



The voice of blind and partially sighted people in Europe

# Accessibility of information: key areas of discrimination for visually impaired people

EBU Declaration October 2022

The **UN Convention** on the Rights of Persons with Disabilities (CRPD) requires State Parties to ensure that people with disabilities (PWDs) receive equal accessibility and opportunities under the law and to refrain from practices that are discriminatory toward them. The goal of the CRPD being full inclusion in society for PWDs, non-discrimination implies positive action, namely reasonable accommodation to meet the specific needs of PWDs. This includes attention to making information accessible for them.

On 18 and 19<sup>th</sup> October 2022 the European Blind Union (EBU) held the concluding event of its PARVIS project (Promoting Awareness on the Rights of Visually Disabled People in an Inclusive Society) in the form of a webinar on non-discrimination, more specifically to exchange on the **most common forms of discrimination** experienced by visually impaired people (VIPs) due to **information accessibility defaults in some key areas** for their inclusion in society.

Approximately 30 participants were present representing 17 national member organisations – from 13 EU countries and 4 non-EU countries – in addition to guests from the University of Leeds and our umbrella group the European Disability Forum.

It is noteworthy and a sign of the times that the most raised concerns about the accessibility of information, in all three focus areas, relate to the use of **inadapted information technologies** (IT), without alternative information channels for VIPs. Online information, be it on the internet, intranet or through applications, has become the new normal, but VIPs are often neglected in this new environment: the development of new IT tools is growing fast but far too often little priority is given to accessibility for all.

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In the area of **education**, educational establishments increasingly use online tools to communicate with pupils/students or parents about essential aspects of life in the establishment, educational programmes, timetables, grades, assignments etc. Yet far from enough attention is paid – either at the outset (“by design”) or as problems appear in practice – to the accessibility of websites, apps or software for visually impaired users, to ensure that they are not discriminated in education. The persistent defaults of the *Pronote* platform in France, described by our French member organisation, illustrate how the entry into force of the EU Web Accessibility Directive is failing to deliver here.

IT problems are also frequently reported to be the cause of inaccessible information in **healthcare**, mostly hospital information around appointment and stays but also, more surprisingly, general information about public health programmes. The experience reported by our member organisation in the UK is significant: failures to meet the precise requirements of the Accessible Health Information Standard are often reported, revealing that a large part of the healthcare system remains unaware of the Standard.

As far as **employment** is concerned, public employment services are far from sufficiently mindful of accessibility of their increasingly digital information and communication. But things do not get better in employment, as employers still largely fail to provide reasonable accommodation at the workplace, namely with software and IT systems that are adapted to the use of screen-readers. Our member organisation in Montenegro exposed the gap between the reality and the employers’ obligations under the national Law on Rehabilitation and Employment of PWDs.

The COVID-19 crisis dramatically exposed the issue, particularly in the areas of education and healthcare, of how IT, if not accessible, could further isolate and exclude VIPs rather than enable and include them as one would reasonably expect them to do.

Of course, accessibility of IT-based information is only part of the discriminations faced by VIPs in these three key areas. However, because of its increasing importance in modern-day live, we feel the urge to make the following **recommendations**:

- Wherever public funding goes to the development of IT software, including public procurement, public authorities should pose strict accessibility requirements, meeting the Universal Design principles.

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- VIPs or representative associations should be involved in the process of making a software accessible (Nothing about us, without us).
- VIPs should always be given the possibility of an alternative means of access to digital information or communication.
- The private sector must step up its efforts to develop fully accessible solutions, even when not explicitly required by law.
- All educational establishments, healthcare providers, especially those receiving public funding, as well as employment services and employers, should ensure that the software programmes and systems they use is accessible for VIP.
- Public authorities should make every effort to raise awareness about the obligations under the CRPD as well as under EU and national law, and to develop expertise in IT accessibility.
- All stakeholders should encourage and facilitate feedback on information accessibility shortcomings and act on it to improve their IT systems.
- Complaint mechanisms themselves should be accessible and easy to find, and VIPs should be proactively informed about them and protected against the fear of further difficulties if they use them.
- Authorities designated to monitor the accessibility of public sector websites and apps should treat the areas of education, employment, and health as a matter of priority to ensure social inclusion of VIPs.

These are the observations and recommendations that we will take every opportunity to bring to the relevant actors, and we call on all stakeholders to echo them in their own advocacy.

### About PARVIS

Supported by the European Commission, the PARVIS project aims to **raise awareness about the rights of blind and partially sighted citizens' rights in Europe**. It focuses on 10 rights derived from the CRPD, including the right to accessible information. It involves our member organisations from Slovakia, Germany, Montenegro, France, Lithuania, Portugal, and Spain, plus Netherlands and Sweden acting as partners.

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**About EBU**

EBU is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. Our 41 national member organisations in Europe include 25 European Union member states (all the EU except Latvia and Malta).

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