



The voice of blind and partially sighted people in Europe

European Commission Public consultation on eGovernment Action Plan 2016-2020

European Blind Union response

January 2016

Foreword regarding the accessibility of the present consultation:

We urge the European Commission (EC) to note that the HTML 'EUsurvey' platform used for the present consultation is **not** accessible for blind and partially sighted people. Furthermore, our tests show that the online survey is also inaccessible to disabled people who use keyboards but can't use a mouse.

HTML content can - and should – be made accessible to all. Provision of “alternative” formats is not the answer. In this particular case, use of the so-called “alternative version” is restricted to people who are visually impaired but **the proposed alternative WORD document is just as inaccessible to screen reader users**. We take this opportunity to stress that PDF documents that are sometimes provided by the EC as an “alternative” to inaccessible online surveys can't be edited so these are just as inaccessible for people who are visually impaired.

We have raised these concerns, repeatedly, for a number of years¹ - to no avail. Some of our members wanted to answer this survey individually, but were unable to do so. The EC urgently needs to audit its online tools and channels of communication, especially those designed to engage with citizens. The EC should

¹ See the overview of the European Commission's websites we commissioned in 2014 for more information <http://www.euroblind.org/media/ebu-blind-date/Access-Denied-Annex-I--European-Commission-Overview.doc>

ensure an appropriate level of accessibility by using European Standard EN301549 when procuring digital goods and services.

Section 1 - General Information

The **European Blind Union (EBU)** is a non-governmental, non profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind people and people with low vision in Europe. It currently operates within a network of 45 national members including organisations from 27 European Union member states, candidate nations and other major countries in geographical Europe.

Our Interest Representative Register ID is 42378755934-87

We are happy for our contribution to be made public.

Section 2 - Lessons learnt from the current eGovernment Action Plan 2011-2015

Has the current 2011-2015 eGovernment Action Plan improved cross-border eGovernment services overall?

No

How do you rate the measures comprising the current eGovernment Action Plan?

User empowerment

Inclusive services, collaborative production of services, re-use of public sector information, transparency, involvement of citizens & businesses.

Not successful

Internal market

Seamless services for businesses (cross-border services, eProcurement), personal mobility, large-scale pilot projects involving more than one country.

Not successful

Efficiency & effectiveness of governments & administrative bodies

Improving organisational processes (skills through ePractice.eu portal), reducing administrative burdens, green government.

Not successful

Preconditions for developing eGovernment

Open specifications & interoperability, key enablers (e-identity & e-signatures), innovative eGovernment.

Not successful

Section 3 - Factors hampering the use of digital public services

For each of the following factors how likely is it to stop you using digital public services in your contacts with the public administration in your home country?

I don't know whether the public service I'm applying for can be requested online

Likely

It's not compulsory to use online services

Likely

I have limited access to internet

Very likely

Comment: inaccessibility of e-government services (websites and apps) for people who use assistive technology, such as screen-readers or screen magnifiers, is common in the EU

The digital public services available aren't user-friendly enough (e.g. they require additional steps that can't be completed online, or it's tricky to navigate through the system or locate the relevant information, or the services aren't available in a language I know)

Very likely

Comment: sometimes it is a crucial part of the online process that is inaccessible, for example the downloadable form that has to be completed is an inaccessible PDF or the payment system features an inaccessible CAPTCHA. While the service is accessible to other citizens, it becomes inaccessible to someone using assistive technology.

I lack digital skills

Likely

Comment: this is an issue for some blind and partially sighted people, but we are keen to stress that this is not an issue for all blind and partially sighted people.

I prefer to interact with public administrative bodies through traditional channels (e.g. by letter or face-to-face)

Likely

Comment: when online services are inaccessible by design, people have no option but to interact with public administrative bodies through traditional channels

Lack of online feedback mechanisms

Likely

I'm not confident that my personal data would be treated Confidentially

Likely

Online services cannot be accessed using mobile devices

Very likely

Comment: inaccessibility of mobile apps, in particular, is a major issue. However, when accessible, mobile apps are likely to be the preferred way to access services for those blind and partially sighted people who are able to use a smartphone.

Online services aren't sufficiently personalised to meet my needs

Very likely

Online services aren't sufficiently accessible for citizens with Disabilities

Very likely

Public administrative bodies require the same information to be provided more than once

Likely

Unsatisfactory past experience with a similar service

Likely

Section 4 - Improving eGovernment services

How important are the following measures in terms of improving eGovernment services?

Working together with the public to produce public services jointly (e.g. 'fix-my-street')

Highly Important

Making all online public services inclusive & accessible to all

Highly important

Making decision-making processes more Transparent

Highly important

Making all online public services personalised & user-friendly

Highly important

Proactive provision of eGovernment services based on life events such as the birth of a child

Highly important

Improving the availability of open data

Important

Ensuring that users have to provide information to public administrative bodies once only

Important

'One-stop shops' for accessing government services (i.e. single entry points for any public service)

Important

Enabling users to monitor (i.e. track & trace) their file(s) online

Highly important

Enabling users to monitor who has accessed their personal data

Highly important

Improving the digital skills of civil servants in public administrative bodies

Highly important

Comment: ensuring that civil servants understand the basics of digital accessibility is very important – it is crucial for those in charge of IT services.

Improving the digital skills of the general Public

Important

Improving digital skills in businesses

Very important

Comment: ensuring that businesses are aware of digital accessibility best practice is very important.

Making online public services more trustworthy & secure

Very important

Comment: like other citizens, we are concerned about privacy and security of our personal data. We welcome features that enable the protection of our data, but this consideration should not lead to processes becoming inaccessible for us. At present many authentication processes are a barrier, e.g. inaccessible CAPTCHA.

Giving users access to public services online

Highly important

Making all public services accessible on mobile devices

Highly important

Enabling people to play a more active part in decision-making & policy-making

Highly important

Enabling users to access their own personal data from anywhere in the EU

Important

Giving users access to eGovernment services in other EU countries using their own national electronic identities

Important

Acceptance of an EU-wide electronic signature (eSignature)

Important

Comment: while an EU-wide electronic signature could potentially be very useful, we are concerned about the fact that the current eIDAS regulation does not include a mandatory requirement for e-Signature to be accessible. So far in most of the EU Member States electronic signature is still inaccessible for blind and partially sighted people. As a consequence such a measure would constitute a further barrier to inclusion of blind and partially sighted people.

Improve and support public transportation related services digitally

Highly important

As a citizen, would you promote at EU level the measures you've selected above as important or highly important ?

Yes

Section 5 - Mobility and cross-border public services in the EU

When interacting online with a public authority in another EU country, we expect:

- to be able to access all relevant information and start the procedure online using a 'one-stop shop'
- to be able to use electronic signatures & electronic identifications from our home country

Other: online tools and procedures should be fully accessible end-to-end

Section 6 - Modernising eGovernment services in the EU

Please indicate how important it would be to improve or apply eGovernment services over the next 5 years for each of the following areas: This applies to all levels of public administration – local, regional/national and EU.

Reporting a crime

Important

Applying for a passport

Highly important

Applying for or renewing a driving licence

Less important

Becoming unemployed

Highly important

Buying, selling, building or renovating a House

Less important

Change of marital status

Important

Death of a close relative and/or starting an inheritance procedure

Important

Enrolling in higher education and/or applying for a study grant in an EU country other than your own

Highly important

Enrolling in school or starting higher education and/or applying for a study grant in your home country

Highly important

Health-related services

Highly important

Looking for a job

Highly important

Making a tax declaration

Highly important

Moving abroad

Highly important

Moving within one country

Important

Obtaining an allowance

Highly important

Registering a car

Less important

Reporting the birth of a child

Important

Starting a judicial procedure (e.g. one concerning a small claim)

Important

Starting a new job

Highly important

Please indicate how important it would be to further improve or introduce each of the following eGovernment related procedures (local, regional/national and EU) over the next 5 years?

Full digitisation of the public procurement process (digital access to certificates & attestations, e-invoicing, e-archiving, etc.)

Important

Online procedure for all insurance-related matters (healthcare, social security) all insurance-related matters (healthcare, social security)

Highly important

Online procedure for all tax-related matters

Highly important

Online procedure for starting a judicial procedure, such as one relating to small claims

Important

Online procedures for running a business (e.g. specific licences/permits to operate in a given sector)

Highly important

Online procedures for the recognition of vocational & professional qualifications

Highly important

Online procedures related to hiring an employee (training, work place security, reporting & documentation, social security, taxes, etc.)

Highly important

Online procedures to obtain government certificates (on capital deposited, social security, healthcare charges & tax payments)

Highly important

Online procedures to set up a business

Important

In which areas should eGovernment services at all levels (local, regional/national and EU) be improved over the next 5 years?

All areas: inaccessibility of eGovernment (e.g. websites, e-services, apps, etc.) is a major concern for us. Access to public services online is patchy and the level of accessibility varies from one country to the next and from one service to the next. This is why we need a strong EU Web Accessibility Directive. Accessibility has not been treated in the same way as core concerns, such as privacy or data protection and inaccessible eGovernment services (e.g. inaccessible websites, inaccessible apps) continue to prevent blind and partially sighted people from fully participating in society. This is everyday discrimination, which is unacceptable. Lack of progress in this area is at odds with the spirit and the letter of provisions set out in the United Nations Convention on the Rights of Persons with Disabilities.

Section 7 - The role of the European Commission

How can the European Commission help improve public administration in the EU at all levels -regional, national and EU-wide?

We believe that the European Commission should demonstrate leadership and set out an ambitious action plan fit for the 21st Century.

A European Standard for accessibility of ICT products and services (EN301549) was adopted in 2014. We believe it should now be referenced in legislation and extensively promoted by the European Commission when engaging with Member States on the issue of eGovernment.

We are concerned about the fact that there is no requirement for eSignature to be made accessible in the EU eIDAS regulation and are therefore calling on the Commission to monitor how this legislation is implemented to ensure that it does not, in future, constitute a new barrier to access eGovernment services for blind and partially sighted people.

We are urging the EC to take on board the switch from desktop to mobile access in all forthcoming policies and regulations. Mobile is the go-to medium to access digital content of any kind and the prevalence of mobile apps as a gateway to this content cannot be ignored. This is also the case for eGovernment services. Mobile apps developed by public administrations should therefore be accessible to all citizens, including blind and partially sighted citizens.

Please indicate for each of the following areas the level of priority for action by the European Commission:

Allow all the Commission suppliers and grant participants to send the relevant data and documents only once

Medium

Make e-Invoicing and pre-award e-Procurement mandatory for all the new Commission market procedures

Medium

Accept the usage of e-Signatures for the most significant communication flows with business, citizens and Member States

High (if accessible)

Section 8 - The 2016 - 2020 eGovernment Action Plan, Citizen involvement

How should people be enabled to contribute to, make proposals on and publicly exchange their views on new initiatives emerging under the eGovernment Action Plan? For instance, should the Commission set up an online social media platform to facilitate the sharing of ideas?

We always welcome new ways for citizens to use social media platforms but have found, repeatedly, that bespoke platforms set up by the European Commission (e.g. Digital Agenda for Europe online platform; Digital4EU – to name just a few) were inaccessible to blind and partially sighted citizens, resulting in exclusion from the online public debate. In this area the European Commission has failed to uphold our rights under, inter alia, articles 4 and 9 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

In 2015, the UNCRPD Committee reviewed the implementation of the Convention by the European Union and one of the recommendations was it should “**take necessary measures to ensure full application of web accessibility standards to websites of all European Union institutions and to offer information in sign languages, Braille, augmentative and alternative communication, and other accessible means (...)**”.

Other examples: Mobile apps launched by the Commission in recent years (e.g. “Going abroad” and “Passengers Rights”) were inaccessible to blind and partially sighted people. This is not acceptable.

Section 9 - Policy principles

Ongoing discussions on public sector modernisation suggest that the EU public sector should aim to introduce a new model for providing public services, based on certain strategic policy principles.

How important are the following strategic policy principles?

Privacy by default

The privacy of citizens and business confidentiality should be protected, in line with EU data protection law

Highly important

Digital by default / Digital first

All public services in the EU should be provided digitally as a general rule.

Important

Comment: we welcome 'digital by default' or 'digital first' on the strict condition that it is fully accessible – in the absence of legislative guarantees (and appropriate enforcement) of this underlying principle, then Member States must ensure that blind and partially sighted people have alternative accessible ways to access public services.

No legacy

This principle would require governments to renew IT systems and technologies after a certain amount of time, to keep in line with the ever-changing environment and development of technology

Important

Comment: renewing IT systems and technologies is a major opportunity to ensure these are accessible to all.

Cross-border by default

It should become the norm for interconnected administrative bodies in different EU countries to provide services digitally

Important

Open by default

Government data and services should be opened up, enabling third parties to build new services on top

Less important

Comment: enabling third parties to build new services on top could increase the number of services on offer, but it is important to ensure that this is done in a way that ensures the accessibility of these services

Transparency

Government processes should become more transparent, open and inclusive, and there should be more stakeholder engagement in open policy

Very important

Inclusive by default

Digital remedies should be found to tackle the digital divide

Very important

Once only

This principle means people shouldn't have to supply the same information more than once

Important

Online end-to-end public sector services

For users of government services, this would mean that a procedure is fully available online and that no further offline steps are required (e.g. completing tax returns)

Very important

Comment: Ensuring the accessibility of downloadable documents (e.g. PDF form to complete and send) and embedded third party services (e.g. payment stage of tax bill) is essential.

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For further information or clarification on this consultation response, please contact Carine Marzin carine.marzin@rnib.org.uk or get in touch with the EBU office.

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