

Study on

“Web accessibility in European countries: level of compliance with latest international accessibility specifications, notably WCAG 2.0, and approaches or plans to implement those specifications”

Annex II

Overview of Accessibility Related Obligations Imposed on Website Owners in Selected Member States & of National Sources of Data on Compliance

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Summary of web accessibility related obligations imposed in selected member States

AT

The E-Government Law 2004 requires that web services of public administrations be designed and structured in such a way as to comply with international standards, including facilitating unhindered access for disabled persons. The law covers all public bodies at state, regional and municipality level, including schools, hospitals, etc. It stipulates that by 1st January 2008, all government / public administration websites should be accessible. Specifically, all sites providing information and transaction services should comply with international accessibility standards (WAI level A). Development of software applications for eGovernment and digital signatures must also comply with accessibility criteria.

Although the Act itself does not seem to envisage any sanctions for non-compliance, there may be some scope for redress stemming from its interaction with the Disabled Persons Equal Opportunities Act 2005 which, inter alia, deals with access to public services. If the public websites are not accessible after 1st January 2008, this could be interpreted as discrimination under the Equal Opportunities Act. This Act foresees material and immaterial compensation depending mainly on the duration and impact of the discrimination.

As regards private websites, the Disabled Persons Equal Opportunities Act 2005 has relevance due to the requirement for equal access to services offered in public. While the Act does not refer to e-accessibility, services covered may include access to public websites (also covered by the eGovernment Act) or access to e-services of companies (which is within the scope of the Consumer Protection Act). There have been a number of appeals on private websites taken by the Litigation Association of NGOs Against Discrimination (Klagsverband), for example, with companies in the airline and mobile telecoms sectors.

DE

The Federal Disabled Equalization Law (BGG) and the Federal Decree on Barrier-free Information Technology (the so-called BITV regulation) are the main legal/regulatory provisions for web accessibility. Section 11 of the BGG stipulates an obligatory requirement on federal public bodies to make their websites accessible to people with disabilities by the end of 2005. Under the BITV, guidelines are provided on how to make public websites accessible to disabled users (based on WAI WCAG 1.0). BITV required new sites to conform immediately, content dedicated to people with disabilities by the end of 2003, and others by the end of 2005.

Registered organisations for disabled people have the right to take legal actions to speak for the rights of disabled people discriminated by information technology of the federal administration that is not compliant to the federal BITV.

The BITV also stipulates the right of registered disability organisations to call upon private sector companies or relevant umbrella organisations to begin negotiations on agreements (German "Zielvereinbarungen") that regulate the technical measures to be undertaken by the private company to implement the BITV. Key elements that have to be addressed include (a) specification of the parties concluding the "target agreement" and of its scope and duration, (b)

specification of minimum requirements on how relevant offerings are to be changed so that they are accessible by disabled people and (c) a deadline or schedule by when the minimum requirements must be fulfilled. One agreement on eAccessibility has already been signed with one large private sector company.

Due to the federal structure of Germany, BGG, Section 11 does not, per se, apply to bodies of the 16 regional (Länder) governments. However, all regions (Länder) have by now adopted their own anti-discrimination legislation in line with BGG, Section 11. In practice they seem to have mostly stipulated the same obligations compared to the federal legislation.

The BITV is currently in the process of being reviewed and expected to be updated by the end of the year. This will include adoption of WCAG 2.0.

DK

The Danish Parliament has passed Parliamentary Resolution B103 of September 2007 on the use of mandatory open standards for software in the public sector. By means of a formal agreement which spans the federal, regional and local district levels, this makes mandatory the use of WAI guidelines by the public sector as of 1st January 2008.

Prior to the Resolution, the Danish Ministry of Science, Technology and Innovation carried out a national review, and the results indicated that there are still major obstacles for eAccessibility on public websites. In response, the Ministry has launched a number of measures directed towards improving the current state of affairs.

To begin with, mandatory use of accessibility standards is followed by an obligation to explain non-compliance to the agreement (i.e. a 'comply or explain' principle). Moreover, from 2008 onwards there will be every two years a benchmarking that evaluates all public websites against WCAG AA criteria, and the results will be published on the internet.

In addition, in response to the finding that web developers can find it difficult to apply the existing guidelines, in 2008 the National IT and Telecom Agency is to have launched an improved online guidance effort about web accessibility issues including explanatory text, practical examples and a video. Already in April 2004 a public procurement accessibility toolbox was released by the agency which includes a section on web accessibility. A second edition of the toolbox was published in 2005.

There is no specific policy measure to achieve accessibility of private websites.

ES

Legislation in relation to website accessibility was first established in Law 34/2002. This was later affirmed and expanded in the anti-discrimination Law 51/2003 and then affirmed again in relation to public websites in the Royal Decree 1494/2007 on accessibility to the information society, and in the public procurement Law 30/2007.

Law 34/2002 Final Disposition (Regulation) deals specifically with accessibility to information provided by electronic means, covering all the web pages of public authorities. It states that public authorities should adopt the required measures in order to have their internet content accessible for disabled or elderly people. It also states that the adoption of norms on accessibility will be promoted for the service providers and hardware/software producers in order to ease access to digital content for disabled or elderly people. The law includes an obligation to fulfil generally recognized accessibility criteria, without mentioning W3C, and although it does not oblige, it indicates that the application of the law should be based on a standard, in this case the Spanish Standard of Computer Accessibility that includes accessibility of the Web.

Article 8 of Law 34/2002 provides for the possibility of actions in a case where any service provider contravenes the principles of the legislation. Also, the Government of Spain has established (by Royal Decree) a new Arbitration Process for disabled people, adopting the existing model of the Consumption Arbitration System. The 2002 law fixed a deadline of 31st December 2005 for the accessibility of public websites.

Law 51/2003, the Law on Equal Opportunities, Non-Discrimination and Universal Accessibility for Persons with Disability, builds on Law 34/2002 and establishes the basic conditions of accessibility and non-discrimination for access and use of technologies, products and services related to the information society and social communications media. It extends the reach of Law 34/2002, and includes design for all as a consideration into all technologies, products and services from their conception to roll out on the market. The law establishes the “accessibility timeframe” for all environments, products and services, which would include public websites. Article 10 establishes the basic conditions for access and use of ICT technologies, products and services and of any means of public communication including public websites. One of the major changes from Law 34/2002 is the shift regarding the burden of proof - it is now the defendants who need to prove their innocence in case of alleged discrimination.

The Law 11/2007 on Electronic Access of Citizens to Public Administration ensure the right of every citizen to communicate with public authorities by electronic means.

Article 5 of the Royal Decree 1494/2007 provides regulation related to Law 51/2003 by specifying a mandatory minimum level of accessibility for government websites of “priorities 1 and 2” of the UNE Standard 139803:2004 (referring to WCAG Levels A and AA). Under this same article, eligibility for public funding for the design or maintenance of public websites will be dependent on compliance with the UNE standard. Government websites must also provide a complaints mechanism so that users can report difficulties with accessibility.

While there are no mandatory obligations on private websites, the Royal Decree 1494/2007 does make a commitment that the Government will promote measures to ensure that holders of

other (non-governmental) websites gradually incorporate accessibility, particularly for websites which relate to goods and services available to the public or whose content involves education, health and social services.

Laws 49/2007 and 56/2007 extend the duty of web accessibility to private social services including education, financial, energy and other public services provided by private companies. These laws set penalties up to € 30,000 per site in case of non-compliance.

FR

Since May 14, 2009, in France there is an obligation for all public websites (over 10 000 sites involved) to become accessible within 3 years. It will maintain a repository, the RGAA (general reference accessibility administrations). This document incorporates the recommendations of WCAG 2.

This obligation is based on the Law for Equal Rights and Opportunities, Participation and Citizenship of People with Disabilities (Law n° 2005-102 of 11 February 2005), Article 47, which makes accessibility of all public online services mandatory. Public digital communication services (public websites in particular, but also phone and TV services) must be accessible to people with disabilities according to international standards. The law does not specify further the services that are concerned, nor does it refer to specific standards.

A decree related to the law will state the rules, methodology, delays (not more than 3 years) and penalties. This decree should also specify measures concerning training courses for the civil servants in charge of these public services. Several versions of the Decree have been circulated and submitted to the Constitutional Council (Conseil Constitutionnel), but were rejected. After the Decree has been published there may be an order making its application mandatory. DB: The decree was published on May 14th, 2009. However the specifications concerning the implementation of the law were regarded as very poor by some NGOs: no penalties, no organisation to monitor the progress. The reference document it mentions (RGAA) not published yet. No specifications concerning the type of training to be provided and how they should be controlled.

The public agency in charge of this field is the Direction Generale pour la Modernisation de l'Etat (DGME), which is part of the Ministre délégué au Budget et à la Réforme de l'Etat. Previously, the agency was called the ADAE.

Currently, the only official technical reference concerning eAccessibility in France seems to be the Référentiel accessibilité des services Internet de l'administration française. This document was published by the ADAE (Agence pour le Développement de l'Administration Electronique) in February, 2004. It was intended to provide a technical, methodological and organisational framework on the accessibility of French administration sites and services over the internet and intranet. It was comprised of two parts: one dedicated to the presentation of accessibility criteria and the second one on usability criteria. It is based on AccessiWeb criteria from the BrailleNet Association, with a clear coverage of the WCAG 1.0.

There is no direct legal or regulatory obligation for the accessibility of private websites.

GR

While there is no direct law on accessibility of public websites, the recently revised (2001) Hellenic Constitution states that “everyone has the right to participation in [the] Information Society.” The facilitation of access to electronic information, as well as the production, exchange and dissemination of this information, is an obligation of the State.

The eGovernment Framework (e-GIF) includes the statement that “government information systems should be designed in such a way to support channels that provide accessibility for people with special needs.”

IT

The ‘Stanca’ Law No. 4 of 9th January 2004, along with the related decrees and regulations, is the main law on eAccessibility in Italy. The law states that everyone has the right to share the benefits of the Information Society and eGovernment, that public administrations have the duty to provide accessible information and services on their websites (and also invites private entities to do likewise) and that accessibility requirements must be taken into account in public procurements of ICTs. It also states that the accessibility enforcement policies must be monitored and fostered at both national and local level. The law covers public services and private organisations in so far as they deliver public services.

Two subsequent decrees implemented the Law: the Decree of the President of the Republic (March 1, 2005, No.75) containing the Implementation Regulations, and the Ministerial Decree (July 8, 2005) containing the Technical Rules. The technical requirements were drafted with a view to having a shared consensus with associations and companies and also to be compliant with international recommendations (ISO, W3C, Section 508 etc.). They can be periodically updated whenever relevant changes are made to international accessibility rules. An assessment methodology was also developed. Public administrations may carry out a self-assessment or use a third-party from a list of officially recognised evaluators.

The main provisions regarding public websites are:

- public administrations cannot draw up, modify or renew contracts for the development and maintenance of websites if they fail to respect the accessibility requirements
- all existing contracts must be updated to meet such requirements within twelve months
- any stipulated contract failing to respect such requirements shall be declared null and void, and
- failure to comply with the law may entail both executive responsibilities and disciplinary actions, as well as any civil liability provided for by the current anti-discrimination law

The ‘Stanca’ Law refers to accessibility of private websites and invites them to address this issue. The law is reported to have increased awareness about the importance of accessible websites and services, both amongst consumers and private sector organisations (products and services suppliers).

The public agency CNIPA (Centro Nazionale per l'Informatica nella Pubblica Amministrazione - National Centre for IT in Government) designed the implementation rules for the Stanca law, including the general operational and organisational practices for achieving accessibility, the procedures for conformity assessment, and the market surveillance methods. CNIPA provides a key support role in the implementation of these measures through both advice and monitoring, and maintains the national accessibility label database. Training is also organised, including the establishment of regional competence centres. In addition, an annual competition is held (PA Aperta) which rewards best practice in eAccessibility and other relevant fields.

There is no mandatory third party certification for websites, but CNIPA has set up a voluntary assessment scheme for websites which results in an accessibility logo. The Regulation distinguishes between the assessment of conformity to technical requirements (carried out by technical specialists according to objective specifications) and the subjective evaluation of accessibility, carried out by accessibility experts and/or disabled users on the basis of more qualitative parameters. The accessibility logo varies depending on the type of evaluation passed by a website.

CNIPA is not responsible for local administrations, though such administrations are also required to be accessible under the Law. Italy is developing regional competence centres (CRCs) that will have the goal to develop training and education in the field of implementation of public website accessibility.

NL

Accessibility of websites is a political issue in the Netherlands. The Parliament has stated that "that all government web sites should be accessible to all citizens. To achieve this goal The Ministry of the Interior and Kingdom Relations has developed the Web Guidelines in 2004.. The Web Guidelines also support the objective of i2010 (Riga, Ministerial Declaration June 2006).

Starting point for the Dutch policy of accessibility of websites was the awareness that accessibility is an international issue that cannot be solved nationally. Therefore the Web Guidelines are fully compliant with international standards. Furthermore the statement of the Parliament, that every government website should be accessible for every citizen by 2010, is in line with the targets in the Riga declaration.

The aim of the Web Guidelines is to accelerate the accessibility for vulnerable groups of websites by emphasizing that accessibility is an aspect of the quality of a website. The Web Guidelines focus on more than accessibility for specific groups: easier and cheaper maintenance of a website, accessibility of websites by different search engines and browsers and the use of websites through mobile devices.

In June 2006 the council of ministers decided that all websites of the central government should comply with the Web Guidelines by the end of 2010. Each minister is responsible for the websites that are built by or commissioned by his or her ministry.

Since April 2007, the Web Guidelines are declared as a national standard for government websites by the national standardisation body.

In December 2008 the National Implementation Programme on Better Services was officially agreed between the central government and local and regional governments. This document states that all governmental websites should be accessible according to the Web Guidelines also by the end of 2010.

There are no obligations on private websites to be accessible, though they may apply for the Drempeel vrij certification. The Web guidelines are all applicable for business websites and not only government websites.

SK

Following the Act on information systems of public administration (2006), the Ministry of Transport, Post and Telecommunications has published standards for information systems which include eAccessibility standards. On the basis of Article 13 of the Act, this standard makes compliance with WCAG 1.0 level A mandatory, and includes some additional rules from Levels AA and AAA. The standard is valid from 1st August 2006 for new public websites and 2008 for all public websites.

In advance of the 2006 Act, a roadmap for implementation of electronic services of public administration (2005) and an information society strategy (2004) made reference to the need to ensure eAccessibility for disabled people.

In 2001, the National Programme of Development of Living Conditions of Citizens with Disabilities in All Areas of Life specified a responsibility to introduce legislation on the duty to design and maintain public websites in a way that is accessible for citizens with disabilities and defined this duty for public administration organisations.

There is no legislative obligation for accessible private websites.

UK

The Disability Discrimination Act (1995, updated 2005) is the main legislative basis for website accessibility. The original Act contains provisions to prevent discrimination against disabled people by service providers and requires service providers to make [reasonable adjustments in order to make] services accessible to disabled people. The Code of Practice to part III of the Act gives the example of a website as a service that is covered by the Act.

The DDA Act 2005, amending the 1995 Act, introduced a positive duty on the providers of public websites. This Disability Equality Duty (DED) applies to all public services. The Code of Practice to the Act for government departments gives examples of the procurement of new IT systems and the re-design of a department's website by external contractors as services to which the DED applies.

Cabinet Office Guidelines for UK Government Websites (non mandatory) have been available for a number of years, providing a best practice framework for guidance on the management of UK government websites. They included targets for public web sites including a mixture of Priority 1 and Priority 2 guidelines of version 1.0 of the W3C guidelines.

In June 2008, a specific guidance document “Delivering inclusive websites” was issued by the Central Office of Information (COI). This document sets out the minimum level of accessibility for Government websites and contains practical guidance on how to achieve this. It states that, in order to help fulfil the disability equality duty for web publishing and online service provision, Government website owners should adopt best practice in commissioning accessible websites, as set out in PAS (Publicly Available Specification) 78. PAS 78 is “applicable to all public and private organizations that wish to observe good practice under the existing voluntary guidelines and the relevant legislation”. With regard to PAS 78, a new technical committee was assembled in 2008 to oversee the development of a full British Standard (BS8878) that is expected to be published in 2009.

The COI guidelines set a minimum level of accessibility:

- The minimum standard of accessibility for all public sector websites is Level Double-A of the W3C Web Content Accessibility Guidelines. All new websites must conform to these guidelines from the point of publication.
- Websites owned by central government departments must be Double-A conformant by December 2009. This includes websites due to converge on Directgov or BusinessLink, unless convergence is scheduled before this date.
- Websites owned by central government executive agencies and non-departmental public bodies must conform by March 2011.

Although there are no direct legislative or other measures that impose a clear legal requirement on accessibility of private websites, it appears that web site accessibility of commercial services falls within the scope of the DDA (and therefore disabled people can make a claim under the Act if they feel discriminated against because of inaccessibility of a website). The Code of Practice cites an airline website as an example of a relevant service. However, it seems that there is little or no case law on web site accessibility so far.

1 Existing data on compliance with accessibility criteria available from Member States

Country and name/description of the exercise	Date/time period covered (if repeated surveys/assessments have been conducted, please provide details for at least the 3 most recent ones)	Types of website covered (indicate the types covered with an 'X')				Sample - number of sites assessed and % of target population of sites that these represent	Accessibility criteria applied e.g. WCAG 1.0 A, AA, AAA; WCAG 2.0; other (to be specified) and assessment method e.g. automatic, automatic and manual etc.	Results (please summarise main findings here, and give reference to where more detailed information can be found)
		Central govt.	Local govt.	Other sites of general public interest	Other private sites			
AT Accessibility & Usability Study 2008	10/2008 – 01/2009	X				11 websites of Federal Ministries out of 13	WCAG 2.0, manual testing, expert analysis and user testing	Accessibility & Usability Report available at: http://www.digitales.oesterreich.gv.at/site/5884/default.aspx
AT E-Forms Evaluation	10/2008 – 01/2009		X			3 eForm examples	WCAG 2.0, manual testing, expert analysis and user testing	Study proves good usability and accessibility level, but identifies specific fields to optimize.
AT Erhebung 2007	2007	X				12 websites of Federal Ministries	self-evaluation on basis of WCAG 1.0	Results of Erhebung 2007 available at: http://www.digitales.oesterreich.gv.at/site/5715/default.aspx
CH Accessibility Study 2007	2007	X	X	X		n/A	WCAG 1.0 AA	None of the assessed sites were completely accessible Sites of national authorities were more accessible than those of regional and local authorities.
DK Webtjek	January 2008	√	√			234 sites – 100%	WCAG1.0 AA	<u>Accessibility rating:</u> Perfect: 0 Good: 14 websites, 6%

								Average: 163 websites, 70 % Bad: 57 websites, 24%
ES Observatory 2009	April 2009	X				30 web sites 15 pages per site	WCAG 1.0, level AA	Most of the public web sites are accessible. Mainly with a level of A, and some with a level of AA. There is an increment in global punctuation of the sites compared with the prior results.
ES Observatory 2008	April 2009	X				30 web sites 15 pages per site	WCAG 1.0, level AA	A number of public web sites are accessible. Usually with a level of A. There is an increment in global punctuation of the sites compared with the prior results.
ES Observatory 2007	September 2007	X				30 web sites 25 pages per site	WCAG 1.0, level AA	Most of public web sites are not accessible.
GR Universal Access and Equal Participation of people with disabilities in the Information Society (C. Stephanidis (Ed.) (2004))	2003	X	X	X		250 websites	WCAG 1.0 (A, AA, AAA)	79% of websites exhibit accessibility problems, which make them practically inaccessible. 20% of websites exhibit a number of minor accessibility problems but are highly usable, whereas only 1% do not have any accessibility problems at all. The study is available (in Greek only) at: http://www.infosoc.gr/NR/rdonlyres/0B306F9C-A819-4F96-ABB1-A21945D1D2B3/1092/final_report

								.pdf
GR An overview of Web Accessibility in Greece: A Comparative Study 2004-2008 (I.Basdekis et al, 2009)	2004-2008	X	X	X		280	WCAG1.0 (A, AA, AAA)	85% of web sites have serious accessibility problems, which make them practically inaccessible. A small group of 14% have minor accessibility problems and only 1% are considered accessible (AAA). It is argued that website accessibility in Greece has actually deteriorated from 2003 to 2008. See I. Basdekis et al (2009): An overview of Web Accessibility in Greece: A Comparative Study 2004-2008. Available at: http://www.springerlink.com/content/l23x52751j3v1557/?p=c1456fad679f4d79bf353d68ae78e12d&pi=5 .
IT CNIPA Monitoring and Assistance	2006-2007	X				100	Automatic and Manual Stanca Law Requirements (WCAG 1.0 AA)	40% of the monitored websites were made accessible thanks to the post-assessment assistance provided by accessibility experts. Telephone (LK): This was not a survey. Rather agencies could ask for help when making their web sites accessible. We examined their web sites and provided advice how these should be made more accessible. Beyond the 40 mentioned above another 30 said that they would implemented the recommended changed in the near future and the reminder didn't further care
IT							Automatic and	4% were strictly compliant with

CNIPA Central Government Survey	January - March 2008	X				1400	Manual Stanca Law Requirements (WCAG 1.0 AA)	the law but at least a 15% were fairly accessible. The least accessible were primarily found among old and discontinued websites.
IT University of Bologna Survey on the quality of public websites	End 2007	X	X			7200	Automatic and Manual Stanca Law Requirements (WCAG 1.0 AA)	15% of the websites were fairly accessible.
SK eAccessibilit y standards monitoring	July-September 2008	X	X	X	X	357 (the total number of Slovak websites is unknown – as of May 2009, there were over 150.000 secondary domain names registered, while the total number of websites is expected to be somewhere in between 3x to 6x)	Other (national standards – WCAG 1.0 A + some other requirements), automatic+manual	Available at: http://www.informatizacia.sk/monitorovanie-pristupnosti-webovych-stranok/2824s
SK eAccessibilit y standards monitoring	December 2008	X	X	X	X	150 (the total number of Slovak websites unknown)	Other (national standards – WCAG 1.0 A + some other requirements), automatic+manual	the same
SK eAccessibilit y standards monitoring	January 2009	X	X			150 (we estimate over 7000 of websites of the first 2 types)	Other (national standards – WCAG 1.0 A + some other requirements), automatic+manual	the same
NL	Each month	x	x			All websites of	Automatic test	A little progress

Overheid.nl monitor	update (continuous one) and once a year					municipalities, provinces and waterboards	results (47 out 125 Dutch national Web Guidelines)	
NL eGovernment progress report	Twice a year	x	x			All websites of municipalities, provinces, waterboards and websites of ministries	Automatic test results	A little progress
NL Webguidelines monitor	continuously	x	x			All websites see above	Automatic testing, manual testing combined	A little progress
UK DRC Formal Investigation	2004	X	X	X	X	1000	Automated testing against WCAG 1.0, user testing including with disabled users on 10% sample of sites, focus groups with users and survey of those developing or commissioning websites.	81% failure against WCAG 1.0 Level A
UK eAccessibility of public sector services in the EU	2005	X				436	Automated and manual testing against WCAG 1.0 AA	70% failure against WCAG 1.0 Level A

2 Overview of policy implementation approaches in the selected core countries

	Official web accessibility guidelines and standards	Enforcement of the implementation of web accessibility obligations	Central source of expertise that can be consulted by parties responsible for implementing web accessibility	practical support to procurers of web related services	Capacity building & Awareness rising more generally	Mutual exchange of knowledge and experiences	certification or labelling schemes
DE	<p>Pursuant to the Federal Decree on Barrier-free Information Technology (the so-called BITV regulation), official guidelines were developed on the basis of WCAG 1.0. The guidelines are part of a comprehensive eGovernment handbook published by the Federal Office for Information Security (BSI)</p> <p>(https://www.bsi.bund.de/c/ae/servlet/contentblob/476832/publicationFile/28054/4_Barriere_pdf.pdf)</p> <p>After 3 years experience with the guidelines, the Ministry for Labour and Social Affairs has started a revision process. Requirements of disability groups, technical changes, WCAG 2.0 and experiences of users, providers and web designers are to be considered in this process</p>	<p>The Federal Ministry of Employment and Social Affairs is overlooking the implementation of BITV, but no direct enforcement mechanism seems to be in place.</p> <p>The BITV also stipulates the right of registered disability organisations to call upon private sector companies or relevant umbrella organisations to begin negotiations on agreements (German "Zielvereinbarungen") that regulate the technical measures to be undertaken by the private company to implement the BITV. Key elements that have to be addressed include (a) specification of the parties concluding the "target agreement" and of its scope and duration, (b) specification of minimum requirements on how relevant offerings are to be changed so that they are accessible by disabled people and (c) a deadline or schedule by when the minimum requirements must be fulfilled.</p> <p>(http://www.bmas.de/portal/19564/2007_09_21_zielvereinbarungsregister.html)</p>	<p>The German government has funded the so called "Alliance for Barrier-free Information Technology in Germany" (Aktionsbündnis für barrierefrei Informationstechnik, ABI). ABI project is organised as a network of national key players in the field of web accessibility, and has played an active role in providing required expertise into this process of implementing the BITV</p> <p>(http://www.abi-projekt.de/)</p> <p>Moreover, a project entitled "Barrier-free Information and Communication" (BIK - barrierefrei informieren und kommunizieren) funded by the Ministry of Social Affairs provides practical support in relation to the implementation of the BITV, e.g. by offering a so called "BITV test".</p> <p>(http://www.bik-online.info)</p>	<p>No specific guidance or tools for procurers seem to be available.</p>	<p>The implementation of the BITV was accompanied by a series of workshops and other training measures.</p> <p>More generally, the ABI project takes the role of an information broker in relation to web accessibility related training courses that are being offered by external parties throughout the country.</p> <p>The BIK project conducts awareness raising measures and workshops for public/commercial decision makers as well as capacity building measures.</p>	<p>ABI maintains an information portal dedicated to web accessibility. Inter alia, people with disabilities who experience any accessibility barriers are directed towards contact persons at so called „ABI reporting points on web barriers“ (Abi-Meldestelle für Webbarrieren). Qualified staff then suggests solutions to the web site owner(s) concerned.</p> <p>(http://www.webbarrieren.wob11.de/)</p>	<p>There is no mandatory certification scheme.</p> <p>ABI is involved in the development of an voluntary certification scheme issuing a DIN (German Industrial Norm) seal for accessible websites.</p>

	Official web accessibility guidelines and standards	Enforcement of the implementation of web accessibility obligations	Central source of expertise that can be consulted by parties responsible for implementing web accessibility	practical support to procurers of web related services	Capacity building & Awareness rising more generally	Mutual exchange of knowledge and experiences	certification or labelling schemes
DK	National guidelines were prepared in 2007 by a working group in the National IT and Telecom Agency. The guidelines refer to WCAG 1.0 AA and are publicly available at a dedicated web site (www.itst.dk/kia.dk)	<p>The Danish Parliament passed a Parliamentary Resolution B103 on the use of mandatory open standards for software in the public sector in 2007, including web accessibility related standards.</p> <p>Public web sites which do not comply with national accessibility guidelines need to provide reasoning for this. The so called 'comply or explain' approach is part of a systematic assessment procedure.</p>	<p>The National IT and Telecom Agency is the central source of expertise to support parties that are required to implement web accessibility.</p> <p>(http://www.itst.dk/)</p>	<p>In 2004 a public procurement accessibility toolbox was released by National IT and Telecom Agency which includes a section on web accessibility. The toolkit is not a part of the national regulatory framework, but is intended to provide practical assistance to public authorities that wish to incorporate accessibility for disabled persons into their procurement.</p> <p>A second edition of the toolbox was published in 2005. It has been promoted both by the National IT and Telecom Agency and Danish Council of Organisations of Disabled People by communication to the Danish local and regional authorities</p>	<p>In 2008 the National IT and Telecom Agency has launched an improved online guidance effort about web accessibility issues including explanatory text, practical examples and video material.</p> <p>Moreover, a dedicated information campaign is targeting local webmasters and directors of IT in the public sector concerning developments in the web accessibility domain, e.g. in relation to WCAG2.0. There is also a monthly newsletter where eAccessibility issues are raised.</p>	<p>Exchange of knowledge and experiences among relevant stakeholders is facilitated by an interactive portal set up and maintained by the Danish National IT and Telecom Agency. Amongst others, one thematic focus is on accessibility issues.</p> <p>The portal understands itself as a social network and tool for development and knowledge sharing, and as a forum for the digitisation of Denmark more generally. It sees itself as both a formal central repository of information on data interchange standards and a creative space for everyone involved in digitising the public sector.</p> <p>(http://digitaliser.dk/about-digitaliseacuterdk)</p>	<p>There seems to be no dedicated certification/labelling scheme directed towards web accessibility.</p> <p>An annual award scheme is maintained for public websites, entitled 'best on the net'. A few accessibility requirements are included in the comprehensive criteria catalogue, but accessibility is only a minor focus for the project. Each web site receives a number of crowns according to how well it has performed against the established criteria.</p> <p>Web site owners are not required to advertise the result on their web site, but may do so if they wish.</p>

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ES	<p>Pursuant to a national framework law on accessibility a decree refers to WCAG 1.0. There is an official national standard UNE 139803:2004, which again is based on and compatible with WCAG 1.0.</p>	<p>The Spanish law considers sanctions in case any service from the information society breaches the principles that are expressed in national legislation. Penalties of up to € 30,000 per site are possible in case of non-compliance.</p> <p>Administrative penalties are imposed by the Ministry of Health and Social Policy of the Government of Spain in the light of any kind of complaint against any public or private web site not complying with the law.</p> <p>Up to now no penalties have been imposed.</p>	<p>The National Center of Reference in Accessibility and Web Standards acts as consultation body in web accessibility to citizens, companies and public entities through its consulting online platform, SISCA.</p>	<p>In the second half of 2009 INTECO, a public agency being part of the Trade & Industry Ministry through Telecommunication & IS State Secretary, has developed a methodology for continuous improvement on web accessibility. This methodology is embodied in an integrated management system to support institutions in managing the accessibility of their web sites.</p>	<p>INTECO will launch a dedicated desktop tool to support the development of accessible websites.</p> <p>On-site workshops are organised for developers and other interested parties, including commercial web site owners, in order to disseminate information on web accessibility</p> <p>INTECO also offers a set of online training courses in web accessibility including a:</p> <ul style="list-style-type: none"> • 10 h online course for users • 35h online course for web managers • 60h online course for programmers 	<p>eVIA is a technology platform established in December 2007 by the Spanish association of industry, public/private technological research centers, universities, public/private users and public/private health organisations. Among five working groups in the wider information society domain, a specific working group on eAccessibility has been set up.</p> <p>(http://www.idi.aetic.es/evia/)</p>	<p>The national standardisation body AENOR offers a voluntary certification scheme based on the Spanish standard UNE 139803:2004, which is based on / compatible with WCAG 1.0. AENOR certifies the website accessibility through the inspection of the web pages (both automatically and manually), and also conducts an audit of the processes put in practice to ensure the maintenance and improvement of accessibility (a web accessibility management system).</p> <p>This certification scheme has been referred to by Spanish legislation (Royal Decree 1494/2007 and Law 56/2007), but is not mandatory. As a support measures prior to the actual certification process, INTECO offers a validation services to interested parties. A voluntary labelling scheme is also maintained by Technosite, a Fundación ONCE's company specializing in technology and disability.</p>

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FR	<p>No national guidelines have existed so far. Official national guidelines, RGAA , are currently elaborated on the basis of WCAG 2.0 . These are expected to become available by the end of 2009.</p> <p>These guidelines will not represent a national standard adopted by the national standardisation body, but it will nevertheless have official character by decree.</p>	<p>An official ministerial web site will be set up which is planned to be set up to address issues of ICT accessibility more generally, and web accessibility in particular. It is planned that – after three years – web sites will be randomly assessed in relation to their accessibility. A listing of sites that are not compliant with the forthcoming RGAA requirements will then be published.</p> <p>Other enforcement mechanisms – including legal enforcement - are not expected at this moment.</p>	<p>An official ministerial web site is currently being established as a source of information and guidance for all parties concerned by the new regulation.</p> <p>Braille Net - a French organisation acting as a centre of excellence in relation to web accessibility – will support this process and provide guidance to parties who need to implement web accessibility.</p>	<p>No specific guidance on the process of procuring accessible web sites is expected to be made available. However, it is clear from the regulation that parties which are covered by the regulation are not allowed to conclude any contacts for design and/or maintenance of their web site by other parties if this does not include accessibility.</p>	<p>Beyond specifically tailored information packages, it is planned to offer training courses to web masters across the country</p>	<p>The Inter-ministerial Delegation for People with Disabilities (Délégué interministériel aux personnes handicapées) plans to establish a mailing list of public web masters in order to facilitate exchange of good practice and mutual learning. It will be hosted as part of the official web site on accessibility to be established.</p>	<p>It is not planned to establish any official certification or labelling scheme beyond a voluntary scheme that is already offered by BrailleNet.</p>

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IT	<p>The technical requirements imposed by legislation take into account WCAG 1.0, Section 508 and 36 CFR Part 1194.22 for the Web and International Organization for Standardization technical specifications. (http://www.pubbliaccesso.gov.it/biblioteca/documentazione/guidelines_study/index.htm)</p>	<p>The Italian legislation assigns the duty to monitor the enforcement of the relevant legislation to the Presidency of the Council of Ministers (Department for Innovation and Technology) and to CNIPA (National Centre for ICT in the Public Administration), especially in relation to central public agencies. CNIPA monitors the accessibility of central administration Web sites and keeps a national accessibility label database in the framework of a voluntary labelling scheme.</p> <p>Breach of the legislation attracts civil liability and therefore an individual can pursue an action where they have legal standing. In respect of Article 9 there is also the possibility of criminal prosecution in respect of breaches of the legislation. Up to now no legal action has been taken.</p> <p>(http://www.pubbliaccesso.gov.it/normative/law_20040109_n4.htm)</p>	<p>The Presidency of the Council of Ministers (Department for Innovation and Technology) and CNIPA trace the accessibility criteria for the development of IT systems in public administration, and introduce the issues relating to accessibility in public personnel training programs.</p> <p>In order to promote the national legislation on a local level, CNIPA is coordinating the establishment of regional accessibility competence centres to spread the effort of assistance, training, and monitoring in relation to accessibility.</p>	<p>No official, dedicated procurement guidelines concerning web accessibility are available. However information materials of more promotional character were developed during early 2009 by CNIPA in association with three major eProcurement companies concerning the "Design and Development of Public Administration Websites". Accessibility and usability are therein described as key factors.</p> <p>(www.cnipa.gov.it)</p>	<p>CNIPA together with the Italian International Webmasters Association (IWA) and various public agencies and universities has organized seminars, events and workshops on accessibility. In particular, training programs on web accessibility are provided to chief officers, editors and webmasters of public web sites. Various federal ministries have developed own flanking measures. Italian Embassies were e.g. provided with a standard, accessible Web template by the Ministry of Foreign Affairs and the Ministry of Cultural Heritage and Activities has developed a Content Management System for small museums and libraries. The Ministry of Education has set up a project with the aim of providing schools all across the country with tools and training courses to ease the development of accessible web sites. The Italian Banking Association (ABI) promoted, along with CNIPA, several seminars and events with the aim of raising awareness on the issue of eAccessibility in the field of eBanking.</p>	<p>At regional and local level, several initiatives have been set up to support the exchange of knowledge and best practices.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • "SpAcER, eAccessibility help desk" – Region Emilia Romagna • "Doors Open on the Web" - Schools of Region Lombardia • "School and Services" – Ministry of Education <p>At the federal governance level, CNIPA offers hands-on advice to federal government agencies in relation to capacity building and knowledge exchange.</p>	<p>CNIPA has set up a voluntary assessment scheme for websites, promoting an accessibility logo which can be requested by public and commercial websites.</p> <p>Private subjects who wish to obtain the label must necessarily apply for an accessibility assessment made by a member of the evaluators' list in order to obtain the accessibility mark.</p> <p>Public agencies and bodies instead may autonomously assess their compliance with the accessibility requirements and with the provisions of the law, in adherence to the principle of self-government</p>

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NL	<p>Based on a quality model that goes beyond web accessibility, National Web Guidelines (webrichtlijnen) were developed. These constitute a package of 125 quality requirements on a given website, including accessibility to vulnerable groups. The accessibility part of the Web Guidelines refers to WCAG 1.0 and the national 'drempels weg' initiative.</p> <p>(http://www.webrichtlijnen.nl/english/)</p>	<p>Web accessibility related policy interventions rely upon a Decision of the Council of Ministers from June 2006. The Council Decision is binding for all central government websites. Pursuant to the Council Decision a National Implementation Programme has been launched. There is no legal enforcement mechanism in place.</p> <p>A national implementation programme entitled 'Better Services' provides the policy framework for web accessibility related policy intervention at the regional and local governance levels</p> <p>Overall, progress is monitored by a steering committee which is chaired by the Secretary of the Ministry of the Interior.</p>	<p>A dedicated web site has been set up as a central source of information on the national Web Guidelines. It provides guidance on how to implement the national Web Guidelines in practical terms.</p> <p>The website is expected to be re-launched in the near future and to present examples of good practice and 'lessons learned' by organisations which already have implemented the Web Guidelines.</p> <p>(http://www.webrichtlijnen.nl/english/)</p>	<p>A process model has been developed which is currently being tested in several pilot municipalities</p> <p>The process model is to provide practical tools and guidance to web site owners on how to procure a website that is compliant with the national Web Guidelines, and how to monitor the entire process until the final delivery of a website.</p>	<p>Practical support is available through a helpdesk maintained at a central 'Web Guidelines' web site.</p> <p>'i-teams' support regional / local governments in establishing a plan for implementing the national implementation programme, including the Web Guidelines.</p> <p>A dedicated communication plan is under development focusing on the advantages that can be gained by web site owners from implementing the Web Guidelines. With a view to private web sites, the Ministry of Economic Affairs is developing a business case in order to demonstrate benefits potentially flowing from the implementation of the Web Guidelines.</p>	<p>On the central Web Guidelines website a WIKI is made available in order to facilitate knowledge exchange. Moreover, there is an advisory board on the Web Guidelines with participants from governments, test authorities, web developers and other ICT suppliers where latest developments are discussed. Members of the Web Guidelines team at ICTU participate in conferences and meetings in order to present the Web Guidelines. ICTU is a public organisation founded by the Ministry of the Interior and Kingdom Relations and the VNG (Association of the Netherlands Municipalities) and helps authorities to improve their ICT performance.</p>	<p>Currently, it is not obligatory to demonstrate conformance with the national Web Guidelines. In relation to web accessibility related aspects a 'comply or explain' approach is however pursued. Web site owners can apply for the quality mark 'Drempelvrij' which is currently offered by two accredited organisations. Alternatively, they can choose self declaration.</p> <p>The voluntary quality mark "drempelvrij.nl" is based on WCAG 1.0. It was set up on request of the Dutch government. The Bartiméus Accessibility Foundation led the project, but transferred it to the foundation Quality Mark drempelvrij.nl in 2005. A similar voluntary scheme is offered by the Accessibility Foundation Netherlands.</p> <p>In future, a dedicated labelling scheme is to be developed in relation to the Web Guidelines. As a first step, an expert group has been established.</p>

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SK	<p>A national standard was developed as part of the legislative process. National legislation refers to WCAG 1.0. Level A compliance is mandatory, and some additional requirements at level AA and AAA are mandatory as well.</p>	<p>Under current legislation the Ministry of Finance of the Slovak Republic acts as a controlling body and has the right to impose sanctions on organisations that are covered by national legislation in case of non-compliance with the national accessibility standard. No sanctions have been imposed up to now.</p> <p>The Ministry of Finance is also responsible for operating a Program for the Information Society where adherence to the national standard is part of the necessary conditions individual projects need to fulfil to be accepted.</p>	<p>The Ministry of Finance serves a central contact point in relation to web accessibility and provides practical support in the implementation and interpretation of national standard. In relation to the latter, the Ministry cooperates with the Partially Sighted Union, acting as official evaluator of standards compliance.</p>	<p>As a general rule, the Ministry encourages public web site owners to specify in any procurement contract that services providers should comply with the law. Systematic guidance or supportive tools are however not available to public procurers.</p>	<p>On a permanent basis, the Ministry of Finance offers awareness-raising seminars to any interested party as a part of its mission.</p> <p>Also, training courses on web accessibility are held on request. These tend to be organised in cooperation with a wide range of public/commercial actors who are interested in web accessibility. Usually, these courses are provided free of charge to the participants. In 2008 6 training courses were held overall, and in 2009 3 have been held as yet</p>	<p>A Working Party on Accessibility of Websites has been established under the umbrella of the Commission for Standards of Information Systems of the Public Administration. It serves as an open place for discussing practical issues relating o web accessibility.</p>	<p>An unofficial certification scheme is in place, operated by the Slovak Blind and Partially Sighted Union. The development of this scheme - entitled "Blindfriendly" - was supported by the national government and is based on voluntary self certification</p>

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UK	<p>A best practice framework for guidance on the management of UK government websites prepared by the Central Office of Information (COI) refers to WCAG 1.0 AA. The COI Web standards and guidelines are the official UK policy applying to public sector websites. (www.coi.gov.uk/webguidelines)</p>	<p>A complaint may be submitted to an Industrial Tribunal in the case of alleged discrimination. In the alternative an individual may pursue an action in accordance with the common law in the normal way. No court case has been taken so far.</p> <p>The Equality and Human Rights Commission has a role in the active enforcement of the provisions of the Act. The Commission may serve a notice on a public authority where non compliance occurs. If the authority fails to act in accordance with this notice then the Commission may apply to the Court for an order compelling compliance.</p>	<p>The best practice framework prepared by the Central Office of Information provides guidance on the management of UK government websites</p>	<p>In 2005, the UK's Disability Rights Commission (DRC) commissioned the British Standards Institution to develop guidance on how to commission accessible web sites, resulting in 'PAS 78: a guide to good practice in commissioning accessible websites'. The PAS is now being further developed into an official national standard.</p> <p>(http://shop.bsigroup.com/en/ProductDetail/?pid=000000000030129227)</p>	<p>Training courses on developing web accessibility policies are delivered to central government website managers.</p>	<p>An online community of practice was set up by COI to encourage knowledge sharing. This platform considers itself a community platform supporting professional social networks across local government and the public sector. It provides a secure environment for knowledge development and sharing through online communities of practice. There is an accessibility sub-community of 'Digital People' currently comprising of 212 members from across government, private and third sectors.</p> <p>(communities.idea.gov.uk.)</p> <p>Moreover, the Cross Government Accessibility Network (CGAN) was set up to build a common approach to delivering accessible IT systems. It also serves as a forum of knowledge exchange.</p>	<p>There is no official certification scheme.</p> <p>The so called "See it Right: UseAbility" label is provided by the RNIB, a charity organization, in the framework of a web accessibility audit that is based on the WAI guidelines. A directory is maintained which 'The See it Right' accessible websites directory includes organisations from a range of areas.</p> <p>(http://www.abilitynet.co.uk/websirlogo)</p> <p>The Shaw Trust offers a Website Accessibility Accreditation Service that includes comprehensive web accessibility audit. The service is endorsed by The Guild of Accessible Web Designers (GAWDS).</p> <p>(http://www.shaw-trust.org.uk/website_accessibility)</p>