# Accessible and Inclusive Public Communication: Panorama of Practices from OECD countries

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Authorised for publication by Elsa Pilichowski, Director, Public Governance Directorate

# Accessible and Inclusive Public Communication: Panorama of Pratices from OECD countries

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Accessible and inclusive public communication helps to ensure that all citizens, regardless of their circumstances, can be heard and participate in public life. As part of a collaboration with the French Government Information Service and the activities of the OECD Experts Group on Public Communication, this working paper presents a range of practices and lessons learned about accessible and inclusive public communication in OECD member and partner countries, with a particular focus on persons with a disability. It covers trends, successes and challenges related to governance, audience insights and engagement, digital tools and processes, awareness-raising and training, as well as evaluation of accessibility and inclusion in public communication.

# Acknowledgements

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# Acronyms and abbreviations

ACA: Accessible Canada Act

ADS: Accessible Document Specialist

AI: Artificial Intelligence

AMA: Agency for Administrative Modernisation (Portugal)

AGID: Agency for a Digital Italy

ANAE: State Accessibility Digital Assistant (France)

BSL: British Sign Language

CoG: Centre of Government

CEN: European Standards Committee

CENELEC: European Committee for Standardisation in Electronics and Electrical Engineering

CEUD: Centre for Excellence in Universal Design (Ireland)

CNCPH: National Advisory Council for Persons with a Disability (France)

CPABE: Certified Professional in Accessible Built Environments

CPACC: Certified Professional in Accessibility Core Competencies

CPWA: Certified Professional in Web Accessibility

CSD: Canadian Survey on Disability

DIGG: Agency for Digital Government (Sweden)

EC: European Commission

EGPC: OECD Expert Group on Public Communication

ETSI: European Telecommunications Standards Institute

EU: European Union

FSL: French Sign Language

GDS: Government Digital Service (United Kingdom)

IAAP: International Association of Accessibility Professionals

ICT: Information and Communication Technology

LGBTQ+: Lesbian, Gay, Bisexual, Transgender, Queer. The "+" includes other gender identities or sexual orientations.

MSD: Ministry of Social Development (New-Zealand)

NDA: National Disability Authority (Ireland)

NSW: New South Wales

NPHET: National Public Health Emergency Team (Ireland)

OECD: Organisation for Economic Co-operation and Development

RGAA: General Accessibility Framework for Administrations (France)

SAFSO: Survey on Accessibility in Federal Sector Organizations (Canada)

SBS: Special Broadcasting Service (Australia)

SIG: Government Information Service (France)

SPF BOSA: Federal Public Service Strategy and Support (Belgium)

WAD: Web Accessibility Directive

WAI: Web Accessibility Initiative

WAS: Web Accessibility Specialist

WCAG: Web Content Accessibility Guidelines

W3C: World Wide Web Consortium

# Executive Summary

## Context

By strengthening dialogue between citizens and governments and enhancing transparency as well as accountability of public action, public communication plays an essential role in making democracies more resilient. When deployed in accordance with the principles of accessibility and inclusion, it ensures that all individuals, regardless of their circumstances, can be heard and are able to participate in public life, a key means to reinforce trust in government.

Designed in collaboration with the French Government Information Service (SIG), this Panorama aims to provide an initial overview of the legal frameworks and guidelines, practices and tools used to increase the accessibility of public communication in OECD member countries. It is based on a good-practice sharing workshop held on 15 February 2022 and interviews conducted with OECD member countries as well as two Directorate-Generals of the European Commission. The Panorama is designed as a collection of key issues identified in the interviews and based on research by the OECD Secretariat. The aim of this Panorama is to describe accessibility practices in OECD member countries and to inform future related initiatives. Indeed, the COVID-19 pandemic has underlined their indispensable nature, as have the first monitoring reports from EU Member States on the implementation of the *Directive 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies*.

## Main conclusions and perspectives

The principles of accessibility and inclusiveness are essential for the equal participation of all citizens in public life and the resilience of democracies. They are often normative and transposed into guidelines detailing their operationalisation. However, this codification should not come at the expense of a flexible approach and should remain adaptable to a changing social and technological context. Furthermore, practices analysed by the OECD show that high-level political and administrative commitment is crucial to support the systematic implementation of accessible communication. In this sense, high-level leadership is essential to encourage compliance with existing standards and accompany the digital transformation. This is articulated in some countries through documents and senior government officials' statements. Nonetheless, a key challenge is to maintain such commitments over time.

Identifying and understanding the target audience of messages and channels is a first key step to make public communication accessible. For instance, audience and behavioural insights are central to ensuring that communication meets the expectations of people with specific needs. If practices in this sense are deployed, they are often sporadic. In addition, beyond the need to better understand stakeholders, involving citizens directly in defining more accessible standards and content is essential, regardless of their age, gender, location, digital literacy level, socio-economic condition or disability. Systematising these initiatives will ensure more impactful messaging.

Considering the increasing importance of digital communication, specific guidelines are available to support public officials in designing more accessible digital websites and applications. Practices presented in this report highlight the widespread use of assistive technologies such as screen readers or voice assistants to ensure accessible and inclusive content, particularly on social media platforms. However, these emerging initiatives can be advanced by designing accessible communication from the very definition of the content, and not at the end of the design cycle once the content is defined and developed. This can be done in consultation or co-production with individuals with specific needs or by relying, for example, on ready-made design templates for the development of accessible websites and applications. Finally, the ethical use of data, especially private, in the design and deployment of technologies in this field is crucial.

One of the challenges identified to the deployment of accessible and inclusive communication is professionalisation. Most of the governments consulted are increasingly raising awareness of accessibility issues among and implementing training programmes for public agents. However, little professional expertise is available, which links to challenges in terms of certification, education and training. Diversity in public employment, namely the recruitment of persons with a disability, minorities and women, is one means of responding to these challenges. Establishing partnerships with the private sector, civil society and the media for the sustainable professionalisation of public officials, but also of students, activists and the private sector on these subjects is another one. Such efforts are indeed needed to establish a pool of experts on public accessibility.

Finally, evaluation is a challenging endeavour for public communicators, including in terms of accessibility. Practices underline that guidelines define procedures and support the implementation of simplified, and sometimes automated, assessments and in-depth controls. However, these guidelines list criteria that are in some cases limited to public sector websites and applications as well as to quantitative controls. Extending them to qualitative analyses including, for instance, translation into sign language, contributes to increasing the impact of the assessments and ultimately, the improvement of accessibility measures in public communication.

Public officials can thus seize a number of opportunities to improve accessibility initiatives by:

- Setting explicit principles with flexible deployment, backed by high-level commitment;
- Engaging target audiences, and listening and adapting more systematically to their needs and behaviours;
- Ensuring the accessibility of communications by design, from the outset;
- Raising awareness and educating to enable the extension of accessible communication measures and initiatives to the whole of society, including through the collaboration of public organisations with the private sector, civil society and the media, which are key partners in promoting accessibility;
- Evaluating the accessibility of public communication beyond websites and applications.

Interviews conducted in the framework of this Panorama highlight new avenues in the field of accessible and inclusive public communication. They represent a compass for future research and reform that would allow to anchor accessibility and inclusiveness in communication more firmly. Improving the accessibility of communication is an opportunity, rather than a challenge or a technical constraint. It represents a cultural shift that encourages governments to rethink how to communicate their public policies and services in a more inclusive and responsive way.

# Introduction

With the publication of its *Recommendation of the Council on Open Government* (OECD, 2017[1]) and *Recommendation on Digital Government Strategies* (OECD, 2014[2]), the OECD has established the essential role of public communication[1] as a catalyst for good governance reforms, which reinforces the principles of transparency, integrity, accountability and citizen participation. Discussions by members of the OECD Experts Group on Public Communication (EGPC) and the *OECD Report on Public Communication* (OECD, 2021[3]) have further deepened the analysis by highlighting its essential role in improving public policies and services, as well as in strengthening public trust in government and democracies in general.

By enabling citizens to interact with their government and efficiently exercise their democratic rights by receiving and sharing information, the public communication function can help the State tailor its messages and services to individual users and guarantee equal opportunities for all citizens. It is therefore necessary, to design messages and services with special attention to segments of the population with specific needs. The public communication function should effectively promote the full integration of the principles of accessibility and inclusion within its strategies, planning, governance, services and actions so they can become pillars for the implementation of effective communication that can reach all segments of the population.

From this perspective, accessibility is understood in the framework of this Panorama as "the extent to which products, systems, services, environments and facilities are able to be used by a population with the widest range of characteristics and capabilities (e.g. physical, cognitive, financial, social and cultural, etc.), to achieve a certain goal in a specified context" (Persson et al., 2014[4]). Moreover, an inclusion policy takes into account diverse and varied perspectives and identities within society to promote social cohesion and synergies (Rocha Menocal, 2021[5]). Therefore, inclusion not only contributes to avoiding the marginalisation of certain groups, but also helps make those groups visible in public life and promotes social cohesion by strengthening synergies between the different segments of the population and the government (Rocha Menocal, 2021[5]).

Accessibility is a term that has often been associated with two concepts: usability and universal design (Oncins and Orero, 2021[6]). Although disability has been the focal point of this conception for years, a new approach aims to promote equal participation of all citizens in democratic life (Oncins and Orero, 2021[6]). In addition, a study focusing on digital accessibility has shown that the high degree of compliance with international standards is of benefit to society as a whole because it renders services more usable (Schmutz, Sonderegger and Sauer, 2016[7]).

Considering accessibility and inclusion in the design of communication activities from their conception means taking into account the wide variety of needs and preferences for accessing, consulting and sharing information in society. For persons with a disability, access to information is an essential need. However, accessible communication goes beyond this particular segment of the population. The concept of accessibility also refers to the assimilation, clarity and readability of information[2]. The language, form, and tools of communication chosen are therefore important determining factors. As for the notion of inclusion, it includes digital inclusion but also involves reaching all citizens, whatever their gender, whether they are young or old, isolated by geography, by education, by disability or by social and urban factors. Public communication fulfils this mission by using the appropriate communication channels, diversifying and

adapting the messages, tools and formats; developing guidelines, strategies, policies and regulatory frameworks for administrations; and by measuring the impact of the measures taken using monitoring and evaluation tools to improve their implementation.

In the United States, since the enactment of the *Americans with Disabilities Act* of 1990, standards have been developed to promote accessibility within public administrations and, more broadly, within society. International standards have also played a key role in encouraging digital accessibility. The best-known and frequently used standards, both in the public and private sector, are those contained in the Website Content Accessibility Guidelines (WCAG) of the World Wide Web Consortium (W3C).

These international norms have enabled the adoption of a variety of guides and standards at the national and supranational level, including within the European Union. The *Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies* establishes the relevant general principles and aims to harmonise legal, regulatory and administrative provisions of EU Member States regarding accessibility requirements.

Member countries have adopted different approaches to transposing the relevant measures in their national legislation and implementation strategies. While the directive focuses exclusively on websites and mobile applications and does not cover all digital public communication (for example, social media, digital press relations, blogs, podcasts and many others) or offline communication (speeches, press conferences, interviews, media relations, brochures, reports, flyers, etc.), it leaves scope for countries to go beyond the prerequisites it enshrines for accessibility and inclusion in public communication.

In France, the adoption of the *Accessibility Charter for State Communication* (French Government, 2021[8]) aims to make public communication accessible to all citizens, by adapting it to the situations of various audiences and to the particular needs of persons with a disability so that each citizen can understand public action and exercise their rights. The Charter gathers a set of principles, rules and practices in terms of accessibility in order to systematise the application of practices.

This Panorama of practices in OECD countries for accessible and inclusive public communication represents the first practical expansion on the challenges of accessibility and inclusion identified in the findings from the *OECD Report on Public Communication* (OECD, 2021[3]).

Prepared with the participation of members of the Experts Group on Public Communication (EGPC), the OECD Working Party on Open Government (WPOG), as well as the support of the French Government Information Service (SIG), this document aims to highlight existing measures and map out key challenges as well as identify practices and lessons learned from the experiences of OECD member countries in terms of accessible and inclusive communication. This Panorama is based on an analysis of practices and feedback from a selection of OECD member countries (Australia, Belgium, Canada, Czech Republic, Finland, Germany, Ireland, Italy, Norway, New Zealand, the Netherlands, Portugal, Scotland, Sweden, the United Kingdom), as well as two Directorates general of the European Commission. The countries mentioned in each section in relations to specific measures and the practices described therein are not necessarily exhaustive: selecting and referring to specific countries does not imply that other countries that are not mentioned do not have similar provisions or other measures fulfilling the same objectives.

This Panorama will help inform the work of communicators and encourage taking accessibility and inclusion into consideration more systematically, starting from the design phase of public communication activities. It will also support the efforts of the SIG to make the French government's communication more accessible.

On the basis of the analyses and discussions conducted with the participating countries, five major issues of accessible and inclusive public communication have been identified and structure this Panorama : I- How to establish rules governing communication practices so that they better integrate principles of accessibility and inclusion; II- How to enable public communication to adapt to the needs and expectations of all citizens and guarantee equal opportunities; III- How to ensure accessible and inclusive public

communication in the digital age; IV- How to sustain an administration trained in the challenges of accessible and inclusive communication; and finally V-  How to promote a more systematic evaluation of accessible and inclusive communication.

# 1 How to establish rules governing communication practices so that they better integrate principles of accessibility and inclusion?

This section explores legal and regulatory frameworks as well as policy documents, strategies, and guidelines governing accessible and inclusive public communication. These texts detail government mandates and priorities and support the effective and consistent implementation of measures taken to make communication more accessible.

This section first provides an overview of legal and regulatory frameworks adopted in the European Union (EU) and beyond, for more accessible and inclusive communication. The second part focuses on guidelines supporting the consistent deployment of laws and regulations in the form of concrete actions at national, regional, and local levels. The third part discusses the importance of high-level commitment to promote adopted standards and to support the full implementation of accessible and inclusive communication by administrations.

## Legislative and regulatory frameworks for a common set of objectives and requirements

Accessible and inclusive communication is a fundamental human right. Article 19 of the Universal Declaration of Human Rights recognises that: "Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers" (United Nations, 1948[1]).

However, individuals' ability to communicate or receive information effectively may be compromised. This is notably the case for people who use modes of communication or languages that are not widely used in their communities (for example, sign language, Braille, or foreign languages), have difficulty expressing themselves orally or cannot use certain digital tools that are not adapted to their condition or disability (McLeod, 2018[10]).

To protect the rights of these people, international and national standards have established principles for the accessible and inclusive use of communication and technologies through which citizens communicate. Internationally, all countries mentioned in this Panorama have ratified the Convention on the Rights of Persons with Disabilities[3] (United Nations, 2006[11]), adopted in 2006 and ratified by 184 countries, which aims to avoid discrimination against persons with a disability and promotes both online and offline accessible communication. Article 9 promotes equal access to information and communications, including information and communication technologies (ICT) and systems. Article 21 stipulates that States must guarantee freedom of expression and opinion, and access to information by providing information intended

for the public in accessible formats and by using technologies and formats adapted to persons with a disability. Signatories should also urge private companies and media to take into account persons with a disability in their communication modes and formats (United Nations, 2006[11]).

In 2008, in response to related challenges, OECD members have adopted the *Recommendation of the Council for Enhanced Access and More Effective Use of Public Sector Information* (OECD, 2008[12]). Its content promotes broad access on non-discriminatory terms to public sector information for consumption and reuse. Developments in normative frameworks and technical and societal challenges led to the adoption of a new instrument in 2021: the *OECD Recommendation of the Council on Enhancing Access to and Sharing of Data (EASD)* (OECD, 2021[13]). This reaffirms the non-discriminatory nature of the accessibility of government information. The *Recommendation of the Council on Open Government* also promotes "an open and inclusive approach" to government for the benefit of democracy and inclusive growth (OECD, 2017[1]).

Another framework has been established at the supranational level by virtue of the *Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies* also known as the "Web Accessibility Directive" (WAD) (hereafter, Directive (EU) 2016/2102). Each Member State has transposed it within its legislation[4]. This represents a major step forward in raising awareness of and implementing accessibility within the public administrations of EU Member States. Overall, this Directive has contributed to harmonise the accessibility of digital services in administrations within the EU while supporting equal opportunities and the participation of all citizens in public life.

More recently, the EU adopted the *Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services* known as the "European Accessibility Act". It aims to make a wide range of digital goods and services, provided within the EU, accessible to persons with a disability. Therefore, for the first time, Member States will have common rules governing accessibility, which will apply not only to the public sector, as has been the case since the Web Accessibility Directive entered into force in 2016[5], but also to the private sector. The provisions of the Act extend to private companies and apply to products such as smartphones, self-service terminals, audio-visual media services and the emergency number "112". Member States should integrate these provisions within their legal frameworks by 2022 and ensure their implementation by 2025. Although the adoption of this Act has been positively received, the European Disability Forum has proposed modifications, in particular for the provision of services and information that are not disseminated via digital communication formats or channels (European Disability Forum, 2021[14]).

To support the implementation of the Directive (EU) 2016/2102 and enable a common understanding of what accessibility means in practice, a harmonised standard has been defined. *The European Standard EN 301 549 – Accessibility requirements for ICT (information and communication technologies) products and services* has been developed by the three European standardisation organisations[6]. This standard was initially published in 2015 to support Member States in procuring accessible ICT products and services. It covered the AA requirements of WCAG 2.0 as well as additional requirements. Following the adoption of the Directive (EU) 2016/2102, this standard was revised to align it with the Web Content Accessibility Guidelines 2.1 (WCAG) (Box 1.1). A second revision was adopted in 2021 to fix some editorial errors and ensure the adequate coverage of certain elements such as downloadable documents including PDFs.

This standard is a harmonised European standard, meaning it offers in particular a "presumption of conformity" to those who use it. If websites and mobile applications adhere to this standard when developing their digital services, they are considered accessible. However, Member States are not obliged to follow this standard and can choose to impose stricter requirements or use different ones (European Commission, 2022[15]). France has defined a technical method and an operational framework to transcribe the European Standard EN 301 549 and the criteria of WCAG into administrative practice (Box 1.1). The

*General Accessibility Framework for Administrations* (RGAA) has thus been developed to ensure the full implementation of Article 47 of *Law n°2005-102 of 11 February 2005 for equal rights and opportunities, participation and citizenship of persons with a disability* and its implementing decree of 2019 in France (Government of France, 2021[16]).

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### Box 1.1. Web Content Accessibility Guidelines 2.1

The Web Content Accessibility Guidelines 2.1 (WCAG 2.1) are part of a set of technical documents developed and published by the World Wide Web Consortium (W3C), the main international organisation for web standardisation.

The WCAG gathers recommendations to make digital content accessible to all Internet users. This technical document is based on four principles of content design: Perceivable, Operable, Understandable and Robust. They allow to reflect on the different ways in which users interact with content and to consider their needs when developing websites. The content of WCAG 2.1 is normative and sets the criteria for conforming to the required level of accessibility. Examples of compliant content are also provided to help interpret these standards.

Conformance levels range from A (minimum level of accessibility) to AAA (maximum level). It is important to note that the W3C does not recommend that Level AAA conformance be required as a general policy. It is indeed not possible to satisfy all Level AAA Success Criteria for some content.

Source: WAI (2022[17]), WCAG 2 Overview, https://www.w3.org/WAI/standards-guidelines/wcag/; WAI (2018[18]), Web Content Accessibility Guidelines (WCAG) 2.1, https://www.w3.org/TR/WCAG21/#intro.

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At the national level, countries have adopted various approaches to framing accessibility and inclusion. Some countries in the EU such as Spain, Italy and Ireland started accessibility and inclusion reforms some 20 years ago, while others have followed the dynamics triggered by the Directive (EU) 2016/2102.

A vast majority of countries adopt an approach targeting all online and offline services provided by the government, while others focus primarily on digital accessibility and inclusion, i.e. websites and mobile applications. In Italy, the Agency for a Digital Italy is responsible for digital accessibility. Since 2004, this is governed by the *Provisions to support the access of disabled people IT tools,* also called the Stanca Act. It notably requires public administrations to provide services and information that can be used, without discrimination, by persons with a disability and incorporate updates over time. Administrations must also provide assistive technologies and software for their employees with specific needs, even if they are working remotely (Agenzia per l'Italia digitale, 2021[12]). The law also incentivises the conduct of technical training courses to strengthen public employees' skills.

Other states conceive the issue of accessibility more broadly and have established relevant centres of expertise. In Ireland, the Centre for Excellence in Universal Design (CEUD) under the authority of the National Disability Authority (NDA) was established in January 2007 by virtue of the *Disability Act 2005* (CEUD, n.d.[20]). The Centre defines standards and advises organisations to help design environments and services that are universally accessible, understandable and usable by everyone, whether offline or online. The prerogatives of the Centre include communication and digital tools as well as physical environments. This is because it can set standards and advise on the design and accessibility of buildings, streets or spaces to which citizens have access, the products and services provided in these places, and the mechanisms and systems in place to provide them, including through information and communication technologies (CEUD, n.d.[20]).

Some countries outside the EU adopt an approach that goes beyond the public sector to encompass the whole of society. This is the case in Norway, for example, where the *Equality and Anti-Discrimination Act*

applies to all sectors of society with some exceptions. This act imposes a duty on public and private undertakings, focused on the general public or users, to ensure that their general functions meet accessibility requirements. This duty applies to both digital and physical environments. The approach must ensure that all citizens can use both ICT and the physical environment without obstacles (Government of Norway, 2018[21]).

The methods used to define these laws also vary. Some countries have invited citizens to contribute to the creation of these legislative frameworks to better understand the expectations, needs, and priorities of the concerned individuals. As highlighted in the *Recommendation of the Council on Open Government*, engaging citizens in law-making helps to increase public trust, develop better policies, and strengthen democratic processes (OECD, 2017[1]). By including citizens in policy-making processes, public policies are designed to meet their needs, contributing to the formulation of better laws and standards, which citizens are more likely to use or adhere to if their expectations are incorporated. In Canada, the *Accessible Canada Act* of 2019 was based on a large-scale public consultation. More than 6,000 Canadians participated in online and offline meetings, which allowed to identify priority areas for the Act, including communication (Box 1.2).

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**Box 1.2. Public Consultations as part of the *Accessible Canada Act***

In Canada, the *Accessible Canada Act* of 2019 aims to promote a "barrier-free Canada" by identifying, removing, and preventing barriers that hinder the full and equal participation of persons with a disability in society. This approach covers anything "physical, architectural, technological or attitudinal, anything that is based on information or communications, or anything that is the result of a policy or a practice" (Parliament of Canada, 2019).

This Act was based on a large-scale public consultation that lasted 9 months and helped to identify priority areas, including communication, to initially define the purpose of the new Act, accessibility obstacles that the act should include, as well as other measures that should be implemented to increase accessibility and inclusion. Over 6,000 Canadians participated in both online and in-person meetings. Participants represented a broad cross-section of the Canadian population, including women (69%), rural (14%) and urban (84%) populations, visible minorities (15%), Aboriginal people (4%) and persons with a disability (52%). These events were made accessible through real-time captioning in English and French, and the use of American Sign Language, Quebec Sign Language and Inuit Sign Language.

As part of consultation, more than 4,300 people answered questions online and more than 200 people submitted their ideas by letter, email, video and phone. Nearly 90 reports were also submitted by organisations representing persons with a disability, trade unions and companies. Eighteen public sessions were held; the Prime Minister took part in one of these sessions and answered questions asked by participants. In addition, more than 110 experts took part in roundtable discussions on several topics, including issues of accessibility to all citizens, regardless of their situation, from public spaces and means of transport, to online and offline public services. Source: Government of Canada (2022[22]), *Creating new federal accessibility legislation: What we learned*, https://www.canada.ca/en/employment-social-development/programs/accessible-canada/reports/consultations-what-we-learned.html; Government of Canada (2019[23]), Accessible Canada Act, https://parl.ca/DocumentViewer/en/42-1/bill/C-81/royal-assent.

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Similarly but at the sub-national level, Scotland has developed a roadmap to implement a law that was adopted in 2015 to promote British Sign Language (BSL) within the public sector in Scotland. The government and BSL users co-produced this document between 2016 and 2017 thanks to an advisory group, made up of BSL users with hearing impairments as well as others who were both hearing and visually impaired, and parents of hearing impaired children, who worked alongside representatives of public bodies to implement the BSL Act (Box 1.3).

> ### Box 1.3. The National Advisory Group on British Sign Language in Scotland
>
> *The British Sign Language (BSL) Act* requires the Scottish Government to publish a national action plan to support and promote BSL. The Scottish Government's National Advisory Group on British Sign Language (NAG) was established in 2016 to seek the views of users, including people with hearing and visual impairments and parents of children with hearing disabilities, and to make recommendations for the inclusion of specific elements in this national action plan.
>
> Co-chaired by a Scottish Government Chief Executive and a British Sign Language user with a hearing and visual disability, the NAG consisted of nine members including two people with hearing and visual impairments, three young people under 18 and the hearing parent of a child with a hearing disability. The Group was supported by the Scottish Government's Equality Unit and language services professionals to ensure that the meetings were fully accessible.
>
> Several key lessons were learned from this consultative process, including the importance of addressing specific communication needs to ensure that all participants can truly express their views. This includes, for example, allowing BSL users to bring their own interpreters and obtaining the documents on which the discussions are based in advance.
>
> Additionally, in terms of preparing for the discussions and their substance, pre-NAG meetings allowed the Scottish Government to share details of the agenda with participants and discuss what the meeting might cover. Other groups were set up, also in advance of the main NAG meeting, including a NAG for young BSL users, a parents' NAG and a NAG for people who are both impacted by a visual and hearing disability. Holding smaller meetings allowed more people to discuss issues relevant to their lives, before designated representatives from each group presented their specific findings and recommendations to the main BSL NAG.
>
> Source: Evidence provided by the Scottish Government as part of exchanges for the preparation of this Panorama.

Recognising the importance of a language accessible to everyone, regardless of the communication channel, some States have also institutionalised the use of plain language. Laws aim to ensure that citizens can easily understand government information, including legal and technical information. In the United States, Germany and Sweden, for example, the clarity and accessibility of language used in government communications and documents are codified in laws (Box 1.4). The adoption of simple and understandable language is a recurring feature of communication guidance documents, found for example in the Swedish communication policy or in the Open Government Partnership (OGP) action plan in Finland (2019-2023).

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**Box 1.4. Various acts requiring public officials to use clear and plain language**

**Germany**

In the framework of the *Disability Equality Act*, which came into force in 2002, the German government included a clause requiring public authorities to communicate with persons with a disability in simple and understandable language. Upon request, they must explain decisions, general decrees, public law contracts and forms in a simple and understandable manner. In addition, the clause requires the federal government to ensure that public office holders increase their use of plain and simple language as well as promote the development and enhancement of plain language writing skills.

**Sweden**

As part of the *Language Act* enacted in 2009 by the Ministry of Culture of Sweden, Article 9 states that the public sector has a responsibility to protect and promote Swedish Sign Language. Article 11 further adds that the language used in all public communication activities must be cultivated, simple and comprehensible.

**United States**

The *Plain Writing Act* of 2010 was enacted to enhance citizen access to government information and services by establishing that government documents provided to the public must be written clearly. The Act requires the head of each agency to appoint one or more senior public officials to oversee its implementation, communicate and train employees on the requirements of the Act, and designate points of contact to receive and respond to public input. In addition, each agency must create and maintain a plain language section on its website, to inform citizens of its compliance with the requirements of this Act and allow public participation.

Source: Bundesministerium der Justiz (n.d.[24]), Gesetz zur Gleichstellung von Menschen mit Behinderungen (Behindertengleichstellungsgesetz - BGG) - § 11 Verständlichkeit und Leichte Sprache, https://www.gesetze-im-internet.de/bgg/__11.html; Swedish Ministry of Culture (2009[25]), Language Act (2009:600), https://www.regeringen.se/contentassets/9e56b0c78cb5447b968a29dd14a68358/spraklag-pa-engelska; Government of the United States (2010[26]), Public Law 111–274, https://www.govinfo.gov/content/pkg/PLAW-111publ274/pdf/PLAW-111publ274.pdf.

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Communication strategies are also tools for promoting short, medium or long-term objectives (OECD, 2021[3]). The federal digital communication strategy in Belgium promotes structuring content so it is as accessible as possible, particularly to persons with a disability or impairments. Editorial standards for all audiences have been defined and additional standards apply for people who have difficulty understanding information (poorly educated adults, low-skilled people, some elderly people, etc.). The understanding of information is facilitated in the following way:

- The style is direct, similar to spoken language.
- The sentences are as short as possible. They correspond to the breathing time when reading aloud.
- Writers prefer "subject-verb-complement" sentences.
- They choose simple vocabulary and short words.

## Guidelines for the development of accessible and inclusive content

Some administrations have introduced guidelines for meeting the specific accessibility needs of groups of citizens when designing messages or services. These documents take different forms: guides (New

Zealand and Australia) or reference tools (Ireland). In Australia, Ireland and New Zealand, these manuals are intended for the entire public sector to guide the creation of accessible and inclusive content from the point of conception (Box 1.5).

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### Box 1.5. Guides and reference tools enabling an accessible and inclusive approach to public communication

**Australia**

In Australia, the *Style Manual* was developed in the 1960s to help public officials communicate clearly and create content that meets users' needs. Once a paper version only, this Manual is now online and updated regularly. It seeks to ensure that editors consider accessibility and at the outset of their initiatives. It also aims to gather evidence to convince public officials to adopt an accessible approach. The Manual covers topics such as content structure, content types, as well as grammar and punctuation. It allows public officials to find answers to their common questions. It is supplemented by a blog where practical information related to accessibility or clarity of language is regularly shared. Anyone interested in this Manual can subscribe to the newsletter, which has more than 3,000 subscribers and promotes good practices put forward by the Manual and their regular dissemination within administrations.

**Ireland**

The National Disability Authority (NDA) and the Department of Public Expenditure and Reform in Ireland developed a toolkit for public officials, encouraging them to implement initiatives supporting communication that can be accessed, understood, and used by everyone. The *Customer Communications Toolkit for the Public Service - A Universal design toolkit* was developed in 2017 and contains information on how to make written, verbal and digital communication accessible in the form of checklists, examples of practices and advice. Resources support tasks' planning, training and briefing of public officials and external contractors. The toolkit adopts the universal design approach promoted by the NDA's Centre for Excellence in Universal Design (CEUD).

**New Zealand**

Adopted in 2019, the New Zealand *Accessibility Guide* was developed by the Ministry of Social Development in partnership with the Department of Internal Affairs and the Ministry for Culture and Heritage, in consultation with civil society organisations representing the interests of persons with a disability. It includes information on alternate formats for persons with a disability and advice on their presentation. One of the chapters covers printed communications, including on their font size and design. Finally, guidance on accessible formats is provided, including for events, online or TV campaigns, websites, emails and social media.

Source: Australian Government (n.d.[27]), The Standard for Australian Government Writing and Editing, https://www.stylemanual.gov.au/; Government of Ireland (2018[28]), « Universal design toolkit for customer engagement in the public sector launched », https://www.gov.ie/en/press-release/51c63c-universal-design-toolkit-customer-engagement-public-sector-launched/; New Zealand Government (n.d.[29]), About the Accessibility Guide, https://msd.govt.nz/about-msd-and-our-work/work-programmes/accessibility/accessibility-guide/about-the-guide.html.

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Communication is a pillar of the implementation of the open government principles of transparency, integrity, accountability and participation, allowing both to inform citizens and strengthen their participation in the definition of policies or services that meet their needs and expectations (OECD/OGP, 2019[30]). In fact, public communication can be an instrument used to increase the impact of the policies that are implemented, as well as citizens' trust in their governments. To this end, and recognising that the

participation of all citizens is a key challenge, Ireland has developed guidelines to support public organisations in their efforts to include persons with a disability in consultative initiatives. This document, entitled *Ask Me - Guidelines for Effective Consultation with People with Disabilities* originally published in 2002, will be updated shortly based on a public consultation. Similarly for youth audiences, OECD data highlights that effective communication with young people, regardless of their circumstances, is a factor in increasing participation in the public policy cycle and building trust in public institutions, while only 45.6% of young people expressed trust in their national government in OECD countries in 2019 (OECD, 2020[31]). Recognising its importance, OECD members adopted the *Recommendation of the Council on Improving Opportunities for Youth* in 2022 (OECD, 2022[32]). It promotes targeted, relevant, clear and accessible communication to young people, based on listening to and understanding their concerns, to ensure their participation in public decision-making and create spaces for intergenerational dialogue. It also calls for targeted measures to involve disadvantaged and under-represented groups, such as young persons with a disability, to achieve more positive and inclusive policy outcomes.

Guidelines for the inclusion of persons with a disability or vulnerabilities in public life have also been developed in many central or federal administrations. They encourage public officials to use tools and practices to avoid their marginalisation (OECD, 2021[3]). Such guidelines promote the use of inclusive language and attitudes toward persons with a disability, for example in the United Kingdom (Box 1.6) and New Zealand, or towards people identifying with the LGBTQ+ community, as in Australia.

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**Box 1.6. Guidelines for communicating with persons with a disability in the United Kingdom**

In the United Kingdom, a guide has been created by the Disability Unit and the Cabinet Office. The guide *Inclusive language: words to use and avoid when writing about disability* includes guidelines and advice on how to communicate better about or with persons with a disability. The guide includes a table listing certain terms that should be avoided and giving advice on the behaviours that should be adopted. For example, the guide advises public officials to speak directly to a disabled person, even if they have an interpreter with them.

Source: Government of the United Kingdom (2021[33]), Inclusive Language: Words to Use and Avoid When Writing About Disability, https://www.gov.uk/government/publications/inclusive-communication/inclusive-language-words-to-use-and-avoid-when-writing-about-disability.

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## The need for a strong commitment at the highest level

Public officials who contributed to this Panorama recognise that leadership and commitment at the highest level to accessibility and inclusion principles helps ensure implementation at all levels of government. During the interviews, some mentioned the challenges related to the lack of a high-level commitment, which might prevent the renewal or increase of resources or financial capacity to implement and sustain actions to make communication accessible and inclusive.

These commitments can take various forms, for example charters (France, New Zealand and Canada), press conferences, regional, national or international conferences (France) or internal communications (Australia). They can be voiced by politicians (Canada, France), senior public agents (New Zealand) or both (Belgium).

High-level political leadership and commitment promote coordination and collaboration between ministries, set priorities and facilitate the engagement and coordination of relevant agencies at all levels of government. They also help to give visibility to government issues and objectives. This can be done occasionally or on a regular basis. In France, the Prime Minister announced the adoption and

implementation of the *Accessibility Charter for State Communication* to ensure the systematisation of accessibility practices within administrations (Government of France, 2021[34]). In Canada, the Minister of Employment, Workforce Development and Disability Inclusion regularly reminds that no public policy should be designed or implemented without considering the needs of persons with a disability.

Charters are part of the tools used to formalise these high-level commitments to accessibility within national administrations. They have been used in countries like France and New Zealand. In France, the *Accessibility Charter for State Communication* rests upon practical principles and provides resources that enable all communicators to make communication accessible and inclusive, regardless of the tools and formats. In New Zealand, all federal administrations have signed the *Accessibility Charter*, developed by the Ministry of Social Development in cooperation with civil society organisations. This document promotes an accessible and inclusive public sector and is further detailed by each signatory agency in a five-year plan ensuring its translation into specific actions (Box 1.7).

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### Box 1.7. An Accessibility Charter in New Zealand

In New Zealand, the Ministry of Social Development (MSD) has developed the *Accessibility Charter: A Commitment to Accessible Information* in collaboration with civil society organisations representing persons with a disability (see section 2). It encourages government agencies to ensure that an accessible environment is in place for both public officials and citizens. The commitment from senior leadership in each agency is stressed as crucial. A work program has been developed to apply the Charter, including training workshops for public officials.

To date, this Charter has been signed by all government agencies, three hospital boards and several local governments, which committed to making their messages accessible to citizens. They must therefore comply with the *New Zealand Web Accessibility Standards* (2017) and ensure that communications are available in alternate formats such as Braille, Easy Read, large print, audio, subtitled and with audio description, transcriptions, and New Zealand Sign Language. The document also urges public officials to ensure that relationships and projects with their external providers comply with accessibility standards.

For the effects to be sustained in practice and for these commitments to be translated into concrete actions, each agency develops a five-year plan. They report on their progress to the MSD every six months and the data shared provides the basis of a report submitted to the Minister for Disability Issues. In this context, resources are also made available to public agents so that they understand the standards to be applied and trainings are also offered.

Source: New Zealand Government (n.d.[35]), The Accessibility Charter, https://www.msd.govt.nz/about-msd-and-our-work/work-programmes/accessibility/accessibility-charter/the-charter.html.

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These high-level political or administrative commitments may be accompanied by events to disseminate or remind people of these expectations. In France, in December 2021, a seminar gathering public communicators from central and decentralised administrations and members of ministerial cabinets was an opportunity to recall the principles of the *Accessibility Charter for State Communication*, tools and practices as well as challenges related to accessible and inclusive communication (Government of France, 2021[16]). This event also allowed discussions on the State brand and the design system with more than 600 participants, which demonstrates commitment at all levels to implement these accessibility principles.

Finally, and to ensure effective fulfilment of the commitments made at the highest level, some countries rely on focal points within each administration to support and disseminate these within public organisations.

The United Kingdom, France, and New Zealand have for example established such functions (see section 4).

# 2 How to enable public communication to adapt to the needs and expectations of all citizens and guarantee equal opportunities?

Strategic evidence-based public communication ensures it is effective in achieving the objectives defined in public communication policies or strategies (OECD, 2021[3]). In this sense, making use of data analysis through quantitative and qualitative methods that support a better understanding of targeted segments of the population allows to better orient communication strategies, adapt public messages and services to the specific needs and expectations of each category of citizens, and ensures that communication activities resonate effectively to achieve the desired impact.

The *OECD Report on Public Communication* highlighted an opportunity to further rely on the study and analysis of the needs, behaviours and citizen journeys through public communication channels (OECD, 2021[3]). Overall, 41% of Centres of Government (CoGs) and 21% of Ministries of Health rely on audience insights on an *ad hoc* basis to plan, design, and implement initiatives. For user research carried out at least quarterly, the percentages are lower (OECD, 2021[3]). However, segmenting the audience and diversifying content according to communication channels and target audiences allows for greater impact through increased knowledge of audiences, including users with a disability.

This section first focuses on the use of evidence-based data, collected through studies and analyses of needs and behaviours, user experiences or even citizens' journeys, to inform the identification of key challenges related to accessibility and inclusion in communication. Secondly, the section explores participatory methods that allow the integration of essential data, such as citizens' perceptions and needs, into the development of communication documents or messages. Finally, the last part outlines how to meet these needs and expectations in the specific case of crisis communication, which, by its very nature, requires a targeted, rapid, and efficient commitment to better inform and protect the whole population in exceptional circumstances.

## Identification of communication challenges in terms of accessibility and inclusion through the analysis of needs, behaviours, and citizens' journeys

A better understanding of audiences allows the development of messages and channels, formats and communication tools that are better adapted to and targeted at citizens, including persons with a disability. This allows citizens to be informed, to engage with the government, and to be involved in the definition and implementation of public policies that concern them.

According to the *OECD Report on Public Communication*, 79% of the CoGs surveyed comprehensively and systematically analyse their users' needs to inform their digital communication (OECD, 2021[3]). However, less than 50% of CoGs focus their efforts on targeting specific audiences such as persons with a disability, young people, the elderly, women, people identifying as LGBTQ+, ethnic minorities, or migrant groups (OECD, 2021[3]).

These statistics show that there is considerable scope for targeting and adapting government messages and communication channels to these groups. Studies would also recognise the unique experiences of these individuals, specifically those at the intersection of several forms of discrimination in society. Indeed, some citizens may experience multiple barriers with implications for their communication preferences. This is particularly the case for individuals with multiple disabilities or vulnerabilities, such as persons with a visual or hearing impairment or persons belonging to one or more minorities, such as women from ethnic minorities.

To ensure that its communication initiatives and reforms are based on evidence related to audiences and their needs, the Czech Republic has conducted a large-scale survey to better understand citizens' expectations. The results highlighted that respondents prioritise administrations that work and serve all citizens (35%), timely, clear and simple information and procedures (18%), over the digitalisation of public services (5%)[7].

New technologies have opened opportunities to collect and analyse evidence in a more systematic and automated way. For example, big data, cloud computing, algorithms, and analytics software can provide access to broad sets of knowledge, while reducing the costs of acquiring and processing relevant information (OECD, 2021[3]). In Canada, for example, various data collection initiatives are helping to refine public communication initiatives, including removing barriers that prevent persons with a disability from having access to public information (Box 2.1). The country has also published disaggregated data on gender, diversity and inclusion in relation to the COVID-19 pandemic (G20/OECD, 2021[36]).

> **Box 2.1. Behaviour and audience analysis under the Accessible Canada Act**
>
> The *Accessible Canada Act* (ACA), which came into force in 2019, aims to identify, remove and prevent barriers for persons with a disability when interacting with federally regulated organisations. Priority areas under the ACA include improving accessibility to employment, transportation, public services, and information technology and public communication. The government collaborates with Statistics Canada and Employment and Social Development Canada on data collection initiatives, such as the Accessibility Data Hub and the *Survey on Accessibility in Federal Sector Organisations* (SAFSO). Their results are used to better understand the communication needs of persons with a disability and to respond to these needs in a relevant and effective way.
>
> Statistics Canada has released a fact sheet based on data from the 2017 *Canadian Survey on Disability* (CSD) providing insight into Canadians with a disability. SAFSO, conducted in 2021, also gathered information about barriers related to accessibility for Canadians with a disability aged 15 and older, particularly in their use of information and communication technologies (ICT), and in their access to public communication.
>
> According to SAFSO, 45% of "Canadians with disabilities, difficulties or long-term health conditions have encountered ICT-related barriers". In terms of communication, reading or understanding written documents poses a challenge for 40% of them. As for ICT, self-service technology is the first obstacle mentioned (27%), followed by online access to public information and services (24%), then watching television programs, films, or other traditional television content (22%) and online access to federally regulated businesses (19%).
>
> Source: Statistics Canada (2021[37]), The accessibility experiences of Canadians with disabilities, 2017, https://www150.statcan.gc.ca/n1/daily-quotidien/211027/dq211027d-eng.htm; Statistics Canada (2021[38]), Survey on Accessibility in Federal Sector Organizations (SAFSO), https://www23.statcan.gc.ca/imdb/p2SV.pl?Function=getSurvey&SDDS=5345; Statistics Canada (2021[39]), What are the accessibility experiences of Canadians with disabilities, difficulties or long-term conditions?, https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2021056-eng.htm.

Additionally, open data can play an important role for more inclusive public communication, whether in the planning, service delivery or evaluation stage. Countries following the concept of "publishing with a purpose" and those sharing valuable data can indeed rely on many external stakeholders for innovative solutions to the challenge of inclusion (OECD, 2018[40]). Using open data as a tool for collaboration with civil society, for instance, would improve the inclusiveness and accessibility of public communication in the long term. Improving access to public data also opens up opportunities for government innovators to create new ways of solving certain problems (OECD, 2018[40]).

Similarly, behavioural sciences provide key evidence on cognitive factors and biases that enable communication to be more strategic and resonate effectively with citizens. Applying approaches based on these sciences can help design communications that are more likely to encourage desirable behaviours in support of policy objectives (OECD, 2021[3]). The COVID-19 pandemic highlighted the need to make the use of behavioural data as flexible as possible to respond to the unprecedented needs and impacts of this crisis (OECD, 2021[3]). For example, Ireland has created a dedicated sub-group, temporarily combining the internal expertise of the Department of Health's communications unit and research division with the expertise of external partners from other public organisations and academia. The objective was to inform the deliberations of the National Public Health Emergency Team (NPHET), with targeted behavioural studies and to inform communication about the virus and public health (see (OECD, 2021[3]), Box 3.2).

Many governments test messages with target audiences to ensure they are accessible, inclusive and understandable before they are publicly released, such as the Netherlands. As part of the management of

the COVID-19 pandemic, pictograms were tested with users of Dutch public communications to ensure they are understandable to assess their reception. Indeed, the Dutch government has conducted studies on the understanding of measures in place in February 2021. It was found that people with little or no literacy skills prefer icons to ease their understanding of governmental announcements, if they are of sufficient size. However, when the pictograms and text were unbalanced, the icons were found to be too small and therefore not immediately clear, or lengthy accompanying text reduced their understanding. In addition, although individuals with low literacy skills prefer the use of images, some pictograms raised questions. For example, in the case of the icon encouraging teleworking, they felt that the person's situation at home was unclear. For the one depicting the reopening of convivial public places until 1 a.m., the results pointed out that people (increasingly so as the age of the audience rises) do not feel represented by the pictogram of the person dancing and felt that an image representing the entire catering sector would be more appropriate[8].

This dynamic also applies to the United Kingdom. This has been demonstrated by the experiment carried out by the Department of Transport to encourage the wearing of face masks while respecting those exempted from doing so and encouraging users not to question these exemptions or even the "personas", profiles developed to highlight the experiences and barriers specific to certain categories of users of public communications (Box 2.2).

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**Box 2.2. « Personas »: user profiles to test the accessibility of communications in the United Kingdom**

In 2017, the United Kingdom Accessibility Team at the Government Digital Service (GDS) created "Personas", which are "characters" used to test accessibility. The different profiles highlight common barriers faced by persons with a disability and provide guidance on how to make specific communication designs for them.

These user profiles are used by teams such as user researchers and developers to create services that are accessible and inclusive. They allow these persons to browse and look for information on the web as users, from the perspective of different characters, to better understand accessibility issues. The profiles simulate the user's situation and the tools available to help them according to their condition. Each profile contains a basic introduction to the character in question and support for using certain features.

The team also developed some mini-training exercises people could do in 10 to 15 minutes per user profile. These are navigation or information retrieval tasks on each of the home pages of the different characters that a user can test. Although these are simple and quick examples, they can be revealing in terms of accessibility barriers.

Source: Government of the United Kingdom (2019[41]), "Using persona profiles to test accessibility", https://accessibility.blog.gov.uk/2019/02/11/using-persona-profiles-to-test-accessibility/.

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Some organisations have institutionalised audience analysis and testing prior to the use of public communication tools or content. They have done so by forming teams or establishing centres specialised in accessibility, to ensure the systematic use of relevant results in the design of public policies, services and messages. The National Disability Authority (NDA) in Ireland, for example, set up a Centre for Excellence in Universal Design in 2007 to conduct testing (Box 2.3).

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## Box 2.3. User testing of the National Disability Authority in Ireland

The National Disability Authority (NDA) was established in 2000 to provide information and advice to the government on coordination and policies relating to the lives of persons with a disability. In 2007, NDA established the Centre for Excellence in Universal Design (CEUD), under the *Disability Act 2005*, to carry out user testing for information technology and public communications.

To this end, CEUD invites users with a disability to test the sites, asking them to "think out loud" as they perform a task to reveal any confusion or barriers, thus allowing testers to identify the source of difficulty. Testers take an observational role, but may sometimes ask the user questions, either during or after the task, to clarify issues or gather additional information.

In addition to these qualitative observational tests, testers may also carry out quantitative tests, measuring the time required to complete specific tasks or error rates at various points in the tests. The data collected can then be compared with benchmarks established during the requirements gathering, to determine whether accessibility criteria have been met.

Source: CEUD (n.d.[42]), User Testing, https://universaldesign.ie/technology-ict/universal-design-for-ict/user-testing/.

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User testing can be used not only before the deployment of digital messages or services, but also after the content has been delivered in order to evaluate them. The analysis of monitoring reports on the implementation of the Directive (EU) 2016/2102 shows that at least six Member States (Bulgaria, Croatia, Lithuania, Malta, Poland and Portugal)[9] mentioned that they test public websites directly with persons with a disability when assessing whether their websites and mobile applications comply with the requirements of the Directive. Accordingly, these countries were able to detect accessibility issues that automatic verification tools could not detect. Recognising this, Bulgaria took a combined approach and conducted additional manual inspections with accessibility experts as well as users with a disability.

Testing the accessibility of public communication messages and tools or services, whether they are online or not, raises certain challenges. Interviews conducted with OECD member countries for the purpose of this document have shown that these challenges include finding and diversifying testers, especially when it comes to internal communication messages or tools. Some of the discussions emphasised the risk of a limited pool of testers, which leads to a form of professionalisation of those testers and possibly to individual biases in the results of their tests.

To meet the challenges of tester diversification, some governments, such as those of Australia or the Netherlands, are reaching out to their accessibility policy partners in the private sector and civil society. Their diverse networks and contacts are likely to broaden the pool of testers and allow more individuals to share their experience and user journey.

Some countries use the services of private sector partners to conduct audience, as well as behavioural and user experience research. Countries such as France or Belgium sometimes use the services of agencies to analyse audiences, user experiences and the evolution of citizen behaviour following communication campaigns[10].

However, it is essential to adopt an ethical approach to such audience and behaviour analysis, particularly when it involves isolated or vulnerable individuals and their personal data, as recommended in the OECD *Principles of Good Practice for Data Ethics in the Public Sector* ( (OECD, 2021[43]); see section 3). Fully aware of this issue, the United Kingdom has put in place practical manuals, both to support public organisations in developing a better analysis and understanding of their audiences and users, and to ensure the protection of their data and implement ethical approaches to these practices (Box 2.4).

Similarly, the EU provides guidance in this regard in the *Better Regulation Guidelines* and *Toolbox* (European Commission, 2021[44]).

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**Box 2.4. Guiding public servants in their user research initiatives in the United Kingdom**

The practical manuals developed by the United Kingdom in 2018 help public officials to better understand the importance of communicating and including a wide range of citizens, including persons with a disability, in behavioural and preference studies. A service manual outlines the steps to follow when selecting participants for user studies, including:

- Identifying target audiences,
- Approaching potential participants, including those with a disability,
- Information to communicate on their role,
- Protection of their private data.

They also offer specific advice to ensure a respectful approach to citizens and their data. These documents stress, for example, the importance of providing accessible and understandable information notes and data consent forms to ensure that people can fully understand their role, fill in these forms, and give their informed consent.

These manuals are based on examples and case studies. The manual that deals with obtaining informed consent for user research provides examples of procedures to be followed when doing a research session with persons with a disability. For example, if someone has a visual or cognitive impairment, public servants can offer to read the form aloud and ask the participant if they need help signing it. Guidance highlights the possibility to check, before the session, whether they need a digital version so they can read it using assistive technology. If the participant has a motor impairment, the manual reminds them that they may not be able to sign the form and that public agents can then record them giving verbal consent instead.

Source: Government of the United Kingdom (2017[45]), Running Research Sessions with Disabled People, https://www.gov.uk/service-manual/user-research/running-research-sessions-with-people-with-disabilities; Government of the United Kingdom (2020[46]), Finding Participants for User Research, https://www.gov.uk/service-manual/user-research/find-user-research-participants; Government of the United Kingdom (2018[47]), Managing User Research Data and Participant Privacy, https://www.gov.uk/service-manual/user-research/managing-user-research-data-participant-privacy; Government of the United Kingdom (2018[48]), Getting Informed Consent for User Research - Service Manual, https://www.gov.uk/service-manual/user-research/getting-users-consent-for-research#related-guides.

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More generally, many OECD reports emphasise the importance of governments adopting an ethical approach to guide decisions and behaviours in relation to open public data in particular (OECD, 2019[49]).

## Use of participatory methods for the design of communication tools in collaboration with target audiences

Interviews with the governments that participated in the framework of this Panorama show that most of them have organised participatory initiatives to integrate citizens' comments, expectations, and needs in the implementation of the accessibility policies. Carried out with varying frequency in different countries, these initiatives are used, for example, to define applicable accessibility standards and legislation, or to explain them in guidelines to facilitate the implementation of legal obligations (see section 1).

Participatory practices can contribute to more targeted, audience-oriented and responsive communication (OECD, 2021[3]). Consulting, engaging or deliberating with citizens on accessibility and communication

tools that meet their needs can lead to more inclusive and effective messages, tools and policies that are based on citizens' expressed needs, preferences and behaviours.

Involving wider samples of citizens with different experiences and perspectives, enriches the results and broadens the conclusions of the study of target audiences to make it more representative (Trevisan, 2020[50]). This can be done in many ways, either directly by the government through online and in-person consultations, surveys and questionnaires, advisory or deliberative committees, or indirectly by using opinion leaders, such as civil society organisations, trade unions or agencies.

These participatory or even deliberative procedures may require more time and therefore more resources and logistical support, particularly when they rely on various modalities such as public meetings, questionnaires, online sessions, meetings with experts, etc. The use of these methods creates expectations on the part of citizens. This requires the government to establish from the outset of the procedures how the feedback from citizens will be taken into account and how the government will follow up and report on this matter (for more information, see the report *Innovative Citizen Participation and New Democratic Institutions: Catching the Deliberative Wave* (OECD, 2020[51]).

At the supranational level, in the framework of the EU legislative procedures, citizen participation is also a crucial step in the review of the Directive (EU) 2016/2102. This is indeed based on extensive consultation. The tools used include questionnaires, one of which is simplified in an easy-to-read and understand format, to allow all citizens to give their opinion and share their experiences and expectations in terms of web accessibility and the measures to be taken to constantly broaden the scope of this accessibility and overcome the obstacles those citizens[11].

Within governments, participatory procedures are used to inform the definition of laws, policies or guidelines guiding the implementation of accessible public communication to take account of target audiences, their behaviour and preferences. As mentioned in the case of Scotland and Canada, some governments have developed laws on accessibility, non-discrimination, or design of public services in consultation or co-production with citizens. Other governments have established consultative procedures to inform the development of their charters or guidelines and better understand and meet the expectations of persons with a disability, as in France and New Zealand (Box 2.5), but also in Ireland or Scotland. In their reports evaluating the implementation of the Directive (EU) 2016/2102, 25 out of 27 countries that submitted them (24 EU Member States and the United Kingdom) explicitly mentioned having engaged organisations representing persons with a disability in their efforts to make websites and mobile applications more accessible and inclusive[12].

> ### Box 2.5. Consultative procedures for the creation of Accessibility Charters in France and New Zealand
>
> **France**
>
> In France, the *Accessibility Charter for State Communication* adopted in 2021 was developed with the support of the French disability ecosystem, in collaboration with the National Advisory Council for Persons with a Disability (CNCPH). It is a consultative body of more than 160 members, which involves and organises the participation of persons with a disability or their representatives in supporting public authorities in defining and implementing standards and policies relating to persons with a disability. CNCPH has ensured that the needs of people regardless of their disability are taken into account in the drafting of the Charter through several consultative sessions.
>
> **New Zealand**
>
> The New Zealand Accessibility Charter derives from the *Disability Strategy*, which was based on a wide public consultation. The Charter has been subject to a closer consultation, in collaboration with the 7 civil society organisations representing persons with a disability in the country. A first draft of the Charter was prepared in collaboration with the Blind Citizens New Zealand. It was submitted to the 7 organisations for comments and validation before they submitted the final document to the Chief Executive of the Ministry of Social Development (MSD) who chairs the Public Services Disability Forum. The Ministerial Committee on Disability Issues then approved this version resulting from the collaboration between the administration and the civil society. On this basis, guidelines were issued to guide the implementation, in collaboration between the MSD, the Department of Internal Affairs, and 3 associations representing persons with disabilities.
>
> Source: Government of France (n.d.[52]), Conseil National Consultatif des Personnes Handicapées (CNCPH), https://www.gouvernement.fr/conseil-national-consultatif-des-personnes-handicapees-cncph; Government of France (2021[53]), Charte d'accessibilité de la communication de l'État, https://www.gouvernement.fr/sites/default/files/contenu/piece-jointe/2021/03/pdf_accessible_charte_accessibilite_com_etat-accessible.pdf.

Interviews conducted for this Panorama stressed that the use of participatory procedures contributes to more inclusive policies and better targeted communication. They also underlined the challenges of implementing deliberative procedures. During these interviews, accessible and inclusive public communication was thus referred to both as a prerequisite for addressing these challenges, since it is a driver for increasing participation in public life, and as a consequence of greater inclusiveness, allowing for the formulation of new and better solutions to meet the specific needs of audiences and pursue accessibility reforms.

## Mainstreaming accessibility in times of crisis

Accessibility and inclusion are key factors in times of crisis. The COVID-19 pandemic highlighted the central role of communication in disseminating reliable and accurate information and promoting the effective implementation of health measures among all people, regardless of their circumstances (OECD, 2021[3]). Accessible communication in such context makes it possible to provide this information to the most isolated or marginalised persons, including those with a disability, low literacy skills, people affected by the digital divide, socially or psychologically isolated persons, as well as linguistic and/or ethnic minorities, among many others.

The pandemic has led administrations to adapt their communication tools, resources and procedures to meet the immediate needs of citizens[13], enabling them to access relevant information and thus protect themselves from the virus, disinformation, and misinformation and make informed choices.

Communication campaigns undertaken by the governments that participated in the development of this Panorama have taken various forms. Some governments, such as Belgium and the Netherlands, provided citizens with posters, easy-to-read and understand leaflets and pictograms. Subtitled videos have often been broadcast and relayed by the media, online platforms and television channels. Other governments have also opted for grassroots and local communication actions carried out by public communicators or relays within communities and minority groups. This is the case, for example, of the Government of Canada, which has worked with them to define the messages and language most appropriate for reaching its targets in the management of COVID-19 (see Chapter 7 (OECD, 2021[3])). Open public data was also used to support public communication actions during the crisis (OECD/GovLab, 2021[54]).

Testing messages, services and applications before they are deployed and measuring their use and impact on citizens is a necessary step to ensure that the information can reach and be used by everyone. The United Kingdom, for example, launched a project to measure precisely how public communication affected the wearing of facemasks in public transportation means in 2020, during the COVID-19 pandemic. Four discussion groups analysed communication prototypes. The objectives of the experiment and the composition of the groups actively took into account persons with a disability, including messages encouraging public transport users not to question the non-use of masks by people with a medical exemption (Government of the United Kingdom, 2022[55]).

To contribute to an effective response to the pandemic, governments sought to adapt crisis communication to the needs and behaviours of persons with a disability, within tight deadlines. The government of Belgium included both hearing and hearing-impaired interpreters in public communication teams to translate government announcements relating to COVID-19. These teams helped to clarify and adapt the language to the needs and constraints of sign language users. France, the Netherlands and New Zealand provided national sign language translation, simultaneous captioning in the vast majority of public interventions, including all interventions from ministers or directors general of Health. In New Zealand, this was valued by the hearing-impaired community and resulted in greater acceptability of New Zealand sign language[14].

At the sub-national level, outreach practices to analyse the needs of vulnerable or marginalised audiences, including persons with a disability, have also been put in place to ensure that communication is targeted to them and meets their needs. Initiatives such as meetings, door-to-door canvassing, distribution of leaflets in food donations delivered by civil society organisations (Box 2.6), etc. can thus help to gather their expectations and preferences and to better know, target and communicate with these groups. In the Netherlands, municipalities are adopting these approaches. This is notably the case in Amsterdam, The Hague and Rotterdam. Rotterdam Central, for example, is a community of professionals taking a user-centred approach to improving public services (Rotterdammer Centraal, n.d.[56]). Regular meetings allow for the sharing of experiences to better understand the needs and preferences of citizens. On 8 February 2022, for example, young people with a disability spoke about their difficulties in participating in the municipality's policies (Rotterdammer Centraal, 2022[57]). This dialogue emphasised that persons with a disability want to be consulted and understood in order to feel involved, and that service providers need to be patient with their specific needs. Another conclusion was the need to adapt processes and indicators to take into account their expectations in the creation of content.

It is not insignificant that some countries, such as Estonia and New Zealand, have made the national sign language an official language. Estonian Sign Language has been the second official language of the country since 2007. New Zealand Sign Language was recognised in 2006 as the third New Zealand official language after the English and the Māori. On their end, the Netherlands made Dutch Sign Language an official one since 1 July 2021.

Regardless of the variety of disabilities, one of the main barriers to understanding public messages is linguistic. This was mentioned by several public officials in the interviews conducted for this Panorama. Several communities including ethnic and linguistic minorities can live together on the same national territories and might better understand certain information in another language than the official one(s). Accordingly, countries consulted for the purpose of this Panorama have increased the use of multilingual practices to facilitate understanding the main national information and public policies.

The COVID-19 pandemic has increased this trend. This was particularly the case with Australia, Belgium (where the communications were broadcast in more than 20 languages), and Canada as well as with the multilingual campaigns and initiatives of the European Commission. In Australia, this approach has been adopted to reach linguistic minorities, including at the local level, for example by the government of New South Wales. Partnerships with the media have helped maximise the impact of communication initiatives by making them relays (Box 2.6).

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**Box 2.6. Multilingual campaigns as part of the response to the COVID-19 pandemic in New South Wales**

In its fight against the COVID-19 pandemic, the Government of New South Wales (NSW) has engaged in regular communication with the general population, while adapting and responding to the demands and expectations of linguistic minorities of the state. Various public communication initiatives enabled the government and its partners to disseminate a coherent message.

For example, the daily 11 am COVID-19 press conference was interpreted live into 10 languages (Arabic, Assyrian, Bengali, Cantonese, Greek, Khmer, Mandarin, Spanish, Urdu, and Vietnamese) from 23 July to 8 October, 2021.

This approach and the impact of these initiatives resulted from the collaboration between the NSW Government and the SBS (Special Broadcasting Service), Australia's multicultural and multilingual broadcaster. Public communication was broadcast on SBS On Demand, and on social media in all 10 languages.

Other means have been deployed, including participation of community and minority leaders in public communication or the distribution of information sheets in food packaging delivered by non-profit organisations.

Source: Information provided by New South Wales government officials.

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Specific arrangements have been developed to respond to the urgency of disseminating public communication in a way that takes account of audiences and their specific needs. In terms of accessibility of crisis communication, working groups have been formed to enable persons with a disability to express their point of view to the government on how to integrate their expectations and needs into the response to the pandemic. In Ireland and Canada, for example, persons with a disability have been invited to share with the government their perceptions of the inequalities experienced during the pandemic (Box 2.7).

**Box 2.7. Consultative initiatives to better identify needs and communicate with persons with a disability during the COVID-19 pandemic in Canada and Ireland**

**Canada**

During the COVID-19 pandemic, the Minister of Employment, Workforce Development and Disability Inclusion established the COVID-19 Disability Advisory Group. Working groups have held regular meetings from April to August 2020, to respond to the difficulties encountered by persons with a disability. Leaders were appointed from among the members of the Group to facilitate meetings, manage groups and make recommendations. The Treasury Board of Canada Secretariat set adaptation measures for the working groups and appointed note takers to help them. It has also provided these working groups with logistical support and translation services.

The COVID-19 Disability Advisory Group made 21 recommendations on the experiences of persons with a disability and measures that could be taken to better support them. They cover 5 areas of work, including public communications and accessibility.

The recommendations proposed by the Group have had a direct impact on public policies and decisions that were adapted by the government namely to ensure public communication is more accessible to persons with a disability and more targeted towards them. The government has thus allocated $1.1 million to national disability organisations to support communication and mobilisation activities, to mitigate the impact of the pandemic on these audiences. The Secretariat has adopted a new strategic approach to accessible COVID-19 communications and resources. Finally, the Minister of Employment, Workforce Development and Disability Inclusion wrote a letter to Accessibility Standards Canada to initiate the development of guidelines aiming to strengthening accessibility in case of future public health emergencies and crises.

**Ireland**

On 14 May 2021, the National Disability Authority (NDA) hosted a virtual event for persons with a disability and their representative organisations to share with the government the perspectives on the impact of the pandemic on daily living. This consultation, bringing together 67 participants, helped to formulate recommendations, including on the use of information technologies to improve accessibility.

Following a presentation and a questions and answers session, the consultation was divided into 6 thematic breakout sessions. The event concluded with a summary of the experiences and suggestions expressed in each of the discussion rooms, so that the whole group could have an overview of the topics and solutions discussed. Participants considered that while the pandemic was challenging in many respects, it has offered a view of how society could be more inclusive of persons with a disability.

Among the most frequent comments about building back better after the crisis, participants stressed that the government should listen and learn more from persons with a disability to help to identify the most effective solutions. Moreover, participants expressed hope that the learning and gains made during the pandemic will be consciously retained and built upon. This consultation was the first in what the NDA hopes will become an annual 'listening event'.

Source: Government of Canada (2021[58]), COVID-19 Disability Advisory Group, https://www.canada.ca/en/employment-social-development/corporate/disability-advisory-group/reports/2020-advisory-group-report.html; Government of Ireland (n.d.[59]), https://nda.ie/publications/communications/building-back-better-consultation/.

However, interviews conducted for this Panorama stressed that the COVID-19 pandemic was an indicator or a catalyst of accessibility challenges in times of crisis. Many interviewees highlighted the pandemic has

increased awareness of the importance of accessibility in ensuring that no one is excluded from urgent communications. The following arguments discuss the challenges that this awareness has brought to light, but also progress made.

Some interviewees mentioned resources for sign language interpretation. They are limited and, particularly in times of crisis, can be drained by the public sector into press conferences and communication initiatives, taking them away from traditionally private use (business, personal assistance, etc.) and depriving citizens of this service. In addition, increased use of these limited resources raises the possibility of increased future costs, until the supply grows and can meet the demand for this type of service. Although public communication resources in all countries cannot meet this demand (OECD, 2021[3]), some countries, such as Germany, are responding to this challenge by integrating dedicated teams within their workforces. Others use external interpreters for their press conferences, as in Belgium. The federal government is working on a call for tenders for a framework contract guaranteeing systematic provision of interpreters when press conferences are organised in the future.

Challenges in terms of the complexity of adapting to the platforms, their accessibility, sharing and confidentiality of data were also highlighted in the context of the migration of public initiatives, including public communication and citizen participation, to platforms such as Zoom or Teams. Interviews showed that governments, as well as the European Commission, have nevertheless found acceptable – despite their imperfections – solutions to meet the requirements of people with specific needs or being assisted on these platforms, while guaranteeing the protection of their personal data.

However, the role that the crisis played as a catalyst for ensuring accessibility in all public communications has also resulted in many innovations. These include for example the virtual assistant ANAE in France (see section 3) and the much more widespread use of the sign language interpreting or real-time captioning, as in Australia, France, Belgium, and New Zealand.

The COVID-19 pandemic has also strengthened the conviction of governments committed to accessibility in public communication that access for all to communication content and tools must be considered upstream of the dissemination of messages, from their conception. Some interviewees mentioned that the initiatives envisaged in this regard do not necessarily require more resources, but sometimes a better structuring and drafting of documents (see section 3).

# 3 How to ensure accessible and inclusive public communication in the digital age?

Digital technology advances have created new opportunities for governments and citizens alike, by offering more participatory, innovative and agile ways to communicate (OECD, 2021[3]). The COVID-19 pandemic has reinforced this trend (Oncins, 2020[60]), notably when restrictions to movements were imposed to curb the pandemic.

The tendency to increase the daily use of digital information and communication technologies (ICT) has highlighted and amplified the digital challenges faced by persons with a disability (Dror et al., 2021[61]). However, recent technological advances provide levers for accessible and inclusive communication.

Most administrations have identified this potential for improving communication with citizens (Berryhill et al., 2019[62]) and the accessibility of digital services, not only via websites and applications, but also via social media.

This section first explores the repositories and other resources made available to public officials, to ensure accessibility in the development of digital services and websites created by public organisations. The second part focuses on tools for designing accessible and inclusive content on social media. The last part aims to bring together government practices that allow the accessibility of communication channels to be taken into account from the outset. This part also emphasises the need to adopt an ethical and responsible approach in the deployment of these technologies.

## Reference documents and resources used to align digital communication websites and applications with applicable rules

To facilitate the implementation of the guidelines for the design of websites and their content, some administrations have created websites specifically dedicated to digital accessibility. These spaces make international standards, national laws and regulations available, as well as strategies and administrative guidelines aimed at establishing the rules for accessible and inclusive communication.

Their aggregation on a single online platform allows public officials to easily find the documents outlining their obligations in terms of accessibility, as well as technical resources to ensure the compliance of their tools with these standards. These websites include practical tools such as systems or templates for the design and development of accessible websites and online digital services from the conception stage, as well as tutorials to help create accessible and inclusive content. France, Italy and New Zealand have developed design kits (Box 3.1). These have the advantage of facilitating the task of developers by providing ready-to-use elements and ensuring the uniformity of websites and applications in terms of their identity and accessibility.

## Box 3.1. Accessibility Toolkits in Italy and New Zealand

**Italy**

Designers Italia is a leading association in Italy for the design of accessible and inclusive digital public services. It provides guidelines, kits, and templates to facilitate design processes focused on citizens' needs. The organisation has developed guidelines based on a consultation to inform the design of digital services and environments based on the real needs of users.

Their kit takes the form of a five-step iterative process of digital design and transformation. The tools it contains allow:

- **Organising the project and its management**: including the operational planning of the digital project, the aspects to be considered to respect the rules of confidentiality in force, as well as the definition of the activities and skills necessary for the development of the project.

- **Better understanding the context in which the service is used**: through tools for research, analysis and a better understanding of users, including data collection. These include templates for interviews with users and relevant stakeholders, online questionnaires to gather information, as well as tools to map user experience and carry out contextual analysis.

- **Designing the interaction with the service**: by implementing the main features of the digital service that emerged from the user experience simulation, through a prototype interface.

- **Creating the user interface**: using libraries, templates and models to build digital interfaces with a defined and consistent visual style.

- **Validating the solution**: through user testing and guidance on monitoring key performance indicators of a digital service using web analytics tools.

**New Zealand**

The New Zealand Ministry of Social Development has developed two toolkits to better assist public officials in making content available online in alternate formats for persons with a disability:

- **Lead Toolkit**: this toolkit explains the Accessibility Charter's work programme to increase the employment of persons with a disability in the public sector. It contributes to transforming the relationship with citizens, the culture of public organisations, their communication and the performance of government (see section 4).

- **Accessible information**: this guide is a tool that enables people, including those at risk (having, for example, brain damage, mental health conditions, etc.), to have control over the decisions that affect their lives. The New Zealand government has created a tool that provides guidance to help persons with a disability to make decisions for themselves. This guide provides an understanding of how to support persons with a disability, including by providing easily readable and understandable communications. When designing information, the guide encourages, for example, considering how people prefer to consume their information and to include real-life experiences to help devise alternative formats, options and the consequences of these for disabled users.

Source: Designers Italia ( (n.d.[63])), Linee Guida, https://designers.italia.it/linee-guida/; Designers Italia (n.d.[64]), Kit di design, https://designers.italia.it/kit/; New Zealand Government (n.d.[65]), *The Accessibility Charter: A Commitment to Accessible Information*, https://msd.govt.nz/about-msd-and-our-work/work-programmes/accessibility/accessibility-charter/index.html; New Zealand Government (n.d.[66]), Accessibility Charter Training, https://msd.govt.nz/about-msd-and-our-work/work-programmes/accessibility/training/index.html; New Zealand Government (n.d.[67]), Lead Toolkit, https://msd.govt.nz/about-msd-and-our-work/work-programmes/lead-programme-work/lead-toolkit/index.html.

Gathering laws, guidelines, tools, and other resources on a single platform promotes a consistent approach to accessibility across the government. It allows all public officials to know where to find the answers to their questions and to easily find information and training on accessibility issues. Some of these online platforms dedicated to accessibility often refer users to trainings, as in the United Kingdom (GCS, 2020[68]) or in Norway. A 45-minute course on universal design created specifically for content creators and developers of public websites is offered there (uutilsynet, n.d.[69]).

In some cases, as in Belgium, the usefulness of these resource sites goes beyond the public sector. They represent a channel for direct communication with the department in charge of digital accessibility within the government. Citizens can thus more easily report an incident in terms of access to information, pages, visuals, information and other content, and testify to shortcomings on websites or be informed of complaint mechanisms through which they can assert their rights to equal access to public information (Box 3.2).

**Box 3.2. An accessibility website to encourage citizens in Belgium to express their opinion**

The Belgian government has developed an accessibility website, with several tools to help public organisations adapt the content governed by the Directive (EU) 2016/2102. The site includes, among other things, information for developers and graphic designers, as well as tips and recommendations for web content writers. In addition, the hub gives citizens the opportunity to provide feedback. It also includes all the information needed to file complaints in case of errors or difficulties regarding the accessibility of a federal public website.

On the website or application, citizens can submit complaints to the Accessibility team of the Federal Public Service Policy and Support (SPF BOSA), which then refers them to the relevant organisation. To do so, citizens can first contact the person responsible for the website concerned, whose contact details can be found in the accessibility statement of each federal website. Alternatively, citizens can contact the administration in charge and then be directed to the appropriate person. As a last resort, in the event of a non-response or an unsatisfactory response, it is also possible to contact the ombudsman of the federated entity to receive a response to the complaint in question.
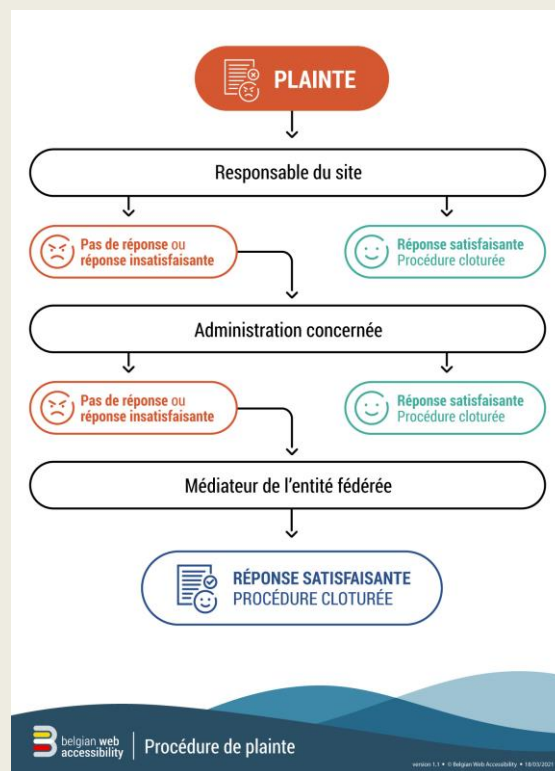


Source: Belgian federal government (n.d.[70]), *Belgian Web Accessibility*, https://accessibility.belgium.be/fr; Belgian federal government (n.d.[71]), *Missions et plaintes*, https://accessibility.belgium.be/fr/missions-et-plaintes.

Finally, some websites dedicated to digital accessibility provide tools to monitor the implementation of digital accessibility. In Portugal, in addition to the tutorials and blogs available on the website acessibilidade.gov.pt, there is a technical tool, "AccessMonitor", that allows public officials to check the compliance of websites. In addition, information is available on the Usability and Accessibility Seal, which was developed by the Agency for Administrative Modernisation (AMA). This seal encourages the development of accessible websites and applications by promoting and making visible the efforts of those who manage these websites (Box 3.3).

> **Box 3.3. Usability and Accessibility Seal in Portugal**
>
> In Portugal, the national digital maturity certification model was launched in 2021. The initiative allows officials in charge of government websites and applications to obtain a usability and accessibility seal following a website assessment. Developed by the Agency for Administrative Modernisation (AMA) and the National Institute for Rehabilitation, it aims to promote efficiency gains within certified organisations and contribute to digital transformation. This initiative encourages public officials to bring their websites and mobile applications up to a required level, or beyond, in order to qualify for a higher-level seal. This seal is also useful to citizens as it informs users of the accessibility level of the website or mobile application. It is structured around three levels: bronze, silver and gold.
>
> An accessibility toolkit is available to help public service webmasters understand how to achieve the various compliance criteria necessary to obtain the three levels of the seal. To achieve the "bronze" level, for example, it is necessary to assess the accessibility criteria of WCAG 2.1 compliance level "AA"[15] through the AccessMonitor tool and check the usability of the content. In contrast, a "gold" accessibility level requires usability and accessibility testing with at least six participants, two of whom with a disability.
>
> Source: Government of Portugal (2021[72]), https://www.acessibilidade.gov.pt/blogue/categoria-acessibilidade/portugal-pioneiro-na-certificacao-digital/; Government of Portugal (2019[73]), Selo de Usabilidade e Acessibilidade, https://selo.usabilidade.gov.pt/Selo_de_Usabilidade_e_Acessibilidade_v1_1.pdf.

The challenge of making websites, applications and social media accessible is all the more important as many administrations are reviewing their communication strategies to reach audiences such as young people through social media. In France and Turkey, for example, public organisations in charge of youth affairs also communicate with young people through mobile applications, although websites remain the most used platform for informing citizens about their work and providing access to public programmes and services, as reported by 95% of them (OCDE, 2021[74]).

## Resources for accessible and inclusive public communication on social media

While social networks are a key channel for informing citizens, including certain target groups such as young people, about existing public policies, the reverse is also true. OECD data underlines that they can be an essential source of information and data collection for public policy makers in identifying key trends in citizens' concerns, including those of young people, and in anticipating their needs (OCDE, 2021[74]; OECD, 2021[3]; OCDE, 2019[75]). Public authorities can take advantage of the interactivity of social networks to solicit and exchange directly with social network users, for example through mobile surveys, live discussions and debates, or the creation of discussion threads around key words.

Some platforms such as Twitter, Facebook, Instagram, YouTube or even TikTok have various and sometimes limited features to accommodate some of the needs of persons with a disability. For example, alternate texts can be added to published images and the services on which governments can post videos sometimes automatically generate subtitles (Olson, n.d.[76]). However, these tools are not necessarily optimal. Public organisations must therefore take into account the limitations of accessibility features on each of these platforms when creating content on social networks. The interviews carried out for the purpose of this Panorama emphasised that accessible and inclusive communication on social media can only be achieved to the extent that the functionalities of these platforms allow.

To overcome this problem, several governments such as Finland, the Netherlands and Norway have stressed the importance of ensuring the dissemination of information through several channels. In Norway,

social media is considered as a complementary communication channel to government websites (Uutilsynet, n.d.[77]). Information must therefore be accessible from the sites run by administrations. In practice, this means that social media platforms are used to attract audiences to the main website. For example, it is recommended to integrate conversations started between government and citizens on social media on the website of the agency or the administration concerned. This allows citizens to follow activities as well as conversations taking place on other platforms.

To fully take into account the accessibility needs of citizens on social media, 13 out of the 16[16] governments that participated in the development of this Panorama have defined manuals to make communications that are disseminated on these platforms more accessible. This is particularly important given that accessibility measures and technologies used by groups of persons with a disability are only sporadically taken into account by social media platforms (Thiel and Bradshaw, 2022[78]). In addition, 50%[17] of governments that have developed such material also emphasised the importance of inclusiveness on social media. In Australia, for example, it is noted that the language and images used should be inclusive and that it is important to respect all people, their rights and their languages (Australian government, n.d.[79]).

In Norway, a webpage on the digital accessibility website collects tips for public agents to create content on social platforms following the principles of universal design (Box 3.4). Such an approach requires, for example, the addition of precise descriptive alternative texts when images are used, so that persons with a disability can also know what the illustration contains. In Canada, specific guides about crisis communication contain advice on how to make public communication on social media more accessible and inclusive (Box 3.4).

**Box 3.4. Making content more accessible on social media in Norway and Canada**

**Norway**

In Norway, a webpage on the digital accessibility website offers advice to communicators on creating accessible content on social media. In particular, it encourages taking into account the target audience to better choose the channel through which to communicate. These recommendations also require public officials to not just publish on social media platforms, recognising that it is important to include accessible alternatives for persons with a disability.

The practical advice is accompanied by examples of detailed alternative texts for certain social media posts, such as PDF documents or images, to make them accessible to persons with a disability. The Norwegian guideline also stresses the importance of enabling citizens, including those with impairments, to participate in conversations and consultations that take place on social media platforms by relaying them on government websites. In this way, users can be aware of and access messages as well as interactions taking place on other communication channels despite potential barriers to accessibility.

**Canada**

Accessibility Standards Canada, the entity responsible for creating and setting accessibility standards within the Canadian government, has developed several guidelines to communicate in a more accessible and inclusive manner during the pandemic and during other crises. These provide practical advice on the effective dissemination of information through various online and offline formats.

In particular, one of the guides sets out the requirements for effective communication that does not create barriers to persons with a disability on social media. The document uses pictograms and easy-to-read text to provide clear and concise information. It highlights the importance of recruiting sign language interpreters for Facebook Lives so that all citizens can take part in conversations with the government. Other recommendations include the use of plain language and the inclusion of links to accessible versions of content where this is not included in the publication. Finally, the guide page itself includes an accessible sign language version and a short format.

Source: Uutilsynet (n.d.[77]), Sosiale medium og universell utforming, https://www.uutilsynet.no/regelverk/sosiale-medium-og-universell-utforming/202; Government of Canada (2022[80]), Accessible Communication during COVID-19 and Other Emergencies: A Guideline for Federal Organizations, https://accessible.canada.ca/resources/emergency-communication-guidelines-federal-organizations.

To make the content accessible, enabling assistive technologies, such as screen readers, to be able to read the content is important. In the United Kingdom, a guide to making social media posts more accessible has been developed and includes advice on how to accommodate assistive technologies. This document describes how to make content accessible for screen readers throughout the planning, creation and publication on social media platforms. Alternatives are detailed where it is not possible to make content accessible due to restrictions inherent in the social media platforms concerned (Box 3.5).

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**Box 3.5. Planning, creating and publishing accessible social media campaigns in the United Kingdom**

The United Kingdom Government Communication Service has produced a guide to plan, create, and publish accessible campaigns on social media. It describes practices for anyone creating or publishing campaigns on these platforms, such as web developers or community managers.

Additionally, it includes helpful scenarios and links to other resources and webinars that allow public officials to hone their skills and knowledge on accessible content. On the dedicated page, specific information is available to ensure that content is screen reader friendly. Tips include adding alternate text for videos that cannot be subtitled under the initial publication on social media, for example. This allows screen readers to access and transmit information to their users.

Source: GCS (2021[81]), Planning, Creating and Publishing Accessible Social Media Campaigns, https://gcs.civilservice.gov.uk/guidance/digital-communication/planning-creating-and-publishing-accessible-social-media-campaigns/.

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Finally, accessibility is also a component in the fight against the proliferation of false information on social media platforms. The inaccessibility of some online content, in particular for assistive technologies, can hamper measures against online misinformation and disinformation. Labelling unverified or false content now available on some social media platforms is one way to fight misinformation and disinformation online (Thiel and Bradshaw, 2022[78]). However, this method is only partially effective because persons with visual impairments sometimes use screen readers to have access to websites and mobile applications. If the structure of published information does not consider assistive technologies, it is impossible to provide reliable information for users with a disability or alerts about unverified content (OECD, forthcoming[82]; AGE Platform Europe, 2021[83]).

However, adopting these accessibility techniques is not the only response to combating misinformation and disinformation among vulnerable audiences. In the context of an ageing population, beyond procedures and assistive technologies, empowering older citizens with the necessary skills to use digital media and communication platforms enhances the accessibility of government messages to them on these channels while helping to reduce the risks associated with misinformation and disinformation. Lack of digital skills can compromise older people's access to essential public information and services in areas such as health, transport, housing and employment.

Besides the content on social media platforms, it is important to make public communication accessible to tools such as screen readers on all websites. Governments are encouraging the use of assistive technologies in their guidelines. A guide on content accessibility in the United States (Government of the United States of America, n.d.[26]) advises developers of digital services to use screen readers themselves. This allows public officials to become familiar with these issues and to better understand the challenges related to disability in practice and how to optimise a website or an application to support the use of assistive technologies. The Press and Information Office of the Federal Government of Germany also deploys this approach.

## Making digital communication "Accessible by design"

The Digital Government Policy Framework of the OECD identifies the principle of "digital by design" as one of the six drivers for improving the digital maturity of governments (OECD, 2020[85]). To do so, technologies must be fully integrated into the development process of digital tools from their conception, in addition to providing equivalent services over non-digital channels, in an omnichannel approach (OECD, 2020[85]).

Thus, taking digital by design into account does not mean adapting government services to digital, but reinventing them so that they are designed for a digital mode. Furthermore, capturing the potential of digital technologies and data at the earliest stages of the process and service design represents an important opportunity to reshape interactions between users and the state (OECD, 2020[85]).

This dynamic also applies to accessibility issues in digital public communication (OECD, 2021[3]). Countries like Canada or New Zealand consider accessibility from the design stage of a communication project. As with digital by design, this allows for the provision of digital communications conceived to be accessible to persons with a disability from the outset. In Canada, accessibility by design represents an integral part of the guide detailing standards for digital transformation teams. It is a precondition for the delivery of usable services for persons with a disability. The guide encourages public officials to adopt a proactive and systematic approach to identifying, removing and preventing barriers to accessibility immediately in order to respect the rights of persons with a disability. This approach to accessibility has reduced costs by ensuring that digital websites, applications and services do not need to be reworked at a later date to address accessibility issues (Treasury Board of Canada Secretariat, 2021[86]).

Similarly, the New Zealand guidelines encourage public organisations to consider accessibility at the design stage for efficiency gains. The webpage entitled "Include Accessibility in Projects" advises to ensure that sufficient resources are allocated to the creation of accessible formats and include accessibility requirements in contracts with external service providers, to test accessibility against web standards, to encourage citizen feedback, and to ensure that experience of the organisation is shared with other teams to ensure a culture of learning within public administration (Government of New Zealand, n.d.[87]).

In addition, innovative solutions are enabling many governments to design in an accessible way, giving society as a whole the opportunity to interact with government efficiently. Leveraging these digital innovations can enable two-way communication between governments and citizens to take into account their requests and be more responsive to their needs (OECD, forthcoming[88]; OCDE, 2021[74]; OECD, 2021[3]). In this way, governments can use the evidence shared by users about their aspirations, needs and preferences to listen to citizens and tailor their services and communications to the specific needs of social groups (OECD, forthcoming[88]). Estonia and Finland, for example, use artificial intelligence (AI) to develop tools to access government information more easily, including through voice assistants (Box 3.6).

These advances are not only essential for persons with a disability, but also benefit society as a whole. Making content accessible by design simplifies the processes and/or diversifies the ways in which citizens interact with government.

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**Box 3.6. Leveraging artificial intelligence to promote digital service accessibility in Estonia and Finland**

The Estonian government is about to launch a voice-mediated virtual assistant, called Bürokratt, after a successful beta testing in 2021. This is the first AI- virtual assistant in public service. It enables citizens to interact with their government through an interoperable network of government AI applications accessible via their voice. One of the main benefits of this new system is that it includes all government digital services in one place and expands access to public services for Estonians with a disability. The use of voice assistants allows people who are unable to write to ask questions or seek services using their voice.

In Finland, a network called AuroraAI is under development. Developed by the Digital and Population Data Services Agency, it will be deployed in 2022. This tool will consolidate government services on a single platform. Aurora AI will contribute to solving complex societal problems related, for example, to social exclusion. The tool will be able to rely in an innovative way on the use of information by users, on the analysis of data from target audiences and on the other uses of AI within the government. Indeed, the data used will be able to assess the needs of citizens and allow a more efficient use of administrative resources.

Source: e-Estonia (2022[89]), "Estonia's new virtual assistant aims to rewrite the way people interact with public services", https://e-estonia.com/estonias-new-virtual-assistant-aims-to-rewrite-the-way-people-interact-with-public-services/; Emerging Europe (2021[90]), "Estonia launches Bürokratt, the Siri of digital public services", https://emerging-europe.com/news/estonia-launches-burokratt-the-siri-of-digital-public-services/; Ministry of Finance of Finland (n.d.[91]), AuroraAI Network, https://vm.fi/en/auroraai-network.

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Beyond voice assistance, other countries, such as France, have developed virtual assistants to sign the content of webpages. The ANAE avatar provides French sign language (FSL) interpretation on the government's "vaccinal pass" (Government of France, 2022[92]) and "vaccines" (Government of France, 2022[93]) webpages. Designed as a chatbot or conversational agent, it highlights how governments can use technological advances to improve accessibility and inclusion on government websites. In Korea, chatbots have also played a key role in managing Covid-19. KakaoTalk, the country's most widely used messaging system, has implemented virtual assistants capable of answering frequently asked questions such as news related to screening centres (OECD, 2021[3]).

The increasing use and development of AI in government requires a responsible and ethical approach. Indeed, there are risks associated with the use of AI, particularly for marginalised people, by perpetuating certain biases and prejudices (OECD.AI, n.d.[94]). A responsible approach requires that actors and stakeholders promote the deployment of AI for outcomes that benefit all, throughout the life cycle of an artificial intelligence system, supported by appropriate safeguards (Box 3.8) (OECD.AI, n.d.[94]).

To support accessibility by design and at all stages of processes, including on digital communication channels, digital by design approaches promote collaboration with stakeholders on public services (OECD, 2020[85]). Government as a platform and accessibility and policy solutions that focus on target audience data and user experiences can improve efficiency and service development. Collaboratively defined and deployed, they are jointly owned and can be a shared responsibility with civil society, including organisations representing persons with a disability, as has been the case in initiatives in, for example, Canada and Ireland. In doing so, the systematic inclusion of citizens, including users of public communications and services with a disability, in the design, implementation and evaluation has the potential to increase accessibility and make it a shared issue and responsibility throughout society (see section 2).

In Germany, the government is also conducting a reflection at the societal level by creating a committee for digital accessibility bringing together stakeholders from the private sector, universities, civil society organisations, and freelancers working on these issues to reflect on the best ways to improve digital accessibility. The entire German administration benefits from the work of this committee.

Digital accessibility has also proven to be important in times of crisis. According to OECD data, centres of government report that communicating to manage crisis situations is the number one digital communication priority cited by a majority of OECD member and non-member countries (58%) (OECD, 2021[3]). Governments have been keen to make their crisis communication accessible online, as in the case of the application developed and deployed in many other countries to fight the COVID-19 pandemic, such as in New Zealand (Box 3.7).

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**Box 3.7. Mobile applications accessible by design in times of crisis**

The New Zealand Ministry of Health's application was developed in 2020 to inform people who have been exposed to someone who has tested positive for COVID-19. This tool was conceived accessible and it tested by members of the Association of Blind Citizens. In particular, the application makes use of accessibility features built into mobile phones, such as VoiceOver on iOS and TalkBack on Android. These tools make it possible to read information aloud to visually impaired citizens.

Additionally, the app includes sensory feedback for supported devices. This feature notifies the person when an official QR code is scanned or an alert received. Although the app is designed to be easy to use, guides in 23 different languages (Te reo Māori, French, Korean, Arabic, all alternate formats including New Zealand Sign Language, etc.) allow everyone to familiarise themselves with how the app works. Behavioural analytics and user feedback also inform the development and improvement of this app.

Source: New Zealand Health Ministry (2021[95]), About the NZ COVID Tracer App, https://www.health.govt.nz/covid-19-novel-coronavirus/covid-19-resources-and-tools/nz-covid-tracer-app/about-nz-covid-tracer-app; New Zealand Government (n.d.[96]), Translations, https://covid19.govt.nz/languages-and-resources/translations/.

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Beyond the COVID-19 pandemic, governments have led efforts to make digital emergency or crisis communication tools accessible. The adoption of the "European Accessibility Act" requires the accessibility of the common emergency number 112 by 2025. In addition, this involves the development of alternative means of communication (applications, SMS, etc.) so that everyone can access the emergency number, regardless of their disability. However, some countries such as Belgium, France or Luxembourg have made this number accessible before the adoption of this act. In these countries, persons with a disability can send a distress fax, a text message or use a mobile application to contact 112 in Belgium and Luxembourg (112, n.d.[97]), and 114 in France (French State Secretariat for Disabled Persons, 2017[98]). Since 2011, 114 is a French public service for emergency calls or information, under the umbrella of the Interministerial Committee for Disability. It allows interaction by videophone, chat, SMS or fax for persons with a hearing or speaking impairment. User associations, in particular representatives of persons with a disability, are engaged in managing and developing this service.

Finally, the design of such digital communication tools has relied on the increasing use of data relating to users, their behaviours and preferences to inform and develop public messages, services and policies. Managing this information in a secure, responsible and ethical way by taking appropriate actions in case of misuse of citizens' information, for example, has become a necessity. The OECD has developed a set of principles to support managing data responsibly and ethically in the public sector (OECD, 2021[43]) (Box 3.8).

**Box 3.8. Good Practice Principles for Data Ethics in the Public Sector**

The OECD developed ten principles to ensure a responsible approach to data management in government projects and services. They are based on digital government practices in OECD member and partner countries:

**1. Manage data with integrity**

To maintain public trust, public officials should ensure trustworthy data management in data generation, collection, selection, storage, disposal, access, sharing, and use. Officials in charge of data management, for instance, should not use this data for personal purposes or take advantage of their position in any way.

**2. Be aware of and observe relevant government-wide arrangements for trustworthy data access, sharing and use**

It is the responsibility of public officials to be aware of governance arrangements, mechanisms and tools framing data access, sharing and use, to ensure they are applied and used effectively.

**3. Incorporate data ethical considerations into governmental, organisational and public sector decision-making processes**

It is necessary to take concrete measures to prevent risks in the management of data at different levels of government, so that these non-binding guidance leads to real impact. This could be achieved for example by incorporating data ethical considerations as part of, or as preconditions for, the planning and funding of public sector digital and data projects.

**4. Monitor and retain control over data inputs, in particular those used to inform the development and training of AI systems, and adopt a risk-based approach to the automation of decisions**

The use of AI systems brings with it specific ethical responsibilities and public officials should maintain control over the data used they access, share and use to train such systems. Thus, it is important to monitor and control the quality, suitability and impartiality of data inputs by defining data management rules and practices.

**5. Be specific about the purpose of data use, especially in the case of personal data**

It is important to consider the kind of data that public officials need in order to develop a service, tool, or message to only collect information useful for the project. Prior to the start of a project, it is therefore necessary to assess whether data needs to be collected, accessed, shared or used in the first place.

**6. Define boundaries for data access, sharing and use**

Processes must promote a balanced approach to data collection and use and governments must understand societal costs and benefits, assess constraints, risks and rules governing data sharing, collection and use.

**7. Be clear, inclusive and open**

Government openness and public communication are key to inform and engage citizens. To enhance their trust, it is particularly important to be open about how data is being used, for what purpose and by whom in a clear and understandable way.

**8. Publish open data and source code**

Publishing codes and data not only allows stakeholders engagement, but also ensures government transparency and accountability. It is important to ensure that data are equitably distributed in society, contribute to the public good, and create public value. Furthermore, the publication of these codes and data allows the public to scrutinise governmental actions.

### 9. Broaden individuals' and collectives' control over their data

Citizens and communities should be able to exercise control over their data and given decision-making power over their data, including the option to withdraw their consent to its use. For instance, it is important that governments allow individuals or their representatives to delete collected data. Furthermore, the replication of databases should be avoided, and shared data infrastructure should be used where possible.

### 10. Be responsible and proactive in risk management

Finally, governments must anticipate risks and proactively address public concerns regarding the collection, storage and use of personal, sensitive or community data in public projects. To implement this principle, establishing legislative frameworks, systems, and government entities that are able to intervene to protect the rights of citizens is needed.

Source: OECD (2021), Good Practice Principles for Data Ethics in the Public Sector, https://www.oecd.org/gov/digital-government/good-practice-principles-for-data-ethics-in-the-public-sector.pdf.

# 4 How to sustain an administration trained in the challenges of accessible and inclusive communication?

As public communication takes place in an ever-changing context, communicators must be able to adapt to the innovations and challenges raised by these evolutions. Continuous development of their skills is key, including in responding to accessibility and inclusion issues (OECD, 2021[3]). A majority of the countries consulted for this Panorama cited the development of accessibility expertise and the retention experts in communication as major challenges[18].

Facilitating a culture of continuous learning within administrations, training and the creation of communities of practice can support the professionalisation of communicators and encourage the sharing of experiences between public officials (OECD, 2021[3]). Within the European Union, 26 out of 27 governments that submitted a monitoring report in EU Member States and the United Kingdom have such procedures in place to support the improvement and sustainability of accessible and inclusive communication[19].

This section details different ways of promoting a culture of accessibility and inclusion within administrations and, more broadly, in society as a whole. The first part describes communities and tools to raise awareness and professionalise public communicators. The second part discusses accessibility training, before addressing the outsourcing of certain actions. Finally, the importance of raising awareness of inclusion and accessibility issues in society as a whole is highlighted.

## Creation of communities that share knowledge and practices

Encouraging the awareness of public agents on accessibility and inclusion issues is a prerequisite for the operationalisation of these two criteria in public communication and, in doing so, for equal access to public information for all citizens. In practice, efforts in this direction take the form of bringing together professionals from the administrations responsible for implementing accessible public communication, within communities of practice. These efforts also involve the creation of specific responsibilities and instruments to raise awareness of these challenges among public officials.

### *Interaction within communities of practice*

To strengthen dialogue and the sustainability of skills, at least 9 of the countries consulted for this Panorama (Australia, Belgium, Canada, France, Germany, Italy, the Netherlands, New Zealand and the

United Kingdom) mentioned having set up networks of professionals or communities, open to a greater or lesser number of public officials, who interact at in-person meetings and/or online.

These discussions may focus solely on accessibility issues or involve broader approaches, for example by being part of more general debates on digital technologies or communication issues. The regularity of their meetings and their formats vary. In the United Kingdom, a community of practice specific to accessibility issues has been established: the "Cross-government accessibility community". In Belgium, these subjects are addressed within the framework of a network covering public communication more broadly: the "CommNetKern". This network brings together those responsible for communication within the federal administration. It meets every two months to stimulate the federal communication policy and support communicators in its implementation, including in terms of accessibility and inclusion.

From a transnational perspective, following the adoption of the Directive (EU) 2016/2102, the European Commission (EC) has created an expert group to share good practices on web accessibility among EU Member States (Box 4.1).

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**Box 4.1. Web Accessibility Directive Expert Group (WADEX)**

To support the implementation of the Directive (EU) 2016/2102, the EC created an expert group in 2016: the Web Accessibility Directive Expert Group (WADEX). The main mandate of this group is to advise the Commission on issues regarding the implementation of the Directive and cooperation and coordination with Member States and stakeholders.

Since its establishment, the group has met regularly (6 one-day in-person meetings and, since the beginning of the COVID-19 pandemic, 24 two-hour online meetings). Participants in the meetings include Member States' representatives to WADEX (mostly digital ministries and agencies), other Commission services, as well as experts and stakeholders invited as observers or speakers depending on the topics on the agenda.

Each of these meetings starts with the introduction of updates on the progress made in implementing the Directive, followed by a series of presentations given for and/or by WADEX members on various topics, such as useful tools and resources, common challenges, as well as the lessons learned. A questions and answers session or a round table discussion follows each presentation and covers perspectives for future practices.

Source: European Commission (2022[99]), Web Accessibility Directive Expert Group (WADEX), https://digital-strategy.ec.europa.eu/fr/policies/web-accessibility-expert-group.

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### Raising awareness to enhance knowledge and skills

Some governments have introduced explicit administrative responsibilities to continuously raise awareness among communicators and public officials specifically on accessibility and inclusiveness issues. Regular awareness-raising plays a role in building knowledge and skills by informing about changes in the legal framework, future reforms, new projects and tools, and possible partnerships.

Many governments have made accessibility a joint responsibility of the whole government and diffused it within administrations. A system of focal points (for example, in Germany), "champions" (for example, in New Zealand) or "referents" (for example, in France and the United Kingdom) within administrations has been established to help disseminate principles and initiatives for more accessible and inclusive communication (Box 4.2). These functions are usually given a mandate to raise awareness of these issues and act as role models in their interaction with audiences with specific needs. Their appointment within

departments provides communicators with a clearly identified point of contact who can support and promote their actions and answer their questions.

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### Box 4.2. Integrating accessibility responsibilities within national administrations

**France: accessibility referents**

In 2021, a single reference framework was created with the interministerial actors: the *Accessibility Charter for State Communication*, which aligns the State's players with a high level of accessibility requirements. In addition, to ensure that the Charter is considered within organisations, accessibility referents have been appointed in each communication department. Their role is to provide information, advice and guidance to any public official who wishes to communicate on behalf of the State and make it accessible to all citizens or to certain target audiences with a disability.

**New Zealand: "champions" appointed by communication offices**

The Accessibility Charter and its programme of work in government agencies is part of New Zealand's action plan to improve access to information provided by government agencies for persons with a disability, while respecting their rights.

To implement the intent of the Charter, a 7-step process is recommended. One of the steps requires that the IT, communications and human resources teams each appoint a "champion" to act as a point of contact to answer questions and assist staff to develop their skills.

Source: Information provided by the Government of France; Government of New Zealand (n.d.[100]), About the Accessibility Charter, https://msd.govt.nz/about-msd-and-our-work/work-programmes/accessibility/accessibility-guide/about-the-charter.html.

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Beyond explicit administrative responsibilities, tools such as guides, blogs and podcasts relating to these themes also help to raise awareness among public officials. Examples include the "Comm Collection"[20] manuals in Belgium or the one provided by the State of Victoria in Australia for youth communication and engagement (Box 4.3), the blog created by the British government, or the podcast on the accessibility of government communications in the Netherlands.

> ### Box 4.3. Tools for inclusive communication
>
> **A manual for gender mainstreaming in communication in Belgium**
>
> In Belgium, in October 2013, COMMnetKern published the "COMM Collection No. 25" on gender mainstreaming in federal communication. It provides the necessary steps for equal and inclusive communication, from the preliminary study to the conditions of execution of the communication. The manual includes a checklist on specifications, evaluation, choice of words, experts, visuals, etc. and examples of practices.
>
> **A manual for communicating and engaging young people in Victoria, Australia**
>
> Published in 2021, as part of the response to the COVID-19 pandemic, the *Youth Communication and Engagement Manual* has been designed to be easy to use by public communicators and to help them publish inclusive messages in a way that encourages conversation with young people. The tools, practices, and recommendations provided were developed with the involvement youth organisation partners of VicHealth, the Australian state health authority.
>
> Source: Government of Belgium (2013[101]), *Integrating Gender into Federal Communication: A Guide for Federal Communicators*, https://fedweb.belgium.be/sites/default/files/downloads/COMM25%2Bannexe_07_11_13_fr_web.pdf; VicHealth (2021[102]), *Youth Communication and Engagement Playbook*, https://www.vichealth.vic.gov.au/-/media/Salt--Fuessel-STAKEHOLDER-Version-Playbook--FINAL-29621.pdf?la=en&hash=8C94895487F86D8FB89867150FE779EE3AE19567.

In the United Kingdom, the "Accessibility in Government"[21] blog presents updates on digital accessibility. A section provides access to accessibility guidelines for the United Kingdom Civil Service, including the *Government Service Design Manual*, *GDS Content Style Guide*, *Digital by Default Service Standard*, and *GDS Design Principles*. The articles cover initiatives to promote more accessible communication and key communication skills to ensure accessible content, such as using audience and behavioural analysis[22] to create and test content.

In 2021, the Netherlands launched a podcast[23] to help public officials better understand the challenges surrounding accessibility. The series, which provides practical advice, consists of episodes on the current context and future of digital accessibility. Interviews show the challenges of using websites or applications that are not accessible. They also address the accessibility of PDF formats or inclusive design, for example.

## Training and capacity building activities

In addition to raising awareness among public agents, training and capacity building are useful actions to ensure that public communicators regularly develop and renew their technical skills to effectively implement accessibility and inclusion in their projects, both at national and local levels. These activities ensure the sustainability and optimisation of communication features in light of the latest societal, legal and technical developments. Therefore, in the European Union, at least 21 out of 27 of governments from EU Member States and the United Kingdom have already conducted training workshops to promote accessibility in the public sector[24].

This is particularly important given that, according to interviews conducted for this Panorama, there are few accessibility experts in communication departments. Recruitment and retention of accessibility experts were also highlighted as challenges.

In practice within national administrations, training efforts may be coordinated or carried out by a government-wide unit, as in Italy, Portugal or the United Kingdom, or internally, within a given public

organisation, under the leadership of a focal point or manager for accessible and inclusive communication, as in the Press and Information Office of the Federal Government in Germany.

In Italy, 55 administrations have taken part in accessibility training courses that have been deployed by the Agency for a Digital Italy (AGID), including in Italian regions and municipalities. Two training approaches are offered. In the first, AGID provides direct support through training. The second is more indirect and consists of providing financial support to local administrations to conduct capacity building activities tailored to their needs. Online training has also been developed. More than 1,200 people have participated.

In Portugal, a micro-learning course launched in 2021 has provided nearly 4,000 people, mainly public agents, an overview of accessibility basics. Similarly, the Government Digital Service (GDS) in the United Kingdom has developed an introductory accessibility training module for the entire United Kingdom civil service. It is currently being rolled out online and over a half day to encourage as many public officials as possible to take it. In addition, some public agents are being nominated to take part in external training, for example on WCAG standards. In the past, the GDS has previously deployed modules for developers. The organisation is currently identifying training needs for designers and developers, particularly on aspects relating to formats, contrasts, etc.

In New Zealand, the Ministry of Social Development which is responsible for promoting accessibility and inclusion, organises monthly training on these issues and bi-weekly information sessions for public officials (Box 4.4).

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### Box 4.4. Monthly training on accessibility in New Zealand

The monthly training programme has an average of 30 participants. It aims not only to train public officials on the Charter and accessibility standards but also to encourage them to go beyond the normative aspects, by informing them of the benefits of an accessible approach to public services and communication and by including practical aspects.

Challenges common to all public agencies are shared as well as ways to avoid the main pitfalls, such as the use of PDFs. Resources are provided for publishing content that is easy to read and understand, examples to follow and not to replicate, as well as accessible and alternate formats to prioritise according to the different situations of the target audiences.

All training content is co-produced with the community of users of accessible public services including associations representing persons with a disability. The training is also presented by these stakeholders in addition to public trainers.

Source: Interview with a representative of the Government of New Zealand, conducted on February 1st, 2022; New Zealand Government Accessibility Training Presentation Material, 2022.

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Recognising the importance of capacity building across different levels of government, the Czech Republic has conducted trainings on easy to read and understand formats for local authorities. This also identified factors that hinder the sustainability of accessibility at the sub-national level.

From all the interviews, it appears that the most effective training courses are those that go beyond the presentation of the legal and normative framework to include practical exercises or modules. These trainings help to understand the user experience of persons with a disability and/or to acquire the right reflexes in the way of designing messages and interacting with these audiences with specific needs. A practical approach is thus adopted within the Press and Information Office of the Federal Government of Germany. Under the leadership of the designated focal point, the Office has recently opted for weekly internal training sessions on accessibility issues. Bringing together a maximum of 12 agents, each session begins with a reminder of what accessibility and accessible documents are, for whom they are produced

and why. This is followed by practical exercises, using templates developed in-house, to apply the styles, formats, checks and conversions to ensure the accessibility of communications. These practices consist of making visible the barriers faced by persons with a disability and highlighting the added value of accessibility. For example, the training allows agents to see first-hand how screen readers perceive non-accessible documents and the impact on the individual trying to access them.

For similar reasons, Portugal is currently considering a new training programme on accessibility. The Agency for Administrative Modernisation (AMA) works with all government agencies. Seventeen of them have already benefited from basic training on accessibility issues. The AMA is therefore considering the development of a more ambitious and thorough training program, combining normative content with practical modules on assistive technologies, audience types and their specific needs, and practical exercises in managing these tools. The duration of this training course would last approximately 70 hours. The project is under discussion at the time of writing this Panorama.

## Outsourcing and interaction with non-governmental actors

Although expertise in accessibility is gradually building up within national administrations, many governments also call on external support. They may use it for various purposes:

- Recruiting experts;
- Implementing accessibility initiatives on behalf of administrations;
- Sharing expertise and create talent pools;
- Certification of accessibility expertise; and
- Educating society as a whole.

The *OECD Report on Public Communication* highlights that some administrations hire external consultants or agencies to compensate for the absence of certain communication skills within their workforce (OECD, 2021[3]). Interviews conducted in the context of the preparation of this Panorama confirm that the accessibility of public communication is not immune to this dynamic. Several governments have awarded service contracts with external agencies, such as Belgium, France and the United Kingdom. In 2021, the Belgian Federal Government established a central purchasing service enabling those in charge of websites or applications to increase accessibility in all public entities. This covers the provision of accessibility auditing and training services by a consortium of private organisations on the one hand, and accessibility consultancy (content production procedures, assistance with the creation, definition of an accessibility and inclusion program or strategy, etc.) by a consulting agency on the other (Belgian Web Accessibility, 2021[103]).

The United Kingdom also relies on private providers to address some of the challenges of implementing accessible communication. Some training is produced and delivered by private sector organisations on behalf of the government. This reliance on external service providers reflects the limited resources of the public sector in terms accessibility expertise and the production of relevant educational content on the subject.

In addition, some governments have opened their communities of practice to professionals from the private sector and civil society. They raise awareness of accessibility issues among a wider membership. In Italy, for example, online communities of practice on Slack and Forum Italia are open to all, allowing cooperation between designers or other professionals inside and outside the public administration.

In France, to promote this approach at the local level, the Cap'Com cooperative connects local and national public communicators and experts from the private sector and academia. Accessibility issues are regularly discussed and researched. Its website publishes news on reforms for this community of practitioners, as

well as practical advice (Cap'Com, 2022[104]) and even useful guides such as the publication *Communicating for all: Guide for accessible information* (Ruel and Allaire, 2021[105]).

Beyond raising awareness and strengthening the skills of public communicators, a challenge lies in the recognition of accessibility expertise, as mentioned during the interviews. The experts differentiate themselves from accessibility professionals by demonstrating excellence, experience in multiple projects, and recognition as a person to turn to for advice and recommendations (24 Accessibility, 2018[106]). Few certifications to date explicitly identify accessibility and inclusion experts. The International Association of Accessibility Professionals (IAAP) has developed four main certification courses, including an expert certificate (Box 4.5).

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### Box 4.5. The 4 IAAP certifications

The International Association of Accessibility Professionals has developed four types of certifications to measure and attest to the expertise of competent individuals in this field. These certifications involve specific curricula and tests and are valid for three years.

- The Certified Professional in Accessibility Core Competencies (CPACC) credential is IAAP's core certification. It validates a interdisciplinary conceptual knowledge of disability situations, accessibility and universal design, accessibility standards, laws, and strategies.

- The Web Accessibility Specialist (WAS) is intended for accessibility professionals who evaluate the accessibility of existing content against published standards and technical guidelines and provide detailed recommendations for remedying the errors they detect. With the evolution of WCAG 2.1 standards, the need for web developers and professionals to be familiar with accessibility standards has increased, as has the need for an objectively verified level of expertise. The Web Accessibility Specialist examination aims to assess and certify skills in this area. Certified individuals not only know the concepts and standards but also use the relevant technologies to apply them, correct errors and improve accessibility. Individuals who pass both the CPACC and WAS examinations are referred to as Certified Professional in Web Accessibility (CPWA).

- The Accessible Document Specialist (ADS) certificate is a technical qualification for advanced accessibility professionals who can create accessible electronic documents. It validates, at a minimum, an intermediate level of experience in the design, evaluation and correction of accessible documents. Knowledge of automated processes alone is not sufficient to obtain it. Practical experience and knowledge of creating and editing documents on multiple platforms, as well as an understanding of the contextual implications for end-users of assistive technologies, are required.

- Certified Professional in Accessible Built Environments (CPABE) designation identifies experts who have acquired the knowledge and skills to implement accessibility standards, codes and legislation specific to the design of accessible environments and apply the principles of universal design to the environments in which citizens live. The programme offers three levels: associate, advanced and expert. Expert level certifiers must demonstrate more than 10 years of established practice as an accessibility or Universal Design professional and show leadership in these areas.

Source: IAAP (2022[107]), Certification, https://www.accessibilityassociation.org/s/certification.

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The interviews highlighted a particular interest in these certificates in a context where universities and other higher education curricula have not yet established or sustained accessibility as a major teaching subject.

A majority of the interviews also raised the importance of education at an earlier stage in the training of future professionals to build a talent pool capable of applying accessibility principles. The need to educate society more broadly could thus be considered from an early age, before investing in training individuals throughout their career. However, education on these topics, where it exists, only takes place in higher education. In New Zealand, 12-week courses currently exist at university. In Italy, some digital design colleges and developer training institutes include modules on accessibility.

From the interview with Portuguese representatives, it appears that a source of expertise for the projects carried out by the Agency for Administrative Modernisation (AMA) in the field of accessibility lies in the universities. However, only 2 to 3 universities have deployed work on these issues, such as the University of Lisbon, which is involved in AMA projects and seeks to develop relevant courses.

Furthermore, awareness of accessibility, for example to meet the specific needs of persons with a disability, is inextricably linked to the composition of the public service workforce, and therefore to its diversity and inclusion, for some OECD member countries. This was emphasised in discussions with the representatives of Germany, Australia and New Zealand, for example.

In this sense, the OECD *Recommendation of the Council on Public Service Leadership and Capability* encourages adhering countries to "develop an inclusive and safe public service that reflects the diversity of the society it represents". To do this, they can adopt tools to measure diversity, inclusion and well-being in the public service and ensure that organisational processes, workforce management and working conditions support diversity and inclusion (OECD, 2019[108]). These issues and practices promoting diversity and inclusion in the public service are discussed in more detail in "Next generation diversity and inclusion policies in the public service: Ensuring public services reflect the societies they serve" (Nolan-Flecha, 2019[109]).

## Raise awareness and educate to promote accessibility across society

While many efforts have been made to raise the awareness and train public officials, there are fewer initiatives to promote accessibility in society as a whole. However, opportunities emerge both in the context of educational curricula and professional training, and in communication campaigns in relation to private sector organisations or in association with civil society and/or the media.

Interviews conducted for this Panorama show that one of the main challenges in advancing accessibility and inclusion in society lies in raising the awareness and educating on these issues from an early age. Such learning efforts can not only promote inclusion and understanding of the main principles, potential barriers and technical solutions but also raise awareness of present and future needs.

Governments' initiatives are emerging in this regard. In Ireland, for example, the Centre for Excellence in Universal Design (CEUD) under the National Disability Authority (NDA) has established an awards program, either within existing training schemes or as part of the Centre's own initiatives, in partnership with academic, civil society and private sector stakeholders (Box 4.6).

> **Box 4.6. National Awards for Universal Design Initiatives in Ireland**
>
> The Centre for Excellence in Universal Design (CEUD) has a statutory remit to promote the teaching of Universal Design to all students and professionals in the design, manufacture and maintenance of environments.
>
> The Centre's national awards for various Irish programmes and curricula highlight and recognise practices in universal design. The Centre therefore supports the universal design categories of national awards for professionals in Ireland through schemes run by the Royal Institute of the Architects of Ireland (RIAI), the Institute of Designers in Ireland (IDI), and the Irish Internet Association (IIA).
>
> The Centre also has its own award: the Universal Design Grand Challenge student awards. It encourages and rewards excellence in student projects that present solutions that work for all citizens.
>
> In addition, the Centre provides faculty, researchers, educators and students with resources related to universal design on its website. These include information on academic courses, continuous professional development modules and other learning opportunities on the subject, as well as references and articles on related issues. The Centre works with a wide range of institutions and professional associations to support the teaching of universal design, whether at secondary, tertiary or continuous professional development.
>
> Source: CEUD (n.d.[110]), Awards and Education, https://universaldesign.ie/awards/; CEUD (n.d.[111]), Universal Design in Education, https://universaldesign.ie/awards/education/.

Beyond the public sector and education, communication campaigns are one of the most institutionalised and deployed means in public communication to raise awareness of public policies. Accessibility issues are no exception to this dynamic. Dedicated public communication campaigns, either within the public sector or aimed at the whole of society, have recently been deployed by several countries. This is the case, for example, of campaigns led by France and the United Kingdom (Box 4.7).

> **Box 4.7. Communication campaigns to raise awareness of accessibility in France and the United Kingdom**
>
> **France**
>
> The French Government's Secretariat of State for People with Disabilities launched the national communication campaign "Let's see people before disability" from October 2021 to January 2022. The campaign aimed to raise awareness and mobilise citizens to change their perspective towards disability.
>
> The campaign relied on three videos illustrating everyday situations and a series of 10 portraits of persons with a disability. The casting was done in an inclusive way, in collaboration with relevant organisations which assigned the different roles to persons with a disability. The aim of this selection procedure was to ensure a complete representation of the diversity of disabilities, including those which are invisible.
>
> This communication campaign was disseminated through various media, channels and platforms: television channels and cinemas, print and radio, social media and digital platforms, posters to raise awareness among a large number of citizens.
>
> **United Kingdom**
>
> The British government has recently launched several communication campaigns to raise awareness of disability and to improve access to public communication and services for persons with a disability.
>
> The Department of Health and Social Care and the Department for Work and Pensions committed in 2021 to improve online access to public services for persons with a disability. For example, the Department for Work and Pensions produced a communication campaign to improve the accessibility of communications about the *Access to Work* scheme, aimed at helping persons with a disability to find or keep a job. The campaign aimed to encourage the use of grants, ensuring that persons with a disability were aware of the benefits of the scheme. Following its launch, the Directorate is considering evaluating the effectiveness of the campaign to identify the most successful activities, with a view to replicating them in the future.
>
> In 2019, the Department for Transport, in collaboration with persons with a disability and organisations representing them, launched the communication campaign "It's everyone's journey", to improve public transport services for persons with a disability, raising awareness among citizens through a series of videos distributed on digital platforms. New videos have also been developed in 2021 following the COVID-19 pandemic, to reflect the difficulties encountered by persons with a disability following the introduction of health measures.
>
> Source: Government of France (2021[112]), « Voyons les personnes avant le handicap : kit de communication », https://handicap.gouv.fr/voyons-les-personnes-avant-le-handicap-kit-de-communication; Government of the United Kingdom (2021[113]), « National Disability Strategy, Part 1: Practical steps now to improve disabled people's everyday lives », https://www.gov.uk/government/publications/national-disability-strategy/part-1-practical-steps-now-to-improve-disabled-peoples-everyday-lives#public-services-making-access-as-smooth-and-easy-as-possible; Government of the United Kingdom (n.d.[114]), Championing Equal Access on Public Transport, https://everyonesjourney.campaign.gov.uk.

In addition, private sector organisations are a relay for accessibility principles and their implementation. Interviews often emphasised that since the initiative mainly derives from the public sector, one way to involve the private sector in efforts to raise awareness and implement accessibility lies, in the first instance, through contractual obligations imposed on the service providers contributing to public projects, as in Belgium, France or the United Kingdom.

Involving private partners in the implementation of accessibility standards is a positive incentive for that sector. Many companies include the implementation of accessibility and inclusion principles in their Corporate Social Responsibility commitments and charters, reflecting a dedication to implement their objectives for the benefit of all individuals.

Finally, while many efforts are made to involve civil society organisations in the definition of standards and tools, they can also contribute to the efforts to raise awareness of and educate on existing instruments. In New Zealand, for example, accessibility training is not only delivered by government accessibility and universal design experts, but also by persons with a disability and representatives of civil society organisations. Similarly, the New South Wales local government in Australia involved the media in relaying public information about the COVID-19 pandemic in line with the government's accessible and inclusive approach.

# 5 How to promote a more systematic evaluation of accessible and inclusive communication?

Effective public communication must be evidence-based (OECD, 2021[3]) and evaluation is an essential component of this. By collecting targeted information, data and feedback on the various activities, programmes and other tools implemented, it allows to determine whether the defined objectives have been achieved and what the impact and scope have been. It also facilitates the identification of obstacles and challenges encountered on the basis of which lessons and recommendations can be formulated to adapt and improve future initiatives. In 2022, OECD member countries adopted the *Recommendation of the Council on Public Policy Evaluation*, which provides a set of general principles that communication professionals can build on and adapt to public communication, including its accessibility and inclusiveness.

Evaluation is nevertheless often seen as one of the main challenges communicators face. In the *OECD Report on Public Communication*, Centres of Government (37%) and Ministries of Health (50%) cited evaluation as one of the three most demanding skills (OECD, 2021[3]).

The same can be said for the evaluation of digital accessibility, where a lack of resources and time can create inhibiting factors.

This section aims to provide an overview of evaluation practices in the countries that took part in this Panorama. The first part is dedicated to the official measures adopted to establish common rules, for example through codes or manuals on evaluation procedures. The second part outlines the methods and tools deployed and the challenges encountered. The importance of evaluating the accessibility of public communication beyond websites and applications is then discussed. The final section focuses on the lessons learned and remedial actions taken based on the evaluation results.

## Towards the adoption of common rules, procedures and evaluation criteria to promote more accessible communication

The acceleration of the institutionalisation of requirements for accessible and inclusive communication, notably under the impetus of the European Union, has created a need for standards and procedures to assess the measures implemented in a harmonised manner.

The Directive (EU) 2016/2102 thus aims to harmonise the laws, regulations and administrative provisions of Member States concerning accessibility requirements for websites and mobile applications of public sector bodies. The Commission's Implementing Decision (EU) 2018/1524 defines the monitoring methodology and reporting requirements for Member States to monitor compliance with the requirements of the Directive at the national level and to report to the public and the European Commission every 3 years.

All Member States are therefore required to submit a monitoring report on the implementation of the Directive (EU) 2016/2102, which defines two monitoring methods: the simplified monitoring method for websites and the in-depth monitoring method for websites and mobile applications. The first monitoring reports submitted in 2021 follow a standardised format, which is defined by Annex II of the Implementing Decision 2018/1524 (European Commission, 2018[115]) leaving however some flexibility to governments on how to assess and present the developments and actions taken (European Commission, 2021[116]).

Some countries provide guides or manuals detailing the procedures for evaluating the accessibility of public communication. Sweden, for example, shares indicators from the authority responsible for evaluating government websites so that public bodies can judge their performance and improve their accessibility processes, in line with the Directive (EU) 2016/2102 and government expectations. In France, an audit kit outlines requirements for sampling, baseline and page testing (Box 5.1).

> ### Box 5.1. Procedural guidelines to evaluate the accessibility of public communication
>
> **Sweden**
>
> The Swedish Agency for Digital Government (DIGG) has developed a supervision manual, including different procedures for evaluating the accessibility of digital public services. The manual provides information on how the DIGG reviews websites, documents and digital applications developed by public agencies. It details the instructions, controls, and possible exceptions for each criterion reviewed, including design, written and visual content, user interface, audio, and video, as well as documentation and support services. The manual also contains the supervision process, legal basis and implementation instructions.
>
> The manual is available to agencies and the public, allowing everyone to learn about the different stages and review criteria. Public bodies and actors can check the accessibility of their website and digital services themselves, in the same way as the DIGG, as the manual covers all accessibility requirements that the agency supervises.
>
> **France**
>
> Within the framework of the *General Accessibility Framework for Administrations* (RGAA), the French government has developed guidelines for evaluating the compliance of public communication with the RGAA. The assessment can be carried out by public bodies themselves, as a self-assessment, or by a third party, on a sample of pages representative of the online public communication service under review, such as the home, contact, legal notices, accessibility and help pages.
>
> The selection of pages and their number must be representative of the online service. Each page in the sample should be checked against the criteria applicable to it through technical tests. These tests provide the number of validated and non-validated criteria, and thus the compliance rate for each page. A criterion is validated for a given page when all the elements of the page have passed the applicable technical tests.
>
> The final phase of the evaluation is the accessibility statement, which reports on the compliance of digital services with the applicable criteria. The compliance rate measures the progress of the online service in meeting accessibility requirements, by calculating the percentage of criteria met or the average level of compliance of the online service.
>
> Source: Government of France (2019[117]), Référentiel général d'amélioration de l'accessibilité – RGAA Version 4.1, https://www.numerique.gouv.fr/publications/rgaa-accessibilite/obligations/#%C3%89valuation-de-la-conformit%C3%A9-%C3%A0-la-norme-de-r%C3%A9f%C3%A9rence; DIGG (n.d.[118]), Så granskar DIGG tillgänglighet, https://webbriktlinjer.se/testa-din-webbplats/sa-granskar-digg-tillganglighet/; DIGG (n.d.[119]), Granska webbsida, https://trg.digg.se/manual/granskning/webbsidor.html.

Although there are indicators measuring the adoption and implementation of common standards at the international level for elements related to accessible design on the web, these do not apply to all government messages. However, Scotland has developed performance indicators for communicating in a way that is understandable to all citizens. A self-assessment manual for public officials explains the principles of inclusive communication and how to meet the needs of citizens regardless of age, gender, ethnicity, native language or disability. On this basis, ten performance indicators allow public officials to self-assess their communication (Box 5.2).

## Box 5.2. Performance indicators for inclusive communication in Scotland

The Scottish Government has developed a set of principles for inclusive communication for public authorities, supported by 10 performance indicators:

### 1) Public commitment

Senior Management makes a visible and public commitment to providing services that support inclusive communication.

### 2) Data collection on need

The service uses a range of data sources and statistics to demonstrate a full understanding of the communication needs of the citizens concerned.

### 3) Inclusive communication review

This is the percentage of services that undergo an inclusive communication review, such as an appropriate self-assessment or an equality impact assessment.

### 4) Service development

Services are fully adapted, or under development, to address the range of people requiring communication support.

### 5) Staff training

The indicator details the percentage of all staff who have received specific training in recognising and responding to a wide range of communication needs.

### 6) User involvement (quantitative measure)

This indicates the percentage of service development and review processes that have included concerned citizens with diverse communication needs.

### 7) User involvement (qualitative measure)

This covers the percentage of citizens with communication support needs who are involved in service development and review processes and are satisfied with their overall contribution to the processes. The service must demonstrate that the method used to gather this feedback is accessible to all citizens involved.

### 8) Tailoring communication to the needs of service users

This indicator makes explicit the percentage of people requiring communication assistance who consult the services and agree that their needs and preferences have effectively been addressed.

### 9) Use of services

This indicator measures the percentage of people who use the services and need communication support.

### 10) Annual improvement

The annual results highlight the progress made in implementing the indicators.

Source: Government of Scotland (2011[120]), https://www.gov.scot/publications/principles-inclusive-communication-information-self-assessment-tool-public-authorities/pages/11/.

## Diversity of methods and tools used in practice

The countries that took part in the interviews for this Panorama all recognised the importance of evaluating accessibility and inclusion measures. However, it is clear the practical arrangements for such evaluation processes vary greatly from one country to another in terms of the agencies responsible for accessibility evaluation, the standards and norms used and the methodologies employed.

In some countries, public organisations assess their own level of accessibility and publish an online accessibility statement detailing the website's level of compliance, as in Australia and New Zealand. Other countries, such as Germany and Austria, have agencies responsible for conducting evaluations. In terms of the entities responsible for monitoring public sector websites and applications in Europe, the responsibility often lies with public sector organisations in charge of digital transformation (44%)[25]. In some countries, the organisations in charge of evaluation are centres of expertise, such as the Centre for Excellence in Universal Design (CEUD) in Ireland, under the authority of the National Disability Authority (NDA).

Some governments commission external experts to evaluate the accessibility of websites and mobile applications. In the Netherlands, since 2004, the government has contracted the Accessibility Foundation to evaluate public websites. In 2011, the Ministry of the Interior and Kingdom Relations of the Netherlands also commissioned external providers to evaluate the accessibility status of all municipalities. In Portugal, in collaboration with the Agency for Administrative Modernisation (AMA), the University of Lisbon assessed the compliance of government websites with the Directive (EU) 2016/2102 during the first monitoring period of its implementation[26].

The Directive (EU) 2016/2102 prompted countries to assess progress on accessibility of public sector websites and mobile applications. In 2018, the European Commission adopted two implementing decisions (European Commission, 2021[116]), which include a template for an accessibility statement as well as a monitoring method and reporting requirements for Member States (European Commission, 2018[121]). The latter calls on Member States to conduct simplified and in-depth audits and details the minimum sample size and composition. Countries should provide a correlation table with the European standard if they rely on other accessibility standards for websites and mobile applications, explain the results of the evaluations conducted and detail information on the mechanisms available to users to comment or file a complaint about web accessibility.

The vast majority of Member States and the United Kingdom have published a monitoring report on the implementation of the Directive (EU) 2016/2102 to the European Commission in 2021. The 26[27] available reports describe the in-depth and simplified assessments conducted and the status of public sector websites and applications with regard to accessibility and inclusion. At least 22 out of these 26 governments[28] involved include organisations representing the interests of persons with a disability in the selection of websites and applications to be prioritised annually for in-depth and/or simplified checks[29].

During the monitoring period, countries evaluated a different number of criteria in EN 301 549. Belgium, for instance, reported having evaluated all criteria from EN 301 549 V2.1.2 (2018-08) in its in-depth monitoring. Spain, assessed 137 accessibility requirements relating to webpages and 162 for mobile applications. Others focused their attention on all or some of the 50 WCAG criteria related to the A/AA compliance level. This may be due to the use of automated private sector tools that have been developed to assess WCAG standards[30].

The evolution of European standards and their recent updates add a level of complexity to the comparability of accessibility monitoring documents. While some countries have used the version of EN 301 549 that was in effect prior to the 2021 update, others have used the new version of the standard, which became the sole version in force in February 2022[31].

In some cases, detailed methodologies have been included in the reports, such as in Belgium and Spain (Box 5.3). In Belgium, the methodologies for in-depth (Government of Belgium, 2021[122]) and simplified audits (Government of Belgium, 2021[123]) define, among other things, the steps to be followed and control samples. The methodology for in-depth audits emphasises the need for accessibility expertise to evaluate the websites and points out the elements that must be included in the report. In Spain, methodologies have also been detailed for both forms of audits to verify the compliance of public sector sites and applications with the criteria defined by the European standard.

## Box 5.3. In-depth and simplified audit methodologies in Belgium and Spain

**Belgium**

The government of Belgium has developed methodologies for in-depth and simplified audits, aligned with the Directive (EU) 2016/2102. They are mainly intended to be used by third parties specialised in digital accessibility or in self-assessments.

For in-depth audits, the methodology includes the steps to be followed to select a representative sample, including the identification of the different types of pages, essential features and web technologies used. The sample can include up to 20 pages, including 2 random pages, and at least 1 page with a document for administrative procedures. Each page is assigned a compliance status: sufficient, insufficient, not applicable and not tested. The results must be detailed in a report, which includes the conclusions of the control steps, the assessment methods, tools used and the evaluation statement. The methodology also lists the elements necessary for an accessibility statement to be compliant, including a description of the scope of the statement and the method used, the presence of contact details, a "comments" option, and a statement of accessibility status, namely "not compliant", "partially compliant" or "fully compliant".

For simplified audits, the methodology details actions to be taken per selected public websites. Using the "AccessibilityCheckServer" tool, sites are scanned on 2 or 3 levels, including all compliance criteria on the pages examined. The number of errors detected and the pages on which they were found are reported by error type. In addition to this automatic check, a manual check is performed on the home page to verify whether navigation is possible through all the links using only the keyboard. Finally, the tool verifies whether the accessibility statement is visible on the home page and on some randomly selected pages and that it details the scope of the statement, a level of accessibility, the method used and contact information.

**Spain**

To meet each of the monitoring methods established by the EU Implementing Decision 2018/1524, the Government of Spain has defined two procedures: the simplified monitoring methodology and the methodology for in-depth monitoring of websites.

The simplified monitoring methodology allows the detection of non-compliance with a subset of the requirements of the European standard and the observation of their evolution over time. The verifications take into account the automation requirements contained in the standard, including criteria that have a greater impact on the final accessibility of the website. The tool used to carry out the simplified check is the "OAW Tracker", developed by the Web Accessibility Observatory. It automatically evaluates the accessibility of a website based on 20 accessibility verifications, which are divided into more than 100 checks.

The in-depth monitoring methodology for websites and mobile applications was developed to verify the compliance of websites with the accessibility requirements of the European standard. It is based on accessibility reviews carried out by the organisations responsible for websites and mobile applications. They are carried out in accordance with the requirements defined by the Implementing Decision (EU) 2018/1524 for in-depth reviews, such as periodicity, selection of pages or screens and review of processes. The results are then detailed in accessibility review reports, submitted to the public oversight body, the Ministry of Territorial Policy and Public Administration.

Source: Government of Belgium (2021[122]), Methodology for an in-depth accessibility audit of websites 2021, https://accessibility.belgium.be/fr/articles/methodologies/methodologie-pour-une-controle-approfondie-de-laccessibilite-des-sites-web-2021 ; Government of Belgium (2021[123]), Methodology for a simplified accessibility audit of websites 2021,

These checks are mainly based on technical web accessibility criteria, but do not cover the full range of accessibility parameters necessary for the inclusion of all citizens, regardless of their condition. Germany, for example, has gone beyond these minimum requirements to include the use of sign language and plain language in the evaluation of government and regional websites and mobile applications (Box 5.4) (Federal Government of Germany, 2021[125]).

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**Box 5.4. Evaluation of the use of sign language and plain language on websites and mobile applications of the German Federal Government**

Based on the legal provision on plain language and German sign language, the German Federal Government and the Länder (federal states) have agreed on certain additional requirements and testing methods that go beyond the minimum standard under the Directive (EU) 2016/2102. They are defined by a recommendation made by the Federal Government and the Länder. They are therefore not mandatory but should be applied at the sub-national level. The Federal Government, for its part, has implemented the recommendation in its own monitoring activities.

The accessibility evaluation includes up to four components: the test criteria and their rating scale, the accessibility statement verification procedure, the examination of documents and the review of plain language and German Sign Language. The audit methodology includes simplified and in-depth evaluation procedures for websites and mobile applications. These include requirements for sign language and plain language, including keyboard shortcuts, audio control, simultaneous captioning, parsing, and visual content.

Source: European Commission (2022[124]), Web Accessibility Directive - Monitoring Reports, https://digital-strategy.ec.europa.eu/en/library/web-accessibility-directive-monitoring-reports.

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To facilitate the assessment of non-compliance of websites with WCAG and EU standards, automatic tools have been developed (Alsaeedi, 2020[126]). Some countries, like the United Kingdom[32], use free or fee-based digital tools that have been developed by private companies. Others, such as Belgium, Italy, Spain and Portugal have developed their own tools to automate the verification of website compliance[33].

While automation has the advantage of saving time and resources, it is still mainly used for simple assessments that do not require human analysis. The United Kingdom, for example, uses an automated accessibility testing extension for Google Chrome called Axe. This tool records only records serious or critical errors and reported issues are manually checked for relevance (Government of the United Kingdom, 2021[127]).

However, some countries have developed their own tools to automate the monitoring of digital accessibility. In Spain, a basic online web accessibility diagnostic service linked to the Web Accessibility Observatory has been established. In Portugal, a similar tool has been designed to check the compliance of digital services (Box 5.5). AccessMonitor can generate an accessibility report from a link, HTML code or an HTML file. It can be used by other organisations, including those outside the public sector. This tool is the result of a project led by the Agency for Administrative Modernisation within the framework of WAI-Tools[34], a project co-funded by the European Commission. Other governments and public organisations are using the automated tools from Spain and Portugal to conduct simplified audits, such as Sweden. Similarly, a tool has been developed to automate tests and share them with other stakeholders in Italy. Although it will

not be made public until 2025, this tool has enabled an in-depth accessibility monitoring activity carried out on 1,300 websites. Belgium has also made available software that can be added to the bookmark bar to check the accessibility of sites on all pages, including those protected by login details.

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**Box 5.5. Accessibility Observatories in Spain and Portugal**

**Spain**

The Web Accessibility Observatory is an initiative of the Ministry of Economic Affairs and Digital Transformation, aimed at improving the level of accessibility of Spanish public administration portals at all levels (general state administration, regional and local governments). Services offered include :

- *Web Accessibility Observatory*: provides periodic evaluation results for websites to detail the state and evolution of their accessibility.
- *Basic online diagnostic service*: allows each administration to directly access an automatic analysis based on the observatory's studies.
- *Reference documentation*: provides regulations, examples of practices, guidelines on the creation and evaluation of accessible content, and informative videos for developers.
- *Web accessibility community*: meeting point for government website managers to share information, experiences and questions.

The accessibility assessment carried out by the Observatory is based on an explicit automated methodology. It includes 20 accessibility checks consisting of automatic verification tests. A report of aggregated results and individual reports for each of the websites analysed are generated at the end of the checks.

In addition, the Web Accessibility Observatory Tracker allows the Spanish government to follow the different iterations of the Observatory and the Community to use of the online diagnostic service. The Tracker enables to check the accessibility of a website and generates automatic reports which consider almost 100 checkpoints. It also provides recommendations for resolving the detected issues.

**Portugal**

In 2008, the Agency for Administrative Modernisation (AMA) developed, as part of the Observatory of Web Accessibility, an automatic tool: "AccessMonitor". It aims to improve accessibility and the use of digital services and to promote good practices in this area. It provides an automatic evaluation and accessibility report using a link, HTML code, or HTML file.

The tool helps to raise awareness of good and bad digital accessibility practices within the public administration and local governments. Furthermore, the data from the Observatory is made public and accessible to all online. The Observatory also provides an overview of the evaluation of 1,200 public administration websites, as well as specific data for certain websites. It is currently being redesigned to be optimised.

Source: Government of Spain (n.d.[128]), Web Accessibility Observatory, https://administracionelectronica.gob.es/pae_Home/pae_Estrategias/pae_Accesibilidad/pae_observatorio_accesibilidad_eng.html; Government of Portugal (n.d.[129]), Access Monitor, https://accessmonitor.acessibilidade.gov.pt/; Interview with representatives of the Portuguese government in March 2022 as part of the preparation of this Panorama.

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Likewise, and beyond the European continent, New Zealand, the first government in the world to adopt the WCAG standards as an official requirement for government websites in 2010, provides a free assessment of website compliance through its Bureau of Internet Accessibility[35]. The country uses its A11Y® platform

to provide a summary version of its automated assessment to give an overview of how a site performs when tested against the WCAG A/AA checkpoints.

## Evaluate the accessibility of public communication beyond websites and applications

The interviews stressed that accessibility evaluation could benefit from a broader focus on a greater number of criteria and incorporating more qualitative components. Indeed, the discussions underlined that the monitoring and evaluation of the implementation of accessibility principles focus on the key accessibility elements of public digital pages, sites and applications in the vast majority of cases and that the indicators set are mainly quantitative.

However, the quantitative criteria of the number of websites and applications to be assessed in simplified and in-depth evaluations are hardly indicative of compliance with the optimal principles of accessibility. The interviews and analysis of the procedures of the countries consulted for this Panorama show that these checks seek above all to detect non-compliance with the defined criteria. Nonetheless, they do not allow for detection of compliance with all accessibility principles. Therefore, some countries have gone further in their evaluation processes to improve the quantitative and qualitative aspects of the assessments. The interviews highlighted that Norway, for example, evaluates not only public websites and applications but also any online service, thus widening the spectrum to all digital tools. Germany has included German sign language interpretation of the content of websites and applications as a qualitative aspect to be assessed when measuring the accessibility of federal public services and communications (Federal Government of Germany, 2021[130]).

Additionally, beyond the criteria and indicators evaluated, the quality of monitoring and evaluation procedures, sometimes automated for simplified accessibility tests, can evolve to provide a better granularity of information, feedback and levers for future corrections and developments. Thus, manual qualitative tests have been recommended in some interviews conducted in the context of the drafting of this Panorama. In this sense, for instance, the representative of the United Kingdom noted that verification checklists can include additional steps such as testing with a keyboard, zooming in on pages, changing colours and contrasts, or following a procedure to submit various documents such as legal, financial or technical documents, trying to go back to a previous page, or testing whether the procedure is interrupted without warning when it takes too long to complete.

Increasing the range of accessibility components included in the evaluation is also a means of correcting other errors than those usually detected, of designing new tools and ways of meeting citizens' needs or of developing them based on evidence and lessons learned from practices and their monitoring. Furthermore, the systematic inclusion of citizens and civil society organisations in both *ex-ante* testing and *ex-post* evaluation was also encouraged in the interviews.

## The benefits of evaluation as a tool for raising awareness, learning and improving the accessibility of public services

While the primary objective of evaluation is to assess the quality of the processes, measures and activities in place, it is also an opportunity to draw lessons from the successes, shortcomings and failures identified to determine the prospects for improvement. Some countries devoted a part of their monitoring report, submitted to the European Commission, to the lessons learned from their experiences. Other have presented them during the interviews conducted for this Panorama.

Based on these findings and discussions, the most frequently cited challenges include the lack of time, budgetary resources and recognised experts on accessibility (see section 4). The difficulty of measuring

the impact of the actions taken, the lack of clarity of the EN 301 549 standard and difficulties in achieving full compliance with the standards were also highlighted[36].

As for the actions adopted to address shortcomings, deficiencies and other compliance issues detected during the assessment process, some countries have adopted action plans, such as Ireland (CEUD, 2021[131])(Box 5.6), or set up systems of sanctions for the public bodies and/or private entities concerned. This is the case, for example, in France, Croatia, Poland, Romania, Slovenia, Slovakia and Malta, where administrative fines range from 250 to 25,000 euros, although none of these countries reported having applied them.

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**Box 5.6. An action plan to address the errors identified in the Irish accessibility review**

In consultation with the Department of the Environment, Climate and Communications and the Department of Children, Equality, Disability, Integration and Youth, the National Disability Authority (NDA) has developed a specific action plan to address the shortcomings identified in the accessibility monitoring.

The measures in the action plan include the recruitment of additional staff as well as collaboration with external accessibility partners to ensure that the missing accessibility assessments of 2021 are completed and reported on in 2022, and that the full cohort of reviews to be performed in the next monitoring period is completed. The action plan also incorporates the Authority's ongoing efforts to ensure that public bodies are provided with practical guidance to remedy issues identified during the monitoring process.

Source: CEUD (2021[131]), Ireland's Monitoring Report for the EU Web Accessibility Directive, https://nda.ie/publications/communications/eu-web-accessibility-directive/monitoring%20reports/monitoring-report-eu-wad-ireland-2021.pdf.

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As the frequency for evaluation is set at three years within the EU, some countries have decided to go further in their accessibility legislation by adopting measures requiring more frequent evaluations. These initiatives are particularly relevant in the digital field where technologies and innovations are constantly evolving, which may therefore require greater responsiveness and adaptability. This is the case, for example, in Germany, which adopted legislation requiring the submission of both interim reports to the German government and a monitoring plan for all public websites, applications and software.

Additionally, some countries, such as the United Kingdom, use the results of evaluations to identify and prioritise accessibility issues, to formulate guides, manuals or checklists[37] for the authorities in charge and to develop training adapted to the specific needs of the moment.

Finally, the *OECD Report on Public Communication* emphasises the importance of remaining flexible in terms of evaluation metrics, according to emerging needs as initiatives are deployed (OECD, 2021[3]). The interviews conducted for this Panorama stressed that this is particularly true for the accessibility of communication. Indeed, the data collected by the OECD underlines that the monitoring processes that feed into the evaluation have revealed the need to adapt action plans and, in some cases, communication strategies to achieve the intended policy objectives. This is all the more important as governments need to reach increasingly fragmented and diverse audiences, which also include various disability situations, through multiple channels and simultaneously pursue diverse objectives in a rapidly evolving media landscape (OECD, 2021[3]; Zerfass and Volk, 2020[132]).

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# Notes

[1] Understood as any communication activity carried out by public institutions in the service of the common good. It is distinct from political communication, which is linked to political parties, partisan debate, or elections (OECD, 2021[3]).

[2] See https://www.gouvernement.fr/charte-d-accessibilite-de-la-communication-de-l-etat/les-grands-principes-d-une-communication-accessible.

[3] The Convention on the Rights of Persons with Disabilities is a human rights' instrument that aims to promote the equality of persons with a disability and their rights. It affirms all members of society have the right to live free from discrimination and to fully enjoy their civil, cultural, economic and social rights.

[4] OECD Recommendations are adopted by the Council and are not legally binding effect. They represent a political commitment to the principles they contain, and member states are expected to do their utmost to implement them (OECD, n.d.[133]). In contrast, European Union directives are legislative acts setting out objectives that are applicable to all Member States. However, each country is free to define and implement its own measures to achieve these goals (European Commission, n.d.[134]).

[5] While adopted in 2016, the Directive had to be transposed by 2018 and applied from 2019 (see article 12 of the Directive).

[6] These entities are CEN (European Committee for Standardisation), CENELEC (European Electrotechnical Committee for Standardisation) and ETSI (European Telecommunications Standards Institute).

[7] This is the result of a survey carried out as part of the project "Research on bureaucratic burdens to citizens and administrations and mapping in time and space", conducted from September 2020 to May 2022 by the Ministry of the Interior of the Czech Republic, in cooperation with the agency Ipsos.

[8] These elements are extracted from two surveys conducted from February to March 2021 to measure the understanding of textual and pictorial government information in the Netherlands. They were shared in the preparatory discussions for this Panorama, based on government synthesis documents in Dutch.

[9] This list is based on the reports submitted to the European Commission as part of the monitoring of the implementation of the Directive (EU) 2016/2102. Other countries may also test public websites with persons with a disability specifically but may have not mentioned it as such or described it in their monitoring report.

[10] Data collected as part of the OECD 2020 Survey "Understanding Public Communication", for the *OECD Report on Public Communication: the Global Context and the Way Forward* (OECD, 2021[3]).

[11] See https://digital-strategy.ec.europa.eu/en/policies/web-accessibility.

[12] This data is based on the study of all the first reports on monitoring the implementation of the Directive (EU) 2016/2102 that were submitted by EU Member States and the United Kingdom in December 2021 and made public online. France was included in this data following interviews, although a monitoring report was not available online on the European Commission website at the time of finalising this publication in June 2022.

[13] Governments engage in crisis communication in response to unexpected events that could negatively affect their reputation or endanger citizens (OECD, 2021[3]).

[14] Elements provided by the Government of New Zealand.

[16] This data is based on OECD research as well as interviews with representatives of the countries that took part in this Panorama.

[17] Idem.

[18] The representatives of at least 8 countries and institutions consulted for the purpose of this Panorama have for example cited this challenge.

[19] This data is based on interviews with the countries that took part in the drafting of this Panorama as well as the study of all the first monitoring reports on the implementation of the Directive (EU) 2016/2102 submitted by EU Member States and the United Kingdom in December 2021 and made public online by the European Commission. France was included in this data following interviews, although a monitoring report was not available online on the European Commission website at the time of finalising this publication in June 2022. Data analysed here includes awareness-raising or training activities in certain countries. It is important to note that although other countries have not explicitly stated that they are conducting training activities, it is possible that they are doing so given that the format of these monitoring reports is standardised by an implementing decision, which allows reporting countries to adapt it.

[20]                                                                                                                      See https://fedweb.belgium.be/fr/a_propos_de_l_organisation/communication/a_propos_de_la_communicatio n_federale/reseaux/commnet/copy_of_werkgroepen/fiches_bourse_commnet_kmnet_avril_2014/comm-collection.

[21] See https://accessibility.blog.gov.uk/.

[22]  See  https://accessibility.blog.gov.uk/2022/01/25/creating-empathy-with-users-that-have-accessibility-needs/.

[23] See https://www.digitoegankelijk.nl/nieuws/podcast-digitale-toegankelijkheid.

[24] This data is based on interviews with the countries that took part in the drafting of this Panorama as well as the study of all the first monitoring reports on the implementation of the Directive (EU) 2016/2102 submitted by EU Member States and the United Kingdom in December 2021 and made public online by the European Commission. France was included in this data following interviews, although a monitoring report was not available online on the European Commission website at the time of finalising this publication in June 2022. It is important to note that although other countries have not explicitly stated that they are conducting training activities, it is possible that they are doing so given that the format of these monitoring reports is standardised by an implementing decision, which allows reporting countries to adapt it.

[25] This statistic is based on the list provided by the European Commission (EC), which lists the bodies responsible for the monitoring of the *Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies.*

[26] These elements are taken from the 19 April 2022 online event on the follow-up to Directive (EU) 2016/2102, organised by W3C and the European Disability Forum as part of the Communities of Practice Web Accessibility Initiatives (WAI-Coop) projects.

[27] The United Kingdom has submitted a monitoring report to the EC. The French report was, at the time of writing, not available on the EC's dedicated page.

[28] This data is based on the monitoring reports of Member States and the United Kingdom sent and published on the EC website. The report from France was not available on the EC's dedicated page in June 2022. It is also important to note that the English translations accompanying the original reports are done via an automatic tool, which can make the content difficult to understand in some cases.

[29] This is a requirement deriving from the Directive (EU) 2016/2102. However, while some indicate in their monitoring report that they work with organisations representing the interests of persons with a disability, they did not necessarily refer to it explicitly in the sampling process.

[30] This data derives from the study of the 26 monitoring reports of the *Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies.*

[31] The harmonisation of v.3.2.1 of the EN standard explicitly allows for a transition period during which both versions of the standard are valid for monitoring purposes (recital 7 of the decision: https://eur-lex.europa.eu/eli/dec_impl/2021/1339/oj). The updated version came into force on 11 august 2021. It became the sole valid version in February 2022.

[32] See https://www.gov.uk/government/publications/accessibility-monitoring-of-public-sector-websites-and-mobile-apps-2020-2021/accessibility-monitoring-of-public-sector-websites-and-mobile-apps-2020-2021.

[33] This is based on interviews conducted for this Panorama and on the monitoring reports the Member States and the United Kingdom sent and published on the EC website. The French report was not available on the European Commission's dedicated page in June 2022. It is also important to note that the English translations accompanying the original reports are done via an automatic tool, which can make the content difficult to understand in some cases.

[34] The Web Accessibility Initiative - Advanced Decision Support Tools for Scalable Web Accessibility Assessments (WAI-Tools) Project has ended on 31 January 2021.

[35] See https://www.boia.org/blog/new-zealands-web-accessibility-laws-an-overview.

[36] This is based on interviews conducted for this Panorama and on the monitoring reports the Member States and the United Kingdom sent and published on the EC website. The French report was not available on the European Commission's dedicated page in June 2022. It is also important to note that the English translations accompanying the original reports are done via an automatic tool, which can make the content difficult to understand in some cases.

[37] See https://accessibility.blog.gov.uk/2016/09/02/dos-and-donts-on-designing-for-accessibility/11.