



Study on the socio-economic impact of new measures to improve accessibility of goods and services for people with disabilities

Public Consultation Analysis



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1 Introduction

In preparation of the European Accessibility Act, the European Commission has launched a Public Consultation, aimed to gather stakeholder views as input for the impact assessment of the measures to improve the accessibility of goods and services in the internal market.

This “Public consultation with a view to a European Accessibility Act” (open from 12 December 2011 to 29 February 2012) was addressed to all citizens (including people with disabilities and older people), as well as to public and private sector organisations. The geographic scope covered includes EU Member States, EFTA/EEA countries and candidate countries to the enlargement of the EU.

The sections below analyse the Public Consultation from a twofold perspective, citizens and organisations, in order to contrast their views and summarise the most important findings.

In relation to the study, the objective of the analysis presented here is also to detect the goods and services prioritised by respondents to be rendered accessible, problems related to the internal market, as well as the potential measures to be taken in order to improve the current situation regarding accessibility and the functioning of the internal market for accessible goods and services.

1.1 Questionnaire structure

The consultation was conducted through a questionnaire available online. The questions were grouped into four groups:

- I) **Profile of the respondents:** aimed to categorise individual citizens (questions from 2 to 8) and organisations (questions from 12 to 23)¹.
- II) **Questions common to all respondents:**
 - Current situation in the Member States (questions 29 and 30)
 - Content of possible measures (questions 31 to 36)

¹ Questions 12, 13 and 14 have not been analysed, as the information gathered is not relevant for the purposes of this report (name of organisation, Interest Representative Register ID and e-mail address, respectively).

III) **Specific questions for individuals, and in particular persons with disabilities:** questions 9 to 11

IV) **Specific questions for the industry and businesses:** questions 24 to 28

Therefore, as the questionnaire was split up into different sections, with specific questions pertaining to the specific types of respondents, the questions for each profile were mutually exclusive.

Concerning the type of questions, group I is composed of multiple choice questions whereas groups II, III and IV are unstructured, open ended questions. The full questionnaire is available in the Annex (section 7.1).

1.2 Profile of the respondents

It is pertinent to define the different nature of respondents since all of them play a different role in the accessibility chain. Individual citizens are the consumers and users of goods and services provided on the Internal Market in the European Union (EU) and may encounter specific challenges related to the level of accessibility of goods and services (in particular citizens with disabilities or elderly). Industry players produce or provide goods and services, while other organisations (NGOs) tend to focus in advocacy and lobbying to intermediate between both. Finally, public authorities play also an important role regulating, enforcing and monitoring accessibility.

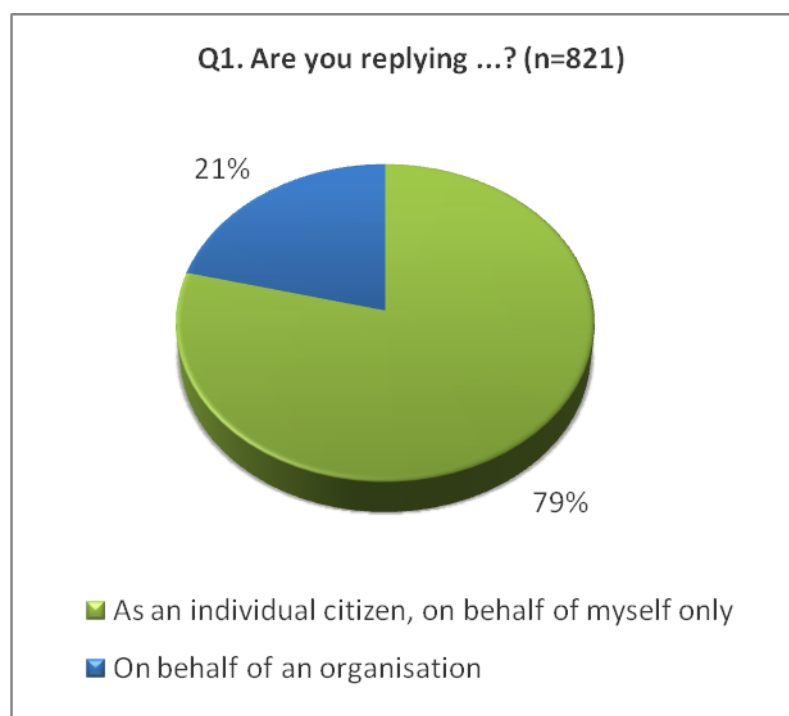
In total, 2956 respondents accessed the public consultation online and an additional 42 responses were submitted in other formats (MS Word and Adobe PDF files). Concerning the raw data base of 2956 registers, it is worth to mention that a high percentage of respondents merely accessed the survey and left the survey without completing the core questions of the questionnaire. Due to this factor, it has been necessary to filter the data in order to analyse the valid responses. To that end, the following filtering procedure was carried out:

- The criterion to consider a response (row) from an **individual citizen** as valid is to have answered at least one of the core questions for individual citizens (questions 9 to 11 and 29 to 36), with a coherent answer (i.e. not symbols such as “x”, “/”, “...”, etc.)².
- The criterion to consider a response (row) on behalf of an **organisation** as valid is to have answered at least one of the core questions for organisations (questions 24 to 36), with a coherent answer (i.e. not symbols such as “x”, “/”, “...”, etc.).

² As the criterion to consider a response (row) as valid was to have answered at least one of the core questions, it may have happened that invalid values remained in the data base. These have been classified as “N/A” in each question, as well as answers such as “no idea”, “no comments”, “no answer”, “see above”, etc.

After applying the aforementioned filters, the sample of valid responses consists of **821 responses** (648 citizens and 173 representatives of organisations³), 79% and 21% respectively.

Figure 1 – Type of respondents



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Citizens

The majority of citizens contributing to the Consultation (648) declared having a disability (60% of the total sample of citizens), including physical (43%), sensory (25%), mental (4%), and intellectual (2%) disabilities. Furthermore, 63% of disabled respondents were born with the disability reported.

On the other hand, out of the 40% of respondents who declared not having a disability (Q4), 76% worked on either accessibility or disability matters. Therefore, the great majority of individual respondents to the Public Consultation have a direct connection to disability-related matters.

³ Note that the questionnaire categorised as “organisations” the following stakeholders: industry, commercial, public bodies, NGOs and others. For the sake of analytical purposes, the categories “industry” and “commercial” were merged and labelled as “industry”, as it was observed that respondents marked these two options indistinctively. Regarding the category “others”, it was further analysed and its respondents were reassigned to the proper category. Therefore, organisations responding were finally categorised as: industry, NGOs and public bodies.

The sample of citizens was balanced in terms of gender (55% male and 45% female respondents), with almost half of respondents aged between 33 and 39 years old. On the contrary, the country distribution was rather disperse; among the 33 countries of residence mentioned, Germany (33%), United Kingdom (11%), Italy (10%), Spain (10%), France (6%) and Belgium (6%) represented more than three fourths of the sample.

For further analysis about the profile of individual citizens, see Annex 7.12.

Organisations

Organisations participating in the survey (173) declared to be based mainly on a particular country (67%), whereas the remaining 33% are of a European or international nature. Among organisations with a national scope (117), four countries account for half of the total responses received (22 nationalities): Spain (15%), Germany (13%), the United Kingdom (12%) and Ireland (9%). Other countries with a notable representation in the sample are Sweden (8%), Belgium (6%), Czech Republic (5%) and France (5%).

Regarding the type of organisation, almost 60% were NGOs, 26% were commercial and business organisations and 14% were government or public authorities.

When asking about the type of organisation (Q18), service providers represent the vast majority of respondents (75%), whereas 25% responded on behalf of industry or business. This matches with the high percentage of NGOs in the sample (60%), since most of these organisations provide some sort of services, mainly social services (64% of service provider respondents), followed by transport (12%). The rest is distributed among cultural (7%), educational (2%) ICT (2%) financial (2%) sport (2%) and other services (2%). Finally, from the organisations representing industry or businesses, 57% belong to the transport sector, 27% to the ICT sector and 13% to built environment.

For further analysis on the profile of organisations, see Annex 7.23.

2 Current situation in the Member States and possible measures

This chapter summarises the responses given from Q29 to Q36. These questions (group II) are common to all respondents, aimed at gathering information about the current status regarding accessibility in the Member States, as well as the content of possible measures to improve it.

This section has been structured to answer the following questions:

- Where is the problem? (Q29)
- What areas are priority/key? (Q31)
- Why is there a problem? (Q30)
- What can be done? (Q32)
- What role do different stakeholders play? (Q33, 34, 36)
- Best practices (Q35)

Finally, feedback received from citizens and organisations is analysed separately in order to contrast their views about the current EU accessibility situation.

2.1 Questions common to all respondents

2.1.1 Where is the problem?

This section presents an analysis of the responses to question 29:

Please provide your general assessment of the accessibility in your country in the areas of built environment, transport and ICT.

The first question in this group concerns the general assessment of the level of accessibility in the respondents' country, in the areas of built environment, transport and ICT. It is worth to mention that respondents expressed the accessibility assessment in several ways, given that the question posed was open-ended⁴.

⁴ Due to the miscellaneous responses received, this question was treated as a multiple choice; some responses assessed the level of accessibility both using a scale and other types of evaluation. Therefore, the analysis of Q29 presents the frequency of each answer category.

A group of respondents assessed it providing a grade in a scale (low, medium and high). Both organisations and citizens think that the level of accessibility in all areas is quite low⁵:

➤ In the area of transport:

- low accessibility: 26% of organisations (37 responses) and 40% of citizens (144 responses);
- medium accessibility: 10% of organisations (15 responses) and 10% of citizens (35 responses);
- high accessibility: 8% of organisations (12 responses) and 10% of citizens (37 responses).

➤ In the area of ICT:

- low accessibility: 23% of organisations (33 responses) and 35% of citizens (126 responses);
- medium accessibility 8% (11 responses) of organisations and 9% of citizens (32 responses);
- high accessibility: 10% of organisations (15 responses) and 10% of citizens (34 responses).

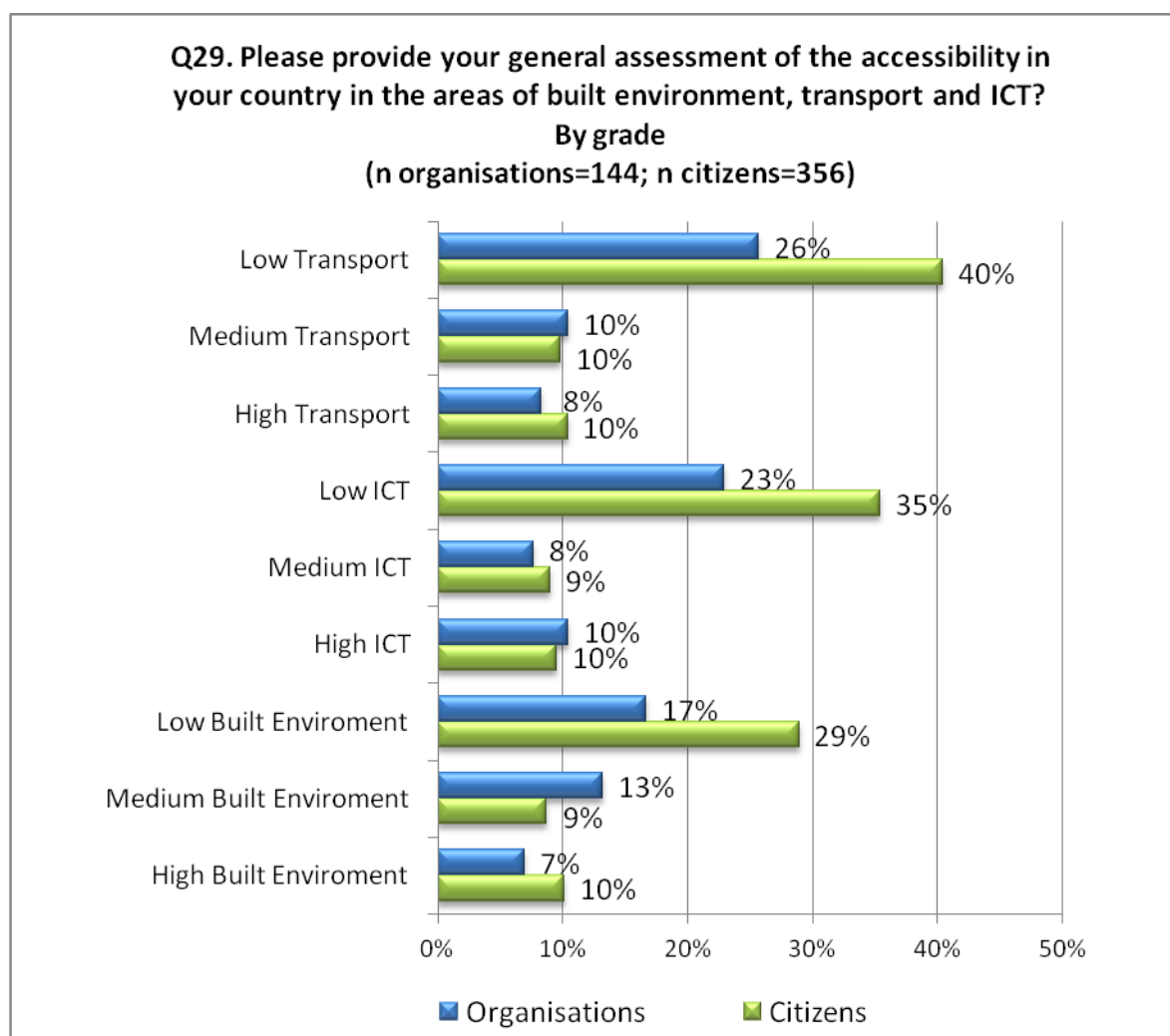
➤ In the built environment:

- low accessibility: 17% of organisations (24 responses) and 29% of citizens (103 responses);
- medium accessibility: 13% of organisations (19 responses) and 9% of citizens (31 responses);
- high accessibility: 7% of organisations (10 responses) and 10% of citizens (36 responses).

The perceived level of accessibility among citizens is in general worse than among organisations, especially when describing it as “low”, in the aforementioned three areas.

⁵ For analytical purposes, responses referring to a generic level (low, medium, high) were considered as referring to the three areas considered (transport, ICT and built environment).

Figure 2 – General assessment of the accessibility in your country in the areas of built environment, transport, and ICT expressed by grade of accessibility



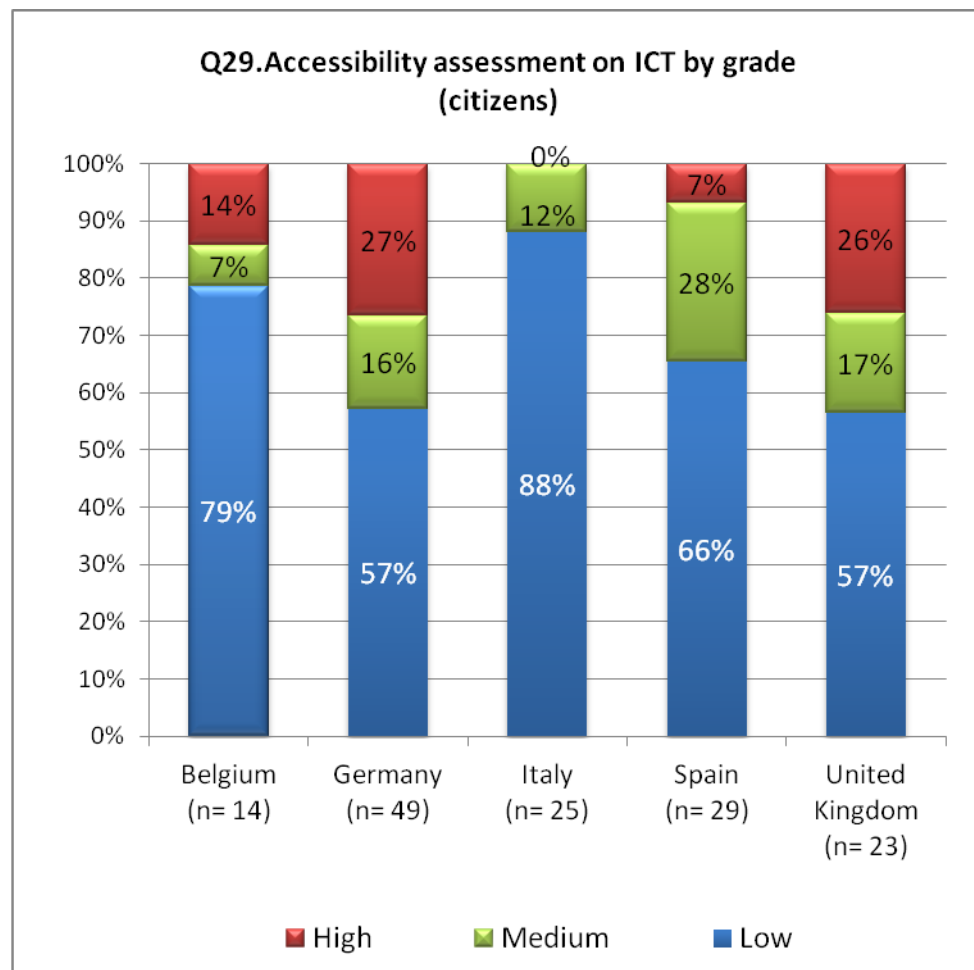
Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. n= number of respondents. Multiple choice question.

A further detailed assessment of the responses unfortunately revealed that none of the responses per country reached a minimum number of responses per category which allow performing a consistent statistical analysis. Similarly, the responses received from organisations per country did not reach the aforementioned minimum sample size; therefore, the country analysis is presented below only concerns to citizens' responses and only to five countries.

As can be seen from Figure 3, the accessibility level of ICT is considered especially low in Italy (88%) followed by Belgium (79%), and Spain (66%). Figure 4 shows that the level of accessibility in transport is considered especially low in Italy (84%), followed by Belgium (81%), and Spain (63%). Finally, the level of accessibility in the built environment, illustrated in Figure 5, is considered especially low in Italy (82%), followed by Belgium (75%), and Spain (62%). The

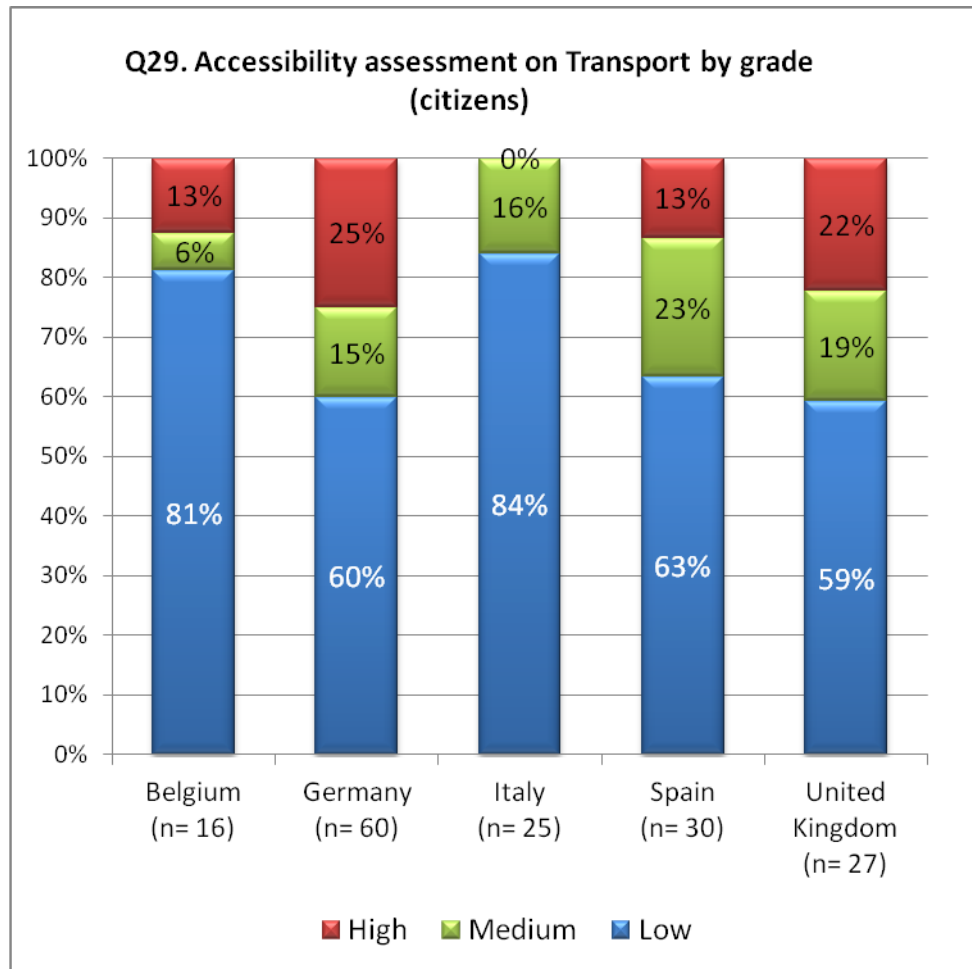
highest level of built environment accessibility is achieved in the United Kingdom (32% of respondents assessed it as “high”).

Figure 3 – Accessibility assessment on ICT by grade (citizens)



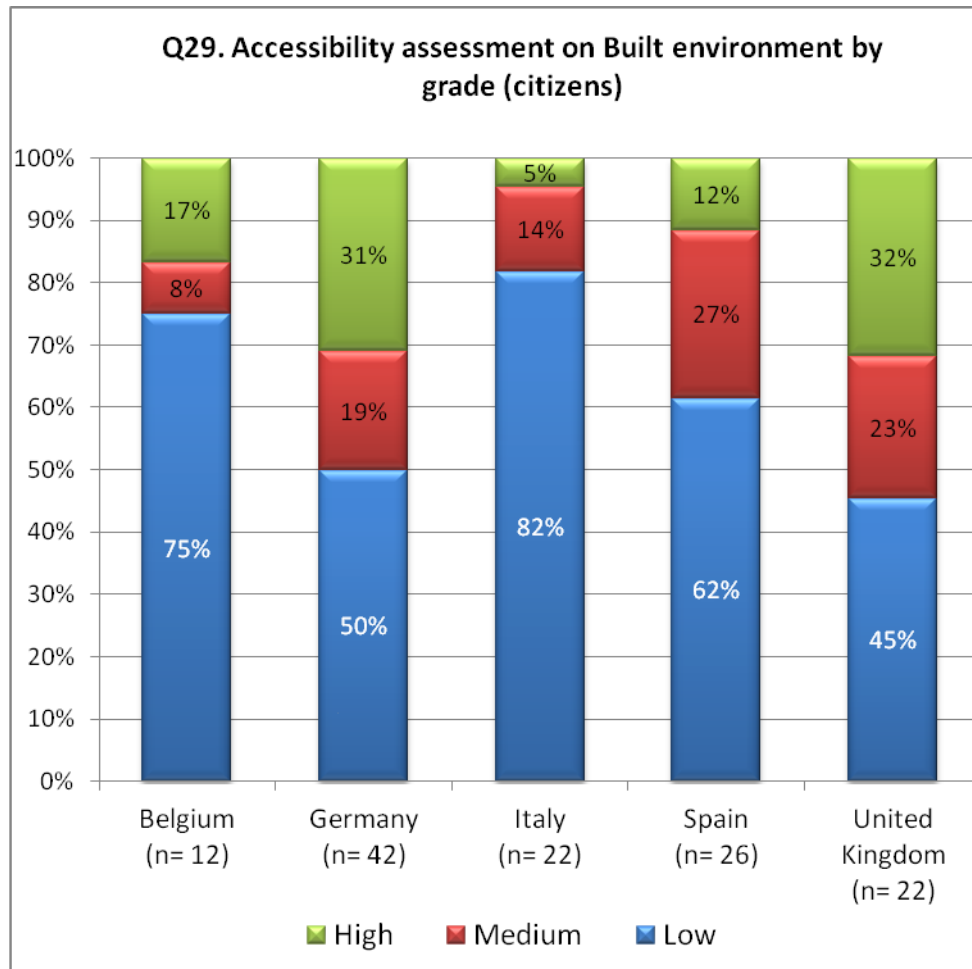
Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Figure 4 – Accessibility assessment on transport by grade (citizens)



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

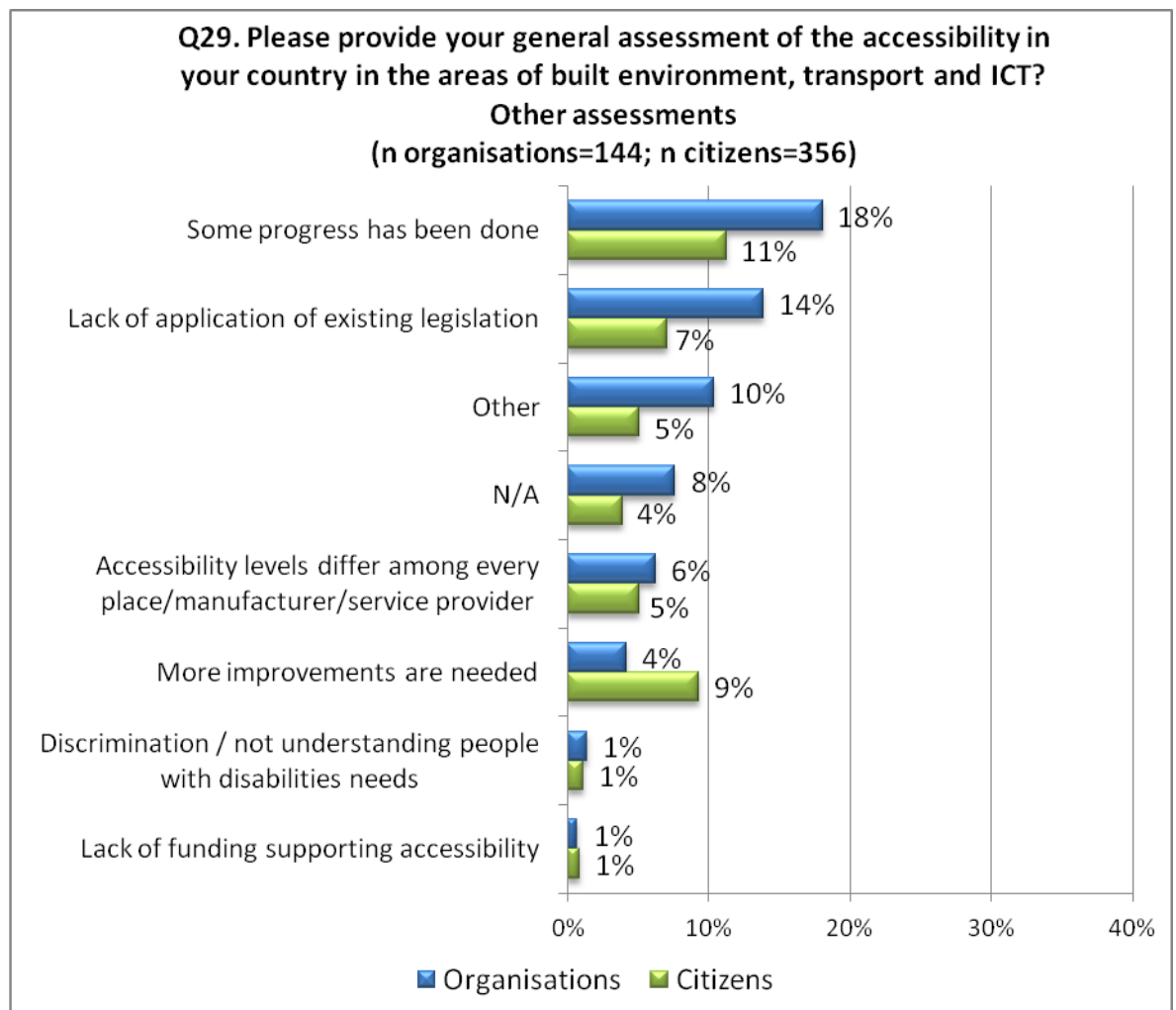
Figure 5 – Accessibility assessment on built environment by grade (citizens)



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Specific assessments of respondents concerning the accessibility level in their country were identified, as per the figure below. Among the responses, the most mentioned are: “Some progress has been done” (18% of organisations and 11% of citizens) and the “Lack of application of existing legislation” (14% of organisations and 7% of citizens).

Figure 6 – General assessment of accessibility in the areas of built environment, transport and ICT; other assessments



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. n= number of respondents. Multiple choice question.

2.1.2 What are the priority areas?

This section presents an analysis of the responses to question 31:

The accessibility for people with disabilities of which goods and services should be given priority?

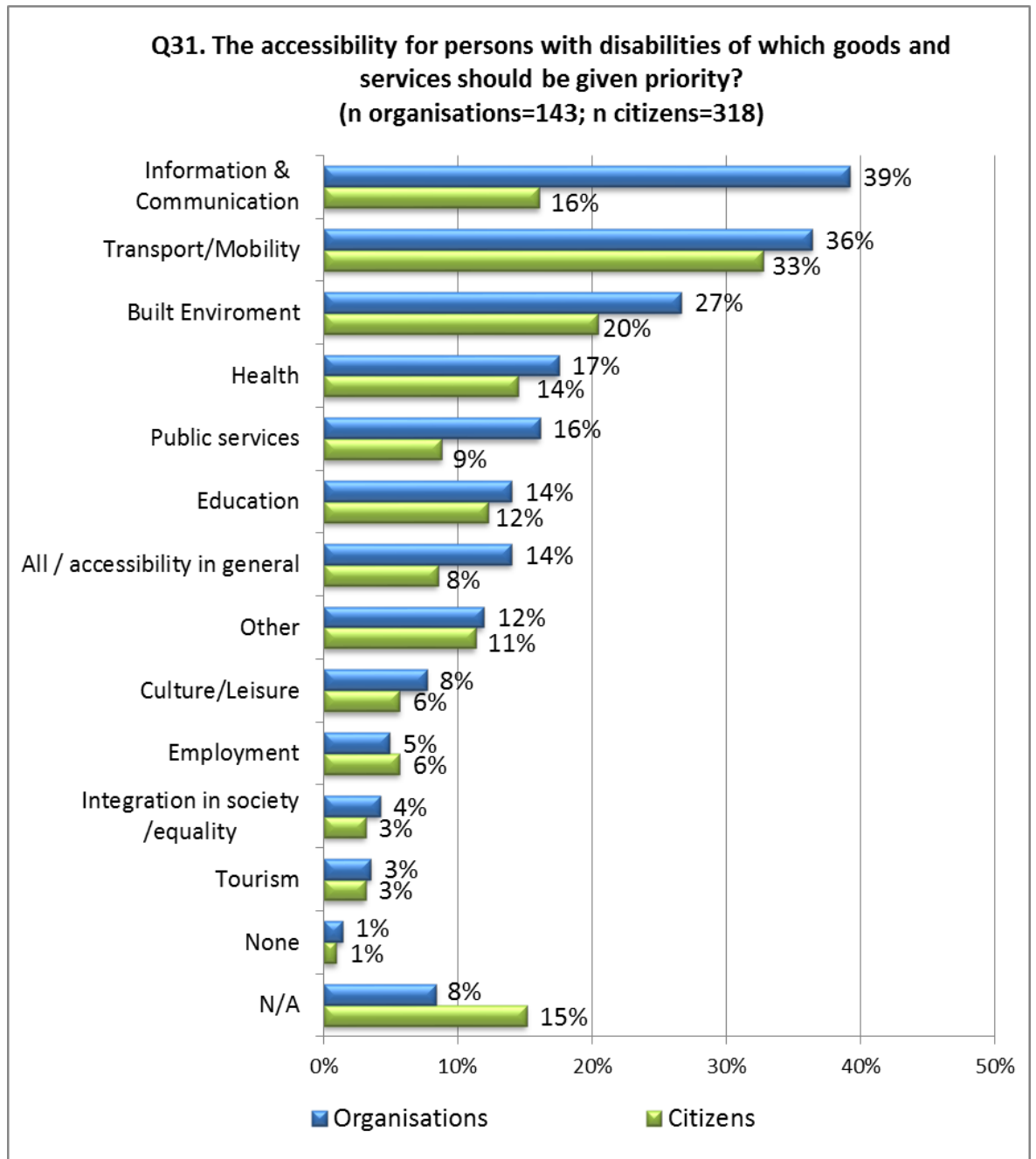
Respondents were asked which goods and services should be given priority in relation to accessibility for persons with disabilities and elderly. The respondents, both organisations and citizens (percentages indicated in brackets respectively), indicated the following areas/sectors as most important⁶:

- Information and communication (39% and 16%),
- Transport and mobility (36% and 33%),
- Built environment (27% and 20%),
- Health (17% and 14%),
- Public services (16% and 9%),
- Education (14% and 12%),
- Other goods and services (12% and 11%),
- Culture and/or leisure (8% and 6%),
- Employment (5% and 6%),
- Integration in society (4% and 3%),
- Tourism (3% and 3%)

Other respondents declared that all sectors mentioned should be a priority (14% and 8% respectively), and that none of them should be given a priority (1% and 1%). The “other” category includes support services (5% and 2%), and other individual products.

⁶ In order to ensure a consistent analysis, the areas defined in question 31 are aligned with the ones considered in questions 9, 10, 11 and 31. It is worth mentioning that not all areas have been mentioned by respondents in all questions. For further information about the terms considered under each area, see Annex 7.3.

Figure 7 -Priority of goods and services



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. n= number of respondents. Multiple choice question.

It is worth mentioning that citizens prioritised first transport and built environment over Information and communication. Built environment was the second priority area for citizens but third for organisations. Health, Public Services and Education follow the list for both segments, varying only in the ranked position. One should keep in mind that specific industry respondents may have indicated their own industry as most important, which could bias the results.

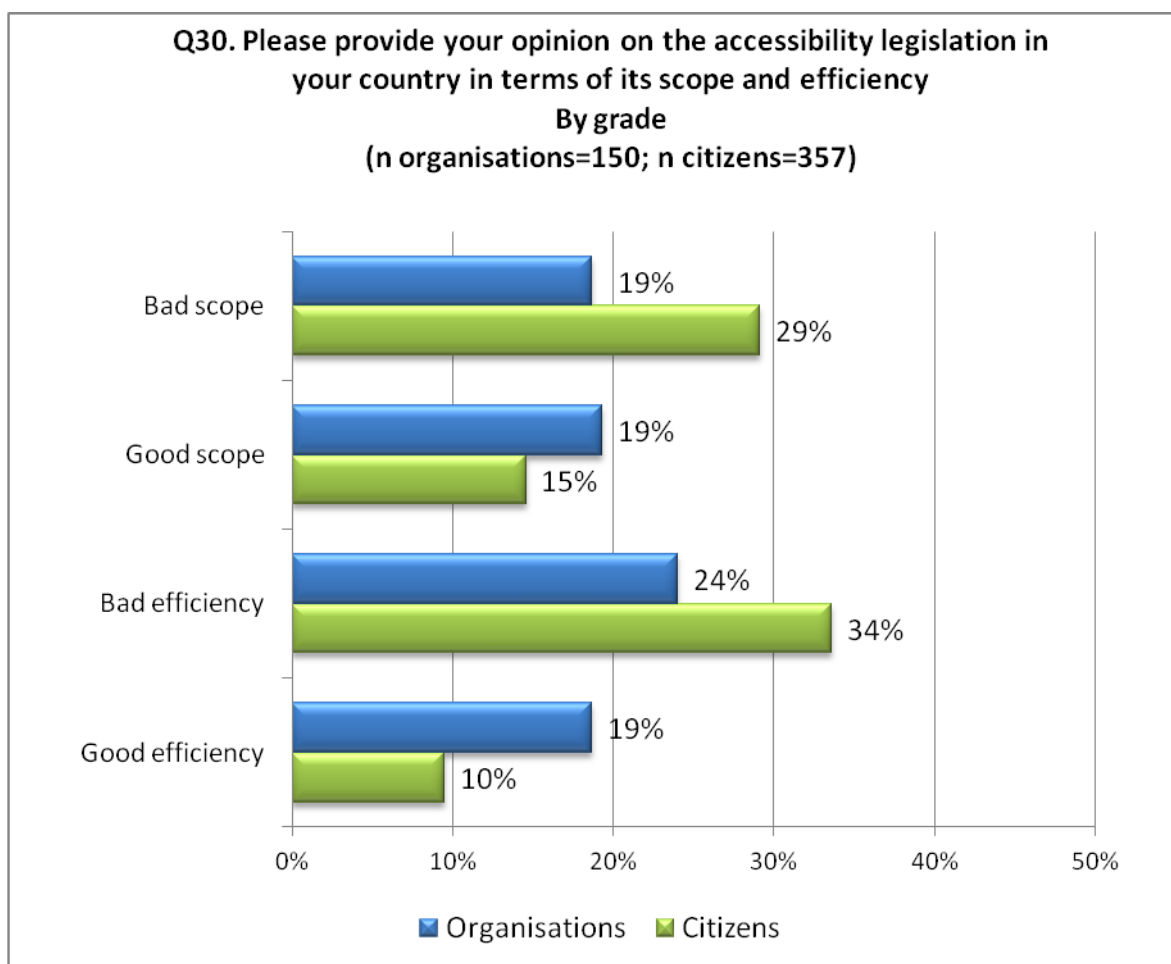
2.1.3 Why is there a problem?

This section presents an analysis of the responses to question 30:

Please provide your opinion on the accessibility legislation in your country in terms of its scope and efficiency⁷ (Q30)

Respondents have opposite opinions about the scope and efficiency of the legislation. Citizens indicate that the accessibility legislation in their respective countries is bad both in terms of scope and efficiency (29% and 34% respectively). Organisation responses show an equal split, where 19% considers legislation good and 19% considers it to be bad with regard to scope. Efficiency of the legislation is judged bad by organisations (24%) in contrast to 19% who deem the efficiency to be good.

Figure 8 –Scope an efficiency of the national accessibility legislation, by grade



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. n= number of respondents. Multiple choice question.

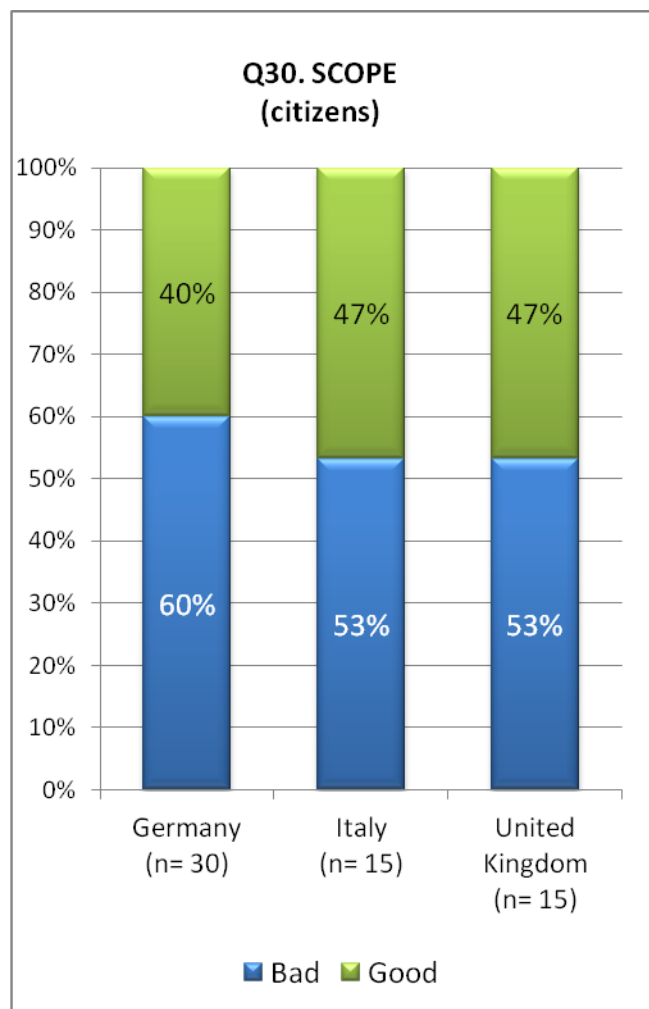
⁷ As the Public Consultation was an open ended, qualitative survey, some answers addressed scope only, efficiency only, or both. Therefore, note that the percentages correspond to the percentage of the respondents talking about either scope, efficiency or both.

Regarding the country distribution of the above question, the sample size of organisations' responses was too small for further analysis⁸. Therefore, the country analysis only concerns responses from citizens.

Separating the variables scope and efficiency, and relating them to specific countries of the respondents, only three countries appear to have sufficient responses for further analysis: Germany (30 responses), Italy (15), and the United Kingdom (15). Nevertheless, only Germany had enough respondents regarding efficiency (29).

In terms of scope, accessibility legislation level is considered bad in Germany by 60% of the individual respondents, while in Italy and the United Kingdom the opinions are divided (47% good, 53% bad).

Figure 9 –Accessibility legislation: scope (citizens)

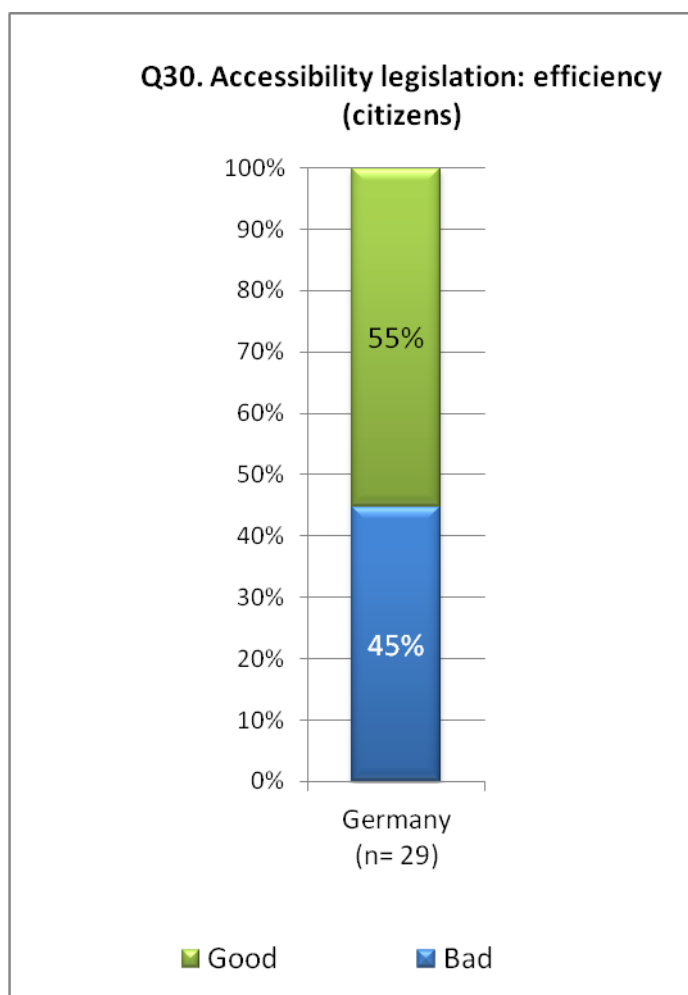


Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

⁸ Only those countries with a minimum of 15 graded responses have been further reviewed, as in Q29.

Regarding efficiency, the only country that could be analysed is Germany (29 citizen responses), where 55% of the respondents judge the efficiency of accessibility legislation to be good. This stands in contrast with the perceived low grade of accessibility declared by German citizens answering Q29 (see 2.1.1), where the level of accessibility was considered low in ICT (57%), transport (60%) and built environment (50%).

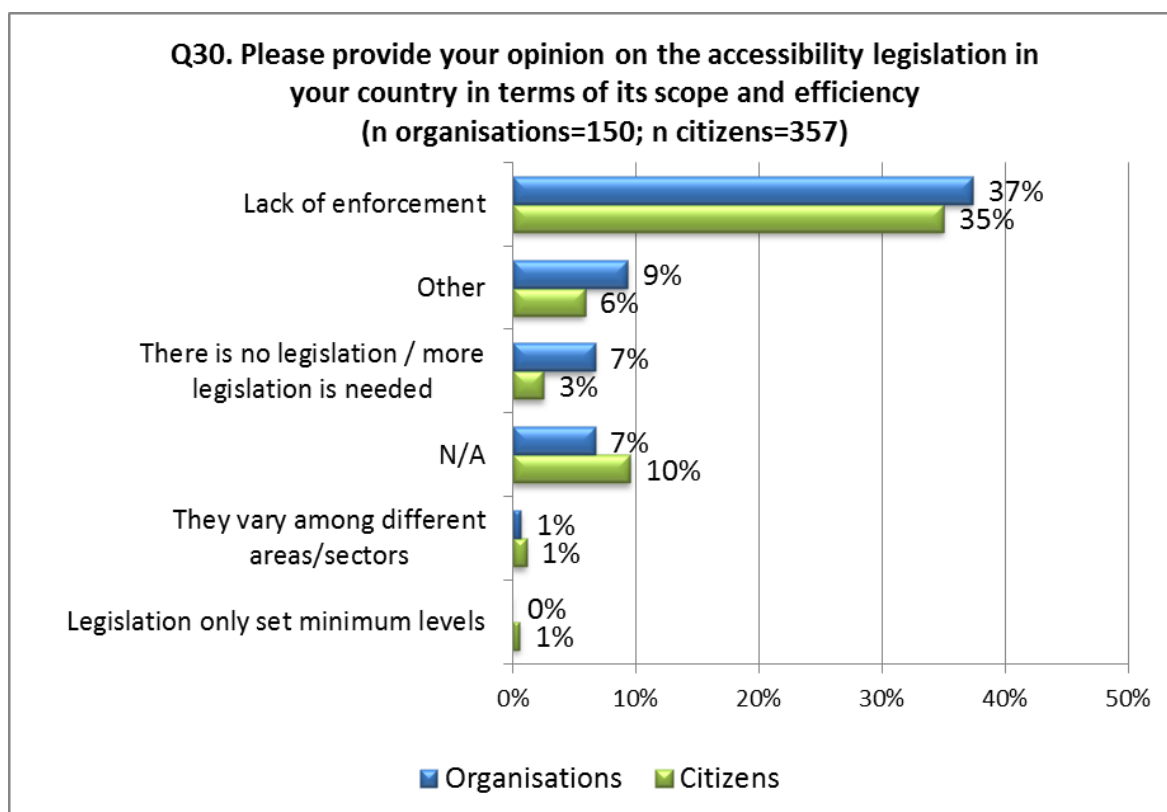
Figure 10 – Accessibility legislation: efficiency (citizens)



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

A group of respondents to question 30 referred to their respective legislations without expressing a value but adding some further comments. It was described as lacking enforcement and/or application by 37% of organisations and 35% of citizens. Other responses stated that more legislation is needed or it does not exist (7% of organisations and 3% of citizens), whereas others pointed out that if legislation on accessibility exists, it varies among different areas and sectors (1% of organisations and 1% of citizens).

Figure 11 – Scope and efficiency of the national accessibility legislation; other assessment



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. n= number of respondents. Multiple choice question.

2.1.4 What can be done?

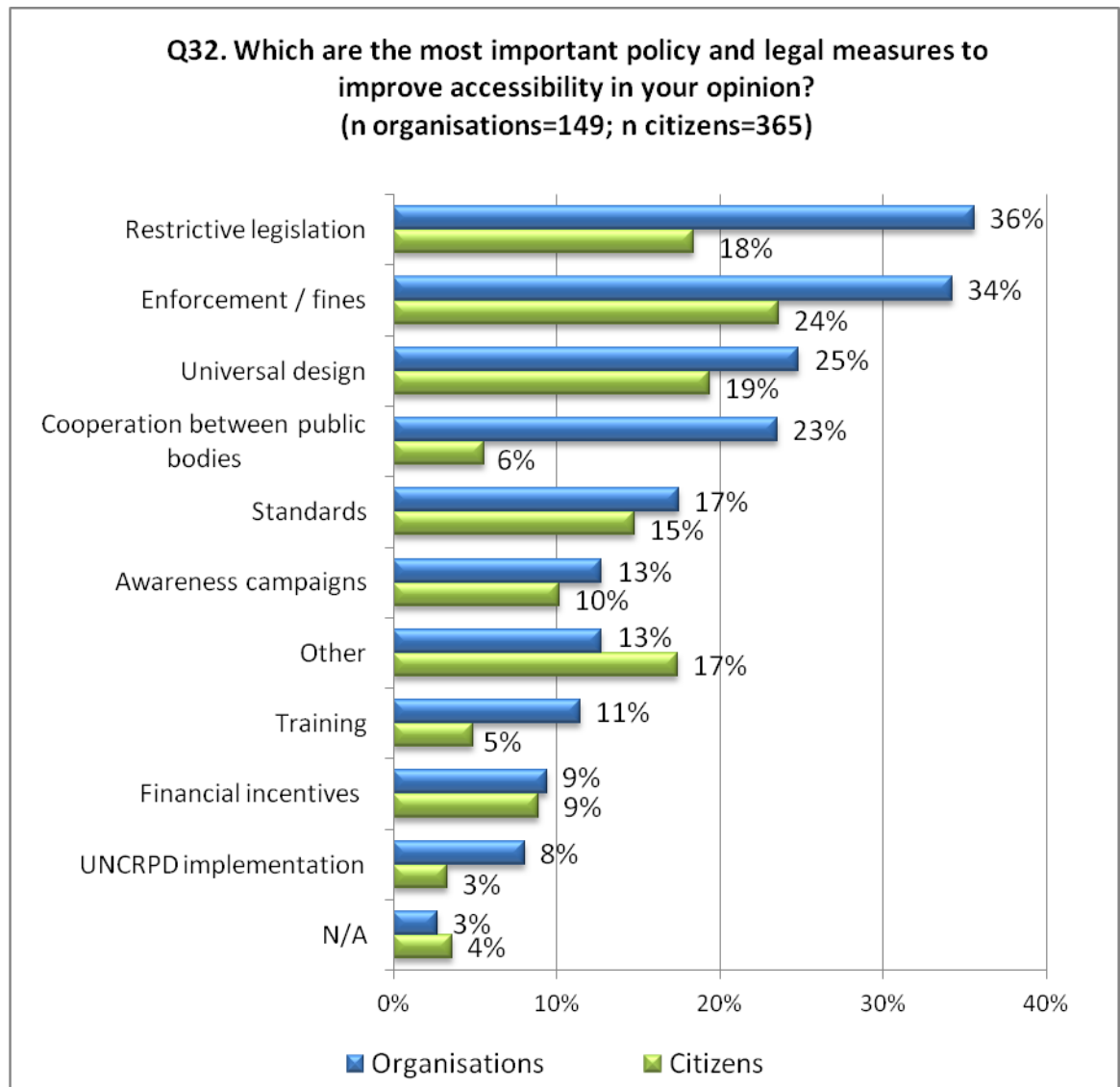
This section presents an analysis of the responses to question 32:

Which are the most important policy and legal measures to improve accessibility in your opinion? (Q32)

Concerning the possible policy and legal measures that could improve the accessibility level, both organisations and citizens were aligned and suggested restrictive legislations (36% and 18% respectively) as the most relevant. Other most mentioned measures are enforcement and/or fines (34% and 24%), universal design (25% and 19%), cooperation between public bodies (23% and 6%), standards (17% and 15%) and awareness campaigns (13% and 10%). Further concrete measures mentioned are training (11% and 15%), financial incentives (9% and 9%) and UNCRPD implementation (8% and 3%).

Eight out of the ten response categories below show that organisations prioritise legal and policy measures that improve accessibility more than citizens responding to the survey.

Figure 12 – Suggested policy and legal measures to improve accessibility



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. . n= number of respondents. Multiple choice question.

Therefore, the three main policy and legal measures identified by respondents were the need to foster restrictive legislation, the importance of extending and accomplishing law enforcement as well as fines and finally the need to encourage Universal Design in all goods and services. Citizens considered more important the role of fines and law enforcement, whereas organisations expressed the need for more restrictive legislation (please note again that the organisations' category includes: industry, NGOs and public bodies). Other measures found in the data convey the convenience of common standards, the importance of awareness campaigns and the proposal to extend staff training to deal with accessibility as well as disability.

2.1.5 What role do different stakeholders play?

This section presents an analysis of the responses to questions 33, 34 and 35. First, an analysis of the role that public authorities and market operators should play is provided based on the analysis of responses to question 33:

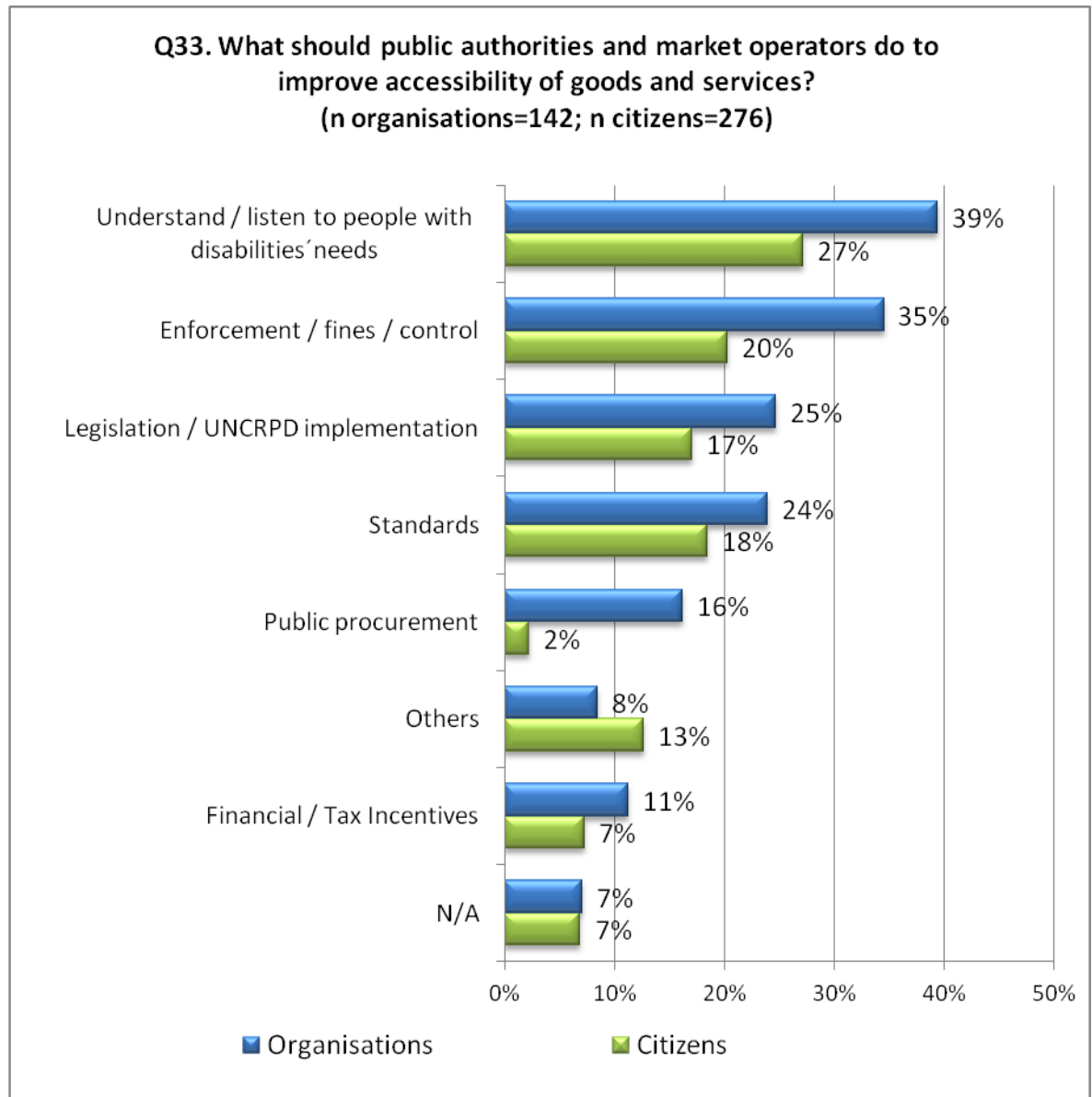
What should public authorities and market operators do to improve accessibility of goods and services?

This question concerns the roles that both public authorities and market operators could play in order to improve the accessibility of goods and services. Both organisations and citizens considered the most relevant actions to improve accessibility are understanding/listening to people with disabilities' needs (39% and 27% respectively), increasing enforcement and control mechanisms (35% and 20%), legislation implementing the UNCRPD (25% and 17%), creating standards (24% and 18%), using public procurement (16% and 2%) other measures⁹ (8% and 13% respectively), and creating financial or tax incentives (11% and 7%).

Therefore, it can be concluded that public authorities were expected to work towards the implementation of the UNCRPD by the means of legal instruments, monitoring its enforcement and imposing fines in the case of non-compliance. Moreover, it was suggested that they should develop standards, procure accessible goods and services and give financial incentives in order to improve the accessibility in the market. Both public authorities and market operators were encouraged to listen to people with disabilities needs as a top priority by citizens as well as organisations participating in the consultation.

⁹ Organisations suggested miscellaneous measures such as training, etc. whereas citizens mentioned promoting R&D, providing information, hiring people with disabilities, etc.

Figure 13 – Measures to be taken by public authorities and market operators



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

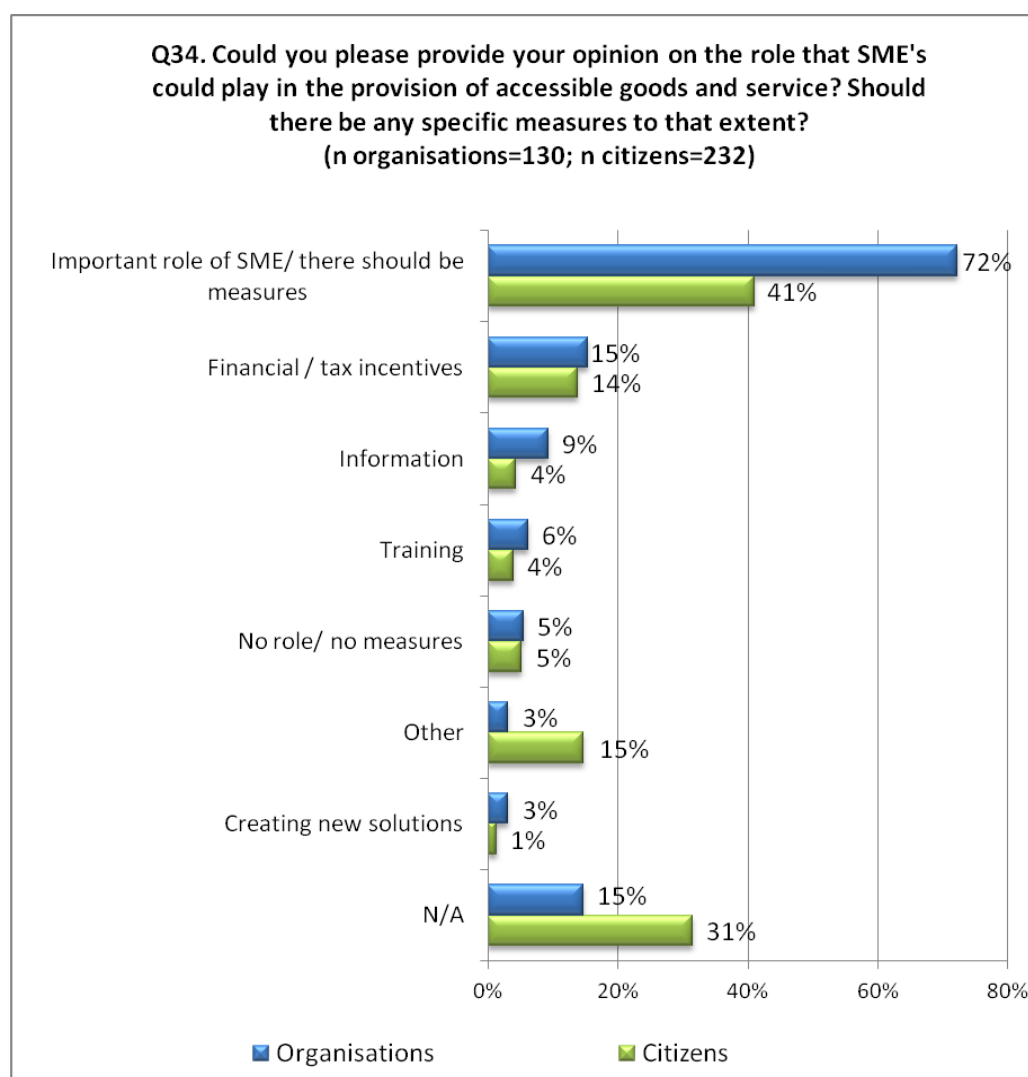
The role of Small and Medium-sized Enterprises is analysed based on the responses to question 34:

Please provide your opinion on the role that SME's could play in the provision of accessible goods and services. Should there be any specific measures to that extent?

Regarding the role of small and medium enterprises (SMEs) in the provision of accessible goods and services, a vast majority of respondents agreed on its importance, indicating that there should be specific measures for them (72% of organisations and 41% of citizens). Concrete measures suggested are tax and financial incentives (15% and 14% respectively) and more

information (9% and 4%). It is worth to mention that some respondents (both organisations and citizens) do not know the meaning of the acronym “SME”.

Figure 14 – SME's role in the provision of accessible goods and services



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

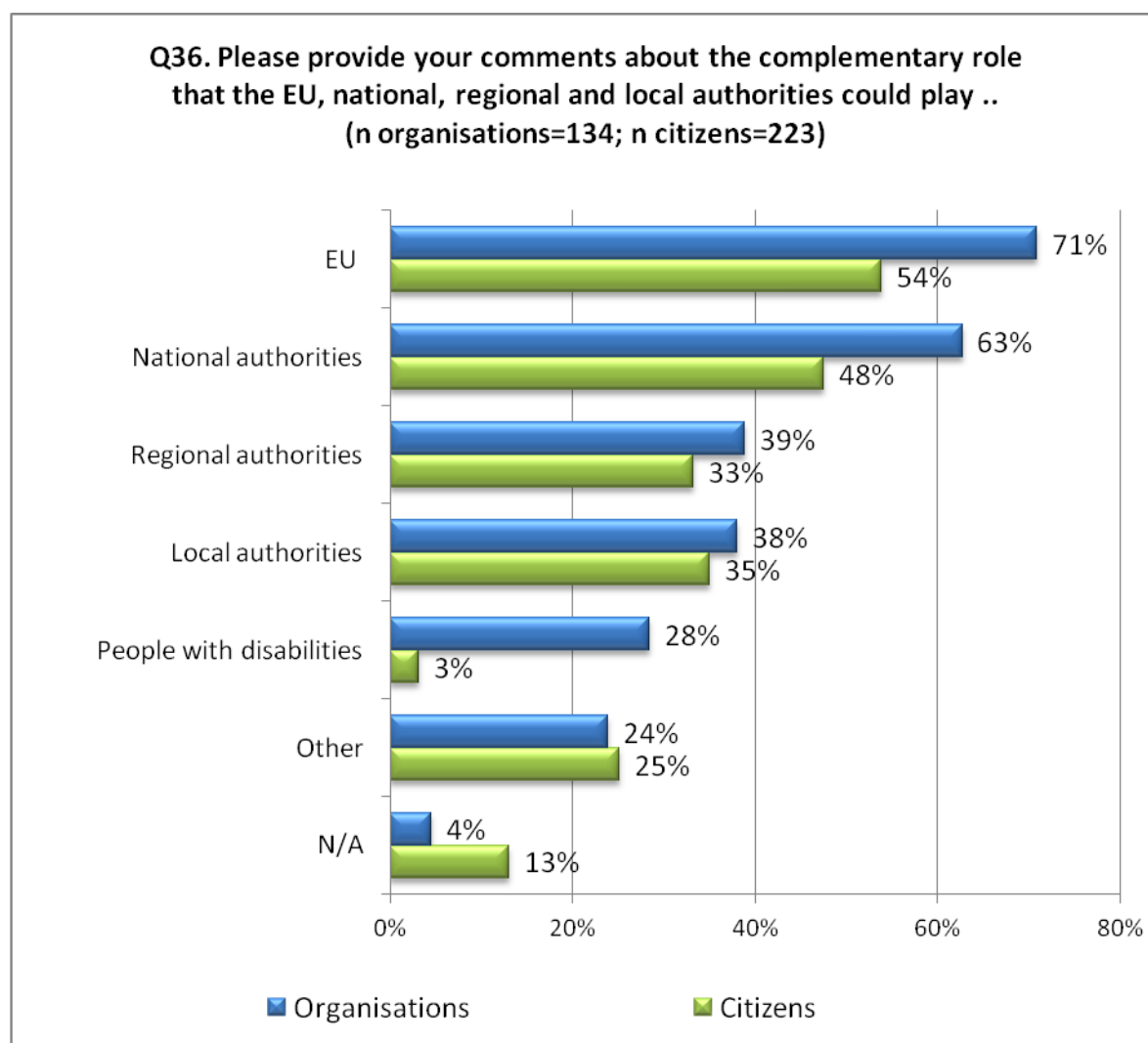
Concerning the complementary role of EU, national, regional and local authorities, the analysis of responses to question 36 provide relevant insights:

Please provide your comments about the complementary role that the EU, national, regional and local authorities could play in improving accessibility?

Respondents identified the European Union as the highest responsible (71% of organisations, 54% of citizens), in the role of harmonising legislation, promoting controls and triggering policy measures that can influence the lower government layers. Close to this response was the importance given to the national authorities (63% of organisations, 48% of citizens). Many respondents identified national authorities as the ones responsible for the lack of execution. The

roles of regional and local authorities were also considered important but to a lesser extent. It is particularly interesting to note that organisations see a role for people with disabilities themselves, whereas citizens did not identify a particular role for this group.

Figure 15 – Authorities playing a role in improving accessibility



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

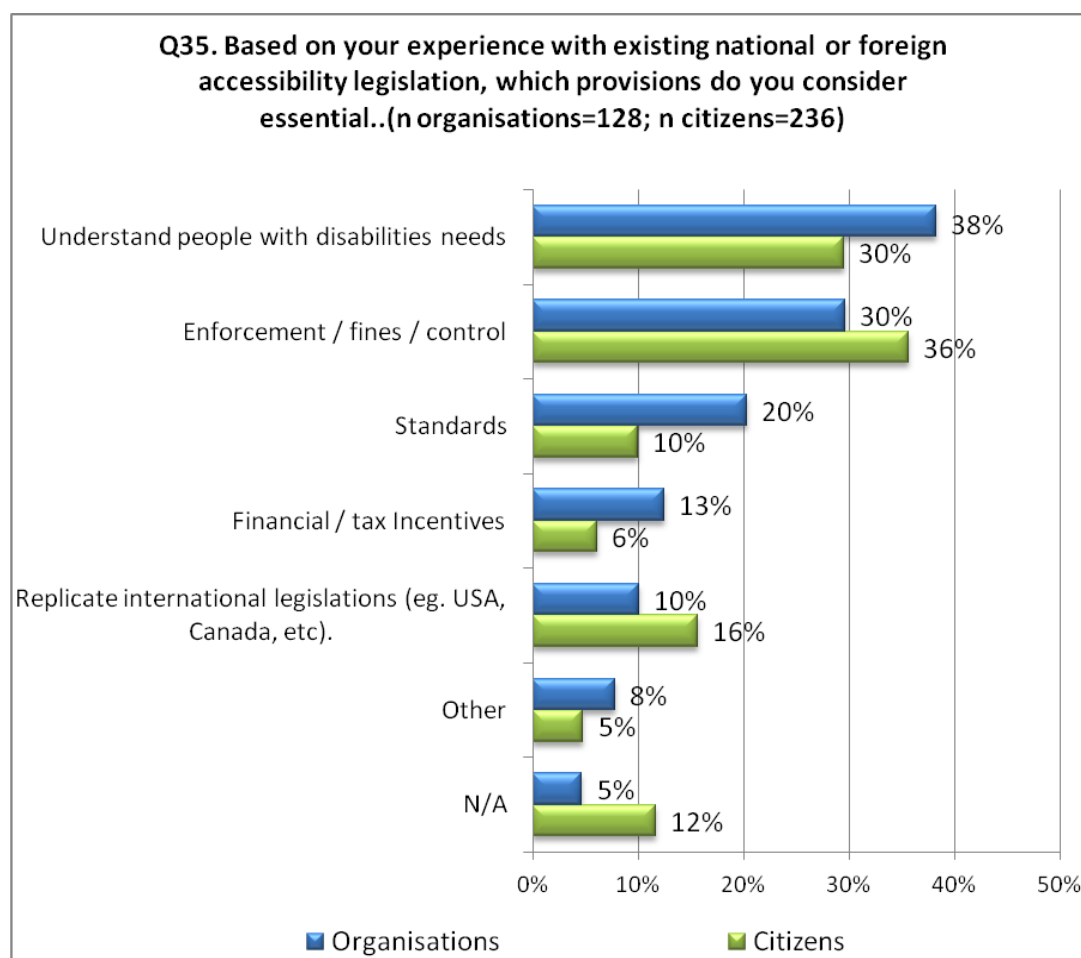
2.1.6 Best practices

This section presents an analysis of the responses to questions 35:

Based on your experience with existing national or foreign accessibility legislation, which provisions do you consider as essential for the effectiveness and success of such legislation? In that context, could you please explain how prescriptive and detailed do you think accessibility legislation should be and how it should be enforced?

Concerning the legal provisions considered essential for the effectiveness and success of legislation on accessibility (based on their own experience), understanding the needs of people with disabilities is the most valued by organisations at 38% and valued at 30% by citizens. Citizens value most the enforcement of legislation at 36% while organisations valued it at 30%. This is followed by standards (20% by organisations and 10% by private citizens) among others. Citizens mostly focused on the successful accessibility law enforcement schemes, naming mainly the US and Canada, among others.

Figure 16 – Essential provisions for the effectiveness and success of accessibility legislation



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

2.2 Conclusions from the citizens' perspective

Citizens indicated three areas as the most problematic (ranked from the poorest to the highest accessibility perceived):

- **Transport:** Accessibility in the transport area was perceived as low as 40% of the respondents stating so. An equal percentage did not answer the question and only 10% considered accessibility in the Transport sector as medium or high.

- **Information and communication:** The ICT accessibility level was considered low by 35% of citizens, whereas 9% and 10% defined it as medium or high, respectively. When looking at the country distribution, it is worth mentioning that the poorest perception of accessibility can be found in Belgium (79%) and Italy (88%). On the other hand, Germany and the United Kingdom showed the highest perception of accessibility (25% in both countries).
- **Built environment:** Most citizens that provided a scale of the accessibility level in the built environment ranked it low (29%), whereas others ranked it as medium (9%) or high (10%). Per country analysed (only those having a minimum of 15 responses), more than half of respondents considered it low, particularly in Italy (82%) and Belgium (62%).

In line with the answers to Q29 above, the three most relevant areas in Q31 (as they present many accessibility barriers for citizens) are presented below, ranked in order of importance¹⁰: Transport is again the most important, whereas the built environment is considered ahead of information and communication:

- Transport and mobility (33%)
- Built environment (20%)
- Information and communication, including ICT (16%)
- Health (14%)
- Education (12%)
- Other goods and services (11%)
- Public services (9%)
- Culture and/or leisure (6%)
- Employment (6%)
- Integration in society (3%)
- Tourism (3%)

In addition to the above, some responses indicated specific goods and services as relevant. A UK respondent stated that all public sector services should be accessible, specially transport, including aircraft, airports, rail, buses, coaches, taxis and the supporting infrastructure. Another respondent from Germany indicated that for people with hearing disabilities, areas such as information, media, transportation and public services are very important, and specifically, visually accessible solutions and services in sign language.

An underlying reason for the low perceptions of accessibility can be found in the scope and efficiency of legislations (as per Q30) as perceived by citizens and organisations. Most citizens ranked badly in terms of efficiency (34%) and scope (29%). Among citizens there is a clear

¹⁰ Percentages surpass 100% since questions were open and responses were not mutually exclusive. Accordingly, one respondent may mention as many sectors as considered relevant.

perception that the legislation is part of the reason why there is a problem with regards to accessibility, it being bad in scope and inefficient.

Concerning the possible actions that can be undertaken, several respondents outlined possible policy measures and best practices that could be taken in order to improve accessibility levels. These policy measures were identified throughout the responses in Q32, Q33, Q34, Q35 and Q36.

The main transversal items found in citizens' responses are the following:

- **Legislation:** When asked about essential provisions on existing national or foreign accessibility legislations (Q36), 16% of citizens cited national legislations such as the public procurement law of the US and some legal requirements on accessibility in Australia regarding consumer information on accessibility features for electronic devices.
- **Standards:** Some citizens considered essential that public authorities unify standards so that there is a comprehensive and coherent standard norm that can be referenced by different legislations and markets (Q33). It is important to remark that the lack of unified standards was considered to be a barrier; also the counterpart was mentioned: unified international standards are needed to foster accessibility (Q33).
- **Enforcement and control mechanisms:** More than one third of the citizens (35%) mentioned the lack of enforcement as a general problem concerning accessibility (as indicated in Q32, Q33 and Q35, among others). These questions referred to what the respondents considered essential on accessibility legislation and important measures to be acknowledged by authorities. As above, the lack of enforcement is seen both as a barrier and a measure (*i.e.* the need of effective legislative enforcement).
- **Fines:** In line with the need of enforcement and control mechanisms (covered in Q32, Q33 and Q35), many citizens highlighted the importance of fines in order to implement legislation successfully. A Belgium respondent indicated that those goods and services not meeting accessibility criteria should not be placed in the market.
- **Universal design:** This concept, linked to the UNCRPD, was the third most important policy measure for citizens, as pointed out in Q32.
- **Cooperation between public bodies:** Respondents ranked in Q36 the cooperation among the four layers of government (EU 54%, national authorities 48%, regional authorities 33% and local authorities 35%). The main concern declared was the actual cooperation of different government levels so that accessibility is effectively accomplished. A UK citizen indicated (Q36) that the EU should set overarching principles and policies; national governments should apply these principles and policies within their own legislative framework; and finally, regional and local authorities should undertake their enforcement.

Other citizens assigned to the EU a core important role, indicating that it should (Q36):

- Provide a common framework to support and harmonise legislation for disabled people across the EU that is reasonably enforceable.
- Set standards across all countries, especially on transit and transport across the EU for disabled passengers.
- Set common practices on wheelchair policy and resource booking at the time of travel booking.
- Set an equal policy for assistance dogs (registered) to travel.

Other specific roles or initiatives identified in the public consultation include:

- **Awareness campaigns:** Within the policy and legal measures acknowledged as important by citizens (Q32), it is worth mentioning the need of awareness campaigns focused not only on the topic of accessibility, but also on disability.
- **Information:** Even though not too many citizens commented on this item, some of them seemed very concerned about the lack of information relating to accessibility: for businesses, citizens and disabled organisations themselves, especially regarding the question about the role that SMEs could play (Q34). Citizens declared that SMEs are very important facilitators in providing improved accessibility. Specific measures and assistance may be required, as costs involved in changing systems and procedures, training staff and providing equipment could be difficult for smaller businesses to meet.
- **Training:** With less importance for citizens than for organisations, training was suggested as a policy and legal measure for the improvement of accessibility (5% of Q32 respondents). Moreover, some responses fostered the idea that special training for SMEs' staff on how to deliver and facilitate services to disabled people was needed (Q34).
- **Financial/Tax incentives:** The role of financial incentives was suggested as a relevant policy measure in order to foster accessibility (9% of Q32 answers). Since many respondents argued that accessibility can represent an important financial burden for small and medium enterprises (SMEs), incentives in the form of funds, subsidies or tax exemptions were suggested (Q34).
- **UNCRPD implementation:** The importance of the UNCRPD implementation was remarked by citizens as an important measure that public authorities as well as market operators should foster (Q33).
- **Understanding the needs of people with disabilities:** A relevant number of citizens (27%) responded that people with disabilities should have an active role on the policy-making process for public measures regarding accessibility as well as in the co-design phase of goods and services in private corporations. This was also marked as a suggestion for public authorities and market operators in order to improve accessibility of goods and services (Q33).
- **Public procurement:** Even though citizens did not mention public procurement as often as organisations did, this resort is a possible option since it can assure accessibility at least in public sector services. For some citizens, this is a starting point for the

development and accomplishment of accessibility. This aspect was mentioned also within the group of suggestions for public authorities and market operations in Q33.

- **Research, development and innovation:** Regarding existing national or foreign accessibility provisions in Q35, citizens remarked the importance of innovation and new research supported by government funds that can generate new solutions for improving accessibility. They linked it to the financial incentives measure. Within those citizens suggesting to encourage R&D and innovation, a significant number mentioned the importance of SMEs developing new accessible solutions in Q34.

2.3 Conclusions from the organisations' perspective

Conclusions from the organisations' perspective are presented below, including a breakdown per type of organisation when possible¹¹.

In line with responses received by citizens, three areas were pointed out by organisations as the most problematic, although ranked differently:

- **Transport:** About one in every four organisations responding to the consultation mentioned transport as a sector with low accessibility, whereas 10% considered it high and 8% medium.

Industries from the rail sector noted that Denmark set aside dedicated funding to improve accessibility, which may contribute to improve the current situation.

Goods mentioned by **NGOs'** respondents regarding the transport sector included trains, buses, and coaches. In the UK, it was stated that all trains should comply with accessibility regulations by 2020; buses and coaches used for scheduled services should comply by various end dates. In the UK it was noted that accessible buses create benefits such as ease of use, more efficiency in terms of route timing and causing fewer accidents and therefore fewer compensation claims.

- **ICT:** In the ICT area, 23% of the organisations mentioned this sector's accessibility as low, whereas only 10% marked it as high and 8% as medium. There were a number of goods and services mentioned by the **industry**, including enlarged teletext internet services and broadcasting services. On a communication and training level, it was noted that people with disabilities require a number of communication channels in order to receive the products and the related information they need, and that staff working at stores should be trained to familiarise themselves with these needs.

¹¹ Feedback from different types of organisations (Industry, NGO's and Public Bodies) is also included in the analysis, although as the questions were open-ended, some topics attracted more attention from some types of organisations than from others. Note that some relevant feedback on these measures was also provided throughout the questionnaire, which for the sake of clarity has been referenced accordingly.

Goods and services listed by **NGOs** as important included: basic ICT equipment, mobile phones, assistive devices, Internet Protocol television (IPTV) and Video on Demand (VoD) services.

- **Built environment:** Some organisations (17%) perceived accessibility to be low in the built environment, whereas others considered it medium (13%) and high (7%). **Industry** respondents pointed out the lack of standards on accessibility in place to guarantee that people with disabilities are supported to fully participate in society (Ireland was mentioned as an example). Responses from **NGOs** in relation with the built environment did point out the current improvements and remaining insufficiencies of accessibility legislation in countries such as Spain, the UK and the Czech Republic. Additionally, it was highlighted that local authorities in the UK volunteer to cooperate with civic initiatives on subsequent adaptations (physical barrier elimination) of buildings in use. Other topics discussed were access to (public) buildings, museums and exhibitions and prisons, access and use of urbanised public spaces and buildings, to name a few.

Concerning the priority areas, the top three priorities are the same as indicated in the previous question (Q29), although information and communication was considered the most important area (Q31), followed by built environment and transport (which was indicated as the most problematic in Q29):

- Information and communication (39%)
- Built environment (37%)
- Transport (36%)
- Health (17%)
- Public services (16%)
- Education (14%)
- Other goods and services (12%)
- Culture and/or leisure (8%)
- Employment (5%)
- Integration in society (4%)
- Tourism (3%)

Again, the underlying reasons for the current problems identified by organisations in relation to the legislation have been analysed. The perceptions seem to be divided regarding the scope of legislation (19% considers it good and 19% considers it bad). Similarly, efficiency of the legislation is judged bad by 24% organisations in contrast with 19% who deem the efficiency to be good. Therefore, it can be concluded that there is no consensus about the current legislation, however there is an indication that organisations consider the lack of efficiency as a reason for identified problems with regard to accessibility.

The number of organisations' responses received per country impeded to examine the influence of the country variable; however, some responses provided more insights about the issues causing problems in the sectors prioritised in Q31 above:

- **ICT:** Organisations responding about the scope and efficiency of legislation regarding ICT stated that its efficiency (or rather the lack of it) can represent a barrier (Q30).

Barriers pointed out in the field of ICT by **NGOs** include:

- lack of including the needs of people with disabilities in the design stage of technology development,
- basic ICT equipment not having inbuilt accessibility features,
- expensive specialist assistive/accessible ICT equipment,
- information being inaccessible,(including difficulties accessing travel information provided online),
- lack of awareness campaigns to inform professionals and public authorities,
- high price of assistive technologies.

NGOs had an overarching agreement that access to information is the key element to being an active member of society. It was stated that hardly any German legislation promoting accessibility takes into consideration people with intellectual disabilities since they are missing elements such as the use of easy-to-understand language, individualised information and consultation, support in administrative procedures, etc. Spoken and written information available in easy-to-understand language and written information accompanied by illustrations and spoken content were stated to be the top two priorities of a respondent regarding eliminating barriers in information accessibility. Without access to information, blind and partially sighted people are not able to access goods and services, they may not even know that these are available; so it is of paramount importance to address this issue¹².

- **Built environment:** Some elements were mentioned as important, such as the lack of lifts and ramps in public places and shops (Q30). The main physical barriers mentioned by the **industry** were footpaths, parking, inaccessible buildings, signage on footpaths that impede movement, deliveries on footpaths and also pathways in supermarkets which are sometimes too narrow for wheelchair users.
- **Transport:** Organisations that indicated accessibility barriers in Transport mostly pointed out the poor efficiency of the existing legislation. Some transport barriers were indicated by an **industry** respondent with regard to the several bus services in Ireland which are not available to people with disabilities, thus requiring the use of private transport which is not always available and can be expensive. It was stated that some services such as rail, main bus services etc. are accessible but are not available to everyone geographically. **NGOs** noted a lack of enforcement of accessibility measures, giving examples such as lack of universality on accessible trains and buses (Q30). In the UK, however, the accessibility regulations for buses do not include requirements for audible and visual announcements.

¹² Feedback also received throughout Q29 to 26.

Difficulties accessing travel information and the behaviour of drivers and other transport staff cause many of the problems people experience when travelling.

Public bodies declared that the main barrier mentioned was the information at bus stops being accessible visually and also in audio form, also noting that people with disabilities should pay lower fees for public transportation services.

Concerning the possible actions or policy measures that could be undertaken to tackle these issues, perceptions of respondents have been identified within different questions (particularly Q32, Q33, Q34, Q35 and Q36).

➤ **Legislation:** For organisations, restrictive legislation is the most important policy and legal measure, mentioned by 36% of them in Q32. Some organisations pointed out international legislation on topics such as fines or public procurement laws from a variety of countries such as the United States, Australia and the Republic of Korea. The national legislation from other countries was also mentioned when respondents were asked about essential provisions to take into account from existing legislations (Q35).

A **public body** from Finland indicated that according to their experience, competition, recommendations and guidance are not necessarily enough to implement accessibility; legislative measures are also needed. An Accessibility Act at EU level would be necessary, and measures should be taken at EU level to monitor the implementation of agreements on disability more effectively. See section 4.2 for more insights about legislation.

➤ **Standards:** When asked about what market operators should do to improve accessibility, one of the top five suggestions was working on unifying and integrating common standards so that the general rule complying standardisation for accessibility is simple and solid. In many cases, an explicit reference to international standards was made (Q33)¹³. A number of **industry** respondents stated that standardisation efforts should be voluntary, industry-led, transparent and open to all stakeholders, especially people with disabilities (Q26). One respondent stated the successful impact of the W3C case as a leader in adopting accessibility standards such as WCAG 2.0, highlighting the effectiveness of a voluntary approach. See section 4.2 for more information about standards.

➤ **Enforcement and control mechanisms:** Organisations considered that actual control, monitoring and even monetary penalties are necessary for the enforcement of accessibility. Respondents made reference to these mechanisms as a measure for public authorities (35% in Q33). An **industry** respondent stated that a market-led approach, rather than government enforced one, to make television services available to consumers with differing abilities before any accessibility legislation was introduced should be the

¹³ NGO respondents applauded the EU ensuring mainstream ICT and mobile equipment and devices having built-in accessibility features, European e-publications conformed to accessibility and interoperability standards (Q31).

preferred option. The general consensus of **NGOs** is that enforcement is key to guarantee the benefits of accessibility legislation. One respondent stated that the Greek legislation concerning accessible built environment does not include implementation deadlines for existing infrastructures nor uses sanctions in case of non-compliance, which makes the well-minded legislation inefficient. Another respondent noted that standardisation is not sufficient if it does not create mutually accepted standards that bind Member States to compliance. It was noted in the UK that although Part M of the Building Code ensures accessibility through most new buildings, problems are still seen in some new and existing buildings due to its varying requirements. On the essential provisions for the effectiveness and success of accessibility legislation, one **Public body** spoke of the importance of mechanisms to ensure effective monitoring of compliance with agreed EC accessibility standards and appropriate sanctions imposed for non-compliance.

- **Fines:** As previously explained, organisations often mentioned the need for more fines in order to enforce accessibility (Q33). Although enforcement of accessibility legislation was deemed important, no further information was specified by industries, NGOs and public bodies.
- **Universal design¹⁴:** The third most popular policy and legal measure perceived to improve accessibility was universal design (Q32). One in every four organisations explained the importance of this concept when cutting costs, gaining new clients and improving accessibility. The use of universal design/"design for all" was a frequent suggestion found throughout **NGOs** responses. One respondent noted that accessibility should be part of market operators' quality standards.
- **Cooperation between public bodies:** Organisations considered that effective cooperation between the four levels of governance is essential highlighting the aspect that cooperation with disabled people and their representatives should be included in the structures of all those levels (Q33).

An **industry** respondent indicated that through the planned European Accessibility Act, the EU could contribute to improving access and providing advice to persons with disabilities. European Directives already exist protecting the interests of persons with disabilities, although provisions have not always been adequately transposed.

One **NGO** in particular noted the obstacle of bureaucracy in Romania and how accessibility legislation is often impeded due to lack of flexibility and communication between public departments. The lack of cooperation between public bodies is noted to result in a reduced use of interpretation services, which creates an obstacle in the participation of deaf people in the social and political life. It was also declared that jurisdiction on equal opportunities (namely for people with disabilities) should be of interest to every government department, including culture, education, urban planning, youth and sports.

¹⁴ Note that the importance of the benefits of universal design was also mentioned by two industries responding to Q25 and Q31.

In words of another respondent to Q33, public authorities should be examples of good practice regarding accessibility. They should establish and follow their own accessibility policies, based on best practice advice and guidance from EU/national experts and disabled and elderly people. They should use the principles of Universal Design in the development of solutions for goods and services, they should advise and control private operators in how to apply accessibility principles and finally sanction operators (public and private) who fail to meet statutory requirements.

- **Awareness campaigns**¹⁵: Organisations as well as citizens pointed out awareness campaigns as a policy measure to promote accessibility (13% in Q32).

Two **industry** responses to the public consultation highlighted the importance of awareness campaigns, and how much an industry can learn about the real situation regarding accessibility after launching such campaigns and investing time into listening to the needs of persons with disabilities. Many businesses or service providers are not aware that their businesses exclude people with disabilities, and could include everyone in their strategies through learning from the best practices of other similar industries.

NGOs considered awareness as important, as it can be used to help the integration of people with disabilities and at the same time enrich those who have not experienced disability so far (Q32). Awareness campaigns can also help shift the general conception that people with disabilities are in need of help, towards a view of them being active citizens who demand respect for their specific needs¹⁶.

Public bodies noted that there is a growing need for awareness on behalf of non-disabled people, to train them in matters of accessibility.

- **Information**: Within the response for specific measures aimed for SMEs (Q34), respondents considered that fluid information to and from SMEs had to be improved (9%). An **NGO** (Q34) indicated that SMEs should be covered by a European Accessibility Act, because their role is crucial in ensuring access to goods and services for persons with disabilities: they are employers of persons with disabilities and they could expand their markets substantially, including towards bigger providers. In addition to this, SMEs also contribute to the development of assistive technologies and play a strong role in fostering innovation in the area of accessibility”.

An **industry** respondent declared that public authorities and market operators should give information to their clients on the levels of accessibility provided.

- **Training**: Doubling the percentage of respondents compared to citizens, 11% of the organisations highlighted training as an item for policy and legal measures (Q32); it is mostly interpreted as staff training on accessibility as well as on disability in general. A few respondents expressed some concern about the need of training for SMEs' staff and managers when dealing with accessibility as well as disability (Q34).

¹⁵ Note that some responses to Q10 and Q29 also mentioned this topic.

¹⁶ It was also believed that lack of awareness can be explained by inadequate communication efforts and lack of funding (Q14).

Training staff working in public services were declared important by many **industry** respondents. People who deliver transport services need to be trained in how to support a person with a disability to access transport services ensuring equal treatment (Q33). One respondent even stated that training of staff is key in delivering an accessible service (Q33)¹⁷.

NGOs also emphasised training staff dealing with the public in various topics including sign language, "design for all", accessibility (Q32). It was pointed out as especially important to train staff in the transport and health sectors (Q31).

When respondents spoke of persons with disabilities receiving training themselves, digital literacy for people with disabilities was considered crucial in order to join the labour market and to enhance personal independence within their communities.

Training was a subject discussed in depth by **public bodies'** respondents. It was stated that the training of product development experts should include "accessibility" and "design for all" themes (Q18). A Latvian respondent stated that in accordance with the recommendations of the European Civil Aviation Conference, air carriers regularly organise training courses of aircraft cabin crew in issues regarding passengers with disabilities and persons with reduced mobility (Q33). Conversely, one respondent stated that research conducted in 2011 revealed that disabled people continue to experience difficulties in accessing and using transport services and that passengers with disabilities indicated that airport staff often lacked sensitivity when screening passengers with a disability and that the needs of passengers with hidden disabilities is often overlooked. Another respondent stated that accessibility should be part of the syllabus of many official degrees such as Architecture, Engineering, IT, etc.

➤ **Financial /Tax incentives:** The role of financial and tax incentives was acknowledged as a measure for improving accessibility for some organisation respondents (Q32): fiscal incentives as well as specific funds will enhance a proper and fair accessibility implementation. Respondents pointed out that it can be problematic for SMEs to improve accessibility due primarily to the financial burden that some adaptations sometimes represent (Q34). One of the solutions given by respondents was to endow SMEs with financial and tax incentives from public programmes (10%).

Industry respondents suggested miscellaneous measures such as:

- European and national film subsidy programmes could, for example, foster the promotion of subtitling and / or audio description in their programmes (Q35).
- The European Commission should support Member States in developing national plans including dedicated funding on transport. The funding must be on a sector by sector basis that supports the Commission's goals on a Europe-wide basis (Q31).

¹⁷ Feedback received in Q25 also stated that all services/shops/support should be disability friendly through training given to staff to ensure that people with disabilities have access to good quality services in our cities, towns, rural communities, etc.

- In a brief way, one industry stated that there is a need for fiscal incentives in order to face technical challenges presented by accessibility.
- Economic incentives including tax reductions could be designed in a way that would lead market retailers to develop original, accessible solutions.

The notion that public authorities should create incentives for market operators in order to make accessibility more attractive to them was emphasised throughout **NGOs** responses. Many respondents found tax incentives pertinent for companies which include "design for all" when manufacturing goods aimed at assisting persons with disabilities. One respondent proposed the exemption of customs duties on all assistive technology equipment, as well as relevant IT software. This call is similar to the tax exemption for cars adapted for drivers with motor disabilities that is already in place, however if implemented in the future it should also include people with non-motor disabilities.

Finally, **public bodies** stated that the federal/national governments could develop financial incentives for the creation of barrier-free access to or barrier-free equipment of hospitals. One respondent states that in France there is a tax incentive that finances 15% of expenses that companies incur to draft proposed standards related to accessibility (Q33).

➤ **UNCRPD implementation:** One in four organisations stated that legislation and public authorities themselves should successfully implement the UNCRPD (Q33).

Both **industry** and **public bodies** respondents stated that the German Federal Government presented an action plan to implement the UN Disability Rights Convention which recently passed through the parliament (Q30). Germany alone created a National Action Plan (NAP) of over 200 projects and activities, highlighting the overall strategy of implementing the Convention and showing that inclusion is a process that should include all areas of life for people with disabilities.

One **NGO** respondent noted that gender mainstreaming must be interpreted through the implementation of the UNCRPD to include women and girls with disabilities.

➤ **Understanding the needs of people with disabilities:** Organisations expressed that market operators and public authorities should listen to people with disabilities and their organisations (40% of respondents), suggesting that stable communication channels should be constructed for a fluid dialogue (Q33).

Similarly to the "awareness campaigns" section above, user feedback from people with disabilities was stated to be of a great value for **industries'** future product developments. A few industries participate in regular outreach and "gain useful insights" through exchanges with the disability community in order to understand the needs and create the products' design.

NGOs mentioned some measures:

- Both public authorities and market operators should involve persons with intellectual disabilities and their representative organisations (whether at local, regional or national level) in their initiatives aiming at improving accessibility.

- Experts with disabilities should be invited to take part as consultants in all stages of the development process.
- Crucial needs of people with disabilities should be included at the design stage of technology development (Q29).
- Market operators must be aware of end users' needs, understand the benefits of including "design for all" and discover the potential business opportunities the disability segment offers.

Public sector organisations expressed to rely very much on NGOs of disabled people/relatives in order to have feedback for policy designing and implementation.

➤ **Public procurement:** Public authorities should strongly include accessibility on their tender requirements for public procurement, suggested 16% of the responding organisations (Q33).

An industry player from Sweden stated that the EU and national authorities must create policies and monitoring systems that are clear, easy to use and to understand. This respondent emphasised that the European and national public sectors are important as models for the rest of the society when it comes to using public procurement and employment strategies to increase accessibility, whereas regional and local authorities might play a role to find innovative and cost effective accessibility solutions.

Finally, an **NGO** respondent from the Czech Republic (Q32) indicated that an effective measure would be a comprehensive EU Accessibility Act, including a robust enforcement mechanism and strong public procurement legislation, making accessibility a mandatory criterion in all public tenders.

➤ **Research, Development and innovation:** Research, development and innovation linked with public funding for new solutions in accessibility were proven to be an essential aspect reported by respondents (Q32). Moreover, this measure is essential for SMEs in order to facilitate competitive advantages through innovation (Q34).

Industry respondents indicated that the EU research framework programme should ensure accessibility as a precondition for funding (Q32).

An **NGO** responding to Q32 mentioned that research and development funds should be awarded provided that account is taken of disabled persons' needs (accessibility).

3 Barriers, priority areas for a European Accessibility Act and impacts from a citizens' perspective

This chapter summarises the responses provided from Q9 to Q11. These questions (group III) were posed only to individual citizens, aimed at gathering information about the goods and services considered more relevant, the barriers faced related to lack of accessibility and the potential impacts of an increase in the availability of accessible goods and services in the market.

This section has been structured to answer the following questions:

- What are the barriers? (Q11)
- What goods and services are priorities for an EU Accessibility Act? (Q9)
- What are the likely impacts? (Q10)

Finally, conclusions about the feedback received from citizens about barriers, priorities and impacts are presented at the end of this section.

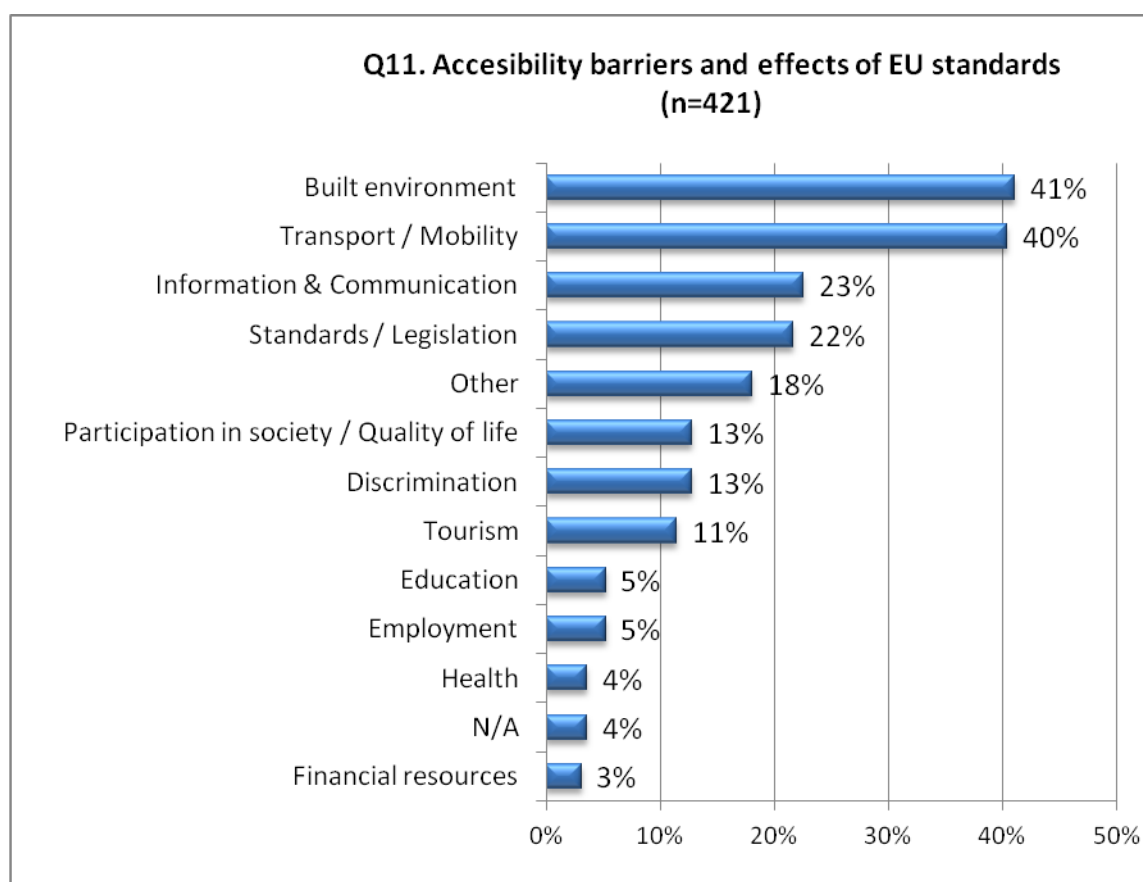
3.1 What are the barriers?

This section presents an analysis of the responses to question Q11:

Please describe the main accessibility barriers you are facing when you want to exercise your right of freedom of movement. What would be the possible effect of adopting EU-wide common accessibility standards?

Concerning the main accessibility barriers faced by individuals (and in particular people with disabilities), as the question posed implies answers both positive (i.e. advantages derived from standards) and negative (i.e. barriers encountered), the analysis has been conducted around topics mentioned.

Figure 17 – Accessibility barriers concerning freedom of movement and effects of EU accessibility standards



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

Respondents declared to find the barriers to exercise freedom of movement and/or effects of EU standards mainly in the areas of built environment (41%), transport (40%) and information and communication (23%). The concentration of problems in these sectors is recurrent since citizens refer constantly to goods, services and situations that are within the scope of these three areas. The fourth category of accessibility barriers are the inexistence or fragmentation of standards at European level: standards themselves and legislation were pointed out as relevant by 22% of individuals. Other topics mentioned were: participation in society (13%), discrimination (13%), tourism (11%), education (5%) and employment (5%), among others.

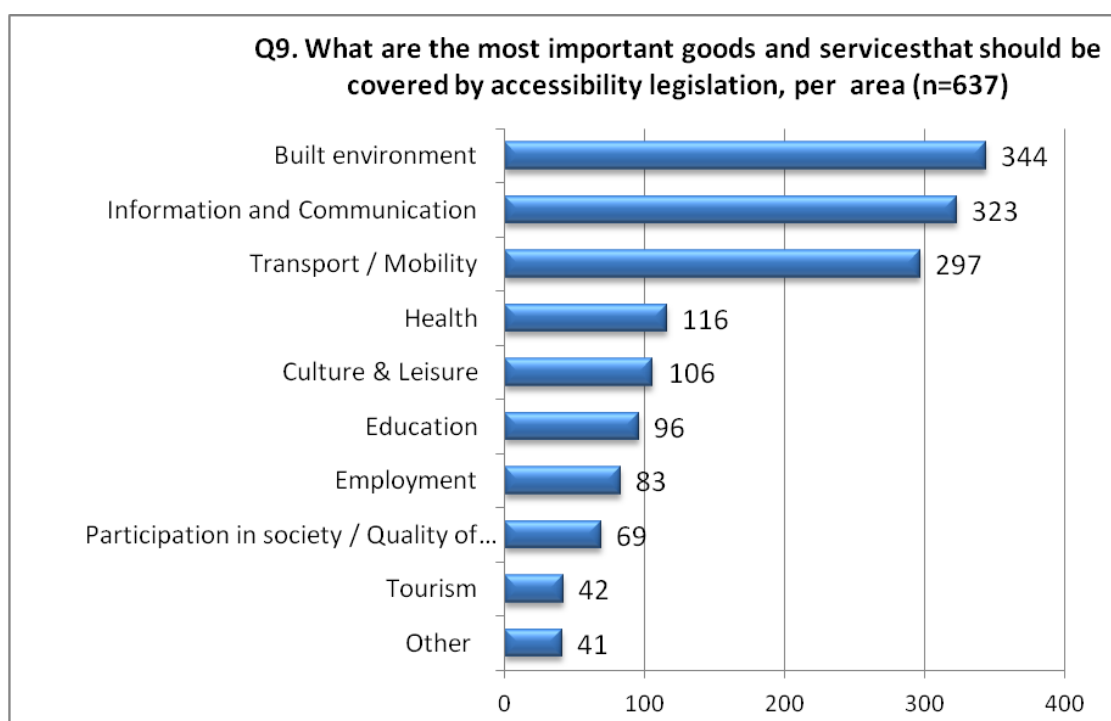
3.2 What goods and services are priorities for an EU Accessibility Act?

This section presents an analysis of the responses to question Q9:

What are the most important goods and services that in your opinion should be covered by accessibility legislation in order to ensure their accessibility?

Regarding the most important goods and services to be included in an EU Accessibility Act, respondents provided a wide range of elements that were analysed according to the frequency of words mentioned¹⁸, and divided into areas/sectors.

Figure 18 – Areas to be covered by accessibility legislation



Source: Own elaboration, 2012. Unit: Frequency of words. Multiple choice question..

As presented in the figure above, respondents referred to goods and services mainly in the fields of built environment (344), information and communication (323) and transport (297); other groups with more than one hundred words are health (116) and culture & leisure (106).

¹⁸ The study team has used tools such as <http://www.wordcounter.com/> and <http://tagcrowd.com/> in order to calculate the frequency of the terms; only those words mentioned at least twice were considered for the analysis. Moreover, it has been necessary to perform a manual categorisation of the results obtained (e.g. words such as “subway” or “metro” have been categorised as “underground”). The list of terms included in each area is presented in Annex 7.3.

Respondents also mentioned terms related to education (96), employment (83), participation in society (69) and tourism (42), among others.

Comparing the results of question 9 with citizens' responses to question 31 (see section 2.1.2), the two categories most cited are the same although ranked differently; whereas in question 9 goods and services related to the built environment are most mentioned, followed by goods and services in the areas of information and communication and transport, in question 31 transport is mentioned as the area to which more attention should be given, followed by built environment and information and communication.

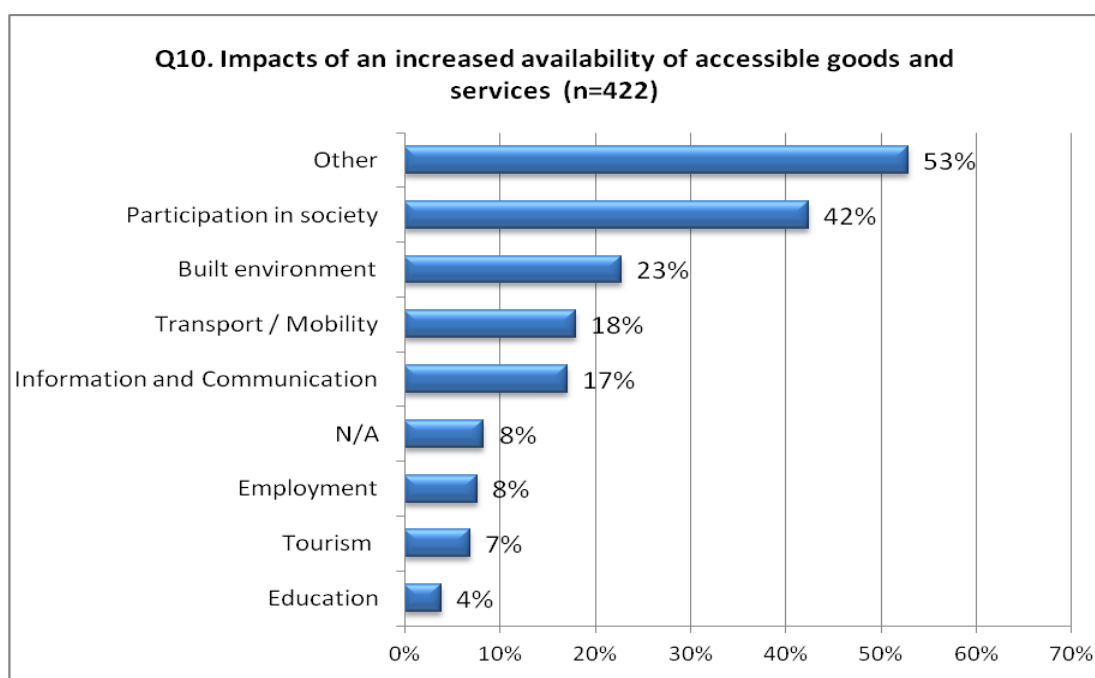
3.3 What are the likely impacts?

This section presents an analysis of the responses to question Q10:

What would be the impact of an increased availability of accessible goods and services in the market on the purchasing behaviour of potential customers? (Provide examples).

The miscellaneous impacts mentioned were categorised for analytical purposes. As presented in the figure below, respondents referred mainly to different sorts of impacts included under "other" (57%), followed by participation in society (42%), built environment (23%), transport and mobility (18%) and information and communication (17%).

Figure 19 – Impacts derived from an increased availability of accessible goods and services



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

More concrete types of impacts are presented in the following table, grouped by area. The most mentioned ones are: a general increased demand for accessible goods and services (109 responses), increased participation/integration in society (83) and increased access to

information and communication (50). It is worth to mention that a number of respondents suggested impacts classified under the “miscellaneous” typology (34)¹⁹.

Table 1 –Types of impacts linked to more availability of accessible goods & services in the market (Q10) ²⁰

Areas	Responses	Types of impacts (units)
➤ Other	223	➤ Increased demand for accessible goods and services: 109 ➤ Miscellaneous: 34 ➤ Lower prices/costs: 31 ➤ Positive impact: 19 ➤ More choice: 10 ➤ The entire population would benefit from it: 5 ➤ Decreased demand of assistive technologies:5
➤ Participation in society / Quality of life / Public sphere	179	➤ Increased participation/integration in society: 83 ➤ Independent living: 62 ➤ Improved quality of life: 34
➤ Built environment	96	➤ Increased access to retail (shops, restaurants, etc.): 44 ➤ Increased access to buildings: 41 ➤ Improved access to toilets: 11
➤ Information and communication	72	➤ Increased access to information and communication: 50 ➤ Increased access to websites/online transactions: ➤ Increased access to media: ➤ Increased access to self-service terminals:
➤ Transport / Mobility	76	➤ Increased access to transport: 45 ➤ Improved mobility around cities: 31
➤ Employment	32	➤ Increased access to employment/better jobs: 32
➤ Tourism	29	➤ Increased access to tourism: 29
➤ Education	16	➤ Increased access to education: 16

Source: Own elaboration, 2012.

¹⁹ These miscellaneous impacts mentioned include “more usability”, “it would take time for accessibility to be implemented”, “people with disabilities cannot be customers if there is no accessibility”, etc.

²⁰ Invalid responses received to Q10 (35) were categorised as N/A and have not been included in this table.

3.4 Conclusions from the citizens' perspective

Concerning barriers perceived by citizens, the same three areas remain the most cited in relation to accessibility barriers for citizens. Presented below and ranked in order of importance (Q11), specific types of barriers mentioned per area are highlighted:

- **Built environment:** Concerning barriers perceived in this sector, answers were focused on architectural barriers (such as lack of lifts, absence or inappropriately designed ramps, inaccessible entrances to public places and high curbs) and on the lack of enforcement of accessibility measures.
- **Information and communication:** The lack of unified standards across Europe is considered the most important barrier in the Information and communication sector, followed by lack of appropriate information in public places (e.g. streets and transport stations signs, braille signing or signing interpretation for the deaf).
- **Transport:** Regarding the barriers perceived, access to public transport was considered to be the most important issue, mainly trains and buses, stating that not all routes are accessible, creating uncertainty and a feeling of lack of freedom of movement among citizens. For instance, a Belgian respondent indicated that it is needed to book assistance 48 hours in advance to be able to travel by train or bus, when sometimes it is unfeasible to plan 48 hours beforehand which exact train to catch.

On a separate note, as pointed out in the Built environment and ICT sectors, lack of enforcement and standards represent an important general barrier for citizens.

Sectors and areas considered by citizens as most important (ranked in order of importance as presented in Q9, which is the same as in Q11 above) are:

- Built environment
- Information and communication, including ICT
- Transport and mobility
- Health
- Culture
- Education
- Employment
- Participation in society
- Tourism

When citizens were asked about the impacts of an increased availability of accessible goods and services (Q10), they explicitly pointed out that the main effects would be found in the areas of:

- Participation in society
- Built environment
- Transport & Mobility
- Information and communication

Starting with Participation in society, it is extensively believed that by improving access to goods and services, disabled people will automatically have a stronger involvement in society, taking part more actively in the public sphere. This would improve quality of life and facilitate independent living. The impact expected for the built environment normally refers to access to shops, restaurants, buildings and toilets. Concerning the impact of measures improving accessibility in transport, it is linked with a better mobility within and around cities. Regarding the impact on Information and communication, the main importance was given to websites and online transactions, media and self-service terminals such as vending machines.

Respondents from the UK also mentioned an increased choice and affordability of accessible goods and services in the market, which would generate increased sales (potential disabled customers are often unable to find goods that they can use or unable to afford the very few goods that exist).

4 Barriers, customers, costs and benefits, and measures from an organisations' perspective

This chapter summarises the responses provided from Q24 to Q28. These questions (group IV) were posed only to the organisations, including industry, business, NGOs and public authorities. The aim was to gather information about barriers encountered, the role of people with disabilities and older persons as costumers, costs and benefits related to accessibility and regulatory measures which could support organisations when implementing accessibility.

This section has been structured to answer the following questions:

- ✉ What are the barriers related to different rules on accessibility? (Q26)
- ✉ Which is the role of people with disabilities and older people as customers?(Q24)
- ✉ What are the costs and benefits? (Q25)
- ✉ Which measures can support the industry? (Q27 and Q28)

Finally, conclusions about the feedback received from organisations about barriers, customers, costs and benefits and measures are presented at the end of this section.

4.1 Specific questions for organisations

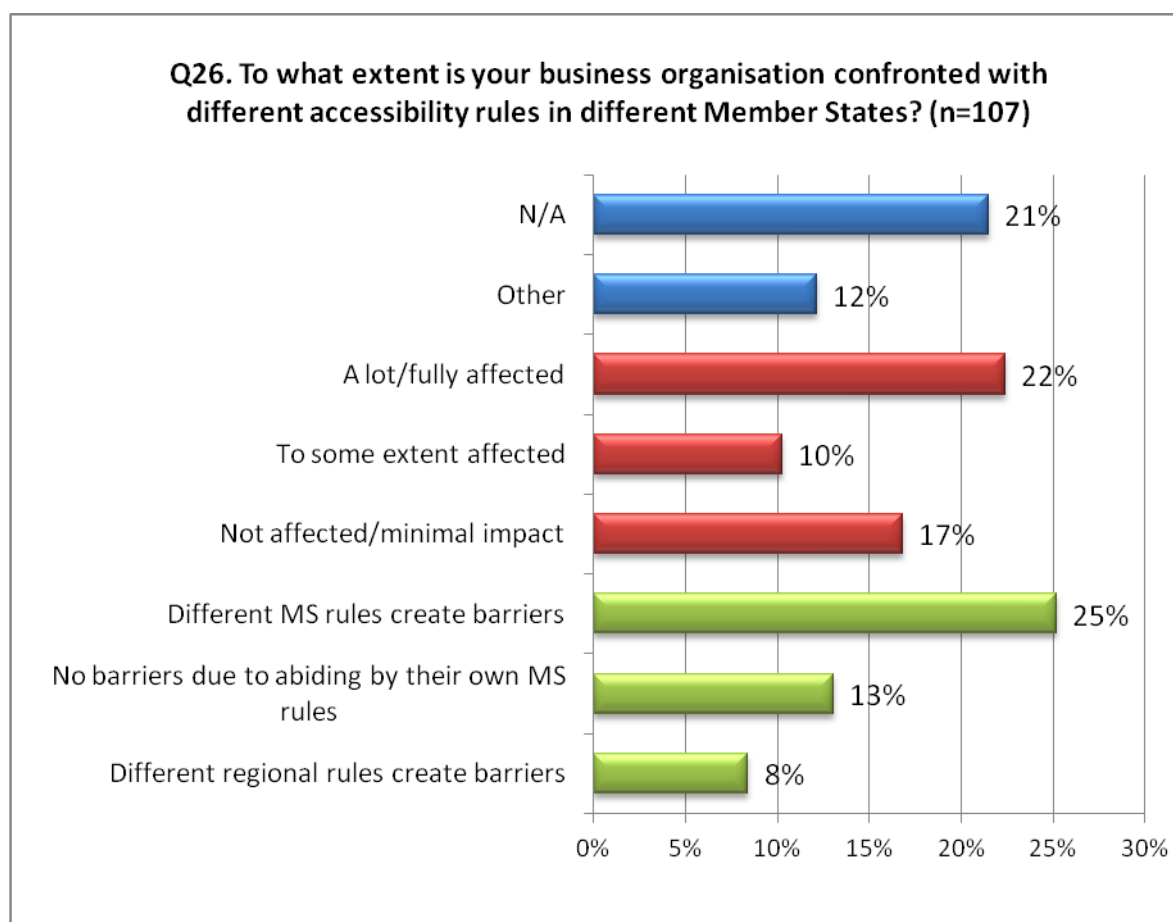
4.1.1 What are the barriers related to different rules on accessibility?

This section presents an analysis of the responses to question Q26:

To what extent is your business organisation confronted with different accessibility rules in different EU Member States?

Unfortunately, a high percentage of respondents declared not having an answer (21%) or gave answers not related to the question posed (12%). A group of organisations provided the degree to which they are affected by having different accessibility rules: the majority of them are highly affected (22%), whereas others were not affected (17%), or only to some extent (10%). Overall, organisations either find barriers derived from different Member States' rules (25%) or none because they comply only with their national rules (13%) or barriers linked to different regional rules (8%).

Figure 20 – Impacts on organisations derived from different Member States' accessibility rules

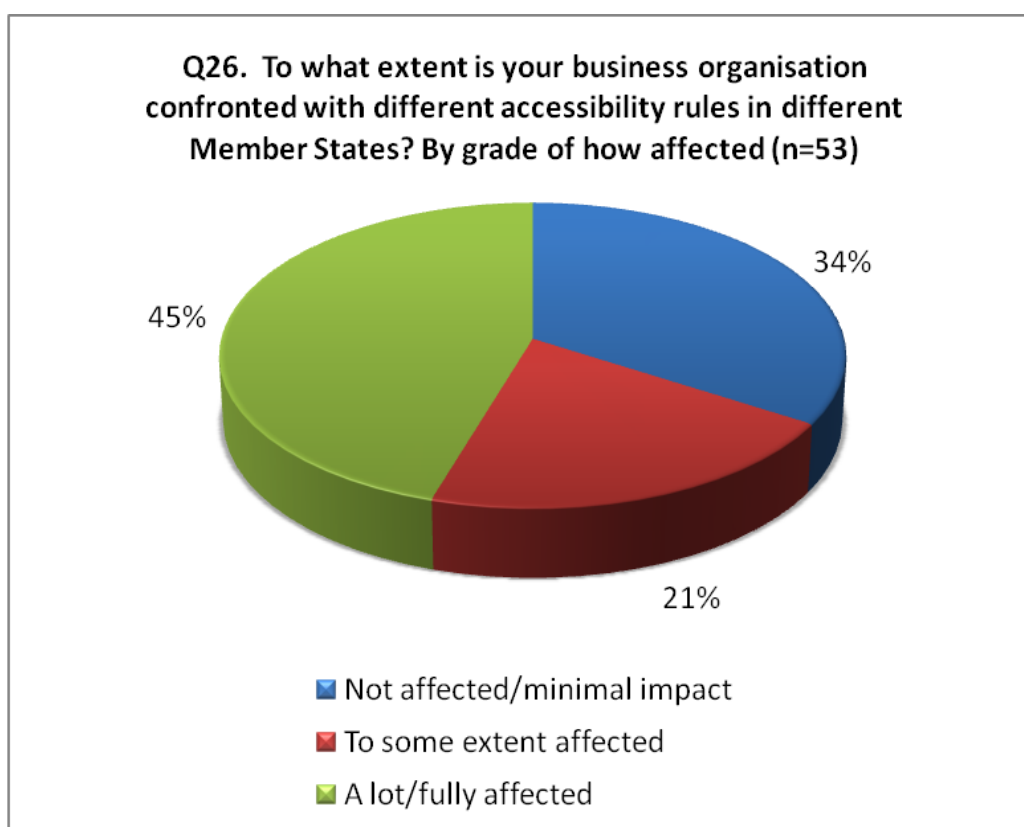


Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

A more detailed analysis of the responses, regarding whether the respondents felt that their business was confronted with accessibility rules in different Member States²¹, shows that the respondents said that they were very much affected (45%), not affected or had minimal impact (34%), or to some extent affected (21%).

²¹ The study team took out the "N/A" and "Other" categories for this analysis; the "n" in the figure below represents the number of responses received (instead of number of respondents).

Figure 21 – Impacts on organisations derived from different MS accessibility rules, by grade of how affected



Source: Own elaboration 2012. Unit: percentages calculated over number of responses for a subset of responses

In relation to the above figure, the responses were analysed in more detail in order to find out which economic activities declared to be most affected by different accessibility rules in different EU Member States (if at all). Unfortunately the number of total responses proved to be too small (53), and many responses came from respondents who did not declare their activity (17), which accounts for 32% of the total. Those who declared their economic activity represent still a too small amount of respondents to produce meaningful results²².

In the same light, focusing on the responses regarding whether the respondents felt that their business was confronted with accessibility rules in different Member States, respondents declared that different Member States' rules create barriers (54%), no barriers were experienced

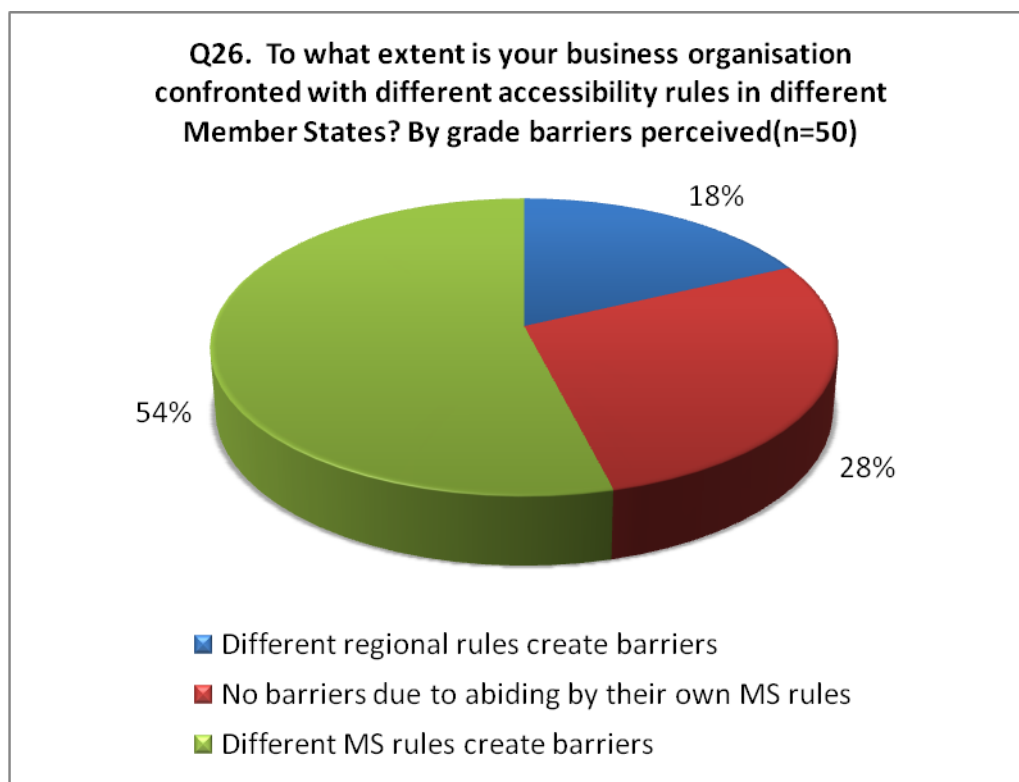
²² Those responses saying they are fully affected (24) were from: social services (5), transport (4) information and communication (2), built environment (1), other (1), cultural (1), and educational (1) economic activities;

Those responses saying they are affected to some extent (11) were from: transport (3), information and communication (2), cultural (1) and health (1) economic activities;

Those responses saying they are not affected (18) were from: transport (7), social services (2), other (2), information and communication (1), educational (1) and financial (1) economic activities.

due to abiding by their own Member State rules (28%) and that different regional rules create barriers (18%).

Figure 22 – Impacts on organisations derived from different Member States accessibility rules, by grade of barriers perceived



Source: Own elaboration 2012. Unit: percentages calculated over number of responses for a subset of responses

In order to provide insights concerning which economic activities encountering barriers from different Member States or regional legislations (if at all), a more detailed analysis was conducted of the responses presented in the above figure. As it happened in the previous set of responses to Q26, the sample proved to be too small (50 responses) and many organisations did not declare their economic activity (19), which accounts for 38% of the total. Therefore, those who declared their economic activity are too few to produce meaningful results²³.

²³ Those saying that different Member States' legislations create barriers (27) were from: information and communication (6), social services (6), transport (3), built environment (1), educational (1), health (1) and other (1) economic activities; Those saying that different regional legislations create barriers (9) were from: social services (2), educational (1), transport (1) and information and communication (1) economic activities; Those saying that they only follow their own national legislation (14) were from: social services (3), transport (2), other (1) and financial (1) economic activities.

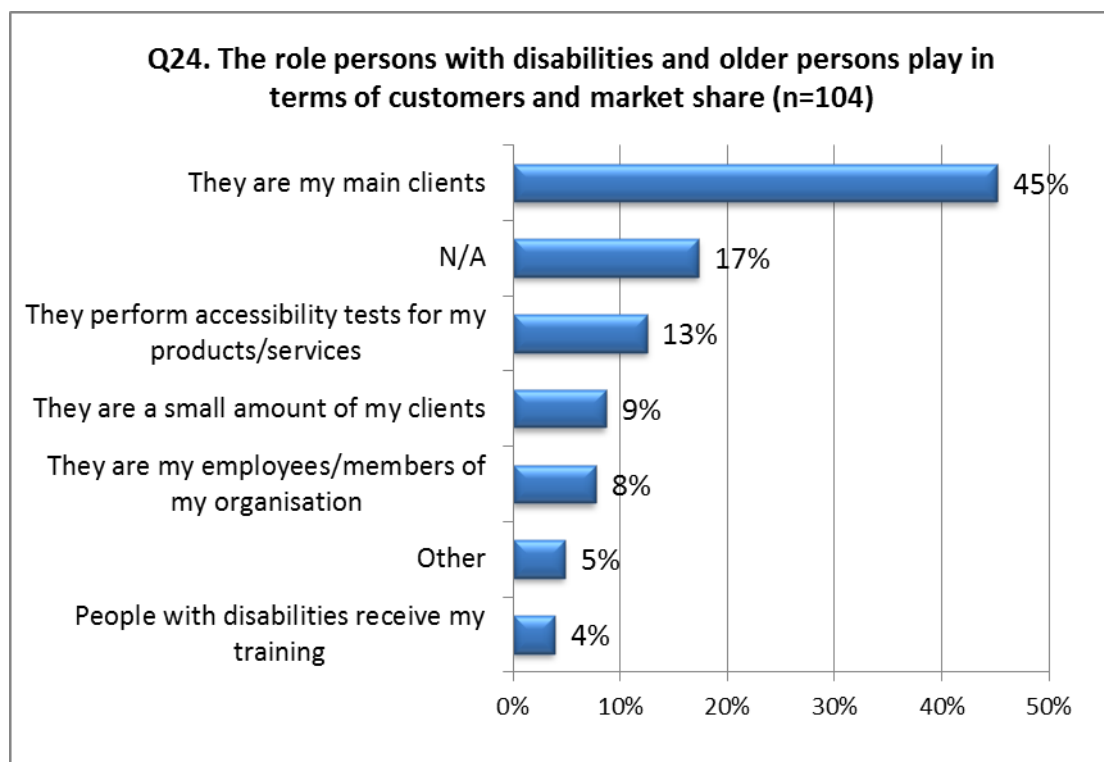
4.1.2 What is the perception of people with disabilities and older people as customers?

This section presents an analysis of the responses to question Q24:

Please explain the role that persons with disabilities and older persons play in terms of customers and market share for your business organisation? (Provide examples)

Organisations were asked about the role that persons with disabilities and older persons play in terms of customers and market share. Respondents declared: that they are their main clients (45%), persons with disabilities test their products and services (13%), are a small share of their total customer base (9%), are members or employees of their organisation (8%), and receive training from their organisation (4%). Note that 17% have indicated this question as not applicable (N/A).

Figure 23 – The role persons with disabilities and older persons play in terms of customers and market share



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

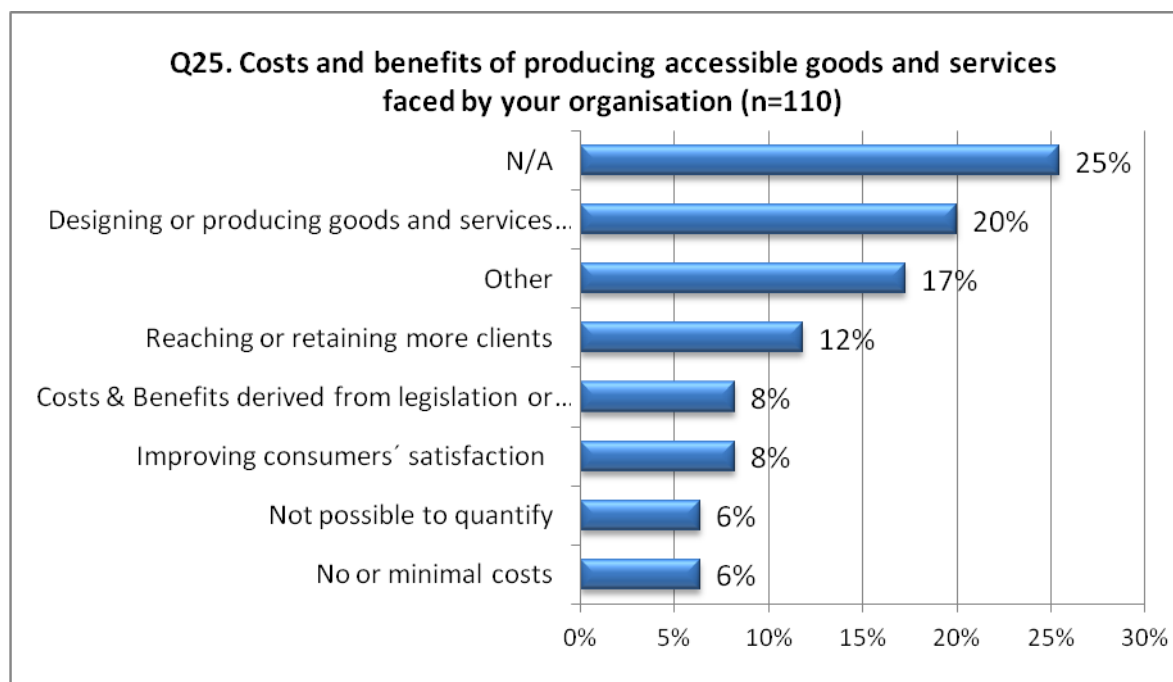
4.1.3 What are the costs and benefits?

This section presents an analysis of the responses to question Q25:

Please explain the costs and benefits, current or potential, of making the goods or services produced by your business organisation accessible.

As in the previous section, a high percentage of respondents declared not having an answer (25%) or gave answers not related to the question posed (17%)²⁴. However, some respondents indicated costs and benefits related to: designing or producing accessible goods and services (20%), reaching or retaining more clients (12%), those derived from having or lacking legislation and standards (8%), or detected an improvement in consumers' satisfaction (8%). Some respondents declared having minimal (or no) costs linked to accessibility (6%), whereas others noted the difficulty in quantifying costs and benefits (6%).

Figure 24 – Costs and benefits linked to producing accessible goods and services



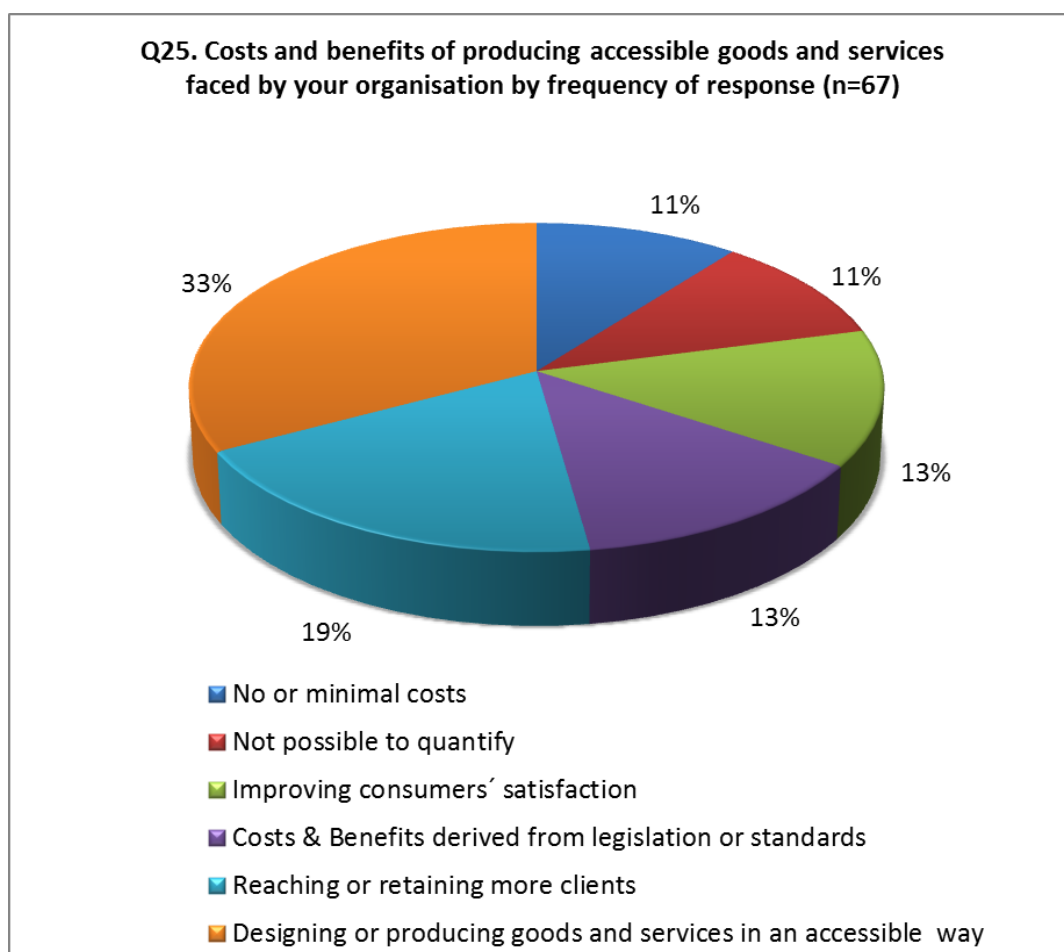
Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

²⁴ For example:

- Urban transport needs to be accessible
- A lot of our customers are facing the problem of accessibility with their assistance dogs
- Disabled persons need to be seen as important actors in the market
- All passengers are depending on easy access to public transport

Responses such as “not applicable” and “other” were eliminated in order to further examine how respondents viewed cost and benefits in relation to their organisation. Some respondents indicated costs and benefits related to: having to design or produce goods and services in an accessible way (33%), reaching or retaining more clients (19%), costs and benefits derived from legislation or standards (13%), improving consumers’ satisfaction (13%), found the costs and benefits not possible to quantify (11%), and no or minimal costs (11%).

Figure 25 – Costs and benefits linked to producing accessible goods and services by frequency of response



Source: Own elaboration 2012. Unit: percentages calculated over number of responses for certain cases

4.1.4 Which measures can support the industry?

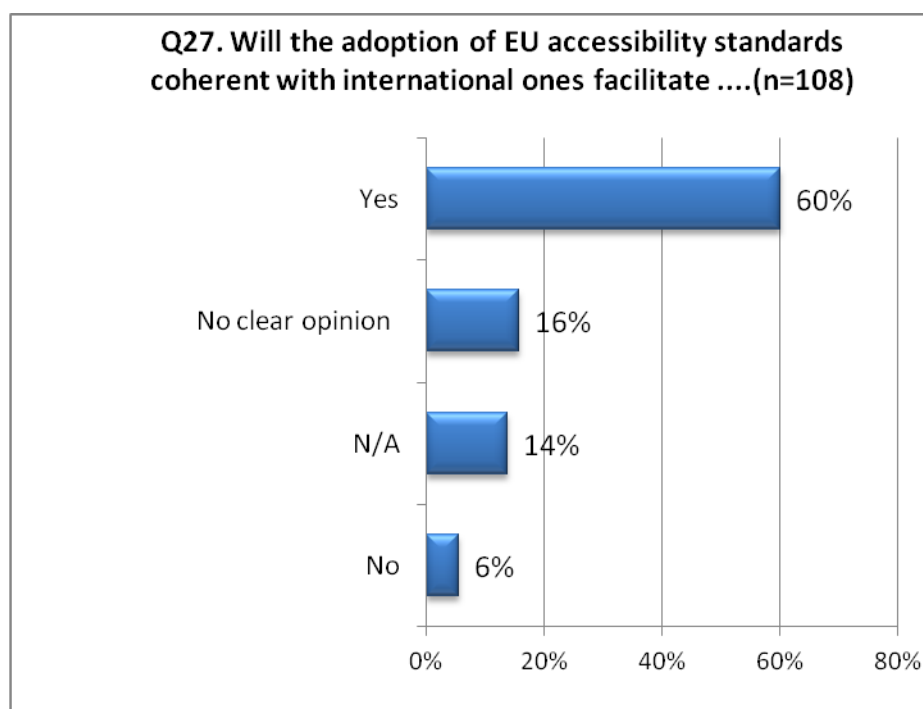
This section presents an analysis of the responses to questions Q27 and Q28, aimed to detect the legislative and non-legislative measures that may facilitate the implementation of accessibility in goods and services.

The following question (Q27) is aimed at exploring the impacts of common standards at EU level:

Will the adoption of EU accessibility standards coherent with international ones facilitate to industry the implementation of accessibility in goods and services?

The majority of organisations (60%) declared that the adoption of coherent EU accessibility standards in line with the existing international ones will facilitate and foster accessibility. A very small number of organisations (6%) were reluctant to this premise, whereas the remaining, either did not have a clear opinion on the topic (16%) or simply did not answer (14%).

Figure 26 – EU accessibility standards as a facilitator of mainstreaming the accessibility adoption by the industry



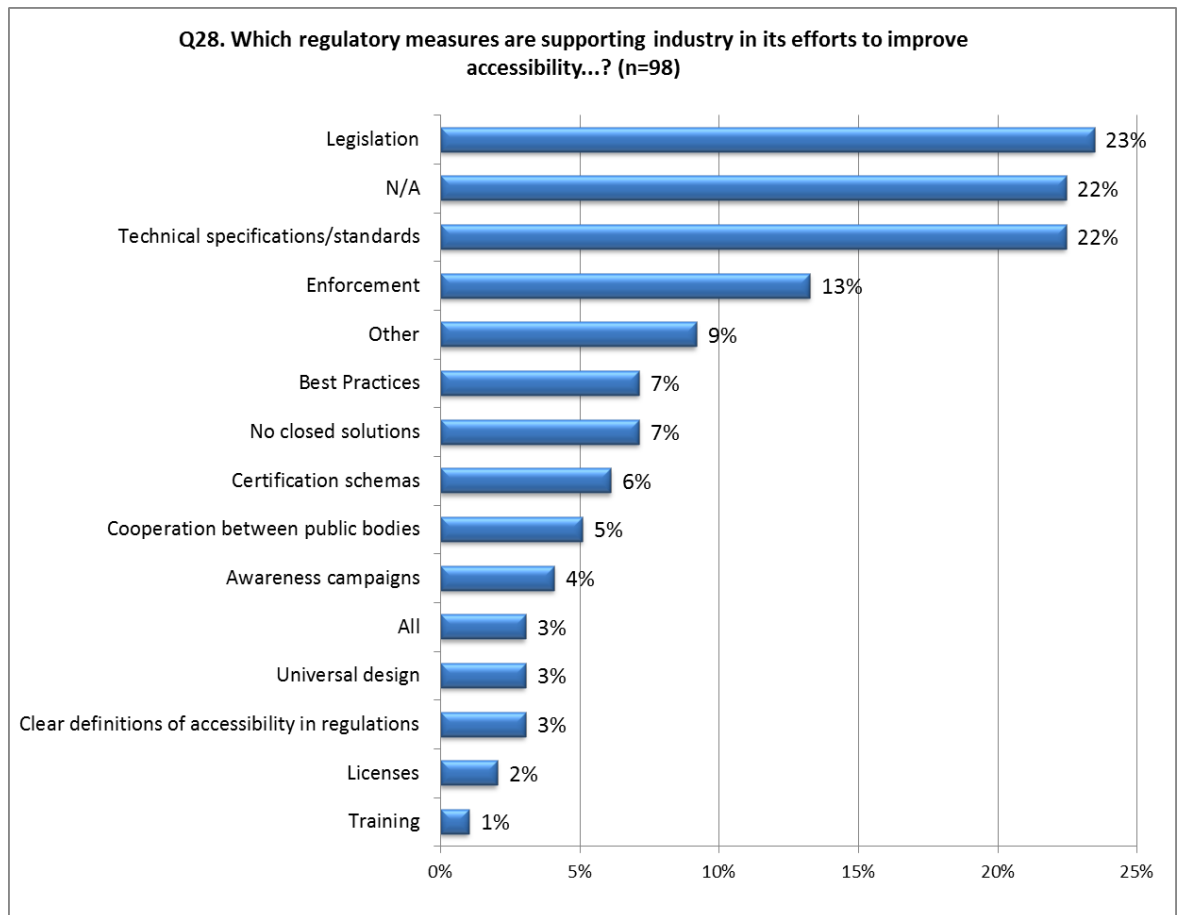
Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

In addition to the role of standards as facilitator of mainstreaming accessibility, respondents were asked about other measures to be considered by regulators (Q28):

Based on your experience with national and international accessibility legislation, which regulatory measures are supporting industry in its efforts to improve accessibility and which ones have you experienced as non-effective or a burden and should be avoided?

Regarding the regulatory measures which either support or hamper the industry in improving accessibility, legislation was considered the most relevant measure (23%) among organisations, which also mentioned standards (22%), enforcement (13%), best practices (7%), certification schemes (6%), cooperation between public bodies (5%) and awareness campaigns (4%) among others.

Figure 27 – Industry supporting or burdening measure related to accessibility



Source: Own elaboration, 2012. Unit: Percentages calculated over number of respondents. Multiple choice question.

Concerning the previous figure, a more detailed analysis was conducted to find out which regulatory measures impeded and/or enhanced accessibility for organisations, providing a breakdown per activity. Unfortunately, the number of total responses proved to be too small (98), and many responses came from respondents who did not declare their activity (31), which accounts for 32% of the total. Finally, regarding those declaring their economic activity (68%), the sample size was too small to prove fruitful results²⁵.

²⁵ Among the categories having more than 15 responses:

- Those mentioning the measure “technical specifications and standards” (22) were from: information and communication (5), transport (4), other (2), social services (1), and cultural (1) economic activities.
- Those responses indicating the measure “legislation” (23) were from: social services (5), transport (4), information and communication (3), other (2), built environment (1), financial (1) and health (1) economic activities.

4.2 Conclusions from the organisations' perspective

Conclusions from the organisations' perspective are presented below, including a breakdown per type of organisation when possible²⁶.

When organisations were requested to explain to what extent they were confronted with different accessibility rules in different Member States (Q26), 54% expressed that different Member States' rules create barriers, whereas 28% stated that no barriers were apparently found. The remaining 18% pointed out that different regional rules create barriers. In relation to the three most important areas the following barriers were identified:

- **Built environment:** As a general view, organisations considered that the lack of coherence concerning accessibility rules is an important barrier (Q26), along with a lack of enforcement (Q28). Barriers found in the built environment for **industry** respondents have to do with the high cost of accessibility and different Member States' accessibility rules. The related items most found in the responses were lifts, public and residential buildings, and thresholds.
- **ICT:** The main items or aspects highlighted were websites as well as the lack of standards (Q26) and enforcement on how to present public information in alternative accessible formats such as Braille (Q28). **Industry** representatives pointed out that the main barrier perceived for accessibility is the lack of unified standards as well as the different legislations around Member States concerning accessibility. The main items mentioned were ATMs, hardware, software, websites and web content.
- **Transport:** The lack of universality on accessible trains and buses (Q28) was deemed important, also in line with responses to Q30. Barriers detected by the **industry** include the high costs and rigid legislation on accessibility. According to respondents, making transport services fully accessible is rather expensive and legislation enforces strict requirements. Some items mentioned in the responses were buses, trains, wheelchair lifts and transport stations. Some respondents pointed out that the different accessibility rules make travel and information difficult for tourists; moreover, they could entail that there are better levels of service in some countries than others. The authorisation (or not) and related requirements for assistance dogs were mentioned by **NGOs** as example of barriers created by different legislations. Laws are not only different between countries, but also within different regions in the same country.

²⁶ Feedback from different types of organisations (Industry, NGOs and Public Bodies) is also included in the analysis, although as the questions were open-ended, some topics attracted more attention from some types of organisations than from others. Note that some relevant feedback on these measures was also provided throughout the questionnaire, which for the sake of clarity has been referenced accordingly.

Regarding the role that persons with disabilities play as customers and regarding market share (Q24), they were reported as being organisations' main clients (24% of respondents). It is clear for private businesses that people with disabilities are a target audience to aim for. Other organisations affirmed that people with disabilities test their products and services in order to improve them in terms of accessibility.

From the **industry** perspective, accessibility is seen as a relevant trend in the market. Some industries target specific accessible segments directly due to their experience in producing goods and services for people with disabilities in a high volume, whereas others target larger segments producing goods and services for the general public but fostering accessibility in order to entice people with disabilities to be customers.

For instance, an ICT company who develops tools and services for authors and designers declared that many of their clients request support in order to create accessible content for their final customers, because these customers are demanding accessibility features. Another ICT company representative estimated that 57% of all adults can benefit from accessible technology.

Public bodies are also aware of the market potential for accessible products: a French public body related to rail transport estimated that, in France, 30% of the population face problems with mobility and the proportion of individuals regarded as having 'reduced mobility' (PRM) is expected to rise significantly. It will be therefore necessary for the local transport system to take account of this trend so that everyone can participate in social and civic life.

The actual costs and benefits of producing accessible goods and services (Q25) are still not quite clear for organisations. Some agree on the fact that designing and producing accessible goods and services is expensive, especially when asked about the costs faced by their own organisation. Compliance with legislation is also mentioned as a source of cost that in many cases is hard to quantify. On the other hand, some benefits were identified such as reaching or retaining more clients and the improvement of consumer satisfaction.

Some **industry** respondents indicated that the estimation of financial costs and benefits was difficult to calculate. For some organisations, accessibility implies no extra cost, whereas for others it is considered a significant burden. Though, very few specified actual figures or estimations. For instance, a German technology institute declared that there are no additional costs for covering general accessibility of developed websites. Additional costs only accumulate if special elements are required: for example if a sign-language-video is needed, the sign language interpreters have to be paid in addition to the costs with the website development.

NGOs particularly highlighted the benefits of accessibility, measureable in monetary terms. In their opinion, adopting EU common accessibility standards could lead to overcome a lot of obstacles as well as to improve the feeling of safety and autonomy of disabled people. If mainstream manufacturers emphasised on built-in accessibility, their products would be in the

hands of consumers who otherwise would not buy them. Increased availability of accessible goods and services on the market would immediately increase choice for disabled people. Two cases were given by respondents highlighting the success that ensuring accessibility can bring. A study by the UK's Royal National Institute of the Blind showed that Tesco supermarkets invested GBP 35,000 to make their online shopping system accessible, which brought them additional revenue of more than GBP 12 million in one year - 30 times more than the previous year. Another company invested to make its website accessible and the investment resulted in a web traffic increase of 100% in three months, a decrease in website maintenance costs by 66% (saving annually GBP 200,000) and provided a 100% return on investment in twelve months.

Finally, some **public authorities** declared that there are generally high costs in making infrastructures accessible. For instance, older public transport infrastructure may imply high costs. In contrast, new public transport infrastructure is already built accessible all over Europe (in some cases with legal national obligations in others without them). Concerning vehicles, the continuous modernisation of fleets has resulted that in many cities (e.g. bus or urban rail) fleets are 100% accessible and in some cities non-accessible existing buses (e.g. high-floor) will be replaced in the coming years.

According to Q28, legislation was considered the most relevant measure (23%) supporting the industry to improve the accessibility of their products, followed by standards (22%), enforcement (13%), best practices (7%), certification schemes (6%), cooperation between public bodies (5%) and awareness campaigns (4%), among others. Feedback received is focused on the two most important measures (legislation and standards). More insights about other policy measures can be found in section 2.3 .

Concerning legislation (Q28), the following conclusions have been identified:

➤ **Industry** representatives indicated that an EU Accessibility Act should include a link to the EU public procurement rules (Q27) since the amount of different accessibility requirements and legislation at different levels is not helpful for businesses. There is a general agreement among industry respondents that rigid legislation represents a burden, whereas certain standards such as the WCAG for websites are supporting industries in their efforts to improve accessibility (Q28). In addition, a mix of EU and Member States' legislation were mentioned pointed out as relevant:

- EU: the Audiovisual Media Services Directive (2010/13/EU), the 2009 revision of the EC Regulatory Framework for Electronic Communications Networks and Services (2002/21/EC), the General Equal Treatment Act (2006/54/EC) and Directive 2008/57/EC on the "Interoperability of the Rail System within the Community";
- Germany: Copyright Act and Disability Discrimination Act;
- UK: 2003 Communications Act;

- International legislation mentioned included: the Australian Code for Accessibility Reporting, where manufacturers provide accessibility reports for fixed and mobile phones, and the Australian Disability Discrimination Act requiring goods used in the delivery of a service to be accessible.

➤ **NGOs** indicated the following national legislations as examples:

- France: 2005 Act on Equal Opportunities;
- Spain: Act 51/2003 regarding Equal Opportunities, Non-discrimination and Universal Accessibility for Persons with Disabilities law (LIONDAU), the Royal Decree 366/2007 regarding Persons with Disabilities and Relations with the General State Administration and the Spanish Royal Decree 505/2007 on Access and Use of Urbanised Public Spaces and Buildings;
- UK: General Building Code and Building Regulations Code, Equality Act 2010, Law no. 448/2006 on protection and promotion of persons with disabilities and the Copyright (Visually Impaired Persons) Act of 2002;
- Although international legislation was not specifically named, many NGOs respondents included references to how the United States with both strong legislation in the education market and strong public procurement legislation has driven companies like Apple to include accessibility features in their products.

➤ Finally, **Public bodies** the following Member State laws

- France: Code of Construction and Housing, which provides public funding to remodel existing facilities so that every disabled person can access them;
- Germany: Act on Equal Opportunities for Persons with Disabilities (BGG) (providing for the prohibition of discrimination against disabled persons by public authorities);
- Regarding international legislation, the success of American accessibility legislation was mentioned and how the American inclusion of mandatory accessibility requirements in public procurement is seen as favourable.

Concerning standards (Q27), the following conclusions have been identified:

➤ The majority of organisations (60%) declared that having EU accessibility standards in line with the existing international ones will facilitate and foster accessibility.

➤ Among the EU standardisation initiatives mentioned by **industry** respondents, the Mandates M/376 and M/420 were deemed important in order to promote regulatory harmonisation. It was pointed out that a unified or common accessibility standard throughout Europe, in line with standards or regulations existing in North America and other major countries, will greatly benefit all the stakeholders including industry, end-users and service providers. Regulations and guidelines such as Section 508 in the US and WCAG have been in place for a few years

now and have gained wide acceptance amongst all stakeholders, even in Europe. Moreover, it was indicated that standards should specify functional requirements, be cross-platform, industry-led and support further innovation and competition.

➤ Standards mentioned by **NGOs** included the Spanish DBUSA Technical Building Code and the British Standard BS 8878: 2010 “Web accessibility: code of practice”. It was stated that European, rather than Member State-specific accessibility standards, should be enforced for the certainty of people with disabilities visiting other countries, this way avoiding possible disorientation and enhancing safety for all citizens (Q28). Many existing goods and services would be more usable if they were designed in a standardised manner, giving access for everyone. Standards regarding built environment are different across Member States which is reported to have a risk for imported devices and materials being incompatible with local standards (Q26).

➤ **Public bodies** indicated the following statements:

- The standards on accessibility to be identified in a future Accessibility Act are subject to constant change (Q26).
- A Europe-wide adoption of common standards for accessibility of goods and services is essential. These standards should be agreed by the European standardisation agencies (Q27).
- EU mandatory standards on accessibility should reflect best practice and should not result in a regression of existing national standards.

5 Prioritised goods and services

This chapter summarises the responses given to Q9 to Q31, aimed at gathering information about the list of goods and services that should be given priority in an EU Accessibility Act. Results of both questions have been combined to the extent possible, although Q9 was only asked to citizens.

A short list of 15 goods and services is presented, plus the breakdown per type of respondent and specific feedback from respondents in relation to the items prioritised. The full list of 86 goods and services can be found in Annex 7.1.

5.1 List of 15 prioritised goods and services

The study team decided to aggregate responses received about which goods and services were considered most important or priority for accessibility.

Considering that Q9 and Q31 formulation and responses shared this objective, the word frequencies under Q9 (section 3.2: *What are the most important goods and services that in your opinion should be covered by accessibility legislation in order to ensure their accessibility?*) and Q31 (section 2.1.2: *The accessibility for people with disabilities of which goods and services should be given priority?*) were investigated. It must be noted that Q9 was only asked to citizens, whereas Q31 was addressed to all (citizens and organisations).

The table below includes the top 15 specific goods and services most mentioned in the public consultation by all types of respondents. Buildings open to the public (219 times mentioned) are the top priority for respondents, followed by websites (177), educational services (154), cultural performances (139), banking services (125), bus and coach vehicles (114) and rolling stock (110).

With less than a hundred mentions, the other goods and services are: retail services (86), shared spaces (81), domestic and international railway operations (77), nursing and care services (73), buildings and related facilities, open to the public, associated with the provision of bank loans (68), operation of cultural facilities (64), buildings related to the workplace (61), analogue and digital TV equipment (57).

Table 2 –Top 15 goods and services mentioned throughout Q9 (Most important goods and services suggested to be covered by accessibility legislation) and Q31 (Accessibility of which goods and services should be given priority?)

	Industry (Q31)	NGOs (Q31)	Government (Q31)	Citizens (Q9)	Citizens (Q31)	Citizens (Q9+Q31)	Total (Q9+Q31)
Buildings open to the public or parts thereof e.g. libraries, shops and other retail outlets, community social centres, community health centres, sports centres and facilities, parks, playgrounds, restaurant, cafés, hotels, theatres, monuments, cultural heritage, leisure and entertainment facilities, etc.	9	17	8	143	42	185	219
Websites and website content management systems	6	30	6	117	18	135	177
Educational services	5	27	3	84	35	119	154
Cultural performances, theatres, cinema, concert	4	15	3	88	29	117	139
Financial services/banking	6	26	3	71	19	90	125
Bus / coach vehicles	13	10	4	77	10	87	114
Rolling stock (e.g. trains, metros, trams)	1	21	2	72	14	86	110
Retail services	3	7	4	58	14	72	86
Shared spaces, public plaza, public roads, pavements, etc.	5	14	0	49	13	62	81
Domestic and international railway operations	8	10	5	48	6	54	77
Nursing and care services	2	11	2	45	13	58	73
All buildings and related facilities open to the public associated with the provision of bank loans, mortgages and other forms of financial credit, post offices, ATMs.	2	18	2	36	10	46	68
Operation of cultural facilities	3	8	1	39	13	52	64
Buildings related to the workplace: industrial buildings, offices, conferences and meetings'	2	7	0	44	8	52	61

	Industry (Q31)	NGOs (Q31)	Government (Q31)	Citizens (Q9)	Citizens (Q31)	Citizens (Q9+Q31)	Total (Q9+Q31)
venues.							
Analogue and digital TV equipment (incl. consumer equipment (e.g. TV sets, digital decoders (set-top boxes), and all related remote controls, product documentation)	0	5	4	42	6	48	57

Source: Own elaboration, 2012. Unit: Word frequency.

In order to examine the divergences on the priorities declared, the following sections present the five most cited terms for both citizens and organisations.

5.2 Citizens' perspective

In line with the total word count of all participants in the consultation (see Table 2), citizens ranked buildings open to the public (185) as the most important goods to be addressed in an EU Accessibility Act, which corresponds to 84,5% of all mentions for this category (also in line with the public consultation sample, from which 79% are citizens). Websites (135) are ranked the second most important item (as in Table 2), which is 76,3% of all mentions regarding websites. Educational services (119) are another category considered especially relevant for citizens, representing 77,3% of the total mentions on this item. Finally, cultural performances (117) and financial services/banking (90) complete the list from the citizens' perspective.

Table 3 – Top five goods and services mentioned by citizens to be covered by accessibility legislation

Most mentioned goods and services by Citizens	Frequency
Buildings open to the public or parts thereof e.g. libraries, shops and other retail outlets, community social centres, community health centres, sports centres and facilities, parks, playgrounds, restaurant, cafés, hotels, theatres, monuments, cultural heritage, leisure and entertainment facilities, etc.	185
Websites and website content management systems	135
Educational services	119
Cultural performances, theatres, cinema, concert	117
Financial services/banking	90

Source: Own elaboration, 2012. Unit: Word frequency.

5.1 Organisations' perspective

5.1.1 Industry

Industry respondents paid special attention to buses (13), followed by buildings open to the public (9), railway operations (8), bus infrastructure and financial services. This emphasis on transport goods and services (especially bus and rail) is in line with the fact that the second most represented industry in the consultation is precisely the transport one (12% of the organisations sample, as presented in Q23, and 57% of industry organisations, as per Q19; see Annex 7.2).

Table 4 – Top five goods and services mentioned by industry to be covered by accessibility legislation

Most mentioned goods and services by Industry	Frequency
Bus / coach vehicles	13
Buildings open to the public or parts thereof e.g. libraries, shops and other retail outlets, community social centres, community health centres, sports centres and facilities, parks, playgrounds, restaurant, cafés, hotels, theatres, monuments, cultural heritage, leisure and entertainment facilities, etc.	9
Domestic and international railway operations	8
Bus / coach infrastructure: stations, platforms, interchange facilities, bus stops	6
Financial services/banking	6

Source: Own elaboration, 2012. Unit: Word frequency.

5.1.2 NGOs

NGOs opinion has some similarities with the goods and services prioritised by citizens and the industry. Websites (30 mentions) are at the top to be covered by legislation.

As per Q17, 59% of the organisation sample are NGOs, and 59% of all organisations provide social services (Q23); which would explain that educational services (27) is ranked as the second most important item.

Another item considered relevant is the financial sector (44 mentions in total), referred as financial services/banking (26) as well as all buildings and related facilities open to the public associated with the provision of bank loans, mortgages and other forms of financial credit, post offices, ATMs (18). Finally, rolling stock (e.g. trains, metros, trams) was cited 21 times by NGOs.

Table 5 – Top five goods and services mentioned by NGOs to be covered by accessibility legislation

Most mentioned goods and services by NGOs	Frequency
Websites and website content management systems	30
Educational services	27
Financial services/banking	26
Rolling stock (e.g. trains, metros, trams)	21
All buildings and related facilities open to the public associated with the provision of bank loans, mortgages and other forms of financial credit, post offices, ATMs.	18

Source: Own elaboration, 2012. Unit: Word frequency.

5.1.3 Public bodies

Finally, public authorities selected buildings open to the public or parts thereof (8 mentions) and websites (6) as the most important items, the same pattern presented by citizens. This alignment shows that public bodies are aware of citizens' demands regarding accessibility of these goods and services. Railway operations (5), analogue and digital TV equipment (4) and bus / coach vehicles (4) complete the list of five most important goods and services.

Many of these items mentioned are under public authorities' responsibility, such as buildings open to the public, nevertheless these public bodies suggest them to be covered by an EU Accessibility Act (many of the buildings listed are managed by different layers of the administration: national, regional and local). Therefore, it could be inferred that public bodies support an EU initiative in order to enforce accessibility in these categories.

Table 6 – Top five goods and services mentioned by Public bodies to be covered by accessibility legislation

Most mentioned goods and services by Government Institutions	Frequency
Buildings open to the public or parts thereof e.g. libraries, shops and other retail outlets, community social centres, community health centres, sports centres and facilities, parks, playgrounds, restaurant, cafés, hotels, theatres, monuments, cultural heritage, leisure and entertainment facilities, etc.	8
Websites and website content management systems	6
Domestic and international railway operations	5
Analogue and digital TV equipment (incl. consumer equipment (e.g. TV sets, digital decoders (set-top boxes)), and all related remote controls,	4

Most mentioned goods and services by Government Institutions	Frequency
product documentation)	
Bus / coach vehicles	4

Source: Own elaboration, 2012. Unit: Word frequency.

5.2 Conclusion: priority goods and services

The top 15 goods and services mentioned are aligned with the feedback provided by respondents throughout the questionnaire: built environment, transport and information and communication are the areas causing more problems and barriers related to the Internal Market to all stakeholders consulted. In general terms, buildings open to the public, websites and educational services have been the three most cited items.

Whereas citizens and public bodies are more concerned about buildings open to the public and websites, industry representatives indicated goods and services related to transport. Finally, NGOs found websites and educational services the most important items to be covered by an EU Accessibility Act.

Many goods and services listed are not regulated with regard to accessibility, they are under the competence of different levels of the administration (national, regional and local). In any case, there is a demand for them to be enforced regarding accessibility by an EU initiative.

6 Conclusion

This chapter summarises the analysis presented throughout the document, focusing on the following topics:

- Current situation in the Member States and possible measures, from both a citizens' and organisations' perspective
- Barriers, priority areas for an EU Accessibility Act and impacts from a citizens' perspective
- Barriers, customers, costs and benefits, and measures from an organisations' perspective
- Prioritised goods and services

6.1 Current situation in the Member States and possible measures, from both a citizens' and organisations' perspective

The purpose of question 29 was to assess the level of accessibility in the respondent's countries in the areas of built environment, transport and ICT and to essentially see **where the problem of accessibility in various countries is**. Citizens indicated transport, information and communication and built environment as the most problematic areas (ranked from the poorest to the highest accessibility perceived), whereas organisations ranked them differently (transport, ICT and built environment). There was a much higher percentage of citizens than organisations who reported low accessibility; citizens' perception was more negative. However, both were consistent in their voting for low levels of accessibility across different sectors.

Regarding **barriers** (question 31), citizens focused more on the barriers that people with disabilities face daily, whereas organisations focused more on lack of legislation enforcement and lack of standards. In more detail, going through the industry responses, the main barriers relate to the financial costs of accessibility as well as the lack of unified legislation.

Question 30 from the consultation examined **the reason of the problem(s)** regarding accessibility, mostly in relation to the legislation in their home countries. Respondents have opposite opinions about the scope and efficiency of the legislation. Citizens think that the accessibility legislation in their respective countries is bad both in terms of scope and efficiency. Organisations also agree when it comes to scope, whereas it considers a higher efficiency of the legislation in comparison with citizens.

Question 32 of this public analysis aimed to cater to the theme of **what can be done** in the field of enhancing accessibility of goods and services. Policy and legal measures were the most popular suggestions by both organisations and citizens. These include enforcement and/or fines, universal design, cooperation between public bodies, standards and awareness campaigns. Other measures mentioned include training, financial incentives and UNCRPD implementation.

When analysing what role **stakeholders play**, the public consultation covered this topic in several questions addressed to citizens and organisations. Question 33 addressed the issue of what public authorities and market operators should do to improve the accessibility of goods and services. It seems that there is an agreement between citizens and organisations on what public authorities and market operators should do in order to improve accessibility: the interaction and understanding of disabilities is the most important measure for all respondents. Disabled people should be involved in all the design, development and delivery process of goods and services. Law enforcement, controls and fines are suggested for the surveillance of market operators by public authorities.

Concerning **legal measures**, both responses from citizens and organisations show similar results. The need of restrictive legislation and effective enforcement was suggested by both groups. Another important remark in the responses concerns the understanding of the needs of people with disabilities as active participants in society and as consumers. With less emphasis but with the same agreement, financial or tax incentives for accessibility were encouraged. On the other hand, the industry respondents were more in favour of market-driven approaches and more flexible schemes. Other transversal measures identified both in citizens and organisations' responses are the following:

- Standards
- Fines
- Universal design
- Cooperation between public bodies
- Awareness campaigns
- Information, especially for SMEs
- Training, not only for staff but also for people with disabilities
- Full UNCRPD implementation
- Understanding people with disabilities' needs / people with disabilities having an active role on the policy making process
- Public procurement (very important for industry players)
- Research, Development and innovation, supported by government funds

A vast majority of respondents to question 34, regarding the role of **SMEs**, agreed on the importance of SMEs, indicating that there should be specific measures for them. Measures suggested included tax and financial incentives as well as training and information.

Responses to question 36 were intended to shed some light on the respondents' views regarding how **EU, national, regional and local authorities** could contribute to improve accessibility. However, this question was interpreted as "Which of the following authorities could play an important role in improving accessibility". Both organisations and citizens indicated the EU authorities as the ones playing the most important role, followed by national authorities then regional authorities. In particular, citizens expect the EU:

- To provide a common framework to support and harmonise legislation on accessibility across the EU that is reasonably enforceable;
- To set accessibility standards across all countries, especially on transit and transport passenger services across the EU;
- To set common practices on wheelchair policy and resource booking at the time of booking travel;
- To set an equal policy for (registered) assistance dogs to travel.

As the results from question 35 show, **best practices** demonstrate that understanding the needs of people with disabilities is most valued by organisations while citizens value most the enforcement of the legislation. Also mentioned were the enforcement of standards and examples from the US and Canada were given.

To conclude, it is worth mentioning the correlation between citizens and organisations' responses concerning the perception of accessibility matters, being industry organisations' responses the major source of divergence.

6.2 Barriers, priority areas for an EU Accessibility Act and impacts from a citizens' perspective

Question 11 was aimed at detecting **the barriers** for citizens concerning accessibility; once again, the three areas indicated were the built environment, information and communication and transport. The lack of enforcement and standards was emphasised as an important general barrier in all the aforementioned areas.

Regarding the **goods and services that were given priority** for an EU Accessibility Act, citizens indicated in question 9 a long list of items that were also indicated in question 31. Goods and services under the areas of the built environment, information and communication and transport were declared the most relevant, followed by health and culture services and their related goods.

Finally, question 10 examined **the likely impacts** of an EU Accessibility Act; respondents pointed out that the main effects would be found in the areas of participation in society, built environment, transport and information and communication. It was also stated that this measure would increase the choice and affordability of accessible goods and services.

6.3 Barriers, customers, costs and benefits, and measures from an organisations' perspective

Responses to question 26, regarding the **barriers related to different rules on accessibility**, referred to different national legislations as a main source of barriers, followed by regional rules. However, 28% of respondents declared not facing any barriers. The built environment, information and communication and transport were mentioned as the most problematic areas.

Barriers encountered in the built environment area for industry respondents had to do with the high cost of accessibility and different Member States' accessibility rules, whereas in the ICT area the main barrier perceived was the lack of unified standards and the different legislations around Member States concerning accessibility. Finally, barriers detected by the industry regarding the transport area included the high costs and rigid legislation on accessibility.

The **role of people with disabilities and older people as customers** was examined in question 24. They were reported as being some organisations' main clients and that they are also hired for performing accessibility tests of different products. From the industry perspective, people with disabilities are a target audience to aim for and accessibility is seen as a relevant trend in the market.

Concerning the **costs and benefits** related to accessibility faced by organisations, respondents to question 25 gave miscellaneous answers. In general, it was stated that it is very difficult to provide estimates. Regarding costs, some declare to face significant costs, especially when retrofitting (e.g. public infrastructures and existing vehicles), whereas others indicate that accessibility implies no extra cost; on the side of benefits, reaching or retaining more customers and the improvement of consumer choice and satisfaction were the most frequent answers.

The scarce quantitative information provided included the Tesco case and the case of a UK company which invested in making their websites accessible and got great results from these investments. Web traffic increases were outstanding and the return on investment was achieved in short periods of time. The additional revenue gained compensated by far the investment.

Finally, questions 27 and 28 enquired about the **measures that can support the industry** in developing accessible goods and services. Legislation was considered the most relevant measure, followed by standards, enforcement, best practices and certification schemes, among others. Industry representatives indicated that an EU Accessibility Act should include a link to the EU public procurement rules because the different accessibility requirements and legislation at different administration and sector levels is not helping businesses.

The majority of organisations (60%) declared that EU accessibility standards aligned with international ones could facilitate and foster accessibility. Mandates M/376 and M/420 were indicated as relevant to promote that harmonisation. Regulations and guidelines such as Section 508 in the US and WCAG for websites have been pointed out as best practices, among others.

The need for an EU initiative was also claimed by some respondents arguing that for instance standards regarding the built environment are different across Member States which constitutes a risk for imported devices and materials being incompatible with local standards.

6.4 Prioritised goods and services

The top five areas that are priority/key for accessibility issues, according to organisations and citizens, include information and communication, transport and mobility, built environment, health and public services.

The goods and services most quoted in the public consultation (Q9 and Q31) include:

- Buildings open to the public or parts thereof e.g. libraries, shops and other retail outlets, community social centres, community health centres, sports centres and facilities, parks, playgrounds, restaurant, cafés, hotels, theatres, monuments, cultural heritage, leisure and entertainment facilities, etc.
- Websites and website content management systems
- Educational services
- Cultural performances, theatres, cinema, concert
- Financial services/banking
- Bus / coach vehicles
- Rolling stock (e.g. trains, metros, trams)
- Retail services
- Shared spaces, public plaza, public roads, pavements, etc.
- Domestic and international railway operations
- Nursing and care services
- All buildings and related facilities open to the public associated with the provision of bank loans, mortgages and other forms of financial credit, post offices, ATMs
- Operation of cultural facilities
- Buildings related to the workplace: industrials buildings, offices, conferences and meetings' venues
- Analogue and digital TV equipment (incl. consumer equipment (e.g. TV sets, digital decoders (set-top boxes), and all related remote controls, product documentation)

The order of importance differs slightly from citizens to organisations; whereas citizens mentioned by order of importance buildings open to the public, websites, and educational services the industry prioritised buses, buildings open to the public and rail transport. NGOs give priority to websites, educational services and financial services, whereas public bodies indicated buildings open to the public, websites and rail transport.

It is worth to mention that many goods and services considered a priority by all stakeholders are not regulated with regard to accessibility and are under the responsibility of different layers of the

public administration (national, regional and local); therefore, respondents claimed for EU action in order to unify the accessibility criteria to be met (also aligning it with international standards), and to enforce it through different mechanisms.

7 Annex

7.1 Public Consultation questionnaire

- **Background**

The Commission is reflecting on the regulatory measures that could be put in place in order to improve the accessibility of goods and services in the European market. This questionnaire is part of the preparatory data collection that underpins this analysis.

In the **European Disability Strategy 2010-2020**, the European Commission proposes to use legislative and other instruments, such as standardisation (including developing specific standards for particular sectors), to optimise accessibility for persons with disabilities. It is now exploring the merits of adopting regulatory measures to ensure accessibility of goods and services, through a '**European Accessibility Act**'.

- **Target group(s)**

All citizens, including persons with disabilities and older people, enterprises and organisations of the public and private sectors as well as civil society in EU Member States, EFTA/EEA and candidate countries.

- **Period of consultation**

- Opening date: 12 December 2011
- Closing date: 29 February 2012

- **Submission of contributions**

The consultation was published on the Commission consultation website "Your Voice in Europe". The consultation site is accessible and follows web accessibility standards.

Responses to the consultation were submitted online via the questionnaire available at http://ec.europa.eu/justice/newsroom/discrimination/opinion/111207_en.htm.

The questionnaire was available in English. The questionnaire was also available in document format and could have been requested for reasons of accessibility.

- **Reference documents and other, related consultations**

Public consultation with a view to a European Accessibility Act - [background document](#).

- **Unit in charge**

"Rights of persons with disabilities" (D3), Directorate-General Justice, European Commission

- **Results of consultation**

A report summarising the main outcomes of the public consultation will be published in the European Commission's website.

- **Data protection**

The policy on "protection of individuals with regard to the processing of personal data by the Community institutions" is based on Regulation (EC) N° 45/2001 of the European Parliament and of the Council of 18 December 2000.

http://ec.europa.eu/geninfo/legal_notices_en.htm#personaldata.

- **Consultation Questions**

I.Profile of the respondents

1. Are you replying?

- ☐ As an individual citizen, on behalf of myself only (go to Q 2)
- ☐ On behalf of an organisation (go to Q 12)

2. Which category below includes your age?

- ☐ 17 or younger
- ☐ 18-32
- ☐ 33-49
- ☐ 50-64
- ☐ 65-74
- ☐ 75 or older

3. What is your gender?

- ☐ Male
- ☐ Female

4. Do you have a disability? (Multiple choice possible)

- ☐ I have a physical disability (skip Q5)
- ☐ I have a sensory disability (skip Q5)
- ☐ I have an intellectual disability (skip Q5)
- ☐ I have a mental disability (skip Q5)

- I do not have a disability (go to Q5)

5. If you do not have a disability, are you

- a family member of a person with a disability
- taking care of persons with disabilities as a formal carer (in a paid job)
- working on disability issues in an organisation
- working on accessibility matters
- without any personal connection to disability issues
- Other (please specify)

6. Disability origin (skip if you replied to Q5)

- I was born with a disability
- I acquired a disability during my life

7. In which country do you live?

8. Where do you work?

- I work in the private sector
- I work in the public sector
- I do paid work in a civil society organisation (including disability organisations)
- I do unpaid work (such as volunteering)
- I am unemployed

(Questions 12 to 23 are for organisations only, skip if you are an individual)

12. What is the name of your organisation?

13. What is your Interest Representative Register ID?

14. Please give the contact email address of your organisation

15. Is your organisation:

- EU-level or international
- National, from a particular country

16. Please indicate, from which country is your organisation.

17. What type of organisation do you represent?

- Commercial
- Government or public authorities
- NGOS, including disability NGOS
- Sector industry, business and professional organisations

- Other

18. Do you represent?

- industry or business
- service provider
- Other (please specify)

19. If you represent industry or business, please mark the sector

- Building environment
- Transport
- ICT
- Other (please specify)

20. Building environment sector

- Constructor
- Architect
- Manufacturer of building material
- Other (please specify)

21. Transport sector

- Manufacturer (of the vehicle or of parts that are relevant)
- Service provider
- Other (please specify)

22. ICT sector

- manufacturer
- service provider
- web developer
- Other (please specify)

23. If you represent other Service providers please mark the sector

- Social services
- Health services
- Educational
- Recreational
- Cultural
- Tourism
- Sports
- Employment
- Financial
- Other (please specify)

II. Questions common to all respondents

Current situation in the Member States

29. Please provide your general assessment of the accessibility in your country in the areas of built environment, transport and ICT?

30. Please provide your opinion on the accessibility legislation in your country in terms of its scope and efficiency?

Content of possible measures

31. The accessibility for persons with disabilities of which goods and services should be given priority?

32. Which are the most important policy and legal measures to improve accessibility in your opinion?

33. What should public authorities and market operators do to improve accessibility of goods and services?

34. Could you please provide your opinion on the role that SME's could play in the provision of accessible goods and service? Should there be any specific measures to that extent?

35. Based on your experience with existing national or foreign accessibility legislation, which provisions do you consider as essential for the effectiveness and success of such legislation? In that context could you please explain how prescriptive and detailed do you think accessibility legislation should be and how it should be enforced?

36. Please provide your comments about the complementary role that the EU, national, regional and local authorities could play in improving accessibility?

III. Specific questions for individuals, and in particular persons with disabilities

9. What are the most important goods and services that in your opinion should be covered by accessibility legislation in order to ensure their accessibility?

10. What would be the impact of an increased availability of accessible goods and services in the market on the purchasing behaviour of potential customers? Could you give concrete examples?

11. Please describe the main accessibility barriers you are facing when you want to exercise your right of freedom of movement. What would be the possible effect of adopting EU wide common accessibility standards?

IV. Specific questions for the industry and businesses

24. Please explain the role that persons with disabilities and older persons play in terms of customers and market share for your business organisation? Could you please provide concrete examples?

25. Please explain the costs and benefits, current or potential, of making the goods or services produced by your business organisation accessible?

26. To what extent is your business organisation confronted with different accessibility rules in different EU Member States?

27. Will the adoption of EU accessibility standards coherent with international ones facilitate to industry the implementation of accessibility in goods and services?

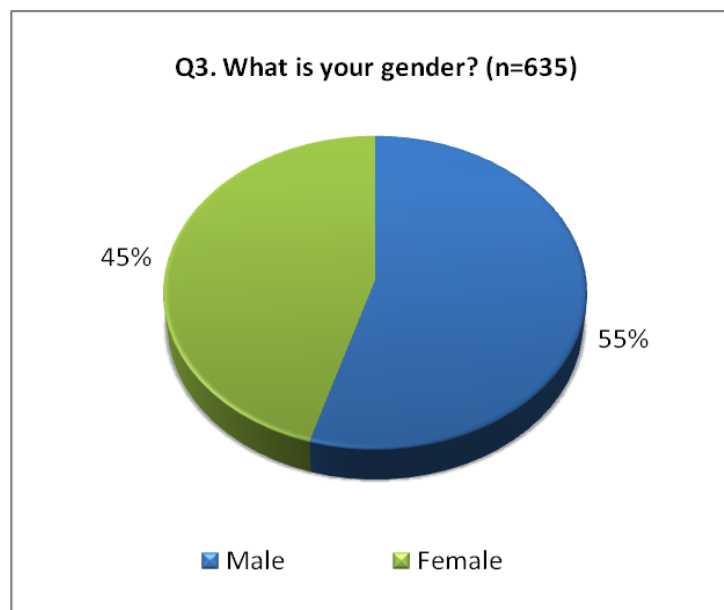
28. Based on your experience with national and international accessibility legislation, which regulatory measures are supporting industry in its efforts to improve accessibility and which ones have you experienced as non-effective or a burden and should be avoided?

7.1 Profile of citizens participating

This section summarises the responses provided from Q2 to Q8, aimed to characterise the citizens answering the consultation.

As the following figure shows, the sample of citizens was balanced in terms of gender (among the total 648 answers received from individual citizens, 55% of the respondents were men and 45% women).

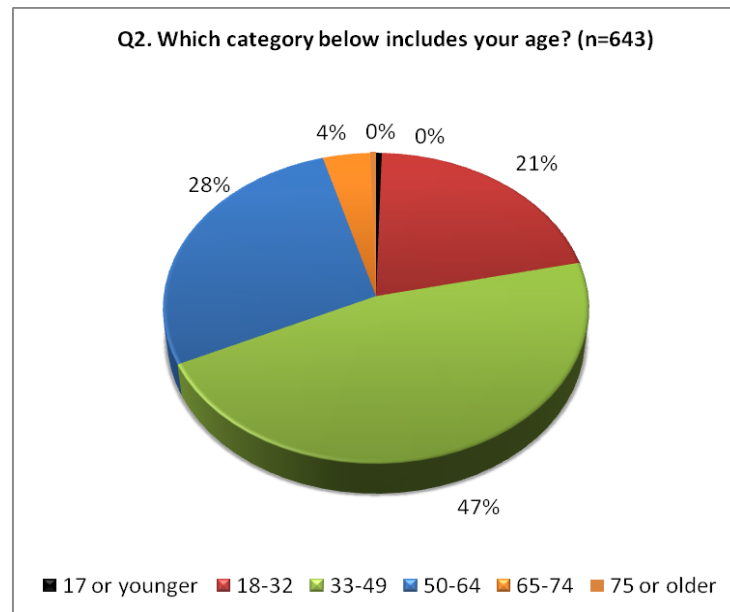
Figure 28 – Gender of the respondents



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Concerning age, respondents ranged between 18 and 74 years old, nearly half between 33 and 49 years old (47%), 28% between 50 and 64 years old and 21% below 33. Only 4% of the respondents were over 65 years old, as the following figure shows.

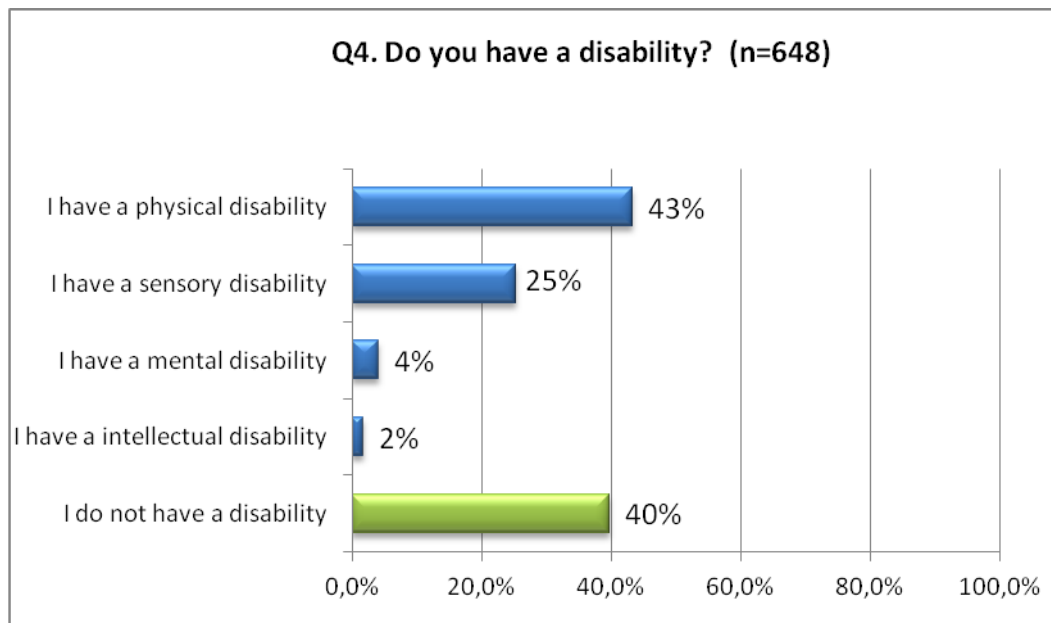
Figure 29 – Age of the respondents



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Regarding types of disabilities, 60% of respondents declared to have some disability. Out of these, most respondents indicated that they have a physical disability (43%), followed by sensory (25%), mental (4%) or intellectual (2%) disability. The remaining 40% indicated not to have a disability.

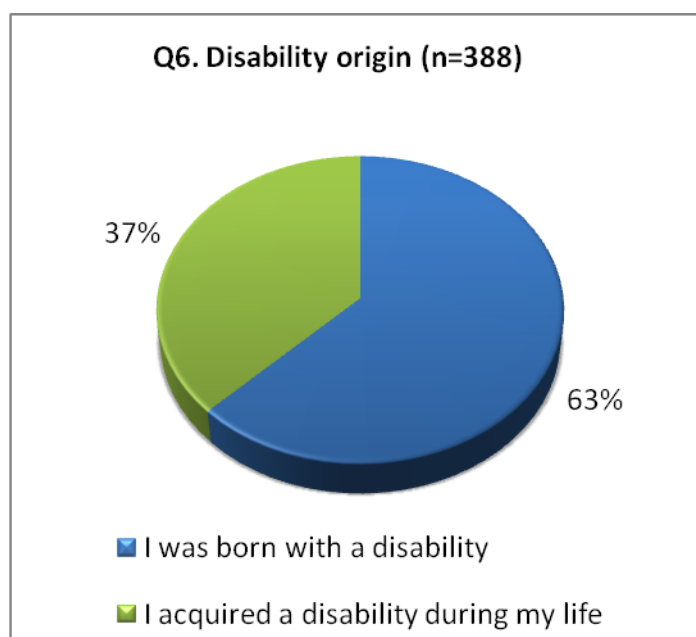
Figure 30 – Participants with disabilities



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Within the group of respondents with a disability, 63% of them were born with their disability and the remainder (37%) acquired their disability at a late stage of their lives, as presented below:

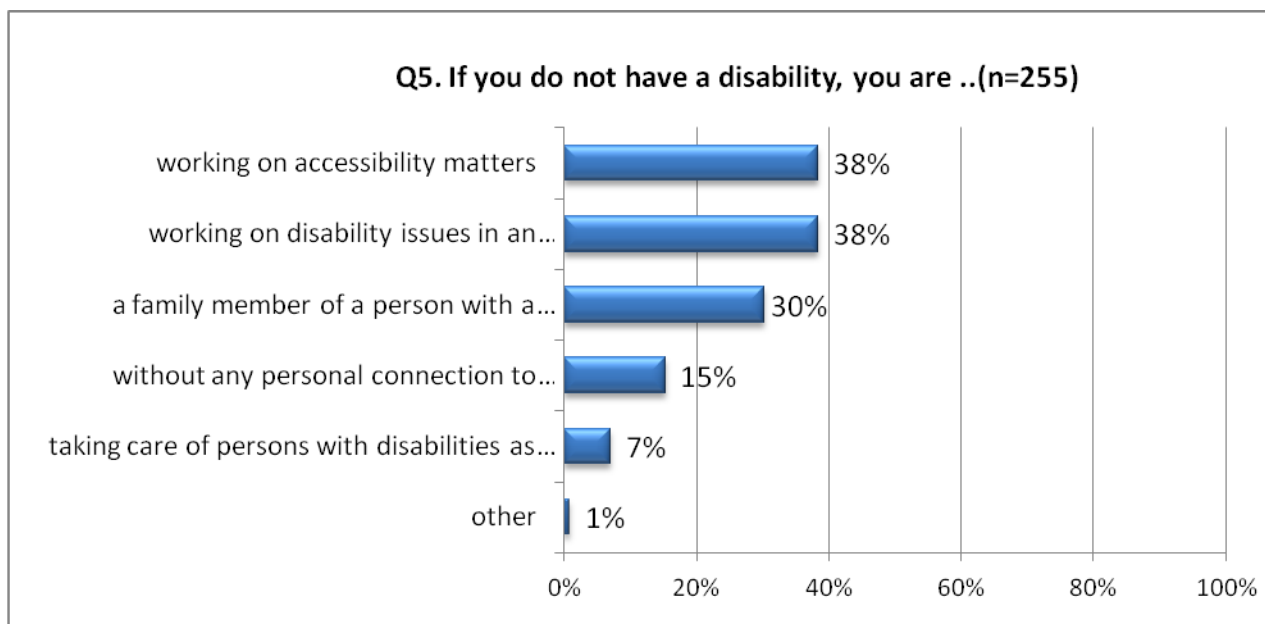
Figure 31 – Disability origin of participants



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Regarding the participants without disabilities (40% of individual citizens), most of these respondents work on accessibility matters (38%), work on disability issues within an organisation (38%), have a family member with a disability (30%), or take care of persons with disabilities as a professional carer (7%). On the other hand, 15% of the respondents without disabilities do not have any personal connection to disability issues.

Figure 32 – Participants' relation with disability

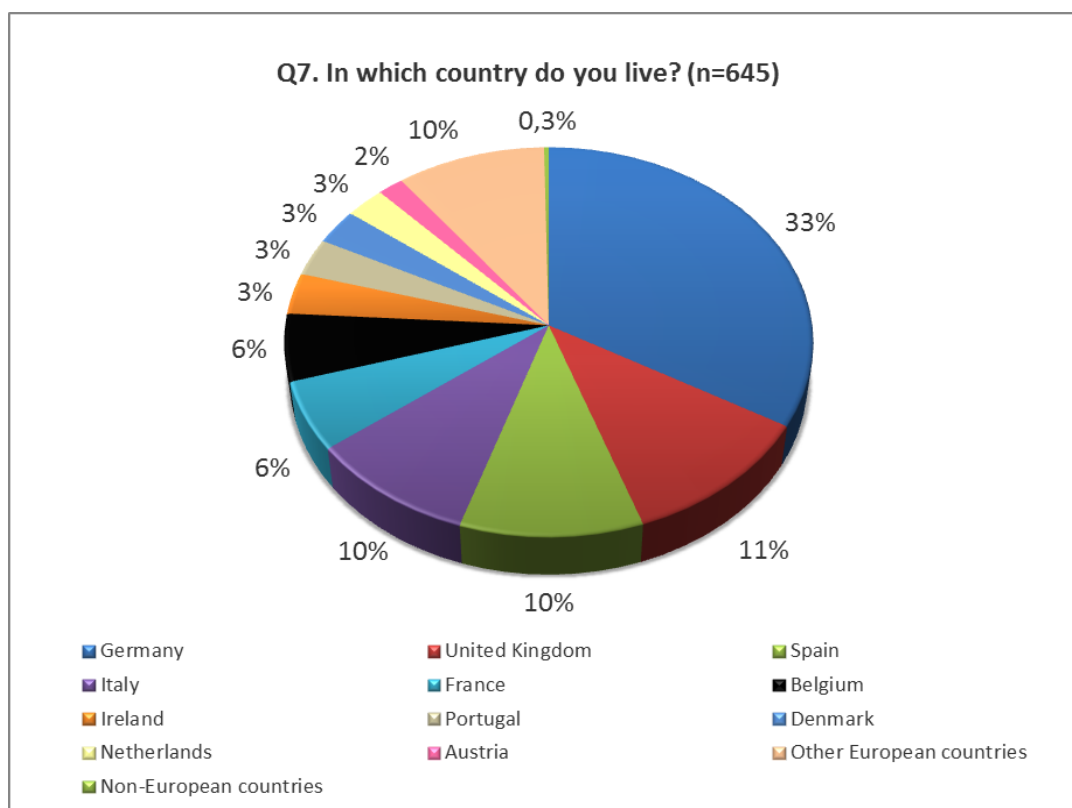


Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Concerning the country of residence, among the 33 different EU/EFTA/EEA nationalities represented in the sample, the most common countries are: Germany (33%), UK (11%), Spain (10%), Italy (10%), France (6%) and Belgium (6%)²⁷.

²⁷ Those European countries with less than 2% of representation in the sample were grouped and labelled as "Other European countries"

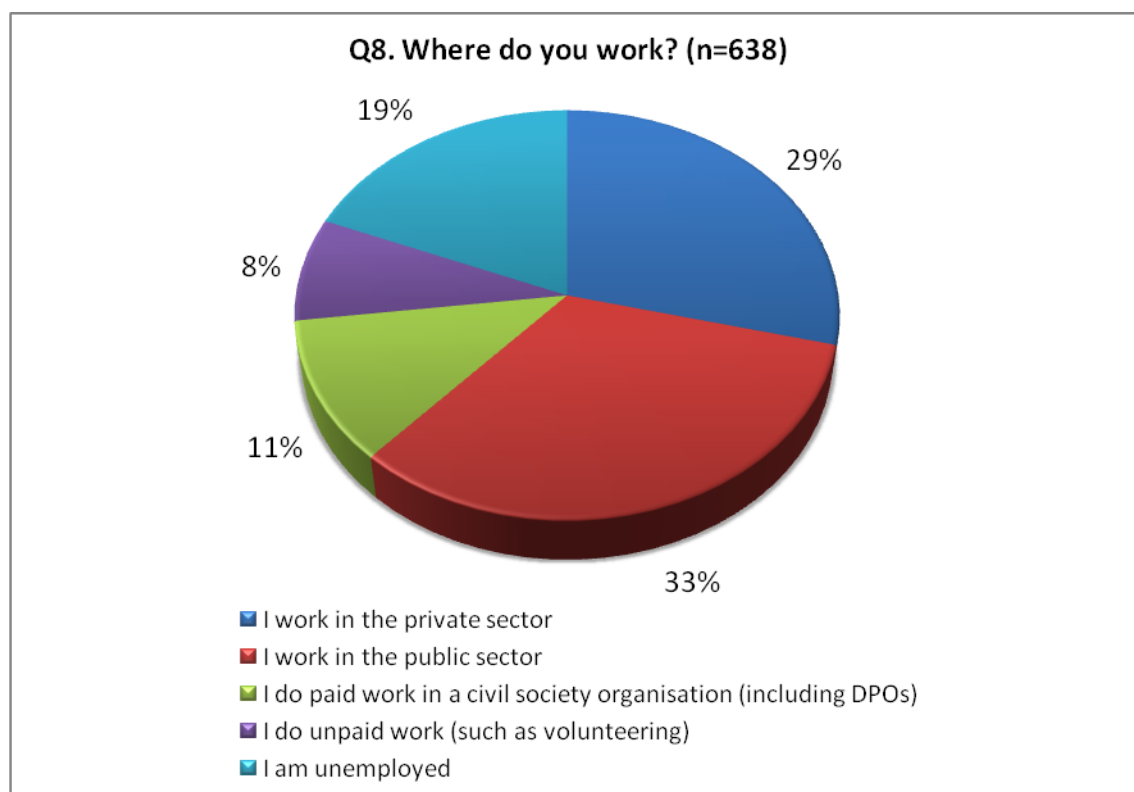
Figure 33 – Individual participants per country



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

With regard to the respondents' occupation, 73% have a paid job: 33% work in the public sector, 29% in the private sector and 11% in a civil society organisation. Of the remaining participants, 8% do unpaid work and 19% are unemployed.

Figure 34 – Respondents' occupation



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

7.2 Profile of organisations participating

This section summarises the responses provided from Q15 to Q23²⁸, aimed to characterise the organisations answering the consultation.

Of the 173 respondents that replied on behalf of an organisation, 67% are located and operate in a particular country, while 33% of them are EU-level or international, as shown in the figure below:

Figure 35 – Type of organisation according to the EU or non-EU level

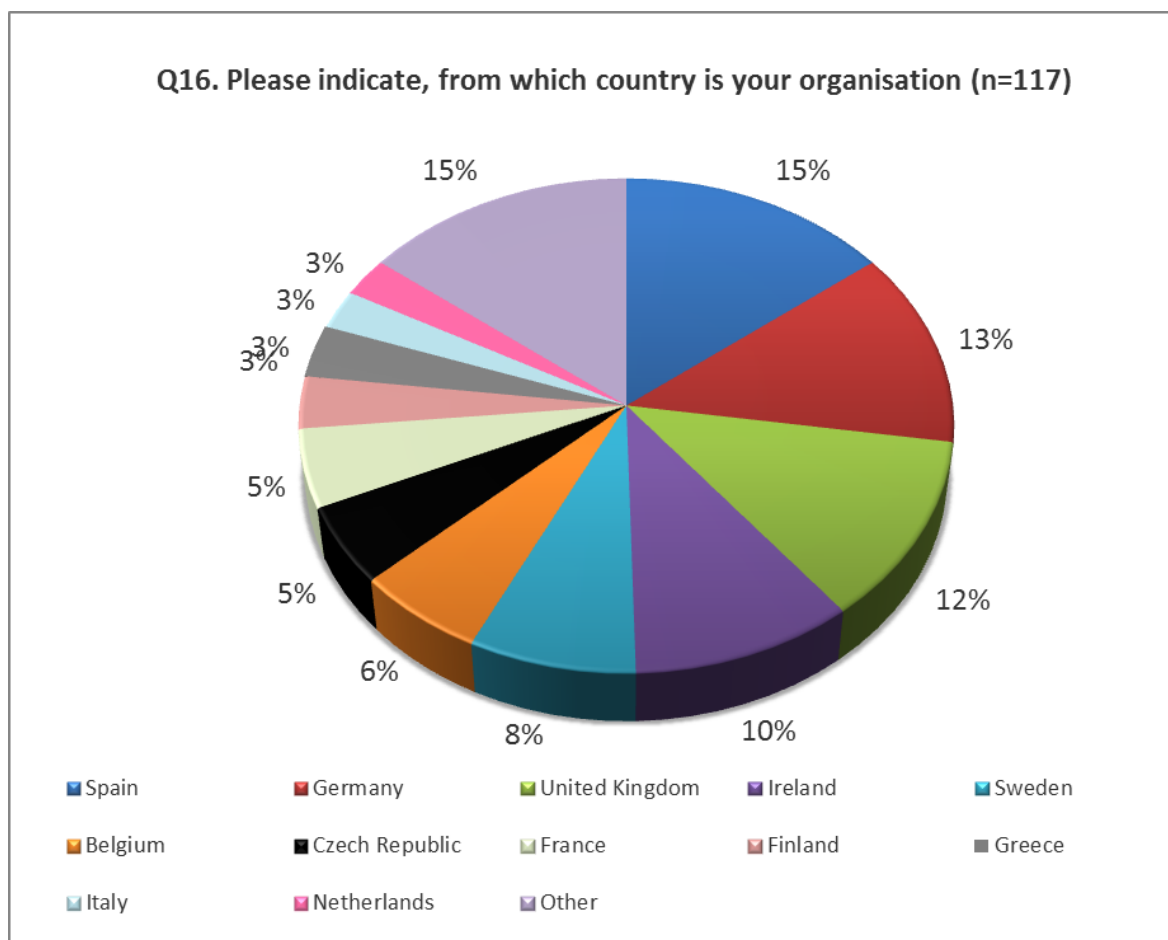


Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Regarding the organisations' nationality, all organisations come from an EU/EFTA/EEA country, mainly Spain (15%), Germany (13%), UK (12%), Ireland (10%), Sweden (8%), Belgium (6%), Czech Republic (5%) and France (5%), plus 14 other European countries represented in the sample.

²⁸ Questions 12, 13 and 14 (name, registration number and contact details of the organisations) have not been analysed, as the information gathered is not relevant for the purposes of this report.

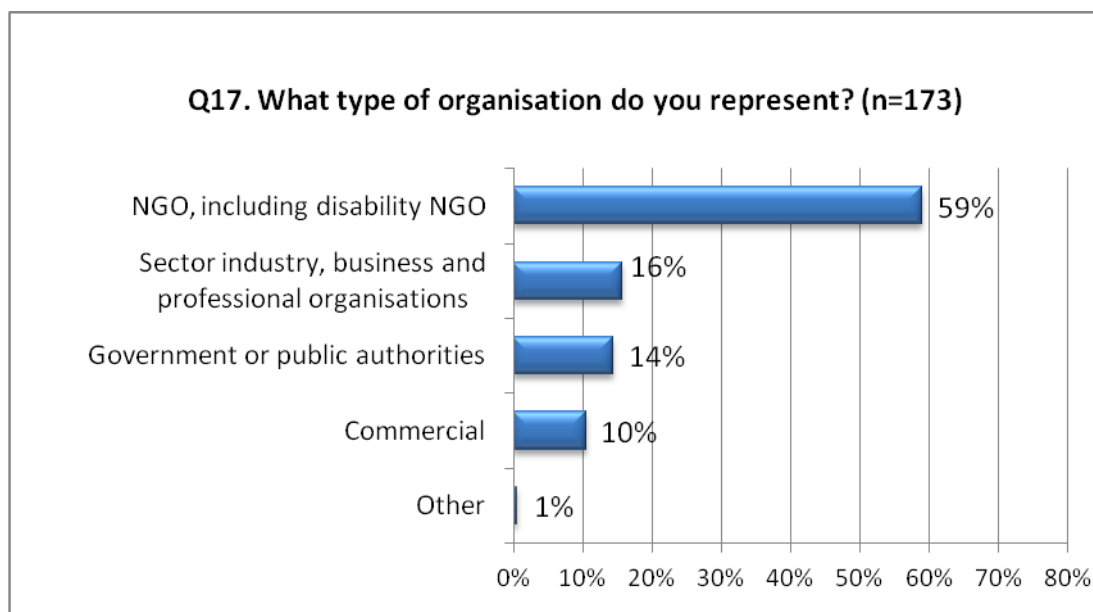
Figure 36 – Organisations per country



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Concerning the type of organisation, 59% are NGOs (including disability NGOs), while 16% are sector industry, business and professional organisations, and 14% are government or public authorities. The remaining 10% come from commercial entities, as can be seen in the following figure:

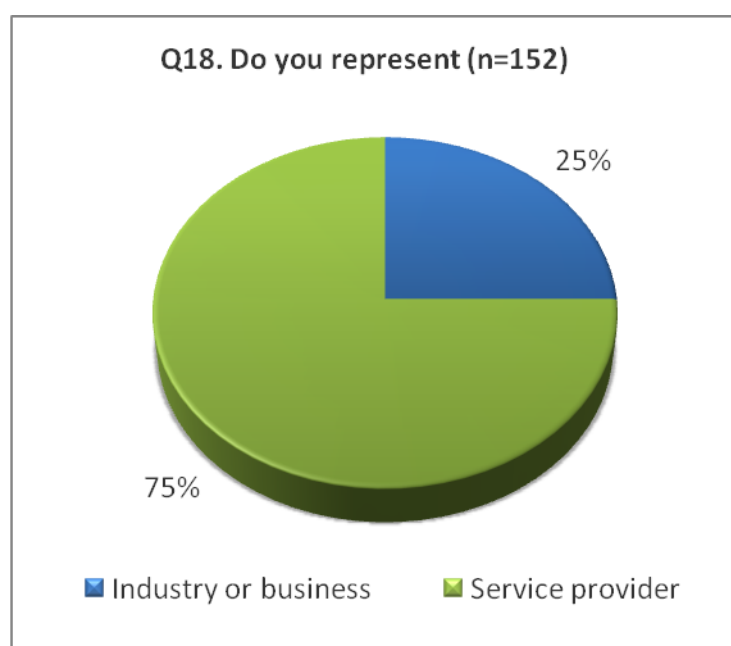
Figure 37 – Type of organisation represented



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

In addition to the above, among the organisations participating in the consultation, 75% represent service providers and the remaining 25% represent industry or business.

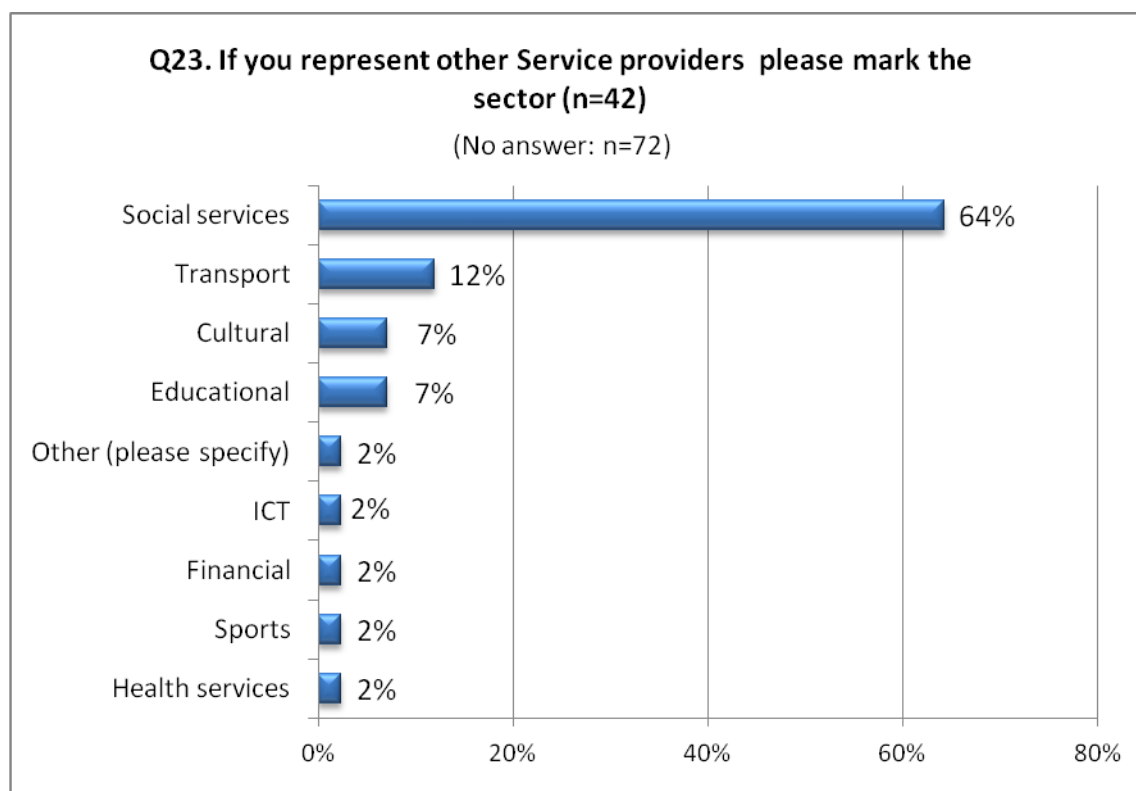
Figure 38 – Type of organisation



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Considering the 114 organisations that represent service providers (according to the previous chart), only 42 respondents specified their sector: most of them work in the social services field (64%), which make sense taking into account that a large part of the organisations are NGOs.

Figure 39 – Sector of the service provider organisations

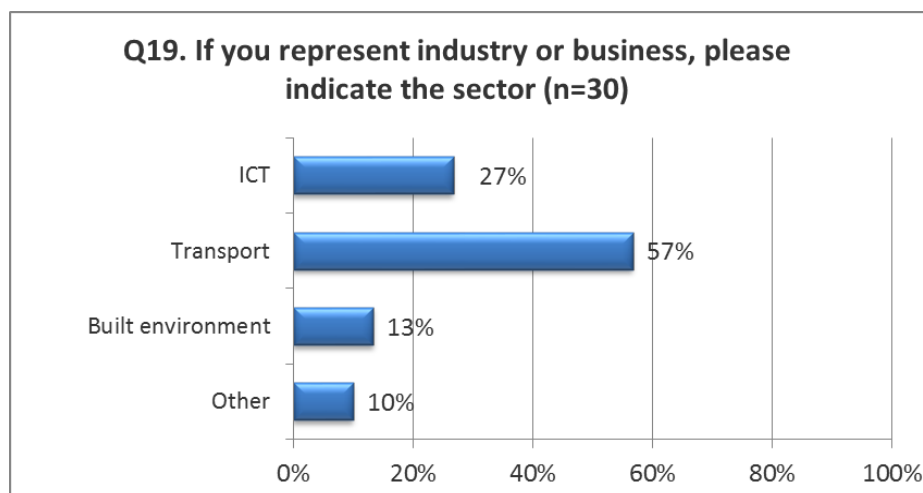


Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

Among the 30 organisations that represent industry or business²⁹, more than half of them work in the transport field (57%), followed by ICT (27%) and built environment (13%). Only three organisations declared to work in other economic activities (hospitality, publishing/creative industries and multi-sector).

²⁹ Due to the reduced sample size of organisations answering questions 20-22, it is not possible to provide more in depth results about the specific sector in which they operate within built environment (question 20 - 5 responses), transport (question 21 - no responses) and ICT (question 22 - 5 responses).

Figure 40 – Sector of the industry and business organisations



Source: Own elaboration, 2012. Unit: Percentages. n= number of respondents

7.3 Detailed data on goods and services prioritised, per area (Q9)

*Table 7 –Most important goods and services suggested to be covered by accessibility legislation
word count, per area (Q9):*

Area	Frequency	Goods and services included and corresponding frequency (units)
➤ Built environment	344	<ul style="list-style-type: none"> ➤ Buildings ➤ Retailing ➤ Houses ➤ Restaurants ➤ Toilettes ➤ Stations ➤ Streets ➤ Sidewalks ➤ Built environment ➤ Parking ➤ Roads ➤ Bars ➤ Entrance ➤ City ➤ Lifts ➤ Architecture ➤ Stairs ➤ Physical environment ➤ Cafés ➤ Doors ➤ Shops ➤ Clubs
➤ Information and communication	323	<ul style="list-style-type: none"> ➤ Information and communication ➤ Web ➤ ICT ➤ Media ➤ Television ➤ Telephony

Area	Frequency	Goods and services included and corresponding frequency (units)
		<ul style="list-style-type: none"> ➤ Sign language ➤ Technology ➤ Digital ➤ Interpreters ➤ Online transactions ➤ Computers ➤ Packaging ➤ Applications ➤ Books ➤ Captions ➤ Displays ➤ Postal services ➤ Self-service-terminals ➤ Intranet ➤ DTV set top boxes
➤ Transport / Mobility	297	<ul style="list-style-type: none"> ➤ Transport ➤ Buses ➤ Trains ➤ Aircrafts ➤ Transport ➤ Underground ➤ Ships ➤ Taxis ➤ Cars
➤ Health	116	<ul style="list-style-type: none"> ➤ Healthcare ➤ Hospitals ➤ Ambulances ➤ Pharmacies
➤ Culture & Leisure	106	<ul style="list-style-type: none"> ➤ Culture ➤ Leisure ➤ Theatre/Cinemas ➤ Sport facilities

Area	Frequency	Goods and services included and corresponding frequency (units)
		<ul style="list-style-type: none"> ➤ Art
<ul style="list-style-type: none"> ➤ Education 	96	<ul style="list-style-type: none"> ➤ Education and training ➤ Schools ➤ Universities
<ul style="list-style-type: none"> ➤ Employment 	83	<ul style="list-style-type: none"> ➤ Workplaces ➤ Employment ➤ Offices
<ul style="list-style-type: none"> ➤ Participation in society / Quality of life / Public sphere 	69	<ul style="list-style-type: none"> ➤ Public administrations ➤ Legislation ➤ Participation in society ➤ Emergency services ➤ Justice ➤ Libraries
<ul style="list-style-type: none"> ➤ Tourism 	42	<ul style="list-style-type: none"> ➤ Tourism ➤ Hotels ➤ Accommodation ➤ Beaches
<ul style="list-style-type: none"> ➤ Other 	41	<ul style="list-style-type: none"> ➤ Banking ➤ Support services ➤ Everything ➤ Assistive Technologies ➤ Home appliances ➤ Accompanying services ➤ Perfumes/chemicals

7.1 Full list of 86 goods and services prioritised, per type of respondent (Q9 and Q31)

Table 8 – Most important goods and services suggested to be covered by accessibility legislation, per goods and services categories and type of respondent (Q31 + Q9):

	Industry (Q31)	NGOs (Q31)	Government (Q31)	Citizens (Q9)	Citizens (Q31)	Citizens (Q9+Q31)	Total (Q9+Q31)
Buildings open to the public or parts thereof e.g. libraries, shops and other retail outlets, community social centres, community health centres, sports centres and facilities, parks, playgrounds, restaurant, cafés, hotels, theatres, monuments, cultural heritage, leisure and entertainment facilities, etc.	9	17	8	143	42	185	219
Websites and website content management systems	6	30	6	117	18	135	177
Educational services	5	27	3	84	35	119	154
Cultural performances, theatres, cinema, concert	4	15	3	88	29	117	139
Financial services / banking	6	26	3	71	19	90	125
Bus / coach vehicles	13	10	4	77	10	87	114
Rolling stock (e.g. trains, metros, trams)	1	21	2	72	14	86	110
Retail services	3	7	4	58	14	72	86
Shared spaces, public plaza, public roads, pavements, etc.	5	14	0	49	13	62	81
Domestic and international railway operations	8	10	5	48	6	54	77
Nursing and care services	2	11	2	45	13	58	73
All buildings and related facilities open to the public associated with the provision of bank loans, mortgages and other forms of financial credit, post offices, ATMs	2	18	2	36	10	46	68

	Industry (Q31)	NGOs (Q31)	Government (Q31)	Citizens (Q9)	Citizens (Q31)	Citizens (Q9+Q31)	Total (Q9+Q31)
Operation of cultural facilities	3	8	1	39	13	52	64
Buildings related to the workplace: industrials buildings, offices, conferences and meetings' venues	2	7	0	44	8	52	61
Analogue and digital TV equipment (incl. consumer equipment (e.g. TV sets, digital decoders (set-top boxes), and all related remote controls, product documentation)	0	5	4	42	6	48	57
Educational institution buildings	0	3	0	44	9	53	56
Telecommunications, mobile and fixed line telephones (incl. public payphones)	5	8	1	39	2	41	55
Buildings owned by governments / public authorities	2	5	0	36	8	44	51
Public services	0	7	0	36	7	43	50
Healthcare services	0	3	1	27	10	37	41
Buildings and related products of health care providers such as health centres, doctor's surgeries and hospitals.	2	2	1	26	8	34	39
Professional development- and in-service training of relevant stakeholders, e.g. professionals in the built environment, ICT and transport sectors as well those involved in the design, development, provision and management of other facilities and services	2	12	0	20	5	25	39
Sign-language interpretation	2	5	2	24	6	30	39
Accommodation services (hotels, etc.)	3	2	1	26	4	30	36
Road vehicles, e.g. cars, taxi facilities, etc.	0	5	0	23	8	31	36

	Industry (Q31)	NGOs (Q31)	Government (Q31)	Citizens (Q9)	Citizens (Q31)	Citizens (Q9+Q31)	Total (Q9+Q31)
Construction related products (including lifts, doors, handrails, ramps, etc.)	2	2	0	26	3	29	33
Hotels and buildings for student accommodation	3	2	1	22	4	26	32
Rail infrastructure: stations, platform, interchange facilities	6	6	3	13	1	14	29
Residential buildings	0	1	0	22	6	28	29
Bus / coach infrastructure: stations, platforms, interchange facilities, bus stops	6	8	3	10	1	11	28
Documents (print), Braille	1	5	3	16	2	18	27
Application software	0	5	1	16	4	20	26
Architecture services	0	2	0	20	2	22	24
Emergency telephone numbers (via fixed landline and mobile phones)	2	11	0	9	0	9	22
Airplanes	0	5	0	15	1	16	21
Car parking facilities	2	1	0	12	5	17	20
In car information devices (e.g. routing and navigation guidance equipment (nomadic and in-car) e.g. sat-navs)	0	3	0	13	4	17	20
Self-service terminals such as automated teller machines, parking metres, transport ticket machines, vending machines, voting machines	2	7	1	7	2	9	19
Sports and gym equipment, training and coaching	1	7	0	7	4	11	19
Mainstream products and services related to emergency egress e.g. lifts	2	8	0	8	0	8	18
Airport infrastructure	0	5	0	8	3	11	16
Labelling of medicinal	1	4	0	11	0	11	16

	Industry (Q31)	NGO s (Q31)	Governme nt (Q31)	Citizen s (Q9)	Citizen s (Q31)	Citizens (Q9+Q3 1)	Total (Q9+Q3 1)
products							
Services for audio/visual media such as captioning, audio description, text transcripts, subtitling	0	5	1	5	5	10	16
Vessels, boats, ships	0	6	0	10	0	10	16
Computers - desktop and laptop	1	2	0	12	0	12	15
Emergency broadcasting services	0	6	0	8	0	8	14
Analogue and digital radio equipment (incl. consumer equipment, and all related remote controls, product documentation)	0	2	1	7	3	10	13
Car lease / rental services	1	3	0	5	2	7	11
Consumer electronics; house hold appliances (white-goods)	2	0	2	6	1	7	11
Port/dockside infrastructure (interchange facilities)	0	6	0	4	0	4	10
Voting facilities, polling centres	0	0	0	5	4	9	9
Public procurement	1	1	2	3	0	3	7
Construction services	1	0	0	5	0	5	6
Domestic and international airline operations	0	2	0	3	1	4	6
Polling booth	0	0	0	3	3	6	6
Publishing, print media	0	2	0	3	1	4	6
Films, TV programmes, music publication	0	0	0	3	2	5	5
Customer services by phone	0	1	0	2	1	3	4
e-Commerce, online sales	1	1	0	1	1	2	4
Justice facilities and buildings and Prisons and other places of detention	0	2	0	2	0	2	4

	Industry (Q31)	NGOs (Q31)	Government (Q31)	Citizens (Q9)	Citizens (Q31)	Citizens (Q9+Q31)	Total (Q9+Q31)
Peripheral devices: keyboards, monitors, mice, etc.	0	2	0	2	0	2	4
Domestic and international bus / coach line operations	0	1	0	2	0	2	3
Transport information services, Intermodal journey planners	0	0	1	2	0	2	3
Biometric systems of identification / authentication by other means, machines for finger-print authentication and retina scanning	0	0	0	2	0	2	2
Machinery	0	1	0	1	0	1	2
Radio broadcasting	0	2	0	0	0	0	2
Real-time captioning	0	1	0	1	0	1	2
Telehealth / telecare / domotics / alarms	0	1	0	1	0	1	2
All documentation that establish a person's identity and nationality, including passports	0	1	0	0	0	0	1
Electronic documents, e-Books	0	0	0	1	0	1	1
Legal representation	0	0	0	1	0	1	1
Taxi services	0	0	0	1	0	1	1
Domestic and international maritime and inland waterways operations	0	0	0	0	0	0	0
Electronic voting	0	0	0	0	0	0	0
Medical diagnostic devices	0	0	0	0	0	0	0
Monitoring and early warning systems	0	0	0	0	0	0	0
Products such a modified car controls required to use a mainstream car	0	0	0	0	0	0	0
Protective systems and equipment	0	0	0	0	0	0	0

	Industry (Q31)	NGO s (Q31)	Governme nt (Q31)	Citizen s (Q9)	Citizen s (Q31)	Citizens (Q9+Q3 1)	Total (Q9+Q3 1)
Public announcement systems (audio and visual)	0	0	0	0	0	0	0
Retrofitting services	0	0	0	0	0	0	0
Television broadcasting	0	0	0	0	0	0	0
Temporary relief accommodation including emergency housing, temporary relief centres, temporary medical facilities or field hospitals	0	0	0	0	0	0	0
TEN-T infrastructures	0	0	0	0	0	0	0
Travel agency and tour operator activities	0	0	0	0	0	0	0
Urban rail: infrastructure: stations, platform, interchange facilities	0	0	0	0	0	0	0
Vehicle modification services	0	0	0	0	0	0	0