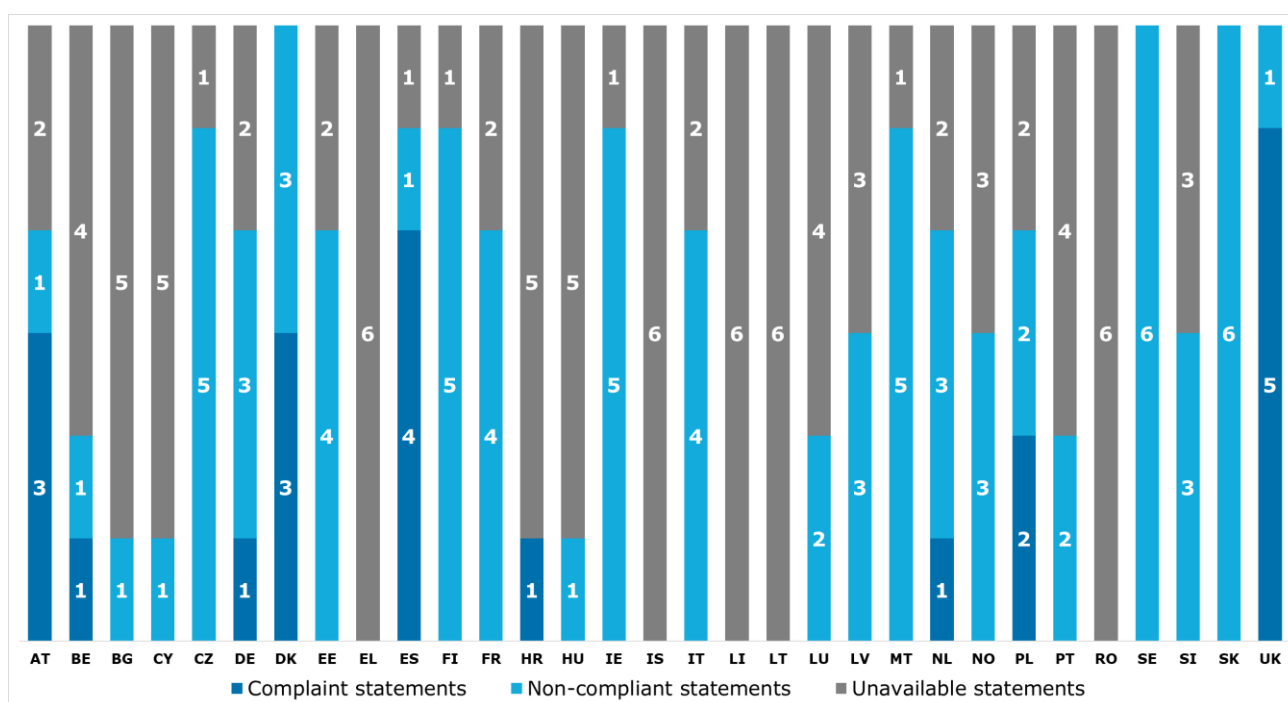
Whereas some countries seem to run out of time, Sweden, Slovakia and the United Kingdom implemented accessibility statements throughout all analyzed websites. Widely published statements were also found in Czech Republic, Spain, Ireland and Malta, which also seem to rely on a **standardized approach** (e.g. using a model statement or statement generator). Noteworthy, Finland managed to implement a statement on 5 out of 6 websites, even though only 1 statement was published in 2018.

Good practices of standardizing accessibility statements

Some countries provide their public sector organizations with specific accessibility statement publishers to generate complaint accessibility statements. Examples can be found in [Finland](#), [the Netherlands](#) and [Portugal](#). Responsible officers may also use the statement generator from the [W3C](#) or use a sample statement with detailed instructions as provided in the [United Kingdom](#) and [Czech Republic](#), following the [European Commission's statement model](#).

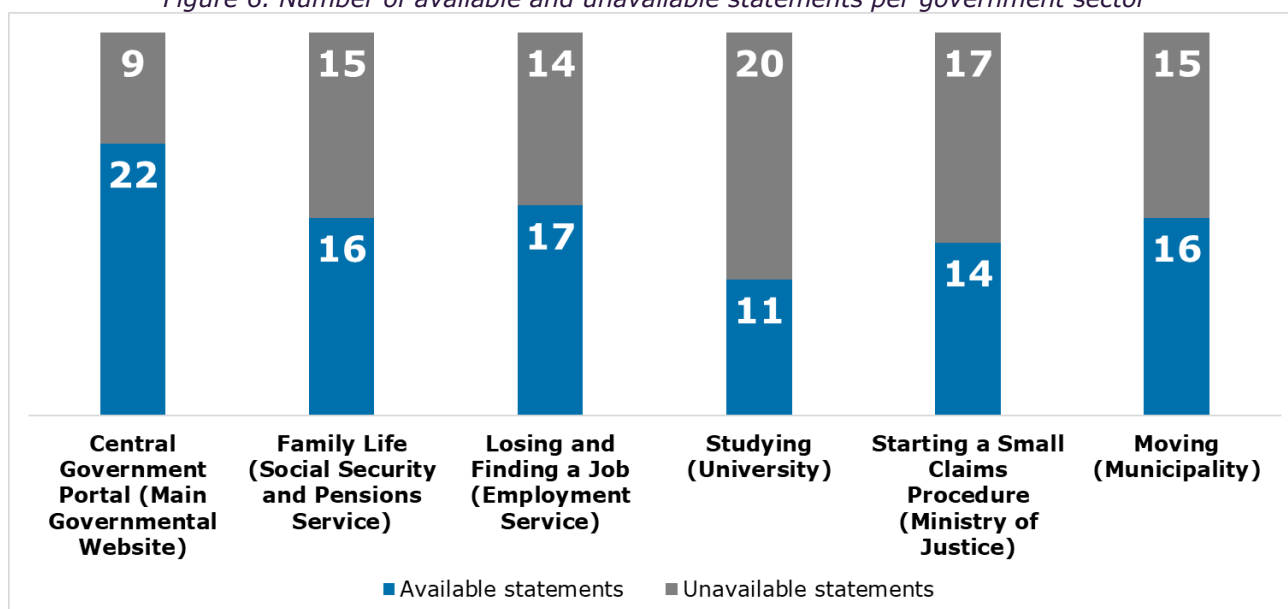


Figure 5. Number of compliant, non-compliant and unavailable statements per country



When comparing the six **government domains** under evaluation, we see that central government websites set a good example. In more than two-thirds of the countries, the national government portal has an accessibility statement. Statements are most often missing in the area of studying. Government monitoring and supervisory authorities may want to reinforce and retarget their communication efforts to ensure all public sector bodies in all sectors publish a complete accessibility statement.

Figure 6. Number of available and unavailable statements per government sector





Conclusions: time to speed up

Half of the analyzed websites is missing a statement and only a fraction of the statements is complete. It's time to speed up. Although countries and sectors differ, substantial efforts are needed throughout public sector to meet the requirements by September 23 this year. How can your organization effectively set up a compliant accessibility statement and avoid formal complaints, administrative sanctions and political blame? The recommended minimal steps include:

1. **Appoint a statement officer:** make sure a person in your organization is responsible for preparing and maintaining the accessibility statements.
2. **Map your websites:** create an overview of all websites under the responsibility of your organization. Each website should have its own accessibility statement.
3. **Carry out an accessibility audit:** ask an internal or external expert to assess the compliance status of your website(s) by combining manual and automated evaluation techniques. Follow strict evaluation procedures, such as the [Website Accessibility Conformance Evaluation Methodology](#) (WCAG-EM) from the W3C, to obtain reliable, valid and complete results on the accessibility compliance with the EN 301 549/WCAG 2.1 AA standards.
4. **Draft the accessibility statement:** declare at least the compliance status, publication date of the statement, non-accessible content, as well as a reference to the feedback and enforcement procedure of your organization. Bear in mind country-specific requirements and use a standardized statement generating tool.
5. **Publish:** publish the accessibility statement in an accessible format and launch it on a webpage that can be reached directly via the header or footer of the homepage.

Searching for more information and guidance?

At Capgemini we build and test accessible websites, train employees, increase organizational maturity and study the impact of accessibility policies and regulations. Please contact us via sem.engerink@capgemini.com if you want to know more about our expertise.



Methodological note

Our method precisely mirrors the analysis carried out under the European Commission's [Monitoring, Reporting and Evaluation Study](#), so that the 2020 results can be compared with the 2018 figures. In order to select websites of types of public sector bodies that are relevant for end-users, life events of these users have been taken as a basis. The definition of life events stems from the European Commission's [eGovernment Benchmark Study](#).

1. **Central government portal** (main government website): the website of a central government agency, that is a portal to providing key public services and information;
2. **Family life** (website of social security and pensions service): relevant for young families in cases of birth (such as obtaining information for parental leave, child allowance, obtaining a passport), marriage (registration) and retirement;
3. **Losing and finding a job** (website of employment service): relevant when losing a job (determining immediate action for the unemployed, applying for allowances, receiving benefits) and finding a job (searching for a job, participating in training programs);
4. **Studying** (website of the university in the capital city): relevant for orientation (course search), enrolment (diploma recognition, enrolment in higher education) and support (career advice, graduation);
5. **Starting a small claims procedure** (website of the Ministry of Justice): relevant for a citizen starting a civil procedure for claims of under €2000 (issue a money claim at a court);
6. **Moving** (website of capital city): relevant websites when moving and living within a country.

In July 2020, the availability and quality of statements have been verified for each website within the sample as defined in the previous paragraph.

First, the availability of the web accessibility statement has been verified per website. In order to find the accessibility statement, we have opened all headers, footers, and side-panels for relevant sections (accessibility statement, legal notice, about the website, help and assistance, audio, accessibility logos or icons or similar) and searched for the statement (within the website and externally with an internet search engine) by using accessibility search words in local languages. We noted the availability of a statement and the location of the link to the statement (as an indication for findability).

Second, the quality of each accessibility statement found was checked. The model accessibility statement that has been published by the Commission as part of the Implementing Act has been the basis for this. This model defines the requirements for the quality of the content of the accessibility statement in terms of mandatory and optional content items. The availability of these content items has been checked in each statement found. The table below provides an overview of the content items that have been verified.

Mandatory content items	Description
1. Compliance status	<ul style="list-style-type: none"> - Fully compliant - Partially compliant, with description of non-compliance(s). - Not compliant with description of non-accessible sections/ content/ functions
2. Non-accessible content	<ul style="list-style-type: none"> - Describe which section / content / functionality is not yet accessible - Explain why the content indicated above is not accessible - Indicate accessible alternatives, where appropriate
3. Preparation/publication date of the accessibility statement	<ul style="list-style-type: none"> - Publication date - Method used to prepare the statement - Review date
4. Feedback and contact information	<ul style="list-style-type: none"> - Description of the feedback mechanism - Contact information of the relevant entity/ unit/ person responsible for accessibility and the feedback mechanism
5. Enforcement procedure	<ul style="list-style-type: none"> - Description of the enforcement procedure - Contact information of the enforcement body
Optional content items	Description
1. Evaluation report	<ul style="list-style-type: none"> - A link to an evaluation report
2. Commitment to accessibility	An explanation of the public sector body's commitment to digital accessibility, for example: <ul style="list-style-type: none"> - Intention to reach a higher level of accessibility than required by law; - Remedial measures, including a timeline
3. Formal endorsement	<ul style="list-style-type: none"> - Formal endorsement (at administrative or political level) of the accessibility statement
4. Date of publication website/app	<ul style="list-style-type: none"> - The date of the publication of the website and/or the mobile application
5. Date of the last update website/app	<ul style="list-style-type: none"> - The date of the last update of the website and/or mobile application following a substantial revision of its content
6. Phone assistance and support	<ul style="list-style-type: none"> - Phone assistance for persons with disabilities, and assistive technology users support



Data from figures in table format

Figure 2. Number of websites and available statements with an indication of statement webpage

Total websites checked	Available statements	Statements reached via homepage	Statements not reached via homepage
186	96	78	18

Figure 3. Percentages of statements with or without mandatory content

Mandatory content	Statements with mandatory content	Statements without mandatory content
Compliance status	65%	35%
Non-accessible content	45%	55%
Preparation (date) of the statement	56%	44%
Feedback and contact information	71%	29%
Enforcement procedure	26%	74%

Figure 4. Percentages of statements with or without optional content

Optional content	Statements with optional content	Statements without optional content
A link to an evaluation report	5%	95%
An explanation of the public sector body's commitment to digital accessibility	16%	84%
Formal endorsement (at administrative or political level) of the accessibility statement	15%	85%
The date of the publication of the website and/or the mobile application	7%	93%
The date of the last update of the website and/or mobile application following a substantial revision of its content	5%	95%
Phone assistance for persons with disabilities, and assistive technology users support	34%	66%

Figure 5. Number of compliant, non-compliant and unavailable statements per country

Country	Compliant statements	Non-compliant statements	Unavailable statements
AT	3	1	2
BE	1	1	4
BG	0	1	5
CY	0	1	5
CZ	0	5	1
DE	1	3	2
DK	3	3	0
EE	0	4	2
EL	0	0	6
ES	4	1	1
FI	0	5	1
FR	0	4	2
HR	1	0	5
HU	0	1	5
IE	0	5	1
IS	0	0	6
IT	0	4	2
LI	0	0	6
LT	0	0	6



Country	Complaint statements	Non-compliant statements	Unavailable statements
LU	0	2	4
LV	0	3	3
MT	0	5	1
NL	1	3	2
NO	0	3	3
PL	2	2	2
PT	0	2	4
RO	0	0	6
SE	0	6	0
SI	0	3	3
SK	0	6	0
UK	5	1	0

Figure 6. Number of available and unavailable statements per government sector

Government domain	Available statements	Unavailable statements
Central Government Portal (Main Governmental Website)	22	9
Family Life (Social Security and Pensions Service)	16	15
Losing and Finding a Job (Employment Service)	17	14
Studying (University)	11	20
Starting a Small Claims Procedure (Ministry of Justice)	14	17
Moving (Municipality)	16	15

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