

***e*Europe Action Plan 2002/*e*Accessibility**

WAI contents guidelines for public Web sites in the EU

Final Progress Report - December 2002

***e*Accessibility group Coordinator – Povl Skaalum, Danish
Ministry of Science, Technology and innovation**

**Commission Support and drafting – M. Monteiro + (I.
Placencia-Porerro & F. Junique), Information Society DG**

**Based on version Pre-DRAFT 0.6 – 20 Dec 2002 (Edited by R.
Lobell, EC, Employment and Social Affairs DG, 23/24 Dec
2002 – 2/3/6 Jan 2003)**

CONTENTS

1 EXECUTIVE SUMMARY	4
2 INTRODUCTION	6
3 EU LEVEL LAUNCH OF THE ADOPTION PROCESS	6
3.1 COMMISSION COMMUNICATION – SEPTEMBER 2001.....	6
3.2 COUNCIL RESOLUTION – MARCH 2002	7
3.3 PARLIAMENT RESOLUTION - JUNE 2002.....	7
3.4 CoR AND ESC	7
3.5 COUNCIL RESOLUTION – DECEMBER 2002	7
3.6 2003 – EUROPEAN YEAR FOR PEOPLE WITH DISABILITIES	7
4 FROM ADOPTION OF THE GUIDELINES TO ACCESSIBLE WEB SITES	8
5 MEMBER STATES AND EU INSTITUTIONS ACTIVITIES AND SITUATION.....	10
5.1 SITUATION ANALYSIS	10
5.2 ACCESSING COUNTRIES	11
5.3 FUTURE ACTIONS	11
5.4 INSTITUTIONS WEB SITES	12
5.5 RESEARCH PROJECTS.....	12
6 GLOBAL CO-ORDINATION AND MONITORING.....	12
7 OVERALL ACCESSIBILITY INDICATORS.....	14
7.1 eEUROPE 2005 ACTION PLAN	15
8 WAI ACTIVITIES	16
8.1 CURRENT VERSION OF THE GUIDELINES.....	16
8.2 NEW VERSION OF THE CONTENT GUIDELINES	17
9 CONCLUSIONS.....	18
APPENDICES.....	19
APPENDIX A -- eACCESSIBILITY TARGETS (eEUROPE 2002 ACTION PLAN).....	19
A.1 THE CHALLENGE	19
A.2 THE eEUROPE RESPONSE	19
A.3 ACTION TABLE	20
APPENDIX B -- eACCESSIBILITY WORKING GROUP AND COMMISSION SERVICES	21
APPENDIX C -- RECOMMENDATIONS FROM THE EU INSTITUTIONS.....	22
C.1 COMMISSION, SEPTEMBER 2001 COMMUNICATION	22
C.2 COUNCIL, MARCH 2002 RESOLUTION.....	22
C.3 PARLIAMENT, JUNE 2002 RESOLUTION.....	23
C.4 COMMITTEE OF THE REGIONS, MAY-JUNE 2002 OPINION	25
C.5 ECONOMIC AND SOCIAL COMMITTEE, FEBRUARY 2002 OPINION	26
APPENDIX D - DETAILED SITUATION IN EACH MEMBER STATE	29
D1 GERMANY	29
D1.1 STATUS IN MARCH 2001.....	29
D1.2 UPDATE OCTOBER 2002	29
D2 FRANCE.....	29

D2.1	ÉTAT EN OCTOBRE 2001	29
D3	ITALY.....	31
D3.1	STATUS IN MARCH 2001.....	31
D3.2	UPDATE MARCH 2002	31
D3.3	UPDATE OCTOBER 2002	32
D4	SWEDEN.....	32
D4.1	STATUS IN MARCH 2001.....	32
D4.2	UPDATE MARCH 2002	33
D4.3	IMPLEMENTATION STATUS	33
D5	PORTUGAL.....	33
D5.1	STATUS IN MARCH 2001.....	33
D5.2	UPDATE MARCH 2002	34
D5.3	UPDATE OCTOBER 2002	34
D6	GREECE	35
D6.1	STATUS IN MARCH 2002.....	35
D7	SPAIN	35
D7.1	STATUS IN MARCH 2001.....	35
D7.2	UPDATE MARCH 2002	35
D8	FINLAND.....	35
D8.1	STATUS IN MARCH 2001.....	35
D8.2	UPDATE MARCH 2002	36
D8.3	IMPLEMENTATION STATUS	36
D9	UNITED KINGDOM	36
D10	IRELAND.....	36
D10.1	STATUS IN MARCH 2001.....	36
D10.2	UPDATE MARCH 2002	36
D10.3	IMPLEMENTATION	36
D11	DENMARK.....	37
D11.1	STATUS IN MARCH 2001.....	37
D11.2	UPDATE MARCH 2002	37
D11.3	ADOPTION STATUS	37
D12	THE NETHERLANDS.....	37
D12.1	STATUS IN MARCH 2001.....	37
D13	LUXEMBOURG.....	37
D14	BELGIUM.....	37
D14.1	STATUS IN MARCH 2001.....	37
D14.2	UPDATE MARCH 2002	38
D15	AUSTRIA	38
D15.1	STATUS IN MARCH 2001.....	38
APPENDIX E - WAI CONTENT GUIDELINES (VERSIONS 1.0 AND DRAFT 2.0).....	39	
E.1	WCAG VERSION 1.0.....	39
E.2	WCAG VERSION 2.0 DRAFT VERSION 2002-08-22.....	39
APPENDIX F - WAI SUGGESTIONS FOR EVALUATING WEB SITES	41	
F.1	INTRODUCTION.....	41

F.2	PRELIMINARY REVIEW	41
F.3	CONFORMANCE EVALUATION TO WCAG 1.0	42
F.4	CONSIDERATIONS FOR SPECIFIC CONTEXTS	43
F.4.1	<i>Evaluation during the development process [...]</i>	43
F.4.2	<i>Ongoing monitoring</i>	43
F.4.3	<i>Evaluation of legacy sites [...]</i>	44
F.4.4	<i>Evaluation of dynamically generated Web pages</i>	44
 APPENDIX G - METHODOLOGY CONSIDERED BY DENMARK		45
 APPENDIX H - US DEPARTMENT OF JUSTICE METHODOLOGY		46
 APPENDIX I - MEMBER STATE AND EU INSTITUTIONS SITUATION SUMMARY		47
 APPENDIX J - PRELIMINARY PROPOSAL FOR CONFORMANCE STATISTICS.....		48
J.1	ATTRIBUTING MARKS FOR INDIVIDUAL PAGES	48
J.2	SAMPLING PAGES AND AGGREGATING RESULTS	48
J.3	SITE LEVEL AGGREGATION	49
J.4	COUNTRY LEVEL AGGREGATION	49
J.5	MONITORING EXERCISE	50
J.6	ALTERNATIVE INITIAL APPROACHES	50
 APPENDIX K - ANALYSIS OF ONE PORTAL PER MEMBER STATE		51
K.1	<i>INTRODUCTION</i>	51
K.2	CONFORMANCE EVALUATION METHOD	51
K.3	REVIEWER SKILLS	51
K.4	ONGOING DEVELOPMENT OF EVALUATION APPROACHES	51
K.5	SUMMARY OF EVALUATION RESULTS	52
K.6	MOST COMMON CONFORMANCE PROBLEMS.....	52
K.7	REPAIR AND UPDATED CONFORMANCE EVALUATIONS	53
K.8	REFERENCES.....	53
 APPENDIX L - APPROACH INVESTIGATED IN THE NETHERLANDS.....		54

1. EXECUTIVE SUMMARY

The **eEurope 2002 Action Plan** included a chapter called “Participation for all in the Knowledge Based Economy”. Five action lines were specified including one on improving the **accessibility of public Web sites by adoption of the WAI guidelines**. The nominated actors for this action line were The European Commission and the Member States.

For its part, the Commission produced a Communication¹ including many recommendations for implementation. Other EU Institutions have responded to this Communication, supporting the actions undertaken and suggesting further measures. In particular, the Council have requested a common methodology for the evaluation of the progress made. The Parliament, have addressed the importance of adequate authoring tools and the Committee of the Regions have highlighted the need to cover also the regional sites.

The recommendations are largely based on implementing the **Web Content Accessibility guidelines (WCAG 1.0) developed by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C)**. However, such implementation has only just begun in many of the Member States and EU institutions and monitoring of the progress needs to be addressed in a coherent manner.

The commitment of the Member States and EU institutions is to apply the guidelines at first to public sites at European and national levels and to gradually extend such coverage to regional and local levels. There is also the recognition of the need to cover private sites, in particular those offering social or commercial services to the public. For these latter sites, it is not clear what role public authorities should play to achieve this, however, special attention is already being given by Non Governmental Organisations (NGOs) to monitor and lobby the corresponding companies.

Many Member States have begun initiatives to implement WAI compliance of European and national public Web sites, however, a common monitoring mechanism is still to be put in place in order to obtain comparable data across Member States. Some Member States have already started with their own methodologies and, although it is still too early to draw quantitative results, the accessibility situation can be seen to be improving in Europe.

The monitoring will be done in two steps, in a first step address the efforts made to implement accessibility, while accessibility metrics are being designed for a more medium term regular statistical measurement of accessibility of the sites in Europe. In a second step, these metrics will be used for monitoring the accessibility of the sites themselves. It is suggested that this common system is contracted out through a Commission tender action and that its terms of reference are defined in conformance with the WAI methodologies and statistics expertise.

Results of the monitoring exercises will be published in order to benchmark the improvement in Europe. Benchmarking will stimulate each country to dynamise their process. Although no specific legislation is yet planned in this domain, web accessibility

¹ COM(2001) 529 final of 25.09.2001

on the work place could be an issue under the European directive on equal access to employment. Further, the designation of 2003, as the European year for people with disabilities, presents an opportunity to raise further the awareness of the actors and to speed up the progress.

The Information Society is rapidly developing to respond to these changes, the WAI is now preparing its second version of the guidelines, to follow these technological developments. The WAI teams of the W3C organisation are also continuing to improve their suggested procedures and guides for assisting in the implementation and the evaluation. EU RTD programmes are supporting these efforts and participation of EU experts in W3C and WAI in particular is further encouraged.

This final report aims to give an overview of the work carried out in Europe since the launching of the action plan, and also to propose a continuation of these activities under the e-Europe 2005 action plan. For this it is thought to be essential that expert links are maintained with the Member States, either through the eInclusion line of the 2005 Action Plan or even on a permanent basis, as the accessibility of Web sites is an issue than needs an initial strong push, not yet completed, but also long term monitoring. Also in the long run, accessibility should not be treated as a separate issue but should be integrated in relevant government activities in particular all global Web quality control mechanisms at all levels (Web masters procedures, administrations audits, etc).

The following recommendations are made for execution as part of the eEurope 2005 Action Plan:

- **Continuation of the actions undertaken** regarding public Web sites accessibility, in particular accompanying measures and the development of a common methodology for monitoring the situation and its progress;
- **Additional measures** such as networking of administrations for faster exchange of best practices, accessibility ombudsman functions in Member States and EU institutions and corresponding information clearly indicated on each Web site.
- **Efficient horizontal intervention in each of the specific themes:** including web accessibility in application for eGovernment, eHealth and eLearning. Also specific attention should be paid to the new developments in new technological platforms: broadband and digital TV, 3G mobile, their relation to the web and the convergence process.

2. INTRODUCTION

This report deals with the target aiming to improve accessibility of public web sites through the adoption of the WAI guidelines. The WAI guidelines that are referred here are the Web content accessibility guidelines V1.0 (WCAG 1.0). These are guidelines set by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C) – international organisation made of representatives of industry, users and administrations, defining the de-facto standards to be used on the Web to ensure its universality. The eEurope 2002 target was the adoption of those guidelines for the public Web sites in Europe by 2001, with an action on the Commission and the Member States: *“Public sector Web sites and their content in Member States and in the European Institutions must be designed to be accessible to ensure that citizens with disabilities can access information and take full advantage of the potential for e-government”*.

Both political and technical activities took place at various levels for this adoption and are now to continue for implementation and setting up the associated monitoring mechanisms. The situation and plans for the future monitoring are described in this document as the final report for this eAccessibility target of the eEurope 2002 Action Plan.

Information on the situation in the Member States has been collected via the eAccessibility group of Member States experts nominated by the High Level Group for the Employment and Social Dimension of the Information Society (ESDIS). Relevant details concerning these are provided in the appropriate appendix.

This report finally contains a brief description of the activities related to Web accessibility proposed in the eEurope 2005 Action Plan.

3. EU LEVEL LAUNCH OF THE ADOPTION PROCESS

Acting on the target defined in the eEurope 2002 Action Plan, the Commission started the adoption process. Then, the various EU Institutions and Presidencies initiated actions during that period, as described in the following subsections.

3.1 Commission Communication – September 2001

Firstly, the Commission services produced a Communication to the Parliament, the Council, the Committee of the Regions and the Economic and Social Committee, regarding the actions to be taken to reach the adoption and subsequently the implementation of the guidelines for content accessibility of Web sites in Europe. The European Commission adopted the Communication in September 2001. A summary of the recommendations is given in [Appendix C.1](#) of this document. The main point is the selection of conformance level A of the WAI guidelines “Web Content Accessibility Guidelines version 1.0 (WCAG1.0)” for public Web sites at national and EU levels. It was accompanied by many suggestions for helping implementation: awareness-raising, best practices dissemination, education and training.

3.2 Council Resolution – March 2002

Answering to the Commission Communication the Council, under the Spanish Presidency, produced a Resolution that was adopted in March 2002. A summary of the recommendations is given in [Appendix C.2](#) of this document.

The main point contained in the resolution is an endorsement of the adoption of the WCAG1.0 guidelines for Europe's public Web sites. As part of the various measures to achieve this, monitoring of the implementation and use of the guidelines, eventually through a common methodology, is requested in order to obtain comparable data that can be used for benchmarking. Also, a recommendation to request web sites funded by public budget to be accessible is made.

3.3 Parliament Resolution - June 2002

Also answering to the Commission Communication, the Committee on Industry, External Trade, Research and Energy of the European Parliament (EP) prepared a resolution which was adopted by the Parliament in June 2002. A summary of the numerous recommendations is given in [Appendix C.3](#) of this document. The main points are the urgency of the implementation (with a need for level AA compliance) and, in addition to the monitoring, the suggestion of setting up reporting channels for citizens who encounters difficulties with public Web sites, as a wider control loop. The Parliament would like to see the cost-benefit analysis verified and also suggests to use public procurement procedures (e.g. with the Authoring Tools guidelines and the Web sites of projects receiving public funds).

3.4 CoR and ESC

Both the Committee of the Regions (CoR) and the Economic and Social Committee (ESC) published an answer to the Commission Communication. Summaries of the recommendations are given in [Appendix C.4 and C.5](#) of this document. Amongst the various comments/advice provided there is, in particular, an emphasis on efforts to be made for regional and local public sites, and for commercial sites. Also the importance of the social beneficial implications and the possible need of special actions for other specific small groups of population are mentioned.

3.5 Council Resolution – December 2002

An additional resolution, entitled: “*e*Accessibility for people with disabilities”, was adopted by the Council (Social Affairs) under the Danish Presidency on 3rd December 2002. The Council re-iterated its wishes to see more co-ordination and measures for the various *e*Accessibility issues including the ones related to Web accessibility.

3.6 2003 – European Year for People with Disabilities

2003, has been designated as the “European Year for People with Disabilities” (EYPD) by Commissioner Diamantopoulou. Many events will be organised, starting under the Greek Presidency and closing under the Italian Presidency. This should be a good opportunity for raising awareness at all levels, regarding in particular the Web accessibility issue, and to put the required infrastructures in place.

4. FROM ADOPTION OF THE GUIDELINES TO ACCESSIBLE WEB SITES

The formal adoption of the guidelines by the Member States and European Institutions is just the starting of a long and complex process that should lead to web sites and content being accessible for all citizens.

It is important to note that all EU countries have public web sites. They differ considerably from each other in size, design, structure, functionality, implementation techniques, and, inevitably, in their level of accessibility. The approach of making these existing and new web sites accessible will be diverse in nature, in order to be compatible with the particularities of each Member State. Even the final goal could be different. In practice various Member States have defined as a target different levels of accessibility in their web sites. Also, the final objective is moving, as new content and services are being provided and the technology used to make and support them on line is rapidly evolving.

However, it was the intention of the European Commission services, via the *eAccessibility* expert group, to obtain an overview of the process in Europe and to report about it in order to inform about the developments and to stimulate the improvement of the accessibility to the sites. In order to do this, it is important to define a series of common steps in the process that could be different in content in each public authority:

- **Definition of the objective:** (i) accessibility of public web sites at various levels of the administration: local, regional public; (ii) level of accessibility as a target;
- **Resources** allocation;
- **Awareness** amongst web masters/authors, public relation officers, managers and politicians directing the content to be made available to the citizens. This can be achieved through various official campaigns. 2003 will be important year for this purpose.
- **Tools availability** for clean authoring, self-checking and repairing: this can be achieved through appropriate procurement procedures;
- **Trained authors.** specific technical training for professional web authors/masters, dissemination of technical resources for more occasional authors (in combination of the authoring tools environments and the awareness efforts mentioned above).
- **Technical evaluation** of the accessibility of sites
- Citizens should also be indicated the path **to follow in case of difficulties** to access publicly available information, and made **aware of such an “entitlements”**;
- Implementation of a mechanism to handle the feedback from users;
- Internal monitoring, analysis and reporting about both technical evaluation and user feedback.

European monitoring through common methodology to obtain comparable data.

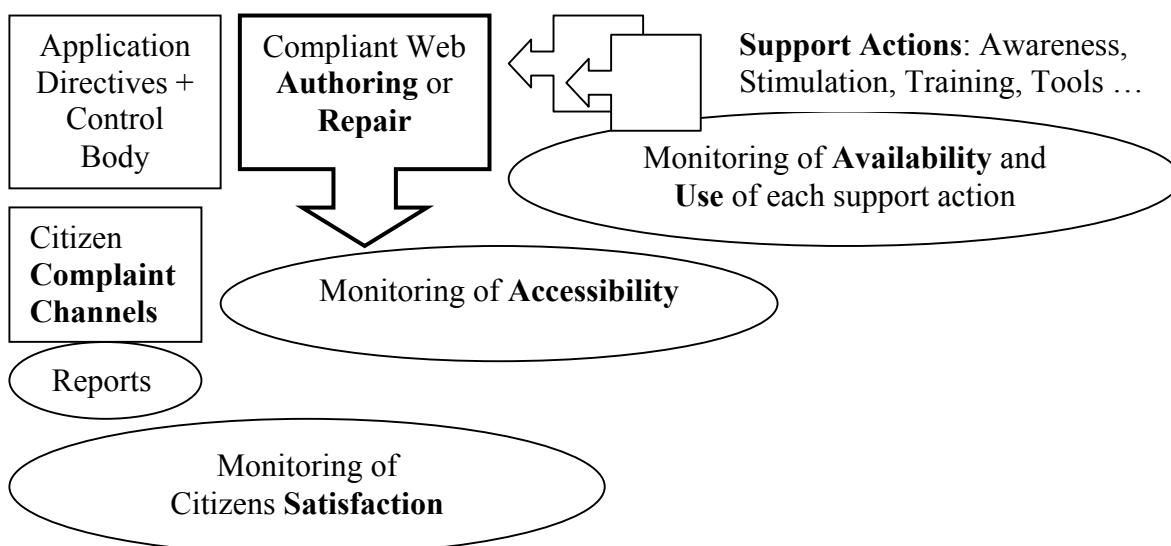
An overview of the situation in the various public authorities in Europe of these topics would provide a qualitative impression of the process to achieve the final goal. Also these achievements could be illustrated through open publishing of benchmarking results

and galleries of best practices. However there is a clear need to obtain data that would permit a quantitative estimation of the accessibility of the existing web sites.

For informing the supporting political bodies of the progress achieved, it would appear reasonable to have a refreshed picture every two years (eEurope started in 2000, the Council in 2002, after receiving first results, requested next ones in 2004 and new action plan is finishing end of 2005).

Both issues require constant periodical monitoring and reporting. While some data has been collected in the first issue for the second no data is available and still the methodology to collect this data is to be defined.

It is not clear what role public authorities should play to achieve this, however, already special attention is given by NGOs to monitor and lobby the corresponding companies. To execute measurements on such a huge and constantly variable number of items (Web pages) and to report, by aggregating multi-dimensional results at various levels (sub-sites, portals, ..., countries), in order to compare results (for stimulation between countries and for progress evaluation), it might be needed to call on the assistance of statistics techniques. This is independent of the method for collecting information on the situation: software tool, expert evaluation, user survey, self-reporting. Those different control loop levels can be shown in the following graphical structure:



With the rollover of pages and sites, even after the initial compliance effort, monitoring will have to be maintained through a permanent mechanism. The choice of system will also be dependent on whether compliance remains on a voluntary basis or becomes mandatory.

Regarding the simpler complaint channels and the control bodies, various solutions could be considered e.g. ombudsman function in each Member State and at European level, observatory or accessibility agency. On a practical level, it should be requested that each site should include, e.g. in its help section, a clear statement on accessibility rights and the path to follow in case of difficulties. This would be at least as important as any compliance label (whose validity is always difficult to maintain).

In order to control the overall budget requirements (e.g. to scale the extension to regional and local sites) and possibly to validate the studies requested to verify the cost benefit of

such accessibility approaches, it is also necessary to monitor the costs incurred by implementing this accessibility compliance. The cost of support actions, monitoring mechanisms and complain structures should also be included in the overall cost. When a reasonable level of compliance is achieved and mainly when the instruments for keeping this policy in effect are sufficiently in place, the project could be considered at its end. It would be reasonable to consider the end of the new *eEurope* 2005 Action Plan as a feasible target.

5. MEMBER STATES AND EU INSTITUTIONS ACTIVITIES AND SITUATION

The experts of each Member State in the *eAccessibility* expert group have collected and described the situation in their countries at several time stages over in the last two years. The information is presented, as collected, in [Appendix D](#).

As part of the Commission coordination role (see next chapter), a summary of the situation is given in the following table (next pages), with an attempt to highlight both the political and practical progresses and the associated mechanisms and organisations. When more information becomes available, it might be possible to separate further the type of actions undertaken (e.g. training, awareness, procurement clauses). It is proposed to publish this information on the Europa site (*eEurope* or Information Society thematic portal), in order to inform the citizens and stimulate Member States and EU institutions to comply.

For preparation of the future tasks and for dissemination of relevant information, the *eAccessibility* experts have also been requested to provide the Commission services with the contact names, in their respective country, for:

- the responsibility for the web authoring for the overall public web sites at national/sub national level,
- the responsibility for the accessibility policies in the field of IST/ICT.

5.1 Situation analysis

Regarding the position and the results of the Member States, the following points can be made:

- (1) Although all countries agree on the overall decision to make their public Web sites at least compliant with **WCAG1.0 level A**,

Some experts have difficulties in obtaining proper information from their countries and therefore couldn't report in detail;

Some countries haven't yet formally adopted the guidelines;

Some countries want to go further in general (e.g. level AA);

Some countries seem to be privileging some aspects of their Web site qualities (e.g. blind users accessibility, usability by the elderly).

➔ These more in-depth approaches are of course welcome but it cannot be used as an argument to neglect other aspects of the guidelines that have been designed to cover accessibility issues at large. Indeed some aspects of the guidelines might become obsolete or pointless with some of the latest versions of assistive equipment but not everybody (impaired or not) can be equipped with technology

supporting all non-standard extensions – either for economical reasons (another aspect of *eInclusion*) or for technical/environment reasons. Other aspects of the guidelines cover standard Web browsing in not optimal conditions (e.g. slow links preventing images downloading, bad-lightning/noisy conditions, user not yet familiar with ICT).

➔ Also, for the benchmarking requested for emulation between the Member States, extensions to basic accessibility can be marked as pluses, but the agreed common denominator must be respected to allow meaningful comparisons.

- (2) Each Member State has its specificity in term of governmental structure both for Web publication and for policing accessibility. This has to be taken into consideration when organising the overall monitoring system and the possible control loops – a typical example is the difference between federally organised Member States, like Germany, and other Member States with a more centralised form of governance.
- (3) Not all countries are at the same level of progress, making the success comparisons not trivial at the moment.
- (4) No normalisation of the results is, therefore, possible yet. However, a comparable evaluation of one public site or portal in each Member State was carried out at the end of summer 2002 by experts recognised by WAI and the results are indicated in the table. It must be clearly noted that it is only a unique sample and it has therefore no statistical value but it could help Member States monitoring teams to verify their own assessment results. An overall analysis was also produced and is attached as [Appendix K](#).
- (5) Regarding the best practices for all the accompanying measures, some examples are indicated in the appendices attached to this report.

5.2 Accessing Countries

Regarding the progress made in the Accessing Countries following the *eEurope+* 2003 Action Plan, information will have to be centralised and, in the framework of the new *eEurope* Action Plan 2005, it should be integrated with the Member States data.

5.3 Future actions

It is important that further information continue to be collected regularly on the efforts in the Member States in regard of the various actions mentioned earlier in this document, in order to be centralised at EU level (through the Commission infrastructure):

- Adoption at all level of administration (national, regional, local)
- Support actions: awareness raising, training, tools procurement, etc – both in terms of availability and effective use
- Control bodies, complaint channel and citizen information about it available on each site
- Initiatives for private sector compliance

- Monitoring accessibility at national level, either - once the common criteria are agreed upon - if the work can hopefully be distributed; or as more in-depth assessment to allow direct repair actions.

5.4 Institutions Web sites

As previously indicated in the Commission Communication of September 2001, the WAI Content Guidelines are part of both the Internet publication rules (Europa second generation). However each institution has its own or additional Web sites, maintained independently from the Europa portal. The overall inter-institutional group regarding Web presence should be requested to report on their individual approaches and progress.

5.5 Research projects

In the 5th Framework Programme for EU Research, the IST Programme included a sector “Applications for Persons with Special Needs”. Amongst the projects receiving an EU contribution, several are dealing with Web accessibility or more generally with Design for All:

- either as a real RTD activity: e.g. WWAAC – browser and enrichment of Web pages with symbols for AAC users, VISUAL – authoring tool and plug-in for enrichment of Web pages with voice messages and voice navigation, IPCA – browser driven by physiological signals, IRIS authoring environment integrating design-for –all;
- or as a support measure: e.g. WAI-DA and WAI-TIES with direct involvement of WAI people for assisting EU regarding awareness, training and assessment/repair tools, IDCnet and D4ALLnet for supporting the new European network of national centres of excellence in design-for-all, with a particular focus on the preparation of a curriculum for future engineers and designers.

In the new 6th Framework Programme, there are again various actions lines or programmes that could be relevant for the Web accessibility effort: *e*Inclusion, *e*Government, Web semantics, Knowledge Society and governance, Support to Policies, etc. However, it should be stressed that this framework programme is focusing on the creation of the European Research Area and that it will be based on new instruments, like the Integrated Projects for multi-disciplinary problem solving approach and the Network of Excellence for structuring the research establishments and equipment.

6. GLOBAL COORDINATION AND MONITORING

It was requested that the Commission and ESDIS play a coordinating role at EU level. To this end several efforts have been undertaken, by the *e*Accessibility group and the Commission services, to define a common methodology. No definition is yet ready, but some elements of that future methodology have been agreed and a concrete proposal is included later in this document.

The main co-ordination actions considered at this stage are:

- agreeing on common evaluation methodology and criteria
- synchronising monitoring to allow useful benchmarking and
- providing a structure for exchange of best practices.

There are two main goals for this exercise:

- to know where an administration is in the process of implementing accessibility in their public web sites and how they progress
- to know how accessible public web sites of the various administrations at a certain moment and be able to follow their evolution.

In the first case a table describing if steps have been taken concerning the following elements will provide a good overview: Definition of the objective, level of accessibility, resources allocation, tools availability, awareness, trained authors, technical evaluation, feed back from users, internal monitoring and reporting etc

For the second an evaluation method for the accessibility of the sites needs to be defined

Regarding the assessment criteria and associated indicators, the first step was to identify what is already available in other countries. This is developed in the annexes. Some of the experiences reported contain very interesting elements, to contribute to a common method.

Regarding the various levels of monitoring indicated in the first chapter, the system is organised as follows:

- **Support actions monitoring:** It is done at national level and reported through the *eAccessibility* expert group representatives or their successors, with the overall table, indicated in the previous chapter, to be maintained by Commission staff and presented on Europa;
- **Accessibility monitoring:** In this chapter a summary of a proposed method is described. Further details on the criteria and aggregation of individual results into global indicators are included in annex X. The detailed design is still to be done and then agreed by Member States. Centralisation and possibly normalisation of data resulting of such process once in place would have to be done at EU level and followed by an analysis before publication. In the meantime, it is worth mentioning an e-government initiated European wide survey of public Web sites quality (partly including accessibility), which appears to be planned for the near future;
- **Monitoring of number of complaints received at nationally level:** nothing is organised yet. However in the proposed new targets for e-Europe 2005 a possible solution is contemplated through the nomination of an ombudsman function.

Overall user satisfaction survey: No such survey is yet planned at EU level, Regarding the exchange of best practices, this was initially achieved through the *eAccessibility* expert group meetings and electronic shared medium (CIRCA area - managed by DG Employment & Social Affairs). For the future, this could continue with the possible successor of this group, but also in the framework of *eGovernment*, through a specific network linking the relevant groups in the various public administrations in Europe. This network could include the administrations – possibly at all level – of the Member States, the Accessing Countries, and the EU institutions. Such network could also provide the infrastructure to maintain a EU gallery of the best practices identified.

It can be also noted that before a real eAccessibility portal is designed (as requested to the Commission), some pages related to accessibility and information society have been implemented on the Europa Information Society thematic site and include most of the official documents referenced in this report. This sub-site is in complement of the eEurope specific pages.

7. OVERALL ACCESSIBILITY INDICATORS

The eEurope initiative includes the reporting on the overall situation through benchmarking with 23 general indicators² to be provided for each Member State. The indicator suggested for public Web sites accessibility is number 15:

Percentage of central government websites that conform to the WAI accessibility guidelines at A level.

Definition: central government sites will be easier to monitor than local or regional government. Definition of WAI accessible at level A is clearly laid down by the Web Accessibility Initiative.

Source: to be established by an expert group on eAccessibility

Frequency: Data will be regularly updated as improvements come on line.

Supplementary indicators: % of central government sites with higher level AA and AAA rating.

This indicator was drafted in 2000. Since further discussions and tests took place with the eAccessibility experts group and the format might need to be slightly adjusted for more efficient monitoring, as this point was highlighted by both the Parliament and the Council.

This overall indicator has to be obtained in a way that can be agreed by all actors and that can be useful for tracing the progress achieved over the years. Through first discussions with the Member States accessibility experts, it appears clearly that for a fair acceptance the metric should take into account a finer granularity than the absolute A or AA levels, in order to show sites that are “nearly” compliant. Also a count based on sites rather than individual pages might not represent a good image of the reality, as some sites are very small and other rather huge (super-sites or portals) with a difficulty to report distribution in sub-sites.

The extension to regional and local administration monitoring should also be foreseen for the future, if possible through a simple adaptation of the method.

It is first worth considering the approaches already tried by individual Member States (Denmark – see [Appendix G](#), the Netherlands – see [Appendix L](#)), the USA (Section 508 – see pointers in [Appendix H](#)) and WAI (draft methodology summary in [Appendix F](#)); although the last two don't seem to provide a scheme for attributing numeric marks. Some preliminary suggestions are also proposed by Commission staff in [Appendix J](#). It should be emphasized that the approach has to be compatible with existing or announced

² As described in Council document 10486/00 ECO 216 CAB 7 SOC 266 EDUC 117 available on-line at http://europa.eu.int/information_society/europe/benchmarking/indicator_list.pdf

WAI methodology. The real system will have to be designed by experts in accessibility and in statistics, with a close link with WAI and with Member States representatives.

It is proposed to have a proper design, with a demonstration/validation on a limited scale but including the various levels (national, regional, local and possibly private), contracted out by the Commission, through a tender action. Then this system could perhaps be handled by Eurostat, although the technical data collection could still require more specialised organisations having access to the required tools, procedures and expertise. As Eurostat seems to often rely on national statistics offices, this could further influence the final solution. Alternatively another type of contractor would have to be found. In any case, a legal and financial framework must be produced. Already a general framework is supposed to be announced for the full set of *eEurope* indicators and this might be already applicable to this particular case. An estimation of the magnitude of budget required is first necessary.

7.1 *eEurope* 2005 Action Plan

The *eEurope* 2005 action plan includes *eInclusion* as a horizontal measure affecting each programme line. Web guidelines compliance can help providing equal access to all, including people with disability, people in handicapping situations and also some of the other groups potentially victims of the digital gap, e.g. through language barriers or with limited technological equipment. *eGovernment*, *eHealth* and *eLearning* are to be treated with particular care. Special attention has also to be given to new technological platforms that will be used also for web access: broadband and digital TV, 3G mobiles.

The additional actions to be considered for supporting the Web accessibility implementation could be:

- the inclusion of a special clause in public procurements;
- the creation of a specific ombudsman function on accessibility with a clearly visible information available from each public site;
- the set up of a network for exchange of accessibility best practices between administrations;
- the availability of relevant agile expertise for each of the *eEurope* working group.

In a similar perspective, the active participation of people with disabilities is to be included in the systems prepared inside the *eBusiness* and *eSkill* themes.

The efforts stated in the 2002 Action Plan need to be pursued until more permanent infrastructures are in place for ensuring the accessibility of public Web information in the EU.

As indicated previously, the current group of national experts in *eAccessibility*, nominated by ESDIS, was linked with the *eEurope* 2002 Action Plan. The Commission should encourage ESDIS to organise a similar structure for the new action plan.

Depending on the possible change in relative responsibilities or involvement between the Commission's services (more particularly those dealing with Employment & Social Affairs and the Information Society respectively) regarding this *eAccessibility* topic, the Commission interface with this new structure would have to be confirmed.

8. WAI ACTIVITIES

As a reminder, the W3C WAI group is in responsible for:

- (i) Elaborating Guidelines for specific Accessibility facets: Web Content (WCAG), Authoring Tools (ATAG), User Agents (UAAG) - e.g. browsers, and XML (XAG);
- (ii) Ensuring that accessibility is taken into consideration from the beginning in all new technology development and standardisation by W3C.

With the technology development and the progress in the approaches, the guidelines have to be updated and it became apparent that test suites and methodologies are required to ease the implementation and its verification, as seen in the current EU effort.

W3C and its various groups, including WAI, are financed through many contributions. The EU is participating through various supported RTD projects (e.g. in the accessibility domain: WAI-DE in the 4th FP, WAI-DA and WAI-TIES in the 5th FP).

Other EU RTD projects in the field of Web accessibility are regularly also encouraged to contribute through their intellectual input in the WAI working groups (see below). WAI is also currently planning to organise workshops and perhaps on-line library of RTD projects in the world, working on Web accessibility issues or technologies that are however not yet ready for standardisation.

WAI has now officially published its guidelines for User Agents (UUAG1.0), it will greatly help the further development of browsers and corresponding assistive technologies for accessing the Web.

8.1 Current version of the Guidelines

The current version of the Content guidelines is version 1.0 and their official language is English. They are completed by companion documents like check lists, implementation techniques for various technologies, tips card, etc.

Although several translation efforts have been made in the past by individuals or by governmental bodies, W3C has still to finalise its decision regarding official translations with the associated risks in technical interpretations. Through the RTD (IST) supported projects, WAI is regularly reminded of the importance of such translations in order to raise the awareness of Web masters in non native English countries, as highlighted also by the European Parliament. In the mean time, several unofficial translations are already available on-line on the WAI site³.

Regarding the assessment techniques and methodologies, the efforts for producing such document and reaching consensus, have somehow been delayed compared to the guidelines themselves. Although several countries in the world are already in advance on implementing the guidelines, Europe is one of first entity to need to put in place all the associated control mechanisms at such a large scale. Therefore, it must be accepted that some of these methodologies are developed at the same time that they are needed but it could also be seen a motivating factor for EU contribution. A summary of the current

³ WAI translation resources available at [http://www.w3c.org/WAI/...](http://www.w3c.org/WAI/)

draft WAI methodology for evaluating sites – at least the organisational elements, is given in [Appendix F](#).

In addition WAI is preparing a world gallery of good practices: it would probably be based partly on frozen sites partly on special relation with Web masters in order to ensure that the quality is maintained; that will be also sometime an opportunity to receive suggestions for even further improvements.

8.2 New version of the Content Guidelines

WAI is in the iterative process of finalising version 2.0 of the Content guidelines. These guidelines are said to be of a more general nature and to have cleared issues initially indicated in version 1.0 as related to older versions of assistive devices which were based on obsolete technology. A brief comparison between the two versions is given in [Appendix E](#).

It is considered to be essential that EU experts in the fields of Web technologies and accessibility participate actively in this definition process and also in the evaluating tools, techniques and metrics that are believed to be developed simultaneously in order to ease the monitoring and repairing efforts that will continue to be needed. As a remainder, the WAI includes several working groups:

- Protocols and Formats Working Group (PFWG) [<http://www.w3.org/WAI/PF/>]
- WCAG Working Group (WCAG WG) [<http://www.w3.org/WAI/GL/>]
- Authoring Tools Accessibility Guidelines (ATAG) Working Group (AUWG) [<http://www.w3.org/WAI/AU/>]
- User Agent Accessibility Guidelines Working Group (UAWG) [<http://www.w3.org/WAI/UA/>]
- Evaluation and Repair Tools Working Group (ERT WG) [<http://www.w3.org/WAI/ER/>]
- Education & Outreach Working Group (EOWG) [<http://www.w3.org/WAI/EO/>]

It is believed that the USA might include these new guidelines in the future, if they replace the corresponding specifications of their Section 508 current legislation.

9. CONCLUSIONS

From the situation and the results discussed in the previous chapters, and although the adoption process is almost achieved, it is clear that the process of implementation has only just begun, in particular, if the regional and local public presence on the Web are considered. Therefore supporting actions (awareness, training, tools) have to continue. Control and feedback is to be based partly on monitoring, both for the availability and efficient use of the support actions, and for the resulting accessibility improvements.

Regarding real accessibility indicators, more work is required to define exactly how this could be efficiently and cost effectively obtained. It is proposed to have a tender at Commission level for specialists to elaborate a system that could be fair and acceptable by the Member States, compatible with the WAI philosophy and statistically correct. NGOs and user organisations (people with disabilities and older persons) should be actively involved in the processes and they could in particular have a strong influence on private sector Web presence.

In the *eEurope* 2005 action plan there is an *eInclusion* horizontal measure through each programme lines. It is suggested to ensure the continuation of the actions started and to investigate the possibility to mainstream accessibility in all the areas of the work through for example, a clause in public procurements, accessibility ombudsman function and clear information available on each site; and on a practical level, a best practices exchange network between administrations and presence of relevant expertise in each working group. A follow-up to the *eAccessibility* expert group is also highly requested.

APPENDICES

APPENDIX A - eACCESSIBILITY TARGETS (eEUROPE 2002 ACTION PLAN)

The eEurope 2002 Action Plan document contains the following text describing the eAccessibility target:

Participation for all in the knowledge-based economy

The Lisbon European Council recognised: *that special attention should be given to disabled people and the fight against “info-exclusion”*.

A.1 The challenge

The implication of the Lisbon conclusions is that eEurope should extend the focus of its eParticipation action. Action in this area will contribute to the new Community initiative to promote social inclusion, also called for by the Lisbon European Council. The key issues were debated extensively in the recent ministerial conference in Lisbon.

As government services and important public information become increasingly available on-line, ensuring access to government websites for all citizens becomes as important as ensuring access to public buildings. In the context of citizens with special needs, the challenge consists of ensuring the widest possible accessibility to information technologies in general as well as their compatibility with assistive technologies. In addition, new technologies can often be easier for everyone to use if the usability requirements of all potential consumers are considered from the beginning of the design process.

A.2 The eEurope response

Efforts will be required to address the problems of those who fail to fully benefit from the information society for various reasons, such as poverty or lack of awareness and training. Measures against info-exclusion need to be given a high political priority if the eEurope objective of an ‘Information Society for all’ is to be achieved.

In relation to the specific area of access for people with special needs, the High Level Group on the Employment and Social Dimension of the Information Society (ESDIS), in cooperation with the Commission will examine and monitor legislation and standards relevant to the information society to ensure their conformity with accessibility principles.

Public sector web sites and their content in Member States and in the European Institutions must be designed to be accessible to ensure that citizens with disabilities can access information and take full advantage of the potential for e-government.

In relation to 'designing-in' accessibility to all information society technologies, training for designers in this area is relatively new and therefore fragmented across Europe. There remains much scope for mutual learning between centres of excellence to build a co-ordinated and high quality approach.

A.3 Action table

Action	Actor(s)	Deadline
Policies to avoid info-exclusion will be more effectively coordinated at European level through benchmarking of performance and exchange of best practice between Member States.	Member States, European Commission	end 2001
Publication of "Design for all" standards for accessibility of information technology products, in particular to improve the employability and social inclusion of people with special needs.	European Commission, Private Sector	end 2002
Review relevant legislation and standards to ensure conformity with accessibility principles.	Member States, European Commission	end 2002
Adoption of the Web Accessibility Initiative (WAI) guidelines for public websites.	European Commission, Member States	end 2001
Ensure the establishment and networking of national centers of excellence in design-for-all and create recommendations for a European curriculum for designers and engineers.	European Commission, Member States	end 2002

APPENDIX B - eACCESSIBILITY WORKING GROUP AND COMMISSION SERVICES

The following persons participated in the collection or aggregation of this final set of data on WAI implementation in Europe. There may have been other people involved in other related actions and, as such, this is not an official listing of the eAccessibility expert group. With the finalisation of the eEurope 2002 Action Plan, this group will probably cease to exist although a similar body might be resurrected in a different setting for the eEurope 2005 Action Plan. However, ESDIS members remain the official contacts in the Member States for relevant eAccessibility activities.

Country or EU-Institution	Name	Organisation	Contact email
Germany	Christian BÜHLER	FTB	c.buehler@ftb-volmarstein.de
France	Bernard DESCARGUES	Premier Ministre	b.descargues@sgg.pm.gouv.fr
United Kingdom	Kevin CAREY		humanity@atlas.co.uk
Denmark	Povl SKAALUM (report content)	Forsknings-ministeriet	Psk@fsk.dk
Ireland	Ann DOYLE	Department of Justice, Equality and Law Reform	Anne_C_Doyle@justice.ie
	Moira O'MARA		Moira_X_O'Mara@justice.ie
Greece	Constantine STEPHANIDIS	FORTH	cs@ics.forth.gr
Italy	Paolo GRAZIANI	IROE/CNR	graziani@iroe.fi.cnr.it
Spain	Cristina RODRIGUEZ-PORRERO	CEPAT	Crodriguez@mtas.es
	Anton CIVIT	Universidad de Sevilla	civit@atc.us.es
Portugal	Helena ABECASIS	Ministério da Ciência e da Tecnologia	info@acesso.mct.pt
Netherlands			
Sweden	Margita LUNDMAN	Swedish Handicap Institute	Margita.lundman@hi.se
Finland			
Austria	Dieter CHMIEL	Bundessozialamt Wien	dieter.chmiel@basb.gv.at
Luxembourg			
Belgium	Jan ENGELN	KUL	Jan.Engelen@kuleuven.ac.be
CEC	Manuel MONTEIRO	DG Information Society	Manuel.monteiro@cec.eu.int
	Inma PLACENCIA-PORRERO (+ François JUNIQUE - document synthesis)		Inmaculada.placencia-porrero@cec.eu.int
	Robert STRAUSS	DG Employment and Social Affairs	Robert.strauss@cec.eu.int
	Robert LOBELL (report editing)		Robert.lobell@cec.eu.int

APPENDIX C - RECOMMENDATIONS FROM THE EU INSTITUTIONS

C.1 Commission, September 2001 Communication

The recommendations extracted from the document⁴ can be summarised as follows:

- (6) Adoption of the Guidelines for all public Web sites before the end of 2001;
- (7) Constant improvement of the Web pages (better ways to deliver Web content and services as new technologies and new versions of these Guidelines are developed);
- (8) Proposal for the establishment of an inter-institutional within the European institutions;
- (9) Monitoring and identification of best practices. Compilation and dissemination of the results. Exchange of information and benchmarking of the progress (based on mutually agreed criteria for adoption and implementation);
- (10) Progress results on the eEurope Web site;
- (11) Awareness-raising, dissemination, education, and training;
- (12) Organisations receiving public funding to be encouraged to make their Web sites accessible;
- (13) Encouraging not only national but also local and regional public Web sites;
- (14) Achieving overall accessibility of both public and private Web sites during 2003, the European Year for People with Disabilities;
- (15) Ongoing dialogue with persons with disabilities and their representatives for regular and consistent feedback.

⁴ A copy of the CEC Communication can be found at http://europa.eu.int/information_society/topics/citizens/accessibility/web/wai_2002/cec_com_web_wai_2001/index_en.htm

C.2 Council, March 2002 Resolution

The comments/recommendations extracted from the document⁵ can be summarised as follows:

- (1) Increasing efforts to speed up accessibility;
- (2) Implementation of specific and adequately-resourced measures to achieve the underlying objective of the eEurope 2002 Action Plan for accessibility of public Web sites at all levels of government;
- (3) ESDIS to monitor progress in the adoption and implementation of the Guidelines and to develop common methodologies and comparable data so as to facilitate the evaluation of progress;
- (4) Digital content to be accessible, for example by, when funding development of websites, requiring those websites to implement the Guidelines;
- (5) Participation in the European Year for People with Disabilities in 2003. Improvement of Web accessibility, awareness and training. First half of 2004 a report giving an overview of progress made;
- (6) Permanent dialogue with representative organisations of people with disabilities and organisations representing older persons, so that their reactions to these matters may be taken into account.

C.3 Parliament, June 2002 Resolution

The comments/recommendations extracted from the document⁶ can be summarised as follows:

- (4) On a mandatory basis, all public websites of the EU institutions and the Member States to be fully accessible by 2003, which is the European Year for People with Disabilities. EU institutions and the Member States to comply with the authoring tools accessibility guidelines (ATAG) by 2003;
- (5) Translations authorised by the W3C in the languages of all Member States as soon as possible (W3C, possibly EU translation services and Member States experts);
- (6) Application to regional and local administrations Web sites;

⁵ A copy of the Council Resolution can be found at http://europa.eu.int/information_society/topics/citizens/accessibility/web/wai_2002/council_res_web_wai_2002/index_en.htm

⁶ A copy of the EP Resolution can be found at http://europa.eu.int/information_society/topics/citizens/accessibility/web/wai_2002/ep_res_web_wai_2002/index_en.htm

- (7) Dialogue with the representatives of disabled and elderly people;
- (8) Co-operation with the candidate countries, including on implementation of eEurope+ 2003 action plan;
- (9) Verification of the cost-benefits achieved by compliance with "the guidelines" for web site designers and web site providers (initial design versus re-design, wider audience).
- (10) Initiatives to improve elderly persons' IT skills (e.g. exchanges of best practices);
- (11) Opportunity for people with disabilities to reintegrate into the labour market and participate in society (of vital importance especially in many candidate countries of the ex-communist bloc, since access to social services is complicated by the transition period in which public facilities are subject to ongoing reform);
- (12) Active exchange of best practice and a benchmarking process incorporating the needs of the candidate countries;
- (13) Availability of the special hard and software and compatibility of information with the hard- and software (accessibility requirements) are not the only conditions for access: information should be structured according to user skills (familiarity with IT, age, etc); training for people who offer information to people with cognitive disabilities;
- (14) Promotion of accessible design for all types of equipment used to access the internet (awareness-raising campaigns, standardisation of equipment etc.);
- (15) Partnership with manufacturers to encourage development and marketing of equipment for simple and cheap home internet access for people with disabilities;
- (16) Web content to be clear and simple (for people with reading problems or intellectual disability);
- (17) Social and human relations play an important role for disabled and elderly people and Web sites should not be the only way of accessing public sector information;
- (18) Further development, adoption and implementation of the improvements (or new versions) of "the guidelines" since the Internet sector is changing very rapidly;
- (19) Web sites provision of content in a universally accessible data format;
- (20) Support of multiple browsers and browser versions;
- (21) Member State "information points" for advising users on actions to take in case of complaints on lack of accessibility;
- (22) Further studies aimed at drawing up measurable criteria with a view to achieving compliance and implementing complaints procedures in accordance with WAI;
- (23) Governments to make disabled people aware of the benefits of getting online and also to encourage higher take-up of the internet amongst people with disabilities (grants for technology, training and support);

- (24) Further research in accordance with WAI and needs for special apparatus to serve people with functional handicaps;
- (25) Promotion of accessibility for the private sector (websites, products and tools), in particular websites with commercial and social functions;
- (26) Projects, activities and organisations that receive public funding to comply;
- (27) Public responsibility of European institutions and Member States governments and opportunity to give an example to others;
- (28) Possibility of specifying accessibility in tenders for products or services;
- (29) Promotion of the quality rating and benchmarking with the Commission as co-ordinator, while developing and enhancing standards; performance highlighted in eEurope benchmarking reports;
- (30) Mandatory criteria in public procurement policies of the EU;
- (31) Websites to be double-A compliant (for more real accessibility);
- (32) Government initiatives (awareness, training available for designers) as to encourage the private sector;
- (33) EP to be kept informed about the progress made (first by the end of 2002);
- (34) EP is informing governments and parliaments of the Member States and of the candidate countries.

C.4 Committee of the Regions – May-June 2002 Opinion

The comments/recommendations extracted from the document⁷ can be summarised as follows:

- (35) Importance of the social objectives of the European information society;
- (36) Urgent implementation in the public sector;
- (37) Importance for the municipal and regional specific services for people with disabilities and older people;
- (38) Needs of small groups of disabled or elderly users with very specific accessibility needs (many municipal and regional online services are designed exclusively for those people);

⁷ A copy of the CoR Opinion can be found at http://europa.eu.int/information_society/topics/citizens/accessibility/web/wai_2002/cor_opinion_web_wai_2002/index_en.htm

- (39) Accessibility needs of various ethnic, language and religious groups (common amongst the users of municipal and regional online services);
- (40) Application to the workplace for equal opportunity (as browser based tools are increasing very rapidly within organisations);
- (41) Priority to European level pilot studies for municipal and local governments, since this level of public administration produces the largest proportion of services targeted at disabled and older people;
- (42) Some local and regional - both public and private sector - portals could be an instrument of good practice with respect to improving Web accessibility in the private sector;
- (43) Public sector services to be considered as an integrated whole without separating the online components. Services provided to disabled and older people through traditional channels to be developed alongside online services;
- (44) Application to European local and regional authorities online services;
- (45) Sufficient investment in promoting guidelines with businesses that are specifically developing and providing services.

C.5 Economic and Social Committee – February 2002 Opinion

The comments/recommendations extracted from the document⁸ can be summarised as follows:

General comments

- (46) Risks of social exclusion for those excluded from accessing information.
- (47) Appropriate funding to be allocated for user awareness training as well as for the purchase of adaptive and assistive technical devices whenever they are required.
- (48) Active and democratic participation of the persons with disabilities as citizens in the decision-making processes.
- (49) Active participation in community life by persons with disabilities as a better possibility to apply for jobs in the public administration and benefit from employment services. Increased participation of people with disabilities in politics and in the democratic process (public Web sites as vectors of political development information).
- (50) Importance to be highlighted also for the Accession Countries (eEurope+ initiative).

⁸ A copy of the ESC Opinion can be found at http://europa.eu.int/information_society/topics/citizens/accessibility/web/wai_2002/ces_opinion_web_wai_2002/index_en.htm

- (51) Standardisation on access for a better use of European-wide available assistive technology.
- (52) Involvement to be extended to regional and local administrations (closer to the citizen's priority needs). Norms and procedures to be simplified for accessing internet based information.
- (53) Major initiative to be proposed in connection with the European Year for People with Disabilities in 2003 to make also private Web sites accessible.
- (54) Ensure a two-way interactive dialogue between the European institutions and the organisations (e.g. EDF) of and for disabled people in Europe as well as with individual experts with disabilities.
- (55) Not to forget elderly persons, especially those who have been marginalized as a consequence of the technological development.
- (56) Active use of research programmes of the European Union (e.g. e-inclusion in 6th RTD Framework Programme). Incorporation of the WAI guidelines in the Interchange of Data between Administrations (IDA) programme.
- (57) Specific programme for joint training activities of developers of Web sites and representatives of disabled users. Co-ordination between EU programmes, for instance on Web security, to mainstream the interests of people with disabilities.

Specific comments

- (58) The issues to be the subject of mandatory legislation; meanwhile to carry into effect without delay all measures proposed by the Commission and to establish a methodical monitoring system of their implementation.
- (59) Disseminating and encouraging the use of the WAI guidelines also among other organisations, like trade unions and employer organisations.
- (60) ESC own Web site to be accessible and user friendly before 2003, the European Year for People with Disabilities, if necessary, with the support of the Commission.
- (61) The increasingly important field of eCommerce and disabled people to be also covered: consumers' interests, protection of personal data, integrity, etc.
- (62) EU institutions own public Web pages to be accessible.
- (63) Public authorities to extend their accessibility initiatives to other areas than Web. Also regional and local authorities to take actions. Introduction of Design for All principle in general didactic programmes for education on ICT, etc.
- (64) Using the principle of Web accessibility at European level to give the European citizens with disabilities a stronger sense of ownership to the idea of European integration.
- (65) A clause against this corresponding kind of discrimination should be included in the proposed disability specific directive to be adopted for the European Year for People with Disabilities.

- (66) Earmark funding for implementation taking into account all aspects and all activities, including professional training of staff and increasing the efficiency of the public administrations.
- (67) Special attention in the setting up of accessible electronic terminals in all places where disabled people are likely to make use of them.

APPENDIX D - DETAILED SITUATION IN EACH MEMBER STATE

D1 GERMANY

D1.1 Status in March 2001

The federal government is working on taking-up the guidelines.

D1.2 Update October 2002

On May, 1, 2002 the “Bundesbehindertengleichstellungsgesetz (BGG)” (Law on the equalisation of opportunities for people with disabilities) was enacted. One important issue in BGG is barrier free access including access to information. Consequently, on July 24, 2002 the “Barrierefreie Informationstechnik Verordnung (BITV)” (Decree on barrier free access to information technology <http://www.fernuni-hagen.de/FTB/new/service/eaccess/doc/rechtsverord.htm>) was enacted. The BITV refers to WAI WCAG 1.0, but transfers the guidelines into a German legislative format. Actually, conformance level AA is the minimum requirement for all sites of the federal public authorities (new sites and substantial changes immediately, special information for people with disabilities until 2003, others until 2005). Special navigation and entrance pages are required to conform with AAA.

Legislation of the States is expected to follow in 2003.

The private sector is addressed through negotiations with accredited user organisations. Negotiations are centrally registered and should lead to targeted agreements.

Intranet pages are covered by the “Sozialgesetzbuch IX” (social book IX) § 81, which requires barrier free access at the workplace.

The federal Government has funded the AbI project (Alliance for **barrier** free **Information** technology www.abi-project.de) in combination with the BIK project (Barrier free **Information** and C(K)ommunication <http://bik-online.dias.de/>) which will support the implementation process with special emphasis on work related sites and contents.

D2 FRANCE

D2.1 État en Octobre 2001

La Circulaire du Premier Ministre d’octobre 1999 recommande aux responsables et concepteurs du web public de rendre accessible aux personnes handicapées les sites internet de l’état en leur appliquant les priorités de niveau A définies dans les recommandations du WAI,

L’agence pour le développement des technologies de l’information et de la communication (www.atika.pm.gouv.fr), service du Premier Ministre chargé de l’appui technique pour l’administration électronique, met en ligne un dossier technique régulièrement mis à jour qui comprend en particulier la traduction française des

recommandations du WAI ainsi que le livre blanc de l'association Brailletnet. L'accessibilité des sites internet de l'état est l'un des indicateurs des progrès de l'administration électronique dont la délégation interministérielle à la réforme de l'état a la charge.

Dans le cadre de l'évaluation annuelle des sites publics de l'État, l'accessibilité d'un échantillon de trente sites a été mesuré par l'association Brailletnet.

L'évaluation est réalisée par un groupe expérimenté constitué de trois experts, ergonomiste, web master et aveugle spécialiste, des aides techniques. Elle est basée sur les recommandations du WAI dont l'application est appréciée par le logiciel Bobby. Les environnements les plus communément employés ainsi que les navigateurs en mode texte associés à l'interface adaptée la plus connue des personnes aveugles et malvoyantes sont l'objet des tests d'évaluation.

Au terme de cette évaluation, il apparaît qu'aucun des sites ne respecte complètement les recommandations internationales du WAI, d'autant que, même lorsque les pages d'accueil sont relativement accessibles, les pages de niveaux supérieurs le sont beaucoup moins.

Les sites évalués se répartissent en trois groupes d'inégale importance :

- Dans un petit cinquième de sites un effort visible d'accessibilité a été réalisé ;
- La moitié des sites peuvent prétendre à une meilleure accessibilité après plusieurs modifications ;
- Un tiers des sites est difficile d'accès ou inaccessible pour un cas qui ouvre sur une page en flash.

Les Problèmes les plus fréquemment rencontrés concernent souvent des points essentiels pour l'accessibilité :

- Les éléments graphiques sans alternative textuelle ;
- Les cadres mal ou pas nommés ;
- Utilisation de script qui ne sont pas reconnus par les navigateurs textuels ;
- Utilisation d'images pour afficher du texte ;
- La mise à disposition exclusivement de documents au format PDF ;
- Les liens images peu concis, peu explicites ;
- L'utilisation de la technologie Flash pour faire des pages plus "attrayantes" ;
- Des sites complexes et peu homogènes, tant dans leur organisation que par la présence de plusieurs chartes graphiques dans le seul souci d'attractivité visuelle.

Pour répondre à cette situation et faire progresser l'accessibilité du web public, les actions suivantes sont mises en œuvre :

- Diffuser largement les résultats de cette évaluation au sein de l'internet public pour une prise de conscience rapide de l'ampleur de la question ;
- Organiser un cycle de "formation de formateurs" à l'accessibilité des sites internet afin de former des agents publics ad hoc en vue de constituer une cellule experte en accessibilité ;
- Monter un réseau interministériel de correspondants ad hoc dans le cadre du Club de l'internet public en utilisant notamment l'extranet interministériel ;
- Organiser des séances de sensibilisation aux publics de web mestres le plus large possible.
http://www.fonction-publique.gouv.fr/communications/guides/guide_index.htm
- Renouveler et annualiser cette évaluation pour suivre les progrès réalisés et encourager les sites accessibles en les valorisant en interne et en externe, notamment par la création d'un label.

D3 ITALY

D3.1 Status in March 2001

An inter-departmental working group co-ordinated by the [Department for Public Administration](#) has been set up. One of the group's tasks is to evaluate the actions that allow access to the information and services available on public administration websites to people with disabilities. A method for evaluating government websites has also been launched by AIPA, in collaboration with Rome University, and taking into account the WAI standards. Other websites, such as that of the Chamber of Deputies (www.camera.it) is already available under the WAI standards.

D3.2 Update March 2002

On March 2001, the Ministry of Public Function signed a directive with the title: "Linee Guida per l'organizzazione, l'usabilità e l'accessibilità dei siti Web delle Pubbliche Amministrazioni". This document contains a sort of national guidelines for both usability and accessibility of Web sites of the public administration, in line with the WAI Guidelines (WCAG 1.0) and with of the eEurope programme concerning the accessibility in the framework of the Italian egovernment plan.

The Authority for Information Technology in the Public Administration (AIPA) has continued initiatives to promote and to facilitate the application of accessibility to both public Web sites and hardware/software used for departmental activities of the public administration. In particular, on September 2001, a directive with the title "Criteri e strumenti per migliorare l'accessibilità dei siti web e delle applicazioni informatiche" was published.

([http://www.aipa.it/servizi\[3/normativa\[4/circolari\[2/file/Aipacr32_accessibilità.rtf](http://www.aipa.it/servizi[3/normativa[4/circolari[2/file/Aipacr32_accessibilità.rtf)).

Other AIPA's initiatives are:

- two national conferences on the subject;
- a CD-ROM on WAI guidelines;
- a training plan for public webmasters;

- an assessment of the impact of accessibility on the public administration activities;
- a study on the accessibility needs of public sites;
- a survey on accessibility level of a sample of public sites;
- a web site on the subject (<http://www.pubbliaccesso.it>).

Some important public Web sites, such as that of the Italian government and that of the Department of Public Function, have been completely redesigned, and are now accessible. More information on all activities can be found at the page: http://www.governo.it/sito_internet/accessibile.html.

D3.3 Update October 2002

The two directives published in 2001 are producing their first results in the field of public Web sites. Several sites of the central and local administration are improving their accessibility level, even if no reliable data are available to give a precise percentage.

On May 30th, 2002, upon a proposal of the Minister for Innovation and Technologies, the Prime Minister signed a new Directive regarding the exploitation of the Internet Second Level Domain ".gov.it", aimed to group Public Administrations sites complying with certain common standards:

http://www.innovazione.gov.it/ita/documenti/direttiva_portale.shtml

One important requirement for these sites is to comply with level A of the WAI WCAG 1.0, following the AIPA (Authority for the Information technology in the Public Administration) directive and the Communication of the European Commission of September 2001.

The directive is addressed to central administrations and to all corporations and agencies controlled by the Government, which are entitled to be considered institutional sites providing public information, services and transactions.

In 2002, thanks to an agreement among three Ministers (Innovation and Technologies, Labour and Social Policy, Health) an Interdepartmental Board for the "Development and Use of Information Technologies for Weak Categories", was established with the task of investigating needs of disabled and elderly persons, already undertaken initiatives and new proposals, in order to define a plan for use of information technologies by these people and in aid of them.

<http://www.ministerosalute.it/cid/DEFAULT.ASP>

D4 SWEDEN

D4.1 Status in March 2001

The Swedish Agency for Administrative Development recently presented its report "Criteria for 24/7 agencies in the networked public administration". IT says that the agencies' services for people with disabilities should be designed with a broad perspective, taking into account the variations related to special requirements. WAI is integrated in guidelines for local authorities since February 2001.

D4.2 Update March 2002

By May 2002, a recommendation on WAI guidelines will be included in a guidelines document for design of web sites of Swedish government agencies, elaborated by the Swedish Agency for Public Management.

By June 30, 2002, the National Accessibility Centre at the Office of the Disability Ombudsman, commissioned by the Swedish Government, will submit requirements for government agencies. A central issue in these requirements will be the W3C/WAI guidelines for web accessibility.

Educational programs related to web accessibility are provided by the Swedish Handicap Institute as well as a few commercial actors.

Consultancy work to create accessible web sites as well as evaluation of web accessibility is carried out on a commercial basis by public as well as private actors.

D4.3 Implementation Status

A study of web accessibility in the Swedish public sector was carried out in February 2002 by the company Handisoft on behalf of the Swedish Institute for Special Needs Education. A number of evaluation tools were used, e.g. BOBBY 4.0, and WAVE 2.0; the web sites were also visually checked and a direct analysis of the HTML-coding was made.

D5 PORTUGAL

D5.1 Status in March 2001

The Web Accessibility Initiative has already been adopted within the framework of the National Initiative for Citizens with Special Needs in Information Society (*Iniciativa Nacional para os Cidadãos com Necessidades Especiais na Sociedade da Informação*) by Cabinet Resolution 96 in August 1999 and Cabinet resolution 97/99 – Accessibility to the Public Administration websites.

An Access Unit (*Unidade Acesso*) has been created within the Ministry of Science and Technology, which develops coordination activities and communicates information about projects within the ambit of the above-mentioned National Initiative (*Iniciativa Nacional*), as well as training and the creation of skills for citizens with special needs. The following actions have been carried out or are in progress:

- Develop of Visitability Requirements
- “Accessibility of Web Public Administration” conference, held in November 2000
- Training courses of designing web accessibility.
- Helpdesk of Web Accessibility to Public Sites Webmasters.
- Accessibility of Public Administration Web Sites Report.
- Web Accessibility Evaluation Methodology.
- Accessibility prize: Portugal@cessível.
- Users Panel

- Accessibility Gallery.

D5.2 Update March 2002

- Develop of Visitability Requirements
- “Accessibility of Web Public Administration” conference, held in November 2000
- Training courses of designing web accessibility.
- Helpdesk of Web Accessibility to Public Sites Webmasters.
- Accessibility of Public Administration Web Sites Report (1st – Nov 2000).
- Accessibility of Public Administration Web Sites Report (2nd – Fev. 2002).
- Web Accessibility Evaluation Methodology.
- Accessibility prize: Portugal@cessível.
- Users Panel
- Accessibility Gallery (www.acesso.mct.pt).
- ADOPTION OF WAI Guidelines
- Manual of Designing WebSites in Public Administration (<http://www.cisi.mct.pt>), being one of the evaluation indicators the accessibility by Citizens with Special Needs including WAI (level A, AA, AAA)
- Implementation and evaluation by an external company (February 2002) in the scope of Central Government departments
- Training Manual: Making WebSites Accessible to people with disabilities (<http://www.acesso.mct.pt>).

D5.3 Update October 2002

Unidade ACESSO of MScT change to UMIC – *Unidade de Missão para a Inovação e Conhecimento* - Mission Unit to Knowledge & Innovation of PCM – *Presidência do Conselho de Ministros* – Council Ministers Presidency.

11 sites of IPM – *Instituto Português dos Museus* – Portuguese Museum Institute adopted the WCAG 1.0 level A with the follow up of HelpDesk of Unidade Acesso (see: <http://www.acesso.mct.pt/museus.htm>)

1 Training course of Web Accessibility Design in INA – *Instituto Nacional de Administração* – National Administration Institute. Target: Webmaster of Public Administration; 10 persons.

Note: Data from Accenture Survey of Web Accessibility of Public Administration Sites (Feb. 2002):

- Total of sites analysed: 302

- 15,2% conform with level A of WCAG 1.0 in all pages (Bobby off-line test);
- 29,4% conform with level A of WCAG 1.0 at Home Page;
- 17,5% of Websites have the Web Accessibility Symbol (NCAM) fixed in the Home Page.

Results of questionnaire: “How you classified your Website concerning accessibility to citizens with special needs? Excellent: 4.1%; Very good: 8.7%; Good: 15.1%; Regular: 25.9%; Insufficient: 46.6%

D6 GREECE

D6.1 Status in March 2002

A Task Force has been set up by the Secretary of Information Society at the Hellenic Ministry of National Economy. One of the duties of this Task Force is to set up and run the National Network on Design for All, Universal Access and Assistive Technologies. The process has already started in April and the network will become operational in the near future.

The Centre for Universal Access and Assistive Technologies of ICS-FORTH is the National Contact Centre representing Greece in the European Network of Excellence on Design for All (eAccessibility Group) and coordinating the national open network represented by all key actors engaged in the field (comprising universities, research centres, disability organisations, industry, etc).

D7 SPAIN

D7.1 Status in March 2001

WAI is being considered by parliament and a standards working group is looking at WAI guidelines.

D7.2 Update March 2002

The “**Ley de Servicios de la Sociedad de la Información y de Comercio Electrónico**” establishes the requirement for public administration pages to be accessible before December 2005. The administration also has the capability of imposing accessibility condition on pages financed with public funds.

The administration will also promote the accessibility of software and hardware products. A Plan is currently under discussion to implement this requirement.

D8 FINLAND

D8.1 Status in March 2001

The WAI guidelines were adopted in the “*JHS129 Guidelines*”, Ministry of the Interior, December 2000.

D8.2 Update March 2002

There is co-operation between several organisations in order to produce information about WAI guidelines.

In April 2002 suomi.fi – a common portal for Finland’s public sector services and related information – has been opened. It includes web services of more than 100 organisations. There are also about 2000 links. Special attention has been paid to accessibility and usability. The text version complies with AA level of WAI guidelines. Also otherwise it follows guidelines as much as possible.

D8.3 Implementation Status

Suomi.fi is accessible.

D9 UNITED KINGDOM

No information provided as yet.

D10 IRELAND

D10.1 Status in March 2001

Recommended Government Guidelines on Web Publication for Public Sector Organisations have been published which include guidelines in relation to Accessibility. A target has been set for all Government websites to achieve Level I WAI standards by end of April, 2001 with achievement of Level II WAI standards anticipated as a target for end of 2001.

A Webmaster Network representing all Government Departments is progressing these objectives.

D10.2 Update March 2002

The 1999 Web Publication Guidelines for the Public Sector are still current. The WAI standards are the adopted standard in the area of Accessibility.

Of 31 central government websites 28 have now achieved at predominantly level I WAI compliance. There has been some difficulty in complying with WAI checkpoints 5.1 and 5.2 on the use of tables which are required for level I. Three organizations have yet to achieve level I. WAI levels 2 and 3 have proved more difficult to achieve and in this respect work is ongoing - currently one site can claim WAI level 3 compliance. Three more Departments are due to launch redesigned level 3 compliant sites shortly.

A new group The Web Standards Implementation Group was set up in December 2001. This group will support and monitor the implementation of all web standards including Accessibility standards.

D10.3 Implementation

90% Level I.

D11 DENMARK

D11.1 Status in March 2001

Web design standards, the state standards for electronic publication and consultation for web designers are established, and the WAI standards are included. Systematic checks are made on the content and accessibility of public websites in all public sectors, and the results are published on the Web at: <http://www.bedstpaanettet.dk>.

This procedure is carried through once per year in – for the present – a three year period, and the first check-year is completed.

The process is open for all for comments, corporation between public webmasters are established – hereunder to make sure, that the web-check do fit the different public service aims.

D11.2 Update March 2002

A revised process – including close corporation with public webmasters before the check results are published – and a revised check list based on the year 2001 check procedure experience, is the basis for the 2002 check which is “in full swing”.

The web-check itself as stated before is supported politically and by organization and activities making the hole program THE packet motivating mutual action reaching accessible and quality public sites over the long term process necessary.

D11.3 Adoption Status

Yes, in the sense, that no negative comments are expressed to the EC-WAI-communication, that WAI is included in the long-term web-check, and that adoption is mainly a question about knowledge.

D12 THE NETHERLANDS

D12.1 Status in March 2001

WAI recommended by Minister of Public Health, Welfare and Sport, February 2001. Ongoing development of adoption plans.

D13 LUXEMBOURG

No information provided as yet.

D14 BELGIUM

D14.1 Update March 2002

Web Accessibility is taken into account in several *egovernment* projects. E.g. guaranteeing accessibility was a requirement for the high speed intergovernmental network UME set up by the federal ICT promoting agency FEDICT (<http://www.fedict.be>).

Also several communities make sure that their webpages are accessible (cf. below).

Accessibility was already an issue in the Tele-administration projects funded by the Flemish government that ran until 2001: see <http://www.vlaanderen.be/ned/sites/teleadmin/>. The research group on Document Architectures of the Katholieke Universiteit Leuven (see <http://go.to/docarch>) was in charge of consulting the Tele-administration projects on accessibility issues. The **WAI Guidelines** on Web accessibility have been promoted.

In April 2001, the non-governmental organisation called Blindenzorg Licht en Liefde (BLL), together with Rudi Canters, set up the Blindsurfer logo for Flemish language Web sites.

The logo is attributed after human checking of the whole Web site, rules being set up according to the WAI Guidelines.

The Flemish government is supporting BLL in their efforts to check and advise many provincial and community-level sites.

The Walloon Agency for the Integration of Disabled People (AWIPH) <http://www.awiph.be>, which is a Walloon Region competence <http://www.wallonie.be>, has achieved a chart of accessibility of the Internet with a version tailored to visually impaired people available. The chart encourages web developers to follow the tips and technical approaches proposed in the guidelines.

As of March 2002, Belgium has no federal testing, labelling or promotional activities in this field.

D15 AUSTRIA

D15.1 Status in March 2001

The subject of the working group "web-based applications" which is related to the Consultation Committee for Information Technology.

APPENDIX E - WAI CONTENT GUIDELINES (VERSIONS 1.0 AND DRAFT 2.0)

The purpose of this appendix is not to detail the WAI documents that can be found online but to summarise the main accessibility dimensions that are covered by the guidelines and how they have evolved between the two versions. This is necessary to consider when a metric is decided upon for the benchmarking statistics.

E.1 WCAG Version 1.0

The official document can be found at <http://www.w3.org/TR/WCAG10/>. The accessibility dimensions that are retained can be worded as follows. The level of accessibility (A, AA or AAA) is determined through specific check points for each dimension and therefore it cannot be indicated here.

- (68) Provision of equivalent alternatives to auditory and visual content.
- (69) No reliance on colour alone.
- (70) Proper use of markup and style sheets.
- (71) Clarity of natural language usage.
- (72) Graceful transformability of tables.
- (73) Graceful transformability of pages featuring new technologies.
- (74) User controllability of time-sensitive content changes.
- (75) Direct accessibility of embedded user interfaces.
- (76) Device-independence of the design.
- (77) Accessibility with older browsers or assistive technologies (*temporary point*).
- (78) Use of W3C technologies and guidelines.
- (79) Provision of context and orientation information.
- (80) Clarity of navigation mechanisms.
- (81) Clarity and simplicity of documents.

E.2 WCAG Version 2.0 draft version 2002-08-22

The official document can be found at <http://www.w3.org/TR/WCAG20/> (possibly a more recent version) . The accessibility dimensions that are indicated can be worded as follows:

- (I) **Perceivability**: all intended function and information can be presented in form(s) that can be perceived by any user - except those aspects that cannot be expressed in words.
- (II) **Operability**: the interface elements in the content are operable by any user.
- (III) **Navigability**: facilitation of content orientation and navigation
- (IV) **Understandability**: easiness to understand the content and controls.
- (V) **Robustness**: use of Web technologies that maximise the ability of the content to work with current and future accessibility technologies and user agents.

The two systems are compatible but with a mapping only at the level of the version 1.0 check points, resulting not in a simple cross-reference between the two schemes, as shown on the table below. It must be clearly stated that the table below is based on this Summer draft of version 2.0 and therefore it could still be deeply changed.

v2.0	v1.0 check points														
dim.	prior	1	2	3	4	5	6	7	8	9	10	11	12	13	14

I	[1]	1.1 1.2 1.3 1.4	2.1 2.2		4.1										
II							6.4	7.1							
III						5.1 5.2							12.1		
IV															14.1
V							6.1 6.2 6.3		8.1			11.4			
Tech										9.1					

I	[2]			3.1 3.3 3.4											
II							7.2 7.3 7.4 7.5		9.3						
III				3.5 3.6 3.7							10.2 10.1		12.3 12.4	13.2 13.1 13.4	
IV													12.2	13.3	
V				3.2		5.3 5.4	6.5		8.1	9.2		11.2 11.1			
Tech															

I	[3]	1.5	2.2		4.3										
II															
III										9.5 9.4			13.5 13.9 13.7	14.3	
IV					4.2	5.5 5.6								13.8	14.2
V											10.3 10.4 10.5				
Tech												11.3		13.10 13.6	

APPENDIX F - WAI SUGGESTIONS FOR EVALUATING WEB SITES

The Education and Outreach Working Group is outlining approaches for reviewing accessibility of web sites. The resource is currently available on-line as draft [<http://www.w3.org/WAI/eval/>] and a very pruned and re-tabulated copy of the 14 November 2002 version, named “Evaluating Web Sites for Accessibility”, is provided below. The “[...]” marks indicates where details have been removed.

F.1 Introduction

This document outlines approaches for preliminary review Web site accessibility, and for evaluation of conformance to the Web Content Accessibility Guidelines 1.0. While it does not provide checkpoint-by-checkpoint testing techniques it does include general procedures and tips for evaluation during development of Web sites, and for monitoring of established Web sites. Other resources will be developed for in-depth compliance testing. The measures described here are intended to supplement an organisation’s existing procedures for content management and quality assurance on their Web sites. [...]

There are a variety of tools and approaches for evaluating Web site accessibility. No single evaluation tool yet provides comprehensive information or captures all problems with regard to the accessibility of a site; therefore evaluation involves a combination of approaches. Goals for evaluating Web sites vary, and require different approaches to meet those goals:

- *Preliminary review can:*
 - *identify general kinds of barriers on a Web site.*

- *Conformance evaluation can:*
 - *catch major problems during development phase of a new site;*
 - *determine the WCAG 1.0 conformance level for an existing Web site;*
 - *demonstrate that a Web site meets a given WCAG 1.0 conformance level.*

- *Conformance evaluation, plus review of procedures for ongoing monitoring, can:*
 - *help ensure that a site will maintain a given conformance level in the future.*

Note: This document may be updated periodically to reflect clarifications or improvements in evaluation approaches, including increasing incorporation of semi-automated evaluation tools as the capability of such tools improves, and corresponding reduction of manual evaluation steps; as well as incorporation of more precise checkpoint-by-checkpoint testing techniques as these become available. Future versions of this document may include an evaluation checklist and/or be published as a W3C Note. [...]. Mention of specific evaluation tools in this document does not constitute endorsement by W3C, and use of either the preliminary review or conformance evaluation method does not guarantee conformance under the laws or regulations of any specific government.

F.2 Preliminary Review

A preliminary review may help to quickly identify the scope of problems on a Web site. However, the preliminary review will not catch all of the problems on a site and should not be used to determine conformance level. A preliminary review does not include perspectives from a variety of users with disabilities nor does it touch or test every aspect of a site.

A preliminary review combines some manual checking of representative pages on a Web site, along with the use of several semi-automatic accessibility checkers. Reviewers do not need to know Web mark-up languages, but should be able to download software and familiarise themselves with some online tools, and change certain settings on their browser.

To conduct a preliminary review, complete all five steps below.

- (1) Select a representative sampling of different kinds of pages from the Web site to be reviewed; must include all pages on which people are more likely to enter your site. ("welcome page" etc.) NOTE: on web sites with database driven dynamically generated web content, generate broadly representative samples, freeze, and test the output.*
 - (a) Use a graphical user interface (GUI) browser [...] and examine the selection of pages [...]*
 - (b) Use a voice browser [...] or a text browser [...] and examine the Web site [...]*
- (2) Use two general accessibility evaluation tools and note any problems indicated by the tools.*
- (3) Summarise results*
 - (a) Summarise the types of problems encountered, as well as best practices that should be continued or expanded on the site*
 - (b) Indicate the method [...]*
 - (c) Recommend follow-up [...]*

F.3 Conformance Evaluation to WCAG 1.0

A comprehensive evaluation combines semi-automatic, manual, and user testing of accessibility features. Comprehensive evaluations require familiarity with Web mark-up languages; initial downloading and/or training on a variety of evaluation tools and approaches; configuration of browser settings; and co-ordination with reviewers with a variety of disabilities. Evaluation with users is important as it helps to identify problems in how the technical solutions are being applied. [...]

A comprehensive evaluation includes all of the steps below except those that are explicitly identified as alternatives or optional (NOTE: while identifying the page selection is a key first step, and summarising and reporting the results of evaluation is the logical conclusion, the order of the intervening steps is not crucial).

- (1) Identify and disclose scope of site to be evaluated and the targeted conformance level for the evaluation (NOTE: disclosure should be internal to the organisation during evaluation; if conformance is claimed publicly, disclose externally (e.g. on the Web site)):*
 - (a) Identify and disclose the target conformance level of WCAG 1.0.*
 - (b) Identify and disclose a page selection for manual and user testing which includes at least one of each different type of page on the site, and all pages on which people are more likely to enter your site. NOTE: there are special considerations for web sites with database driven dynamically generated web content*
 - (c) Identify and disclose the entire Web site including all pages at a base URL for automatic and semi-automatic evaluation; NOTE: if testing of the entire site is not feasible (e.g. because of its unusual size or dynamic nature) identify an expanded page selection, to be clearly explained and disclosed on the Web site. Suggestions for inclusions in this expanded*

page selection: pages from different sections of the Web site; pages representing different "look & feel"; pages representing different development tools and processes including those generated from databases; pages produced under different guidelines; "contact us" pages; pages critical to your business; etc. If any area of a site is excluded from evaluation, be sure to disclose this information.

- (2) *Semi-automatic and automatic evaluation*
 - (a) *Validate markup including syntax and style sheets, using all applicable validators, on page selection. Run at least one validation tool across entire Web site [...]*
 - (b) *Use at least two accessibility evaluation tools on page selection and run at least one tool across entire Web site. [...]*
- (3) *Manual evaluation*
 - (a) *Examine page selection using relevant checkpoints from the Checklist of Checkpoints for Web Content Accessibility Guidelines 1.0. NOTE Relevant can mean: checkpoints that cannot be evaluated by automatic or semiautomatic tools; checkpoints that actually apply to the site (e.g. if site contains no audio content, skip those); and, as a minimum, those checkpoints that apply to the level of conformance you are evaluating. [...]*
 - (b) *Read over the pages: is the text clear and simple to the extent appropriate for the purpose of the Web site? [...]* [NOTE: this is also an appropriate question to ask people participating in usability testing of accessibility features].
- (4) *Usability testing of accessibility features*
 - *Have people with different disabilities, different levels of technical expertise, and different levels of familiarity with the site, using a variety of assistive technologies and adaptive strategies, review page selection and explore freely across entire Web site [NOTE: Sometimes this is done in the context of a testing laboratory, but it is also valuable for people to evaluate the site in their typical Web environment. Different levels of user technical experience and familiarity with the site are important, and note that these will change over time, as people participate in reviewing the site.]*
 - *Ask testers to try to find answers to the most common questions for which people visit the Web site. Note areas where it is difficult or impossible the use the Web site.*
- (5) *Summarise and follow-up*
 - (a) *Summarise any problems and best practices identified for each page type and a representative URL, and method by which they were identified*
 - (b) *Recommend follow-up steps [...]*

F.4 Considerations for Specific Contexts

F.4.1 Evaluation during the development process [...]

F.4.2 Ongoing monitoring

To maximise likelihood that a Web site will maintain a given conformance level in the future, the following provisions should be in place:

- *clear statement of expected conformance level and scope of Web site it applies to*
- *clearly identified individuals responsible for monitoring the site, and follow-up procedures they can use to rapidly bring non-conformant pages into conformance*
- *clear expectations with regard to frequency, method, and scope of evaluations*
- *processes for validating and evaluating all changed pages and new types of pages before they are added to the site*
- *software to facilitate evaluation*
- *incorporation in Web site of address for feedback on accessibility of site*
- *automated or semi-automated tests to identify problems identified in the comprehensive evaluation*

NOTE: A full conformance evaluation is not necessarily required at each milestone in an ongoing review process. Steps like repeated user testing may only be required after major template or content changes.

F.4.3 Evaluation of legacy sites [...]

F.4.4 Evaluation of dynamically generated Web pages

Dynamically generated pages are usually assembled from one or more templates that provide common layout and navigation features, and content provided automatically from a database or other content management system. To achieve full conformance the accessibility of both templates and generated content must be evaluated. It is not sufficient to evaluate only templates: content may also contain markup, or be required to contain markup in order to be accessible. [...].

APPENDIX G - METHODOLOGY CONSIDERED BY DENMARK

Denmark has been investigating an approach of monitoring web sites quality through a weighted checkpoints list integrating accessibility, usability/usefulness and many other dimensions, in order to attribute global marks to pages or sites. Although not all accessibility criteria seem to have been integrated (the global mark mixes all qualities together and, therefore, strongly relativises accessibility importance) it might be worth reflecting on this general scheme, when designing the EU overall approach to monitor accessibility and to integrate it in general statistics collection about web use. It is also important to realise that several criteria listed as general usability issue are supposed to have some accessibility components (e.g. navigation, presentation). This shows that it is not easy to decide on general quality analysis scheme.

The big categories retained by the initial Danish scheme are listed below with their respective weight (maximum number of points). Individual criteria in each category are not displayed here.

- (1) Usability [69]
 - (a) Accessibility [23]
 - (b) Navigation [14]
 - (c) Presentation [23]
 - (d) User Orientation [9]
- (2) General Use Value [30]
 - (a) Content [16]
 - (b) Service [6]
 - (c) Legal Basis [8]
- (3) Specific Use Value [maximum 124]
 - (a) *Specific points* [53]
 - (b) Electronic Self-Service [71]
- (4) General Openness [12]
 - (a) Openness about Organisation [3]
 - (b) Dialogue and openness about services and procedures [9]
- (5) Specific Openness [maximum 18]

APPENDIX H - US DEPARTMENT OF JUSTICE METHODOLOGY

From the information publicly available on their Web site, it can be seen that the American Department of Justice (DoJ) is doing some monitoring of the implementation of the US Accessibility regulations. This could provide some ideas for the set-up required in the EU. The following lines of actions have been understood from their publications, with the assistance of some WAI contacts. It might be possible to contact some official there to understand how their model works in practice.

- The US DoJ does a survey every two years.
- Here are some detailed documents of possible interest, starting with their current questionnaire & process description, and then going into the first survey and report.
 - US Department of Justice home page (this is separate from the central 508 page for the US, and relates specifically to the DoJ's responsibilities under the statute):
→ <http://www.usdoj.gov/crt/508/508home.html>
 - Section 508, statutory language (especially Sec. 508 (d) REPORTS (1-2) and (e) COOPERATION):
→ <http://www.usdoj.gov/crt/508/508law.html>
 - Section 508 self-evaluation survey, introductory page:
→ <http://www.usdoj.gov/crt/508/survey.htm> .
 - Documents relating to current self-evaluation survey:
→ <http://www.usdoj.gov/crt/508/508docs2.html>
 - Memo explaining survey, including explanations of changes compared to previous survey:
→ <http://www.usdoj.gov/crt/508/cover.htm>
 - Web Page Accessibility Questionnaire... (note the section on "Selecting the Web Pages to survey"):
→ <http://www.usdoj.gov/crt/508/web.htm>
 - Web Page Accessibility Questionnaire (more basic questions):
 - The 2000 Report, that was based on the 1999 Survey (it will be superseded at some point - soon? - by an updated report), in particular the four sub-sections of section III, federal agencies' Web sites:
→ <http://www.usdoj.gov/crt/508/report/content.htm>

APPENDIX I - MEMBER STATE AND EU INSTITUTIONS SITUATION SUMMARY

See separate tables provided at the the end of the appendices (landscape orientation, pages 55 –58).

APPENDIX J - PRELIMINARY PROPOSAL FOR CONFORMANCE STATISTICS

The scheme below is a very preliminary idea, drafted by some Commission staff for establishing the basis of a fair reporting of the progress on accessibility of public Web sites, in the context of the benchmarking indicator required for eEurope. The description is based on a two stages process: (i) attributing marks to a page, and (ii) aggregating marks for sites and for countries, regions, etc.

The idea is also to break the overall indicator along several dimensions in order to allow multiple analyses which, in a political context, are always preferable, even if the objective is to provide emulation between Member States.

J.1 Attributing marks for individual pages

The principle would be to reach an overall mark per page – for each compliance level, through series of aggregation of partial assessment results. This would allow to define a notion of “nearly compliant” level, without relying too much on subjectivity, in order to fairly include sites that made a big effort but not complete yet. On the other hand, to stay at reasonably easily achievable compliance levels and not to waste expensive resources, only level A and AA would be considered.

J.2 Sampling pages and aggregating results

It is not possible to automate all the checkpoints of the WAI content guidelines, some aspects have to be reviewed manually and some tested with real users. Therefore it is impossible to evaluate all pages available on a large site and more over in a country with only limited resources. Suggestions to monitor only top level pages doesn't seem to be acceptable as there is not standard way to structure a site and, as mentioned above, it might be essential to have good navigation in the portal level pages, but it is useless if the pages containing the real information are inaccessible. WAI recommend a manual selection of pages, this will be optimal but requires a good knowledge of each site and therefore additional competent resources. In consequence it is proposed here to investigate a process based on statistical sampling, although this might require larger samples to reduce the error margin. The question of dynamically generated content, more and more frequent, has still to be treated carefully, as indicated in the WAI draft methodology. The random selection of pages could however be moderated to give particular attention to pages that users needs to go through for accessing information pages (e.g. home pages and portals menus), and also that as many sites as possible are included although some may be small compared to the others. These factors might still be possibly machine treated.

Aggregation could be done both on the dimension marks and on the counters of sites “reaching” or “nearly reaching” level A and AA. Aggregation can be done by site or super-site (portal) and globally at the country or region level, but should at all the levels be based on the total number of pages considered: simple aggregation of site results for example wouldn't work, as there is a huge discrepancy of sites in number of pages. The average marks per dimension would allow seeing where more effort has still to be done for each country (and for each site). It might be worth completing them with a dispersion indicator - a simple standard deviation for example; although there is no reason to expect a Gaussian distribution (it would be in fact interesting to study these distributions).

J.3 Site level aggregation

Some information is available from WAI concerning attributing a conformance level to a site but it is still leaving many grey areas. An arbitrary calculation method could be proposed but only to attribute “near” A/AA compliance marks and the sampling should be significant. For “full” compliance, the strict WAI guidelines should be followed, including the analysis of all the pages.

The principle would be to allow only a very limited number of pages not to have a good level of accessibility. It might be possible to find adequate aggregating formulas, either based on individual aggregation of each accessibility dimension or on the global values, and perhaps also on the ration of pages “nearly compliant”.

J.4 Country level aggregation

As indicated above the total number of pages (rather than sites) will be used for producing the overall indicators per country: percentages of public pages nearly-A, A, nearly-AA and AA.

Country	Level	% of pages		Accessibility Dimensions (WCAGv2 draft) Averages				
		Nearly compliant	Fully compliant	Perceivable	Operable	Navigable	Understandable	Robust
Germany	A							
	AA							
UK	A							
	AA							
France	A							
	AA							
...	A							
	AA							

The overall benchmarking eEurope indicator 15 could include both the “near compliance” and “full compliance” figures for level A and AA, in order to exhibit at the same time those countries who have made a big effort and the ones which have completed this effort.

Alternatively, as indicated above, rather than averaging the accessibility dimensions marks, it might be more valuable to concentrate on the distribution of sampled pages according to the amplitude of the problem detected

Country	Level	% of pages		% other pages according to their overall mark				
		Nearly compliant	Fully compliant	[0, .2[[.2, .4[[.4, .6[[.6, .8[[.8, N.C.[
Germany	A							
	AA							
UK	A							
	AA							
France	A							
	AA							
...	A							
	AA							

J.5 Monitoring exercise

Estimating the magnitude of the number of pages to analyse for accessibility would allow evaluating the amplitude of the resource necessary (cost and duration) for the simple monitoring of the situation. The following table tries to give such a number of pages at each level, for statistical sampling, although it should be re-estimated by a statistician.

	National level	Regional level	Local level	Total (10 regions: 7 big, 3 small)
Federal State	25	50 per region	50-100 per region	1375
Centralised Nation	100	25 per region		1200
Small Country	50	-	100	150
EU institutions	-			50
Total (mix of small, federal and centralised countries)				16000

This total number would reach around twenty thousands, if the Accessing Counties were to be included. This is a huge quantity and the resource required would be at least around 5 person-years, if based on the semi-industrial methods (about 3 pages per hour for complete evaluation including overheads).

However the quality of the criteria might not be sufficient to allow reliable assessments. In that case multiple assessment and election should be introduced which will increase the cost. In any case the methodology selected should include its own validation procedures (gauging).

J.6 Alternative initial approaches

It is worth mentioning that these resources could be initially much reduced if it is accepted to drop the aggregation of accessibility dimensions markers for detailed situation analysis: indeed all manual or user based checkpoints could be only evaluated if all the ones that can be processed automatically are positive enough to still allow an overall “near conformance”. This could be re-introduced later when finer actions become necessary to improve further the quality.

While the global accessibility situation is still quite poor, resources could perhaps even be reduced further, by abandoning the real compliance indicators (near or full A/AA) and handling the problem in an inverted approach (as considered in the Dutch investigation), i.e. detecting and counting only – but quickly - all big possible issues in pages and therefore attributing kind of negative marks on each dimension (omitting to consider small importance issues). This would still allow comparing situations both in evolution and between countries or regions. However when the situation improves, there is then a high risk that readers only consider the absence of big issues, forgetting the probable presence of (perhaps many) small issues making the page not compliant, or would it be another notion of “near compliance”?

APPENDIX K - ANALYSIS OF ONE PORTAL PER MEMBER STATE

The e-Accessibility Expert Group nominated a sample of portals (about one per Member State) to be centrally evaluated on identical criteria (WAI), in order to give national evaluation team an opportunity to adjust their own evaluation system. This work was carried out by specialists recognised by WAI in the framework of the FP5/IST Project WAI-DA. The sub-sections below indicate the overall results, while individual reports were directly passed to the corresponding national representative of the e-Accessibility expert group.

SUMMARY OF WCAG 1.0 CONFORMANCE EVALUATIONS OF WEB SITES NOMINATED BY THE E-ACCESSIBILITY EXPERT GROUP. (8/12/2002)

K.1 Introduction

This document summarises the results of evaluations of 17 Web sites, nominated by e-Accessibility Expert Group members from 11 EU Member States, to be evaluated for conformance to W3C/WAI's Web Content Accessibility Guidelines 1.0 (WCAG 1.0) [1]. The reviews were conducted during September and October 2002, by the BrailleNet Association and others on behalf of the Web Accessibility Initiative Design for All (WAI DA) Project of the World Wide Web Consortium (W3C) Web Accessibility Initiative (WAI) [2]. Detailed review results on individual Web sites will be made available to the individuals who nominated each site and to the European Commission co-ordinators of the e-Accessibility Expert Group

K.2 Conformance Evaluation Method

The Web sites were reviewed for conformance to the Double A level (checkpoint priorities 1 and 2) of WCAG 1.0, using a modified form of the conformance evaluation method described in the document "Evaluating Web Sites for Accessibility" [3] and a draft version of the evaluation report template available at "Template for Accessibility Evaluation Reports" [4].

K.3 Reviewer skills

Reviewers had a variety of skills including knowledge of WCAG 1.0 and W3C technologies; familiarity with the conformance evaluation process, with use of different evaluation tools, and with specific assistive technologies. Reviewers had a variety of natural language proficiencies as indicated in the individual reviews.

K.4 Ongoing Development of Evaluation Approaches

While these reviews were being conducted, WAI was revising its recommended evaluation methods to facilitate producing clearer and more consistent evaluation reports, regardless of the involvement of different reviewers, as was necessary during reviews of sites using a variety of languages. This slowed the process of conducting these seventeen reviews. W3C/WAI's Education and Outreach Working Group is continuing to revise its evaluation approaches according to feedback from these and other reviews. However, in order to deliver these review results we have relied on interim versions of the documents. We welcome any additional feedback on these documents, and/or on the clarity and usefulness of the evaluation reports themselves.

There are an increasing number of commercial evaluation tools available which can assist in different parts of the conformance evaluation process. WAI is working with developers of these tools to develop means by which to determine the relative accuracy of different tools when evaluating different aspects of accessibility.

K.5 Summary of Evaluation Results

At the time of the reviews, none of the Web sites fully conformed to WCAG 1.0 Double A (checkpoint priorities 1 and 2). However, several Web sites were very close to Double A conformance, and in the opinion of the reviewers would need minimal work to achieve Double A.

More specifically, of the 17 Web sites, 11 Web sites had significant accessibility problems and therefore did not meet a Single A conformance level (priorities 1 checkpoints only); three Web sites would need only minor improvements to meet Single A conformance; and three Web sites need only minor improvements to meet Double A conformance.

Some of the reviewed Web sites showed very good use of accessibility features. For instance, 11 of the sites used consistent navigation bars on all their pages, and style sheets for consistent layout on all their pages. These sites appeared to be more amenable to rapid improvements of other minor accessibility problems. Some sites also used WCAG 1.0 Priority three checkpoints, such as internal links, to allow users of certain assistive technologies to skip over navigation bars and go directly to the main content of the page.

K.6 Most Common Conformance Problems

The most common conformance problems encountered on these 17 Web sites included the following:

- 1. [16 sites] Pages that do not validate because the document type declaration is missing, or because the character encoding is missing, or because HTML errors have been found. [WCAG 1.0, Checkpoints 3.2 and 11.2, Priority 2]*
- 2. [15 sites] Use of forms without explicitly associated labels, or with labels not properly positioned. [WCAG 1.0 Checkpoints 10.2 and 12.4, Priority 2]*
- 3. [14 sites] Omission of text equivalents for images, including omissions of text equivalents for informative images, form submission buttons, and omission of null (" ") alt for decorative images. [WCAG 1.0 Checkpoint 1.1, Priority 1]*
- 4. [14 sites] Header elements not used to define the structure of a page, or not used according to specification. [WCAG 1.0 Checkpoint 3.5, Priority 2]*
- 5. [12 sites] Use of absolute units (pixels) to define the size of tables and images rather than relative values (percentages). [WCAG 1.0 Checkpoint 3.4, Priority 2]*
- 6. [12 sites] Omission of style sheets to control layout and presentation, and/or use of deprecated HTML features such as inline markup to control font style. [WCAG 1.0, Checkpoints 3.3 and 11.2, Priority 2]*
- 7. [11 sites] Link targets are not clearly identified nor differentiated; in some cases the same word is used repeatedly on a page to link to different documents. [WCAG 1.0, Checkpoint 13.1, Priority 2]*
- 8. [10 sites] Failure to inform users when links open Web pages in new windows. [WCAG 1.0 Checkpoint 10.1, Priority 2]*
- 9. [9 sites] Failure to clearly identify changes in natural language of text in documents. [WCAG 1.0 Checkpoint 4.1, Priority 1]*

10. [7 sites] Use of scripts without non-script alternatives to display information, open new windows, create events, or activate links or forms. [WCAG 1.0 Checkpoints 6.2, 6.3, Priority 1; and Checkpoints 6.4, 6.5, 9.2, and 9.3, Priority 2]
11. [7 sites] Omission of key metadata needed to provide semantic information. [WCAG 1.0, Checkpoint 13.2, Priority 2]
12. [6 sites] Use of colours that do not contrast sufficiently in images. [WCAG 1.0, Checkpoint 2.2, Priority 2]
13. [5 sites] Use of text pages, as an alternative to inaccessible Web sites, that included inaccessible features (such as use of scripts to validate forms), and/or did not include equivalent information or functionality as the original inaccessible pages, and/or were not updated as frequently as the original inaccessible pages, and/or were used as replacements for pages that could have easily been made accessible. [WCAG 1.0, Checkpoint 11.4, Priority 1]
14. [3 sites] Omission of frame titles, and/or no description of the relationship between frames when there are many frames and the relationships between the frames are not obvious. [WCAG 1.0, Checkpoints 12.1, Priority 1, and 12.2, Priority 2]
15. [3 sites] Use of document formats that are not confirmed to be accessible, such as PDF, without provision of alternative formats known to be accessible for those documents. [WCAG 1.0, Checkpoint 11.4, Priority 1]

K.7 Repair and Updated Conformance Evaluations

The majority of the conformance problems listed above are not difficult to repair. Problems related to Priority 1 Checkpoints present a greater barrier to people with disabilities, and may be considered higher priorities for repair than Priority 2 Checkpoints. The individual Web site evaluation reports contain links to relevant WCAG 1.0 checkpoint text for any checkpoint for which conformance problems have been noted. In addition, the checkpoint text in WCAG 1.0 links to implementation techniques in Techniques for Web Content Accessibility 1.0 [5] with sample code that Web site developers can use for repairing specific accessibility problems

The reviewers welcome Web site owners who have made revisions to their sites based on the information in their individual site reports to contact us for follow-up conformance evaluations. Any such reviews would be conducted with the latest versions of the evaluation resources.

K.8 References

- [1] Web Content Accessibility Guidelines 1.0
<http://www.w3.org/TR/WCAG10/>
- [2] Web Accessibility Initiative
<http://www.w3.org/WAI/>
- [3] Evaluating Web Sites for Accessibility
<http://www.w3.org/WAI/eval/>
- [4] Template for Accessibility Evaluation Report
<http://www.w3.org/WAI/eval/template>
- [5] Techniques for Web Content Accessibility Guidelines 1.0
<http://www.w3.org/TR/WAI-WEBCONTENT-TECHS/>
- [6] Checklist of checkpoints for Web Content Accessibility Guidelines 1.0
<http://www.w3.org/TR/WCAG10/full-checklist.html>

APPENDIX L - APPROACH INVESTIGATED IN THE NETHERLANDS

The Dutch government bodies have been investigating, through the *Drempels Weg* initiative, solutions for monitoring the progress of the accessibility of the Web sites in the Netherlands.

Currently there is a project defining a possible grid of detailed objective “criteria” for the checking of pages according to the WAI checkpoints that will be followed by a feasibility study of its use for assessment of the Web sites in the country. First results could be expected in June 2003. This could be a valuable input for an EU wide system.

The first goal is to have a quick feed back of the quality of a site by signalling the problems found in those pages. It is not the intention at that stage to look at conformance level. Reports will be given on the bases of lack of accessibility because of problems of varying significance encountered in a site. A further evaluation could lead to recommendations for improvement. If no problems are found in the site, the site is not declared conformant but it is reported that no problems were found at this stage and that it is worth carrying out an in-depth conformance test.

The various approaches considered seem to include:

- identifying important and less important items in pages;
- processing of numerous pages by fast elimination based on serious problem detection;
- internally attributing bad points to sites, based on the number of serious problems detected and following the evolution over e.g. bi-annual re-assessment cycles;
- possibility of weighting the importance of each criteria;

It is also discussed if quality label or “marks” could be attributed to sites, with links to a verification and complaint handling body.

Country (more details in Appendix)	Official adoption at various levels and relevant policies	Implementation Efforts	Monitoring Bodies	Monitoring Method	Implementation Situation and Progress	EU level normalisation of results	Overall Cost Estimate	Efforts on other Categories of Web Site
BE - Belgium	Included in e-government Federal concept, and actively promoted through initiatives at communities level.	Variable at federal, Flemish and Walloon communities levels: projects, logo attribution, chart, etc. Particularly oriented towards blind citizens.	no implementation at federal level yet			Not possible yet.		
DE - Germany	Federal level adoption (May-July 2002) : (Germanic) WAI level AA for federal sites, States level expected for 2003.					Not possible yet.		Negotiations with private sector, legislation for Intranets, emphasis on work related sites
DK - Denmark	inclusion in Danish standards	annual prize	central body (mutually motivating policy)	annual check (2000 sites), public results, multi-facets methodology		Not possible yet.		
EL - Greece		various initiatives				Not possible yet.		

Country (more details in Appendix)	Official adoption at various levels and relevant policies	Implementation Efforts	Monitoring Bodies	Monitoring Method	Implementation Situation and Progress	EU level normalisation of results	Overall Cost Estimate	Efforts on other Categories of Web Site
ES - Spain	Law for accessibility implementation by 2005					Not possible yet.		
F - France	Included in official guidelines (October 1999)					Not possible yet.		
IT - Italy	March-Septembre 2001 directives and May 2002 directive	various national initiatives: sensibilisation, training, assessment of activities impact; inter-ministerial board (2002)	AIPA		several important sites already accessible (some after complete redesign) - <i>no figures yet</i>	Not possible yet.		progress on local administration sites
IRL - Ireland	1999 published recommendations (A for April 2001, AA for end 2001)	webmaster network	The Web Standards Implementation Group		28/31 sites at level A, 1-4/31 at level AAA	Not possible yet.		

Country (more details in Appendix)	Official adoption at various levels and relevant policies	Implementation Efforts	Monitoring Bodies	Monitoring Method	Implementation Situation and Progress	EU level normalisation of results	Overall Cost Estimate	Efforts on other Categories of Web Site
LUX - Luxemburg	<i>no information made available</i>					Not possible yet.		
NL - Netherlands	recommendation (February 2001)	in progress				Not possible yet.		
Ö - Austria	working group					Not possible yet.		
PT - Portugal	Cabinet resolutions (1999)	various national initiatives: sensibilisation, training, prize, user panel, gallery		reports (November 2000, February 2002), methodology including survey	302 sites analysed: 15% A, 29% A for home page, survey: 28% v. 47% (positive / negative opinions)	Not possible yet.		
SF - Finland	adoption (December 2000)				new central portal was given accessibility and usability attention (text version of the pages at AA level).	Not possible yet.		

Country (more details in Appendix)	Official adoption at various levels and relevant policies	Implementation Efforts	Monitoring Bodies	Monitoring Method	Implementation Situation and Progress	EU level normalisation of results	Overall Cost Estimate	Efforts on other Categories of Web Site
SV - Sweden	Guidelines for local authorities (February 2001), Guidelines for government agencies (May-June 2002)	educational programs, design and evaluation consultancies (commercial, public/private actors)	Swedish Institute for Special Needs Education (one time study in February 2002)	one time methodology (first pages of the tested sites only)	level A results: 10/19 government agencies, 3/21 county admin. boards, 7/21 county councils/regions, 4/45 municipalities	Not possible yet.		
UK - United Kingdom	<i>no information made available</i>					Not possible yet.		
European Commission		training is now available for both specialised Web page editors and for more casual producers						intranet editorial guidelines