



**Research,
Evaluation and
Consultancy**

European Blind Union

External evaluation Action Plan 2021

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Final report

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LIST OF ABBREVIATIONS

ANEC: European Association for the Co-ordination of Consumer Representation in Standardization.

BPS: Blind and partially sighted (people)

CAV: Connected and Autonomous Vehicles

DPO: Disabled Person's Organisation (s)

EC: European Commission

EDF: European Disability Forum

EP: European Parliament

EU: European Union

GA: General Assembly

GEAR: Gender Equality Awareness Raising (project)

ICEVI: International Council for Education and Re/habilitation of People with Visual Impairment

LC: EBU Commission for Liaising with the EU

M&E: Monitoring and Evaluation

MS: Member State(s)

REC: Rights, Equality and Citizenship (programme)

SDG: Sustainable Development Goal(s)

UN: United Nations

UNCRPD: United Nations Convention on the Rights of Persons with Disabilities

VI: Visually impaired

1. INTRODUCTION

I want to express my gratitude to all those who have contributed to this evaluation round, and in particular posthumous to Maria Kyriacou, the Secretary General of EBU and coordinator of the EBU Gender equality Working Group. Maria participated annually in the interviews and surveys, since I started the work on the external evaluation of EBU in 2012. She also contributed to this evaluation round, just a week before I received the sad message that she passed away. I experienced Maria as a kind, positive, professional, committed and dedicated person as well as a role model for many (young) women with visual impairments.

EBU created in 1984, is a non-governmental, non-profit making European organisation and 1 of the 6 regional bodies of the World Blind Union. EBU has currently 41 members, of which 25 in EU Member States. The [EBU Constitution](#) together with the [UN Convention on the Rights of Persons with Disabilities](#) and the [UN Sustainable Development Goals](#) (SDGs) are the guiding principles of the work of EBU.

The mission of EBU is threefold:

- To promote the interests of all blind and partially sighted people to European bodies.
- To produce European-wide research and best practice relating to policies, services and social inclusion.
- To support and strengthen national organisations of blind and partially sighted people.

SAGO Research was contracted to evaluate the implementation of the [EBU 2021 Action Plan](#). This EBU 2021 Action Plan is framed within the remit of the [EBU Strategic Orientation Plan 2020-2023](#). The objectives of the EBU 2021 Action Plan are related to different areas of work:

- Promoting Braille and Braille literacy.
- Employment (enhancing young blind and partially sighted job-seekers employment opportunities).
- (improved) Access to technology.
- (improved) Participation in public life, i.e. accessible voting.
- Non-discrimination.
- Accessible good and services (i.e. accessible audio-visual productions, audio-description, accessible lifts, implementation of the [Marrakesh Treaty](#), payment terminals and household appliances).
- (improved) Mobility (i.e. connected and automated vehicles).
- (improved) Governance and working processes (gender equality, cohesion amongst the membership, EBU Solidarity Fund, development issues)
- (improved) Communication and campaigning capacity.
- (improved) Fundraising capacity.

These objectives are linked with the priorities and objectives of the EBU Strategic Orientation Plan 2020-2023:

- **Priority 1: Empowering blind and partially sighted persons:**
 - In cooperation with ICEVI-Europe, governments, professionals and other stakeholders are made aware of the importance of braille (UNCRPD art. 9, 21 and 24 - SDG 4).
 - Every blind and partially sighted adult in Europe has the opportunity to have a fulfilling job (UNCRPD art. 27 - SDG 8).
 - Every blind and partially sighted person has access to technologies that meet their information needs (UNCRPD art. 9 – SDG 9).
 - Every blind and partially sighted person has the right to participate in public life (UNCRPD art. 29 - SDG 16).
 - Blind and partially sighted persons, including children, are protected against discrimination in all areas of life (UNCRPD art. 5 – SDG10).
 - Every blind and partially sighted person has access to inclusively designed goods and services (UNCRPD art. 9).

- Every blind and partially sighted person has improved mobility (UNCRPD art. 20).
- **Priority 2: Strengthening EBU and its members**
 - EBU has improved governance and working processes.
 - EBU and its organisations have improved communication and campaigning capacity.

EBU is funded through membership fees and contributions, grants from the European Commission and sponsoring.

Reading Guide

After the introduction to this report, the second chapter explains the objective and approach of the evaluation of the EBU Action Plan 2021.

In chapter 3 the conclusions and recommendations are presented.

Chapter 4 presents the evaluation findings, structured around overall findings, the priorities in the Strategic Orientation Plan and other themes EBU was working on in 2021.

2. OBJECTIVE AND APPROACH OF THE EVALUATION

2.1. OBJECTIVE AND OBJECT OF THE EVALUATION

Objective

The **main aim of the external evaluation** of the EBU Action Plan 2021 is to assess the **performance and achievements** of 2021 vis-à-vis the overall objectives of this Action Plan.

This evaluation aims to:

- Contribute to a learning process aimed at the improvement of the functioning of EBU activities.
- Contribute to a broader evidence base to inform the management and governance of EBU.

Object

The object of evaluation is for 2021 defined by the clusters of activities specified in the 2021 Action Plan:

- Contribution of the work of EBU to the development of the EU law/policies and to their implementation.
- Building the capacity of the members of the network and/or training relevant practitioners and stakeholders and/or informing the general public.
- Awareness raising and dissemination.

2.2. EVALUATION QUESTIONS, CRITERIA AND INDICATORS

The main evaluation **questions** guiding this research are:

- Are the activities of the EBU 2021 Action Plan implemented in an effective and relevant way in achieving the objectives?
- To what extent is there coherence between the various activities of the EBU 2021 Action Plan?
- To what extent have the resources been used in the most optimal way?
- Did the implementation of the EBU 2021 Action Plan lead to the expected results/changes?

The **criteria** used are:

- Effectiveness: the extent to which the objectives have been achieved of the EBU 2021 Action Plan.
- Efficiency: the extent to which the resources have been used in the most optimal way to achieve expected results and this in relation to the various part of the object of evaluation.
- Relevance: the extent to which EBU appropriately responds to the needs and priorities of its members (and the wider BPS community they represent) through the implementation of these various activities.
- Coherence: the extent to which the various activities are coherent, addressing the synergies and interlinkages and consistency between the various activities.
- Sustainability: the extent to which the results/effects of the various EBU activities that are part of the object of evaluation are sustainable in the long terms (outcomes leading to impact).

2.3. TOOLS FOR DATA COLLECTION AND ANALYSIS

For the **data collection**, two main tools were used:

- Documentary analysis.
- 20 online/telephone interviews with a selection of members and the EBU Secretariat).

Data collection for the whole evaluation process took place between March and December 2021.

Documentary analysis

A range of documents produced in the framework of the EBU 2021 Action Plan was used as input into the evaluation:

- EBU Action Plan 2021.
- EBU Strategic Plan 2020-2023.
- Notes from follow-up meeting of the 26 May 2021 – GEAR project.
- Dashboard REC 2021 (internal document).
- EBU Communication audit 2021 – September 2021 (internal document)
- Internal communication strategy paper – January 2017 (internal document)
- Report on the thematic online workshop on the Study on EBU organisational management by Carine Marzine – April 2021 (internal document)
- EBU response to the [European Commission's request for feedback on its roadmap for improving access to emergency communications through single number 112](#) (pdf), a [word version of this document is also available](#) (October 2021)
- EBU response to the [European Commission's public consultation on the Web Accessibility Directive](#) (pdf) a [word version of this document is also available](#) (October 2021)
- EBU Response to [consultation on improving SDG monitoring report](#) (pdf) a [word version of this document is also available](#) (September 2021)

- EBU response to the [European Commission's public consultation on a set of European Digital Principles](#) (pdf) [a word version of this document](#) is also available. (August 2021)
- EBU contribution to survey '[Targeted consultation on the availability of works other than printed works in formats accessible for persons with disabilities within the internal market](#)' (pdf), a [word version of this document](#) is also available (April 2021)
- EBU position paper on the [EU Disability Rights Strategy 2021-2030](#), (pdf) a [word version of this document](#) is also available (April 2021)
- EBU response to [European Commission survey: Combating gender-based violence – protecting victims and punishing offenders](#) (pdf) a [word version of this document](#) is also available format (April 2021)
- Press Release: 16 June 2021, [Creative Europe \(2021-2027\) - Including people with visual impairment](#)

Furthermore, the LC e-mailing list interactions between members and between members and the EBU Secretariat during 2021 were also used as an input into this evaluation.

Online/telephone interviews

Online/telephone interviews were organised with a selection of 17 EBU members and 3 staff members of the EBU Secretariat to gather opinions and perceptions about the implementation of activities and mainly as complementary to the online survey. The type of interview that was conducted is **semi-structured**.

3. CONCLUSIONS AND RECOMMENDATIONS

3.1. INTRODUCTION

The external evaluation of the EBU 2021 Action Plan work is based on **telephone interviews in which in total 17 member organisations participated**. Furthermore, desk research was carried out based on several key documents and email traffic in the Liaison Committee (LC) in 2021.

Overall, the interviewees and respondents have a **positive assessment** of the implementation of the EBU 2021 Action Plan. Most of the activities that were planned for 2021 have been implemented. Members positively assess more in particular the advocacy work done by EBU, especially under the particular circumstances created by the COVID-19 pandemic.

3.2. CONCLUSIONS

1. Are the activities of the EBU 2021 Action Plan implemented in an effective and relevant way in achieving the objectives?

Despite the severe effects of the COVID-19 pandemic related measures, most of the activities of the EBU 2021 Action Plan were implemented and most of the objectives were achieved to a large extent. It should be noted that for an important part of the work of EBU (advocacy and lobbying), results are only visible on a longer term, but that on an annual basis steps are taken to achieve the longer term objective.

The relevance of the activities developed and implemented by EBU in 2021 was confirmed by interviewees. Yet, it needs to be considered that not all interviewees have information about all activities and that replies are given in function of their involvement in the implementation of the EBU Action Plan. Because of the variety of activities, member organisations are in a position to select those activities that they consider

to be most relevant for them/their organisation. One key conclusion (again confirmed this evaluation round) is the importance of exchange between member organisations or the **mutual learning**.

Furthermore, again the fact that many of EBU's outputs are translated is very much appreciated by members and is a significant condition for accessibility and uptake of messages and tools delivered by EBU.

The effectivity of the implementation of the Action Plan is amongst others related to the **structures and support systems** in place. The **model** that has been used to engage members in the implementation process is challenged by the limits of the extent to which members have the capacity to participate in EBU's activities, whether it be in a leadership position, or as an organiser of an event or a participant. Capacity refers to the ability of people and organisations to manage their activities and processes successfully. It also refers to time issues and prioritisation at the level of member organisations. The model in place is based on shared responsibilities between the EBU Office and EBU members, but is not always very clear when implemented. Members ask for more clarity in relation to this, but also about the actual working structures in place, e.g. committees, projects¹, etc.: how do all these mechanisms inter-relate?

Engaging members in the implementation of the annual Action Plans is a major challenge, which needs further consideration, as was already recommended in the 2020 external evaluation report.

Overall, members give a positive assessment of the approach and the results of campaigning. Communication and campaigning go hand in hand and communication benefitted the last year from incremental steps made for further improvement. The visibility of EBU has improved at EU level and its expertise is increasingly recognised.

¹ The evaluator would like to point to a distinction between projects that are integral part of the implementation of the EBU REC Action Plan (as a way to organise the work) and complementary EU-funded projects like PARVIS and PAsCAL.

2. To what extent is there coherence between the various activities of the EBU 2021 Action Plan?

The activities of the EBU 2021 Action Plan are part of a larger framework of activities that is presented in the EBU Strategic Orientation Plan 2020-2023. Activities are selected on an annual basis and included into annual Action Plans. The activities as such complement each other, though having an overall framework explaining the **intervention logic** would be helpful to give more insights into the relations between the activities as recommended in the 2020 evaluation report. During the interviews the issue of complementarity between the projects (like e.g. PARVIS) and the annual Action Plans was raised. These projects follow an own dynamic and work plan. More clarity on how to link projects and the annual Action Plans in order to benefit from synergies would respond to this need.

3. To what extent have the resources been used in the most optimal way?

This evaluation did not analyse the use of financial resources of EBU, nor whether these financial resources were used in the most optimal way. Yet, based on the evaluation, there is evidence that the use of the human resources (expertise) available in the EBU network could be optimised through a strengthened engagement of members. A first step is to know what the expertise is that members can/want to contribute to the network.

4. Did the implementation of the EBU 2021 Action Plan lead to the expected results/changes?

Overall, members assess the results of the work of EBU in 2021 very positively, especially taking into account the restrictive measures still in force in response to the COVID-19 pandemic. Interviewees recognise that results of advocacy work become only visible on a longer term but

that it is important to monitor in-between progress. Ideally indicators could be used to support this monitoring process.

Depending on the involvement of interviewees in EBU's activities in 2021 (and thus the perception of interviewees on activities), various highlights in terms of results and progress in 2021 were presented during the interviews:

- the progress made in cooperation with other DPOs, in relation to the [EU Disability Rights Strategy](#) in which various messages of EBU and its allies were taken up, e.g. on improved accessibility of elections and the Disability Card.
- Analysis of the implementation of the European Accessibility Act.
- Outputs produced in the framework of the different projects, i.e. PARVIS and PAsCAL as well as outputs delivered as part of the implementation of the REC Action Plan.
- Progress on audio-description within the Creative Europe/MEDIA calls for proposal 2021-2027.
- To keep Braille on the agenda.

The **visibility** of EBU has improved at EU level and its **expertise is increasingly recognised**; one of the indications is that EBU is more and more solicited by EU-level services to provide input in consultations. As in previous years, EBU responded also on own initiative to the various (for EBU relevant) consultations of the EC.

Internal and external communication is 'work in progress': Various tools are already in place, which are overall positively assessed by EBU members and steps have been made to improve the communication. Yet, a clear communication strategy (translation of (strategic) objectives of EBU into communication objectives, linking audiences to communication messages and tools/channels for various audiences) is necessary to support the other clusters of activities and processes in EBU (more in particular advocacy but also capacity building).

The evaluator adds to this that longer term impact will be enhanced when activities are embedded in a clear intervention logic and when outcomes are linked to a monitoring and evaluation framework.

3.3. RECOMMENDATIONS

The following recommendations are a combination of proposals for improvements suggested by interviewees and respondents as well as suggestions for improvement by the evaluator.

1. Celebrating success: what have we achieved? To what changes did we contribute?

Evaluations tend to focus on what may not have worked well in an organisation, while at the same time positive change in an organisation (EBU in this case) should be facilitated and celebrated. EBU has realised various results in 2021 that contribute to positive changes at the level of EU-level policies as well as at the level of member organisations and national level policies. It is recommended by the evaluator, on an annual basis, to gather all positive outcomes (changes as a result of the implementation of activities – **outcome harvesting**) and to communicate and share these with member organisations, and possibly also with partners.

The evaluator wants to link the celebration of success to appreciating the EBU outputs on their value and to optimise the use of the outputs, e.g. a project outputs could be ‘translated’ into an advocacy tool or training material.

2. Optimise outcomes through identifying what EBU wants to achieve and what is needed for that (intervention logic linked to monitoring, evaluation and learning)

The evaluator recommends to define a clear intervention logic of EBU, starting from mission and vision of EBU and how this is translated into the Strategic Plan and the annual Action Plans, to then define what is needed (activities and outputs) to realise this mission and vision. This process of determining the activities and outputs, will inevitably be fed by the resources available (inputs). An intervention logic will at the same

time contribute to identifying (necessary) synergies between activities (and projects), leading to the optimisation of results.

This intervention logic needs to be complemented with a monitoring and evaluation framework, based on indicators to monitor progress and assess results (see also recommendation in 2020 evaluation report). **A monitoring and evaluation framework is an essential instrument for learning and development** in the network, which are key to make progress (see also April 2021 meeting of the EBU Board as a follow-up of the Carine Marzine report).

3. Optimising working structures to facilitate the engagement of members

In the 2020 evaluation report, the evaluator proposed to develop a members' engagement strategy, reflecting on how to involve members in an active way, what is hindering members to engage with EBU, how can their engagement be further stimulated, what can members contribute to EBU and what can EBU offer to its members (taking into account the variety of needs)? This recommendation still stands, since the active engagement of members is crucial in EBU, but yet also a challenge given the limits to member participation (lack of time and capacity, prioritization, etc).

Based on the 2021 evaluation, the evaluator proposes to link the issue of 'members' engagement' to the model used to implement the annual EBU Action Plans, since this model is based on active participation of member organisations (necessary for legitimacy reasons, collecting evidence, make optimal use of expertise available, create ownership). Different working structures have been installed in the past to implement the annual Action Plans, based on the model of member engagement (committees, working groups networks, projects, etc.). The recommendation is to reflect on the current structures in view of what is needed to accomplish the vision and strategic objectives (see intervention logic) and to ensure the sustainability of results. An example is to link the 'projects' (temporary in nature like GEAR, PARVIS, etc.) to a more sustainable 'canvas', like a working group or a committee

composed of a core group of EBU members monitoring and working on a specific theme. This latter recommendation was also mentioned by interviewees in the 2021 evaluation round.

4. Take further steps in internal and external communication

The visibility of EBU has improved, yet a **coherent strategic vision** is needed to take the current communication approach a step further. A few issues that result from the 2021 evaluation (presented by interviewees and supported by the evaluator):

- What are the messages that EBU wants to convey to which audiences? Which tools are most suitable for this?
- Further improvement on the visibility of EBU on social media.
- Who should play which role in the communication process (EBU Office, Board and members, eventually complemented by a Working Group on Communication), whereby the internal information flows in member organisations should be considered.
- What resources are needed to implement the resulting communication strategy?
- Reporting on results (and outcomes more in particular) rather than on activities.

4. EVALUATION FINDINGS

The evaluation findings are presented according to the two priorities in the Strategic Plan 2020-2023, introduced by a paragraph with some overall findings.

4.1. SOME OVERALL FINDINGS

For the evaluation of the EBU 2021 Action Plan, the evaluation criteria have been applied to the various activities implemented. Yet, based on the analysis of the interviews and desk-research, some overall findings emerge:

- **Prioritisation** in the EBU agenda is an issue coming up in the interviews, considered the available resources for campaigning in the EBU Office and in member organisations. In view of the mission and vision, choices need to be made and these choices need to relate to the expertise available in the EBU community (make sure that there is expertise in areas where EBU wants to act or act in areas for which there is expertise available in EBU).
- In terms of **management and governance** of EBU, an important message coming out the interviews is that the involvement of young people in governance structures needs be beyond tokenism; young people need to feel welcomed and feel part of the EBU community. Furthermore, a plea is made to make the link between the work of the working structures (committees, networks, working groups) and the overall action plan and strategic plan of EBU more apparent. All members interviewed have a very positive assessment of the new leadership in the EBU Office and the initiative taken to install a leadership forum, bringing together leaders in member organisations. While in 2021 there has been not that much activity in this area, the intention is to continue this work in the future.

- The **engagement of members** in the implementation of the EBU Action Plans remains an issue that needs attention. The human resources of the Office and the membership is the most valuable resource in the EBU network. Using the expertise available is crucial to make the most use out of the financial resources, to deliver optimal results, to provide for legitimacy for its actions and to develop and maintain ownership of the activities and results. The current model of members' engagement and implementation of the Action Plan is based on coordination by the EBU Office and active involvement of member organisations in various roles and responsibilities (leader of activity, host of event, member or working group, etc.). The sustainability of this model is questioned by some interviewees in view of the availability and capacity of member organisations.
- Overall, there is a **survey fatigue** with EBU members, though requests for input on rather practical issues (e.g. organisation of personal assistance in the different countries) receive a higher response compare to calls for input on more strategic issues, which might be conceived as rather abstract, e.g. consultation of Web Accessibility Directive.
- **Inclusiveness** is valued as an important principle for EBU as a basis for its activities, i.e. inclusiveness in terms of involvement of different regions in Europe, age and gender of participants as well as visual impairment. A few interviewees mentioned the importance of the involvement of young people in EBU activities and in its governance to ensure the future of EBU. An interesting initiative to mention is the participation of EBU in the ICC 2021, the International Camp on Communication and Computers for young people with VI between 16-21 years, addressing young people and informing them about the EBU activities to raise awareness of self-advocacy opportunities. This is considered to be a long-term investment.
- Related to previous issues is the **importance of exchange and mutual learning** in the EBU network. Strong member organisations create a strong network. Support to building the capacity of members

is not only taking place through specific capacity building actions but also via the implementation of the working structures, i.e. working groups, committees and projects. These working structures need to be 'animated' whereby exchange is a key tool and mutual learning a key outcome. Especially the younger interviewees express an explicit need for this exchange and mutual learning, which needs to be built into the agendas of meetings as well as working methods like leaving sufficient space for discussion, questioning, etc. Mutual learning could be a motivator for members to be more closely involved.

- The evaluator also wants to highlight the importance of reporting on **results (e.g. successes) and not only activities** as mentioned in previous evaluation reports. Insights into the results of activities (changes resulting from the use of outputs) could be motivating for members to engage more actively (see previous evaluation rounds) and could also be used for advocacy purposes (evidence-based advocacy).
- Insights into the **connection between work at national and EU (transnational) level** is important for members and should according to interviewees be more explained and emphasised.
- The close **cooperation with EU-level others and in particular EDF** is very positively assessed by interviewees.
- The issue of **moving the EBU Secretariat** to Brussels was raised again during the interviews, as so far no firm decision has been taken by the GA. Opinions about this are dispersed, for some members the place where the Secretariat is located does not make too much difference, especially since online working is established as common practice. For others, EBU is about campaigning/advocacy and the targeted institutions are mainly based in Brussels. For them, the choice to move the office is obvious. Yet, the latest position of the Board seems to be to keep the EBU Office in Paris, but increase the presence in Brussels if needed. As a result of measures taken to tackle the COVID-19 pandemic, online work became more

mainstream and has put less focus on taking this issue further. Yet, it is a topic that needs a clear statement from the EBU governance.

- The **COVID-19** pandemic changed the life of all citizens drastically and as a consequence also the implementation of the EBU Action Plan also in 2021. While building expertise around working in an online environment in 2020 has paid off during online activities in 2021 and increased the participation rate of members in events, the absence of onsite activities also negatively impacted networking and engagement of members. Interviewees make a plea for more meetings/interactions using the current possibilities of online and hybrid formats, e.g. for the LC meeting one onsite meeting and 2 online meetings on an annual basis. Some interviewees argue that hybrid meetings allow a more inclusive way of working within EBU. The LC meeting in November 2021 took place in hybrid format and was overall positively assessed, also in terms of engagement of all participants in the meeting (those onsite and those online).
- In January 2021, the EU-funded **PARVIS project** was launched, which is a 2-year project aiming to raise awareness on blind and partially sighted people. EBU is implementing this project with two consortium organisations and with a number of EBU members as partner organisations. Interviewees hold high hopes in relation to this project, as raising awareness on the rights of VI citizens is essential in achieving the mission of EBU and its member organisations. Also the PAsCAL project and the activities related to aiding young VI citizens who are seeking employment are mentioned as playing an important role in the delivery of outcomes for EBU and its member organisations.

4.2. EMPOWERING BLIND AND PARTIALLY SIGHTED PERSONS

Description

This first priority in the Strategic Plan is composed of the following objectives, which relate to specific areas of work (objectives) in the Action Plan 2021:

1. Improving Braille teaching and literacy (UNCRPD art. 9, 21 and 24 - SDG 4) – relating to Objective 1 (Promoting Braille and Braille literacy).
2. Every blind and partially sighted adult in Europe has the opportunity to have a fulfilling job (UNCRPD art. 27 - SDG 8) – relating to Objective 2 (Employment).
3. Every blind and partially sighted person has access to technologies that meet their information needs (UNCRPD art. 9 – SDG 9) – relating to Objective 3 (Access to Technology).
4. Every blind and partially sighted person has the right to participate in public life (UNCRPD art. 29 - SDG 16) – relating to Objective 4 (Participation in Public Life).
5. Blind and partially sighted persons, including children, are protected against discrimination in all areas of life (UNCRPD art. 5 – SDG10) – relating to Objective 5 (Non-Discrimination).
6. Every blind and partially sighted person has access to inclusively designed goods and services (UNCRPD art. 9) – relating to Objective 6 (Accessible Good and Services).
7. Every blind and partially sighted person has improved mobility (UNCRPD art. 20) – relating to Objective 7 (Mobility).

Analysis

1. Improving Braille teaching and literacy (UNCRPD art. 9, 21 and 24 - SDG 4).

EBU promotes Braille and Braille literacy as essential tools for the autonomy of blind and partially sighted individuals. For 2021 the following activities were planned:

- The delivery of a statement clarifying EBU's position on Braille to support standardization work.
- Conduct the Onkyo Braille Essay Contest and communicate its results.
- Follow-up the 2020 Braille survey on national Braille authorities, to collect good practices in the area of Braille teaching as well as evidence on the importance of Braille literacy.
- Start the work towards an EP Resolution to promote Braille.

Some interviewees report that the EBU Working Group on Braille received in the past period a boost. The work plan agreed upon with a clear timeline, milestones and outputs is much appreciated. This work plan is amongst others based on the 11 recommendations put forward in the [report on Braille teaching and literacy](#) delivered in 2018. While Braille is considered to be a very important tool it is at the same time also a delicate subject, with probably insufficient acceptance in education settings. There is less usage of Braille, especially amongst young people who prefer speech outputs, of which the quality and availability improved the last years. Yet VI children often have other impairments as well, making it more difficult for them to learn Braille. When people become VI at a later age, learning Braille is not easy either. Furthermore, various countries have a different policy and approach in relation to Braille; the support of standardization work is a complicated issue according to some of the respondents, involved in this EBU work. The statement on EBU's position is work in progress and will be published in 2022.

The follow-up of the 2020 Braille survey² is also work in progress, i.e. analysing results and setting up a online forum (database) on Braille authorities at national level.

The Onkyo Braille Essay Contest was cancelled in 2021 due to organisational issues with the organiser. The contest succeeded in the past to mobilise various EBU members and possible future ways of organising such a contest might be reflected upon not to lose the active engagement of these members.

The work of EBU in this area is also related to the work on accessibility of lifts, getting the message across that tactile information is no alternative for sufficiently visible information as VI citizens are not used to read tactile characters. Both formats are necessary to make text information accessible.

2. Every blind and partially sighted adult in Europe has the opportunity to have a fulfilling job (UNCRPD art. 27 - SDG 8).

For 2021 the following activities were on the agenda:

- The organisation of the annual conference on the theme of access to jobs and rehabilitation.
- The promotion of the dimensions of the EP report on the employment of persons with disabilities ([Langensiepen report](#)). EBU had largely contributed to this report, together with EDF and other disability organisations.
- Pursue the ADVISE project to support VI young people's job access (Aiding Young Visually Impaired Seeking Employment). The aim of this project is to enhance young blind and partially sighted job-seekers their employment opportunities. The project is part of the REC Action Plan and is based on a training and coaching approach and a [manual](#)

² This is a survey on national Braille authorities, to collect good practices in the area of Braille teaching as well as evidence on the importance of Braille literacy.

for inexperienced job seekers with a visual impairment was developed, which has recently been updated (2021). This manual includes an analysis of skills and competencies as well as guidance on writing a c.v., going for an interview and a section on body language and presentational skills. This document is currently available in 10 languages.

Interviewees first of all refer to the absence of data at national/regional level on employment of VI people including youngsters, which makes it more difficult to contextualise results and monitor progress.

After approval, the Employment and Social Affairs committee (EMPL) of the European Parliament in January 2021, the European Parliament plenary adopted in March 2021 the own initiative resolution on the implementation of the Equality in Employment Directive in light of the UNCRPD. EBU welcomed this resolution through its communication on Twitter.

In October 2021, the EBU Annual Conference was held in Belgrade (Serbia) on the theme of 'Employment and Rehabilitation of Blind and Partially Sighted People' and involved about 150 participants. At the end of the conference, EBU published the Belgrade Declaration, 2021, with the results and conclusions. This Declaration is considered to be an important advocacy tool for future use and is available in Albanian, Estonian, French, German, Hungarian, Italian, Montenegrin and Spanish.

The ADVISE project is ongoing and on track. The third round of training sessions took place in 2021.

3. Every blind and partially sighted person has access to technologies that meet their information needs (UNCRPD art. 9 – SDG 9).

In 2021 this objective is operationalised through providing information on ICTs through EBU Access Casts. In 2021 seven episodes have been completed. Furthermore, all episodes are accessible via a dedicated YouTube channel (now 34 episodes in total) and further visibility is

given to the podcasts via the EBU Twitter account (retweeting of @ebuaccesscast tweets on this matter). Through Twitter, a larger community could be reached for awareness raising not only about the subject, but also about the work of EBU. In 2020 there were on average 220 listeners per episode. Interviewees argue that some extra effort could be invested in increasing the visibility of this very valuable output (e.g. difficult to find on the EBU website). Yet, it should be noted that whenever a new podcast is released this is communicated in a separate e-mail to member organisations. These podcasts were produced with volunteers who will terminate their activities at the end 2021, implying that new professionals need to be found.

Furthermore, the proposal was made by interviewees to expand the content of the podcasts to non-technology subjects and to use the format of podcasts to complement the EBU members' newsletter.

4. Every blind and partially sighted person has the right to participate in public life (UNCRPD art. 29 - SDG 16).

The activities planned for 2021 are:

- Promote EBU's [Accessible Voting Awareness Raising report](#).
- Lobby for an EP resolution calling for fully accessible EP Elections in 2024.

EBU expressed support for the [EDF recommended amendments](#) to the resolution on the [reform of the EU electoral law](#). These amendments aim to further harmonise the electoral system and procedure applicable to European elections, to meet the needs of people with disabilities. The Constitutional Affairs Committee of the European Parliament (AFCO) is expected to vote on the text in December 2021. This issue is high on the priority list of EBU and is also taken up in the PARVIS project as part of the decentralised awareness raising event in 2022.

In 2023, the European Commission will issue **guidance on the participation of persons with disabilities in the electoral process**, as announced on the European Commission website. The expectation or hope

is that the guidance at EU level will also be used as guidelines for the organisation of national, regional and local elections.

5. Blind and partially sighted persons, including children, are protected against discrimination in all areas of life (UNCRPD art. 5 – SDG10).

This encompasses a continuous effort by EBU to lobby the EU institutions to re-activate the EU Equal Treatment Directive and have it adopted. In 2008 the European Commission proposed a new anti-discrimination Directive known as the Equal Treatment Directive or Horizontal Directive. Yet, more than ten years later the Equal Treatment Directive has still to be adopted by the Council of the European Union, composed of EU member states.

In the framework of this priority in the work programme of EBU in 2021, the following activities were planned:

- Promote the need for an EU Equal Treatment Directive.
- Lobby for the extension of the EU Disability card scheme.

The promotion of the need for an EU Equal Treatment Directive is still on the EBU agenda and need long term investments.

In March 2021 the EC presented the EU '[Disability Rights Strategy](#)' (2021-2030). EBU made a [provisional statement](#) in which a reaction was given on the main features of the Strategy. This Strategy comes after a process of extensive consultations with disabled persons' organisations throughout 2020, which is much welcomed by EBU (translation of 'nothing about us without us' in reality). While EBU welcomes the intention to address discrimination in key areas in the Disability Rights Strategy, the silence on the horizontal Equal Treatment Directive, blocked at the EU Council is regretted. A more detailed reaction to the Strategy was released by EBU in April 2021 in a [position paper](#). The uptake of messages conveyed by EBU and EDF in this Strategy is identified by interviewees as a main successful result of their campaigning work.

The EC announced also in March 2021 that, by the end of 2023, it will propose an EU-wide [Disability Card](#), as an instrument of mutual recognition of the disability status, building on the experience of the ongoing pilot project in eight Member States as well as on that of the European parking card for persons with disabilities. In 2020-2021 EBU has been very vocal on this issue, together with several other DPOs. In June 2021 EBU published its [Focus Newsletter on the EU Disability Card](#).

6. Every blind and partially sighted person has access to inclusively designed goods and services (UNCRPD art. 9).

This area of work encompasses various topics; for 2021 the following activities are on the agenda:

- Push the EU and Member States to use their financial leverage to promote the production of accessible audio-visual productions, including productions for children.
- To collect and publish good practice at national level on audio-description.
- To pursue our advocacy for accessible lifts.
- Continue to advocate for an effective implementation of the Marrakesh Treaty with a focus on non-EU countries.
- Consider other goods and services such as payment terminals and house hold appliances.

In February 2021 EBU participated in the first of a series of 'Peer support (online) meetings' on the implementation of the [European Accessibility Act](#) (EEA). The efforts of EBU in this context focus on two specific areas, i.e. e-Books and payment terminals. Related to the latter, a number of EBU members (the Netherlands, Austria and Germany) joined together in a taskforce to make technical recommendations for accessible payment terminals.

EBU continued to liaise with ANEC (European Association for the Coordination of Consumer Representation in Standardisation), amongst

others to comment on their position paper on the technical revision of the EU standard for accessibility to lifts. The technical revision was adopted (providing for satisfactory colour contrast requirements). ANEC representations in the relevant working group of CEN (the EU standardisation body) contributed to this result.

Early 2021 EBU started to lobby the EC on the Creative Europe/Media work programmes for 2021 and beyond. All funding applicants are asked to commit to promote diversity and inclusiveness in their company strategies and this criterion will be taken into account in the selection of the projects. Furthermore, through the national member organisations EBU started to investigate the practices and needs of the film industry at national level on audio description.

A [public consultation](#) was launched by the EC on 19 July 2021 to allow the public, especially persons with disabilities, to express their views on the Web Accessibility Directive, the state of web accessibility, and measures or actions for improvement. The consultation was open until 25 October 2021. EBU submitted a [response](#) before the deadline, whereby previously in September 2021 a call was sent to EBU members to participate in the consultation about the Web Accessibility Directive.

In 2021 EBU further monitored ratification processes in various countries (e.g. Bosnia and Herzegovina and Liechtenstein ratified the Treaty) as well as the process of the EEA EFTA States joining the Marrakesh Treaty. The plan for 2022 is to gather input on the implementation of the Treaty in the EU through a members' survey.

7. Every blind and partially sighted person has improved mobility (UNCRPD art. 20).

Mobility is an area in which many changes can be observed, and this trend will continue. The challenges, obstacles, but also the aids and means to overcome them, are constantly changing. This requires a constant effort to adapt and develop by e.g. urban planners, public

authorities, the industry, and, of course, blind and partially sighted people themselves. For 2021 the following activities were on the agenda:

- In follow-up to the 2020 [EBU series of webinars on acoustic systems information and navigation](#), start collaborative work to harmonise acoustic information and navigation systems.
- Pursue our engagement with developments regarding connected and automated vehicles (CAVs) so that the user perspective of blind and partially sighted people is taken into consideration from the outset.

The [FOCUS Newsletter of February 2021](#) was dedicated to the subject of Acoustic Systems for Information and Navigation.

EBU continued in 2021 to implement the [PAsCAL project](#) on CAVs. This project aims to contribute to better understanding the implications of CAVs on society, to measure the degree of acceptance of European citizens towards these mobile robots, and educate their future drivers, passengers and those who will share the road. The project includes 13 partners (amongst other universities, private companies and end-user organisations, of which EBU is one). In 2021:

- a second survey was organised (May to July 2021) involving EBU members in Czech Republic, Germany, Hungary, Italy, Lithuania, Macedonia, Portugal, Switzerland which collected, amongst others, data from 802 blind and partially sighted respondents.
- [4 Focus Discussion Groups](#) were held in Italy (June and July 2021) and involving 53 blind and partially sighted persons, with the support of the Italian Union of the Blind and Partially Sighted.
- [1 test with 5 visually impaired persons in an autonomous bus in Luxembourg](#) (September 2021) was organised, with the support of the German Federation of the Blind and Partially Sighted.

Interviewees argue that it would be useful to develop a position paper, based on the findings of the project that could be used as an advocacy tool in the future. CAVs are currently not a priority on the policy agenda, yet it could be useful to have recommendations ready.

4.3. STRENGTHENING EBU AND ITS MEMBERS

Description

This second priority in the Strategic Plan is composed of the following objectives:

1. EBU has improved governance and working processes – relating to Objective 8 (Improved governance and working processes) and Objective 10 (Improved fundraising capacity of EBU and its organisations).
2. EBU and its organisations have improved communication and campaigning capacity – relating to Objective 9 (Improved communication and campaigning capacity of EBU and its organisations).

Analysis

1. **EBU has improved governance and working processes.**

Introduction

EBU strives to become more diverse and representative of its constituency at all levels of the organisation and recognises that this requires further action. In parallel, EBU endeavours to continuously improve its working processes and methods in view to increase member's participation. Against that backdrop, in 2021 EBU will:

- Continue its work towards balanced representation in terms of gender, age, and type of visual impairment through the respective REC activities.
- Start the work of the re-established Gender Equality WG.
- Enhance cohesion amongst the membership.
- Promote the EBU Solidarity Fund amongst members.
- Establish a new Development Commission.
- Stimulate an increased use of virtual communication between meetings.
- A focussed meeting on the outcome of Carine Marzin's report.

Analysis

Interviewees explain that measures have been taken to ensure equal representation of different groups; yet the practice still has to follow.

["Member organisations need to take this principle of equal representation into account when appointing their representatives"].

The active engagement of young people in EBU (governance and activities) is considered to be key *["bring in new and fresh ideas"]*. The ADVISE project, as well as the EBU Youth activities are supporting this and need to be further expanded.

Engagement of the members in the implementation of the EBU Action Plan is key, yet a challenge. The **model** used to actively engage members in activities is very specific to EBU: the involvement of members in activities is solicited via internal 'calls' to which members can respond and express their interest. While the coordination of the work is done by the EBU Office, member organisations play a key role in implementing the work programme, e.g. as leader of an activity, a working group member, participant in an activity or event host.

An issue raised during the interviews was the **appropriateness of this current model** as well as its sustainability and the roles and responsibilities that are attached to it, especially related to the availability and capacity of members. There is a tension between on the one hand the necessary engagement of member organisations as a core condition of the model and on the other hand the limits to the capacity and availability of members. Working structures need to be designed in a way to enhance sustainability of results, i.e. by linking projects to committees to do the monitoring and follow-up. Some interviewees ask for an organisational capacity audit/evaluation to optimise processes and results of EBU.

Insufficient participation of members in the activities has different implications:

- The danger of the lack of ownership of activities and results, leading to more dis-engagement.

- The statutes of EBU state that EBU is [*“representing all blind and partially sighted persons in Europe”*]. This representation is shaped via its member organisations, whereby they themselves represent blind and partially sighted persons in various countries in Europe. To what extent is active engagement of these member organisations necessary for the representation by EBU to be still legitimate?
- Knowledge and expertise available within the network are not optimally used. In his internal communication strategy paper of 2017, the EBU Executive Director wrote that it is important to know the members; what are the assts and what are the barriers they face in active engagement in EBU’s work. This is still very much an issue: [*“You need to know what members need and what members can contribute to the network. Currently there is little knowledge about this”*].
- The engagement of members is key as input into campaigning, i.e. what is the situation on specific issues in the different countries and to gather evidence to support and complement campaigning messages.

During the interviews some members explained that they would like to be more involved, but that they have (currently) not the necessary capacity (time and resources). Furthermore, the COVID-19 pandemic forced many members to focus on national priorities. This challenge of engaging members was already mentioned in several previous evaluation rounds (see evaluation reports of 2016, 2017, 2019 and 2020) and is a not only a challenge faced by EBU but by many EU-level networks.

Interviewees express that for members’ engagement it is necessary to approach and communicate with members in a **more personalized** way, perhaps even to visit members to liaise with them more closely.

[*“Members must have the feeling that there is a connection and that participation in EBU brings added value at national level”*].

Also for EBU the COVID-19 crises accelerated the use of online meetings, allowing for more people to participate. The combination of online, hybrid and onsite meetings will be further explored and used in the future. Some interviewees expressed their disappointment about the

lack of more online meetings in 2021, i.e. of the LC and of the leadership of EBU member organisations.

A majority of the interviewees explains not being able to give a sound opinion on the use of the EBU Solidarity Fund³, nor on the Development Commission due to a lack of sufficient information. Those interviewees who gave their opinion suggest to reflect on the future use of both (the Solidarity Fund and the Development Commission). In 2021 only 1 project was submitted to the Solidarity Fund. Members will be reminded of this Fund and the possibilities it offers (as it is done annually). Despite the new Terms of Reference of the Development Commission, no new Commission is up and running. The call to re-establish a renewed Development Commission did not meet the required number of members to serve on that Commission. Yet, in the Board meeting of October 2021, the decision was taken that projects that seek funding from the Development Fund can be submitted directly to the Board which will examine the proposals.

The Gender Equality Awareness Raising (GEAR) project continued in 2021. So far various countries participated in the project that aims to deal with gender and equality in the member organisations, increasing knowledge about gender and equality through trainings and awareness raising activities and to monitor the situation to identify what needs to be done. Each of the participating countries (Austria, Denmark, Slovenia, Iceland, Montenegro and Germany) has identified lessons learned and next steps in their country.

The (re-installed) EBU Gender Working Group presented an action plan for the period 2021-2023, building on the EBU GEAR Conference in 2019 and structured around three objectives:

- Mainstream gender in all EBU work, policies and documents, including the constitution and by-laws.

³ According to the statutes: The EBU shall give financial support in the form of loans, grants or other to national organisations of blind and partially-sighted people through its Solidarity Fund. Priority shall be given to projects submitted by EBU member organisations in need.

- Advance the work on balanced representation at all levels of EBU.
- Raise awareness on the situation of VI women and girls and work towards the inclusion of blind and partially sighted women in society and ensure that EBU's work with other organisations (e.g. EU, EDF, EWL, ICEVI) takes into account the perspective and specific needs of VI women of all ages.

An interesting initiative that was launched in May 2021 are the Tea-talks, i.e. once a month members of the network gather to discuss a theme that they have introduced. With the loss of the coordinator of this Working Group a new leader needs to be appointed and the dynamic re-installed.

Late April 2021 a meeting with the EBU Board was organised based on the report written by Carine Marzine on the organisational management of EBU. Eight Board members were present (and one Board member was substituted). This meeting was rather a reflection meeting with considerations on what was written in the report. Some recommendations followed this meetings, with amongst others the need for a strategy to develop the visibility of EBU, the development of a monitoring and evaluation (M&E) framework for EBU as an organisation with the necessary attention for the development of internal review processes, incorporation of M&E results into the work of EBU, communication of progress on activities to members as well as strengthening the EBU team.

2. Improved fundraising capacity of EBU and its organisations

Introduction:

Growing and diversifying EBU's funding resources, in order to implement and sustain our ambitious agenda is an obvious goal for EBU and its members. Facilitating exchange on this topic is considered to be important. In 2021, EBU planned to provide an overview of the new EU funding programmes during an online presentation.

Analysis:

Interviewees ascertain the challenge to complement EU funds with other resources. Some are of the opinion that specific competencies (skills and knowledge) are needed e.g. for fundraising and that these are currently not available within EBU. At the same time it should be noted that EBU's dependency on EC funds is not that high (approx. 60%) compared to many other EU-level networks (80-85%).

3. EBU and its organisations have improved communication and campaigning capacity.

Introduction

For 2021 the following activities are on the agenda:

- Conduct a communications audit and develop a social media strategy to support campaigning.
- Provide information and training on campaigning through the “how to memos” and ongoing collaboration.

As part of the external evaluation, communication is since many years mentioned as an ‘issue of attention’. In 2013-2014 an external consultant developed a communication strategy of EBU which was mainly focussing on external communication, yet without much attention for social media at that stage. In 2017 an internal communication strategy was put on paper by the EBU Executive Director leading to some changes, i.e. mainly a revised website and a revised Newsletter (a monthly members’ Newsletter in English and a three-monthly newsletter on a specific topic in English, French, German and Spanish (EBU-Focus). A Working Group on communication was installed.

Also in 2017 the head of campaigning was recruited allowing the EBU team and the whole EBU network to increase its advocacy capacity. In September 2021 the information officer (responsible for internal and external communication) and the campaigning officer (with input from other EBU team members and consulting a number of external stakeholders) delivered a note on a ‘communication audit’.

Analysis

The interviewees have overall a positive assessment of EBU campaigning. Effective campaigning and advocacy go hand in hand with effective communication. **Communication is crucial for EBU as an advocacy organisation.** Communication in EBU (which channels to be used for which target groups, what messages to deliver to which audiences, etc.) is in development since a longer period, which is as such not an abnormal phenomenon in organisation (or in this case EU-level networks). Yet, having clear **communication strategy**, of which the implementation is feasible, timely and supporting the other processes in EBU (more in particular advocacy but also e.g. capacity building) would facilitate the current (communication) work.

Based on the 2021 EBU note written by the information officer and the campaigning officer of EBU and the interviews carried out in the framework of this 2021 evaluation round, the following issues emerge:

- There is a **need for more clarity of direction**, i.e. translation of (strategic) objectives of EBU into communication objectives, linking audiences to communication messages and tools/channels for various audiences e.g. policy makers, the VI community, the wider public, (potential) partner organisations, the private sector. This communication strategy needs to encompass a social media strategy as well as press work.
- There is a need for **more clarity in relation to roles and responsibilities** of the different 'actors' involved:
 - In the Secretariat the various staff members and more in particular the information and campaigning officers, but also the Executive Director and other staff members since all communicate with EBU members and with 'external' stakeholders: what is expected from them?
 - In the Board of EBU: Board members have (possibly) a role to play in determining the headlines of the communication strategy, based on the overall EBU strategy for the next years (2020-2023), adopted during the 11th EBU General Assembly meeting. E.g. if one of the strategic objectives is 'In cooperation with ICEVI-Europe, governments, professionals and other stakeholders are made

aware of the importance of braille' what does this mean in terms of communication?

- The WG on communication: what is expected from them?
- The members of EBU : what is their role in disseminating the information coming from EBU Secretariat within their own organisation and their members? Spreading the information at national level is identified as one of the 'knots' in the network, i.e. an aspect which is very important yet also challenging: how to improve this in order to spread 'the EBU messages' as effective and efficient as possible? [*“Many VI people do not know the existence of EBU while EBU speaks on behalf of all VI people. (National) member organisations have a role to play in this communication process”*]. Also dissemination of information within the EBU member organisations is mentioned as key to optimize internal communication within the EBU community. At this level some more investigation is needed on how internal processes within member organisations can contribute to the flow of information, e.g. the level of opening information links coming from EBU Office.
- During the interviews, it was explained by EBU members that the past year, the exchange within the network (between EBU members) was probably not as strong as previously, which is related to the situation resulting from the COVID-19 pandemic (only online exchanges). Yet, EBU members involved in specific projects assess this communication between members more positively. In his 2017 internal communication strategy document, the EBU Executive Director wrote that 'developing a sense of belonging to EBU as a community' was one of the objectives of this strategy. The COVID-19 crisis did not contribute to the implementation of this, yet interviewees confirm that improved communication and exchange between members can only be of benefit of the individual member organisations and of the network. [*“The importance of the exchange between members should be more emphasized”*]. At the same time interviewees also recognize that not all member organisations have sufficient capacity to invest in exchanges. [*“If I send out requests for information, I do not receive a lot of replies”*].

- Some of the interviewees make a very explicit plea to further stimulate exchange within the network to enhance mutual learning, focused on **practical** exchange ('how to'). Existing meetings/events could be more constructed in a way that this mutual learning is optimized (stimulating openness, trust, equal opportunity to contribute, etc.), with sufficient opportunity for exchange, eventually in smaller groups. Also the organisation of **study visits** is proposed as an effective way to learn from other experiences.
- The implementation of a communication strategy **requires** indeed **capacity** of those involved, which should be made explicit. Capacity refers to the human, material, financial, technological resources but also collective skills like managerial skills within an organisation, the ability to learn or the skill to adapt to new situations. If the available capacity (competences and/or capabilities) is not adequate, ways must be found to meet the requirements like e.g. training of staff, set up internal dissemination procedures within member organisations, etc.
- Interviewees understand the rationale of establishing a Working Group on Communication, but consider also the danger of 'postponing decisions' (decision-making dependent on the meeting cycle of the Working Group).
- The exchanges between EBU members' leadership was very much appreciated by interviewees, as well as regional cooperation that is in place (e.g. between the Nordic countries). More specifically in relation to the Leadership Forum further follow-up with more meetings in the future is suggested by interviewees.
- Furthermore, the interviews make it clear that in order to implement any communication strategy **resources** are necessary, whereby specific attention was given to human resources which are indispensable to implement the strategy. If the necessary knowledge and expertise is not available within the Secretariat, solutions need to be looked at, e.g. social media training, buying in expertise, etc.

Various tools are already in place, which are overall positively assessed by EBU members. This was confirmed in previous evaluation rounds as well. One of the main messages conveyed during this evaluation round

by the interviewees is to better use and optimise what is in place (which tool/channel and message for which audience), based on a clear communication strategy. About half of the group of interviewees clearly propose to increase the presence of EBU in social media and to increase the presence of EBU overall 'where it matters' and more in particular at EU-level.

The EBU Website:

During the 2021 interview round, some of the interviewees explain that specific outputs could be more visible on the website, like e.g. the podcasts. Another proposal made was to gather resources on specific topics and to integrate this into the website (kind of resource centre). Other suggestions were proposed in the EBU communication Audit 2021 note of September 2021 referred to earlier in this report. In the period January 2021 – October 2021, the page views on a monthly basis varied between 7.816 (August 2021) and 12.161 (October 2021). The most visited page was the EBU homepage and this throughout the whole period (between 885 and 1.762 visits on a monthly basis).

The EBU Newsletters:

Based on the 2020 EBU external evaluation members' survey, almost all respondents assess the Focus Newsletter (assessed by 15 out of 16 respondents as good to excellent) and members' Newsletter (assessed by 14 out of 16 respondents as good to excellent) positively. The revised format of the Newsletter (since 2017) whereby a 'click-through' system is used (via hyperlinks), is not unequivocally positively assessed, e.g. required computer skills. Though it is a small minority of interviewees commenting the current Newsletter format.

The EBU social media:

In EBU, the choice was made to the use of Facebook and Twitter, i.e. the focus for Facebook is on communication and for Twitter for advocacy and campaigning, while in practice the separation between both is not that severe.

- Facebook (page was opened in 2011): 1.658 followers on 18.11.2021 (comparison with European Union of the Deaf, opened page in 2010: 58.300 followers).
- YouTube channel (since 2009): 22 subscribers (the European Union of the Deaf does not have a dedicated YouTube channel but posts video's on You Tube on a regular basis).
- Twitter (joined in 2014): 5.054 followers and 14.2K Tweets on 18.11.2021 (comparison with European Union of the Deaf, joined in 2011: 7.070 followers and 3.305 Tweets on 18.11.2021).

The figures as such are illustrative, but more interesting is the level of engagement with the content of the messages and the profile of the followers. In the 2021 communication audit note, it is explained that in the case of Twitter the engagement of EBU members could be strengthened. Some interviewees explain that Twitter is not (yet) much used in their country. A Twitter course would be useful, say some amongst them. The evaluator notes here that in the past a Twitter course was already delivered and that a 'how to memo' for members has been developed in relation to campaigning in which Twitter received attention. Overall, the use of Twitter by members is limited and more overall when members use Twitter, it is mainly on their own account and not so much related to EBU messages.

Based on the interviews, the evaluator concludes that EBU became more visible and considered by the EU level, e.g. EBU is explicitly solicited for input in case of consultations and EBU was very active in responding to consultations. An [overview](#) can be found on the EBU dedicated website pages. At the same time it is argued that this increased visibility is also a result of EBU participating more regularly in consultations, as well as in EU-level events (facilitated by the online opportunities to participate in the past 1,5 years).

Recruiting a campaigning officer is very positively assessed by the interviewees. It is almost considered as entering a new phase of EBU whereby the Secretariat evolved from being focused on an administrative and management role, to policy development, advocacy and implementation. Whereas before 2017 advocacy was implemented by a core group of EBU members, advocacy is since this date not only

coordinated but also implemented by the EBU office in cooperation with the members.

END OF TEXT