Feedback possible until Sunday April 3rd 2023 (Boston/ Eastern Time).

Accessibility CEN CENELEC

Opportunity to react until 4.4.2023

Already in the framework

Latest CENCENELEC Age appropriate digital services framework
Verify accessibility, which consists of the following tasks:

1. **Verify** that your product or service meets the latest **accessibility requirements** such as Web Accessibility Directive (WAD), European Accessibility Act (EAA) and standards such as EN 914 301 549 Accessibility requirements for ICT products and services.
2. **Accommodate** children with special educational **needs or disabilities**
3. **Consider the affordability** of your product or service.

Additions that The Accessibility for Children Community Group Suggests

1. … and are compliant with the most recent version of the W3C's Web Content Accessibility Guidelines at level AA. More specific country resources for special needs and inclusion: Country Information | European Agency for Special Needs and Inclusive Education (european-agency.org)
2. Consider the diversity of children with and without diagnosed disabilities, including high-incidence disabilities (such as learning disabilities and ADHD) and neurodiverse children more broadly.
    a. Where appropriate, apply Universal Design principles (for learning,) such as Universal Design for Learning Guidelines, which will be helpful in designing solutions for a majority of users and reduce need for specific, retrofitted accommodations to meet individuals' needs
    b. Consider intersectionalities. Children often have developmentally-appropriate evolving needs, abilities and intersectionalities which are different from the adult population and should be addressed in systems impacting them. (e.g. evolving literacy)
        - Inclusive design - personna spectrums https://inclusive.microsoft.design/
3. Make sure all processes of participatory design, usability testing, feedback flow and monitoring in your processes include Universal design, accessibility, and/or children with disabilities as participants.
4. Accessibility should be robust and interoperable.
    a. Consider smooth use of integrated assistive technology.

    b. Consider which assistive technologies and features of assistive technologies children will be able to use readily
    c. Reduce learning curves and lower engagement thresholds for assistive technology.
    d. Consider tactile supplements to digital services and content
5. Identify scalable accessibility initiatives to share and document. (e.g. share educative technology throughout a school system)
6. Provide a mechanism to collect feedback from users. Especially for children, this opportunity to express learning experiences has value on its own.

Note for information (not to be added to the response): Only standards mention the existence of accessibility guidelines (WCAG). The guidelines are not mentioned in EU legislations.

- Web Accessibility Directive WAD: No reference to the guidelines specifically.

- The European Accessibility Act (Directive 2019/882) : No specific mention of the guidelines but ‘ obligation for states to provide guidelines and tools to facilitate application of the national measures transposing this Directive’. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019L0882&from=EN

- EN 914 301 549 refers to accessibility guidelines (WCAG included) https://www.etsi.org/deliver/etsi_en/301500_301599/301549/03.02.01_60/en_301549v030201p.pdf

Not for inclusion in feedback but for our reference

EN 301 549, V3.1.1 (2019-11): The European Union's harmonized standard (https://www.etsi.org/deliver/etsi_en/301500_301599/301549/03.01.01_60/en_301549v030101p.pdf), outlining accessibility requirements for purchasing, developing and manufacturing Information and Communications Technology (ICT). It was originally developed under Mandate M 376 [i.3] (https://ec.europa.eu/growth/tools-databases/mandates/index.cfm?fuseaction=search.detail&id=333) and was created by the European Telecommunications Standards Institute (ETSI) "Technical Committee Human Factors (HF), and the eAccessibility Joint Working Group (JWG) of CEN/CENELEC/ETSI." Like ETSI, CEN and CENELEC (https://www.cencenelec.eu/standards/DefEN/Pages/default.aspx) are European standards organizations.