Beyond Compliance the EAA Implementation Report

Landscape and Progress

February 2026

ABOUT THIS REPORT

Our 2023 report reached thousands of professionals across Europe and proved something important: **accessibility transformation is measurable.**

Now, with the June 28th, 2025, enforcement date behind us, we examine what that transformation looks like in the new accessibility reality.

The deadline that generated so much uncertainty and questions across boardrooms and design teams throughout Europe has arrived. As businesses navigated this transition, many discovered that clear **guidelines remain elusive, best practices are still emerging, and we are all learning together** what accessibility implementation truly means in practice.

This report represents the **first comprehensive, business-focused analysis of European Accessibility Act implementation across Europe** – not to evaluate, but to **reflect together on where we are heading.**

It's time to pause and ask: What approaches are proving effective? What challenges persist? How are organizations across different sectors and countries navigating this shared journey? Most importantly: **where do we go from here?**

This analysis was created by the Business Accessibility Forum team with substantive expertise from Widzialni (the Visibles) and reflects contributions from BAF member who shared their experiences openly — embodying the collaborative approach that drives meaningful progress in accessibility execution.

Join us in this journey. The window of opportunity is now. The business case is clear. This report is your roadmap.

What You'll Find in the Report

Chapter I: Landscape

Understanding where we are: the regulatory framework, implementation challenges, and collaborative solutions shaping Europe's accessibility future. From the EAA's ambitions to Poland's pioneering Trialogue model, we map the terrain all businesses must navigate.

Chapter II: Progress

Hard numbers from our two-year study tracking accessibility transformation across banking, e-commerce, and telecommunications. See how Poland compares to Europe, which sectors are leading, and what separates organizations achieving 80%+ compliance from those still struggling.

Chapter III: Voices

The heart of this report: Exclusive interviews with leaders defining accessibility policy and practice across Europe. From EU institutions to international organizations (IAAP, EDF, ILO,

Zero Project, CCIA, EIDD), and business pioneers (Orange, Microsoft) these conversations reveal what's working, what's challenging, and where European accessibility is heading. These are the voices shaping our shared future.

Chapter IV: Leaders

Real implementation stories from BAF members and accessibility champions. See how leading organizations are translating requirements into practice: the tools they use, frameworks they've built, cultural shifts they've achieved, and lessons they've learned. From AI solutions to banking sector plain language ecosystems: inspiration you can apply.

Chapter V: Community

How to join Europe's leading cross-sector accessibility platform and connect with organizations transforming accessibility from obligation into opportunity.
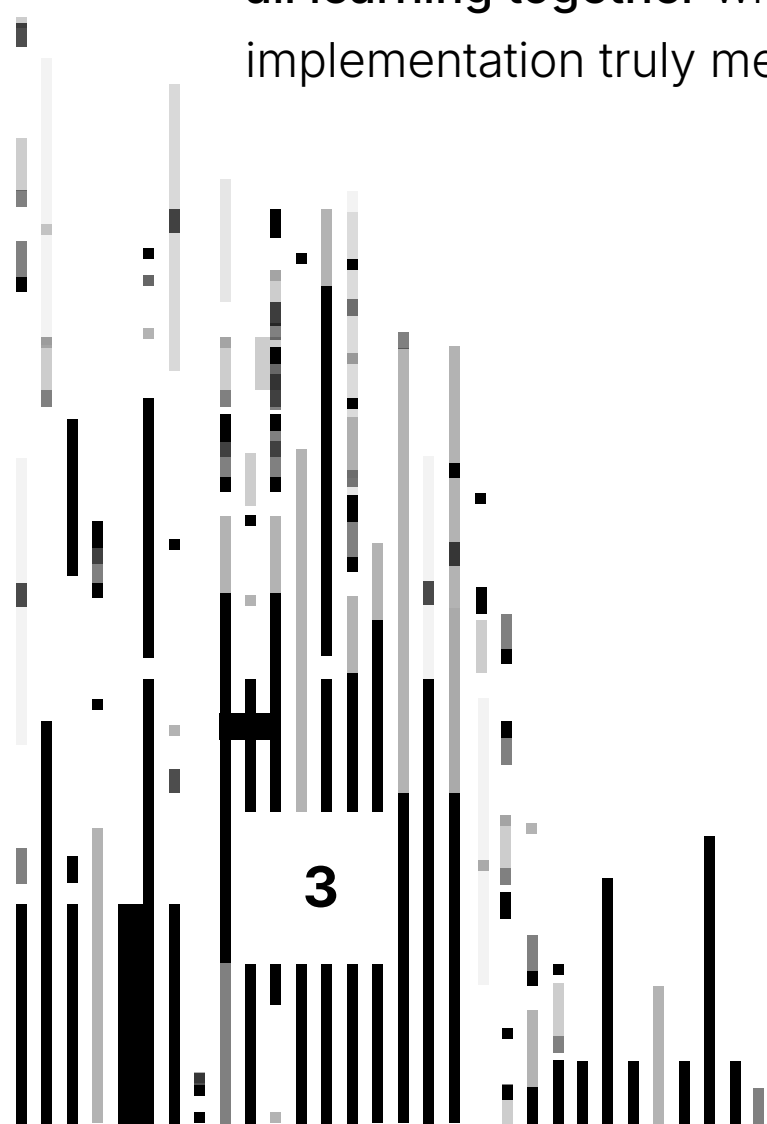
EXECUTIVE FOREWORD

The European Accessibility Act defies simple categorization. This is legislation at the intersection of law, technology, design, user experience, and organizational culture. Applying **accessibility requirements demands more than legal expertise – every person in your team needs to understand what accessibility means for their role.**

This interdisciplinary reality is precisely why **accessibility has become central to ESG strategies** and why its impact will extend far beyond the companies currently within EAA's direct scope. Today the Act primarily covers businesses selling products and services to consumers online – e-commerce platforms, banking

services, telecommunications providers. But make no mistake: **accessibility will eventually touch every entity in the supply and value chain.**

Meanwhile, we face a substantial technological and social debt that demands urgent repayment. The digital infrastructure built over the past decades has rarely prioritized accessibility. We're now in a period of necessary correction - one that will define how European businesses serve all their customers. This report exists to accelerate that transformation by sharing what leading companies have learned and where the European market currently stands. Rather than evaluating, it aims to guide and inspire, highlighting solutions and fostering dialogue.

I won't pretend the path is clear. Many questions remain unanswered. Even regulatory authorities are still learning the full scope of who must comply and what exactly compliance means in practice. There is ambiguity. There is uncertainty. There are legitimate questions without definitive answers yet.

But here's what we know for certain: waiting for perfect clarity is not an option. The debt is too large. The deadline has passed, and the transformation is happening whether we feel fully prepared or not. The organizations that start now will be the ones who thrive. Those who wait for every question to be answered will find themselves playing catch-up in a market where accessibility is already the expectation, not the exception.

Accessibility is our shared journey. Let's learn together, build together, and create a world that truly works for everyone.

Dr. Karolina Mendecka

Director, Business Accessibility Forum
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Landscape

Navigating the European Accessibility Act

The Foundation: Accessibility as a Human Right

The UN Convention on the Rights of Persons with Disabilities established accessibility as a human right in 2006. The principle is straightforward: everyone deserves equal access to information, opportunities, products and services. For European businesses, digital accessibility represents the greatest implementation challenge under the European Accessibility Act (EAA) and is therefore the focus of this report.

Technical standards like WCAG have existed since the 1990s. But voluntary approaches did not work. The European Accessibility Act ends that era – transforming accessibility from aspiration into legal requirement across the EU.

The Strategic Shift

This regulatory transformation accelerates what was already an emerging business reality: accessibility has evolved from corporate social responsibility initiative to strategic imperative. Businesses recognize that accessible design benefits the entire user bases – aging populations, users with temporary injuries, anyone facing situational constraints. This universality transforms accessibility from specialized accommodation into fundamental design principle.

Confronting Technical Debt

However, this recognition emerged late. Decades of digital development without accessibility requirements accumulated **substantial technical and social debt** that organizations must now remediate within compressed compliance timeframes. Businesses face the **dual challenge of fixing legacy systems while simultaneously building accessible futures.**

The New Normal

The EAA transforms accessibility from "nice to have" to "must have" for vast segments of European business. Organizations across banking, e-commerce, telecommunications, transport and digital services now face unambiguous legal obligations. Yet the path to meeting these obligations remains far from clear.

A New Regulatory Era

The European Accessibility Act, adopted in 2019 with a transposition deadline of June 2022 and an application deadline of June 2025, represents one of the most significant shifts in European consumer regulation since GDPR.

Businesses still confront unresolved questions at every level of operational reality – from fundamental legal definitions through technical standards to operational procedures. These **ambiguities affect strategic decisions about resource allocation, technical architecture, liability exposure, and compliance pathways.**

Who's In? Defining Scope and Liability

Let's start with basic questions:

– What precisely constitutes "consumer banking services" or "e-commerce services" under the EAA?

– Does the directive encompass only transactional elements or the entire digital customer journey including discovery and personalization?

– Which products *exactly* are covered by the EAA?

Different member states may adopt varying interpretations, fragmenting the single market the directive aimed to harmonize. But businesses cannot determine their compliance obligations without knowing which portions of their services fall within the scope.

Then there is the puzzle of third-party dependencies. Modern digital services integrate external payment processors, authentication systems, content delivery networks, and analytics platforms. When external providers fail to deliver accessible services, **liability boundaries remain undefined.**

Standards in Limbo

Technical standards present a second challenge. Most businesses build to EN 301 549, but the standard itself is still evolving. This creates dilemma for business: should they invest substantial resources implementing the current version or wait for the updated standard, risking delayed compliance?

There's another tension. Technical standards, by their nature, undergo lengthy development and approval processes. By the time formal specifications arrive, the technology landscape has often shifted. Some accessibility approaches referenced in current standards reflect tools and practices from earlier periods of digital development.

This leaves businesses navigating between two imperfect options: building to specifications that may not fully capture current user needs, or innovating ahead of formal guidance without regulatory certainty. When standards lag behind technological reality, organizations face difficult resource allocation decisions: investing in what's formally documented today while anticipating different requirements tomorrow.

Reporting Across Borders

Procedural requirements add complexity, as member states differ in how and when accessibility incidents must be reported to users and authorities. Timing requirements diverge. Content specifications vary. Submission procedures differ. A business operating across multiple European markets must navigate multiple distinct notification regimes for the same accessibility incident: precisely the fragmentation the directive aimed to prevent.

Why Dialogue Matters

These layered ambiguities – legal, technical, operational, and procedural – do not invalidate the EAA's essential goals. Rather, they reveal why businesses cannot resolve implementation tensions independently. Organizations require collaborative dialogue among businesses, accessibility advocates, and market surveillance authorities to transform regulatory ambiguity into operational clarity at each level of application.

Credible sources:

– European Commission, European Accessibility Act (EAA)

– EDF, The EAA

Blueprint: Trialogue Model

Building Bridges

Poland's "Trialogue" working group demonstrates how collaborative governance can transform regulatory ambiguity into practical guidance. The initiative brings together market surveillance authorities – including representatives of the State Fund for Rehabilitation of Disabled Persons, the Financial Ombudsman, the Ministry of Digitisation, the Office of Electronic Communications, and other regulatory bodies – with business representatives and non-governmental organizations to address complex accessibility implementation questions through a structured dialogue.

Shared Understanding

This multi-stakeholder model achieves what isolated regulatory interpretation cannot: **shared understanding grounded in operational reality.** Regulatory authorities bring legal expertise and enforcement perspective. NGOs contribute user experience and rights-based frameworks. **Business brings the practical knowledge of technical constraints, market dynamics, resource realities, and operational complexities that determine whether regulatory requirements can be translated into functional accessibility.**

BAF's Role in Trialogue

The Business Accessibility Forum actively participates in Trialogue proceedings, contributing business perspectives grounded in operational realities. The working group has developed practical recommendations which the Polish Accessibility Council (Rada Dostępności) subsequently adopted (PDF). These address questions businesses confront daily: Where do e-commerce boundaries lie? Who bears responsibility when accessibility fails on consumer devices? How does liability distribute across third-party platforms? Which documents demand compliance? Further recommendations are in development as the group addresses new challenges.

Shared Goals, Practical Solutions

The power of this approach lies in its recognition that all stakeholders ultimately pursue the same goal: genuinely accessible digital environments that serve users effectively while remaining economically sustainable for businesses to adopt.

The regulatory ambiguities cannot be resolved through enforcement alone. They require dialogue where business expertise informs regulatory interpretation, where accessibility advocates make sure user needs remain central, and where authorities provide legal clarity within this collaborative framework.

The Polish model demonstrates why business participation in such forums is essential. Businesses implement accessibility requirements daily, encountering technical barriers, resource constraints, third-party dependencies, and user needs that regulatory frameworks must address pragmatically. **Regulatory guidance that ignores business realities** risks becoming impossible to implement in practice.

The Trialogue Template

The Trialogue model offers a replicable template for the EAA's Article 28 expert group and for national transposition frameworks across Europe. When regulatory authorities, NGOs, accessibility experts, and business representatives collaborate openly toward shared objectives, accessibility regulation becomes more effective, more practical, and more likely to achieve its fundamental purpose: ensuring equal access to digital society for all users.

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In Poland, I have the privilege of leading the **Trialogue** – an initiative that puts into practice the idea of **shared responsibility for adopting the European Accessibility Act (EAA).** It is a model of collaboration between public administration, business, and the expert community, aimed at jointly interpreting the law, identifying barriers, and developing practical implementation recommendations.

Within the framework of Trialogue, we develop recommendations for interpreting the national Accessibility Act – covering certain products and services – which are then used by supervisory authorities, businesses, and consumers alike. As a result, **the process of implementing new regulations becomes more consistent, predictable, and grounded in the real-world experience of market participants.**

This approach, **based on dialogue, expertise, and shared accountability, can be considered one of the most inspiring best practices in Europe.**

Artur Marcinkowski

Founder, Business Accessibility Forum

Trialogue demonstrates that executing **accessibility legislation doesn't have to be a confrontational process; it can be a partnership-driven effort,** fostering a culture of cooperation and mutual learning.

Through this initiative, P**oland has shown that accessibility can be a shared goal and a shared value.** It's a model worth scaling to the European level – as a tool for dialogue and practical coordination in the implementation of the European Accessibility Act.

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Beyond Compliance: Our Manifesto

The Path Forward

Businesses implementing the EAA face a fundamental question: how do we operationalize accessibility consistently across Europe when regulatory guidance remains incomplete?

In response to this challenge, Business Accessibility Forum developed the Accessibility Manifesto, a framework of guiding principles designed to promote EAA implementation while balancing compliance with organizational realities and strategic objectives.

It reflects lessons learned from Poland's Trialogue and real-world experience across sectors. Rather than prescribing rigid technical requirements, the Manifesto emphasizes:

– Harmonization across member states to preserve the single market

– Transparency in compliance expectations and enforcement approaches

– Dialogue between businesses, advocates, and authorities

– Technological understanding grounded in implementation realities

– Investment in sustainable, long-term accessibility practices

These principles provide a compass for companies committed to meaningful accessibility – not as a checkbox exercise, but as an organizational transformation.

Accessibility Manifesto

The entry into force of the European Accessibility Act strengthens our efforts to build a society where there is no place for discrimination, and access to information, technology, and services is universal and independent of individual needs. We welcome these steps, which lead us toward a more inclusive and just digital environment, enabling every person to fully participate in social, cultural, and economic life. We also recognize the positive impact of the act on the development of organizations and the culture of innovation within enterprises.

The BAF Accessibility Manifesto arises directly from these fundamental commitments and from our conviction that digital accessibility is not only a right but also a condition for fully enjoying civil liberties and human rights.

Click here to see the BAF Manifesto in plain language.

Our Values

– Accessibility is a human right and essential for fully enjoying basic rights, including the right to information, the right to conduct business and work, the right to education, to participate in culture, and the right to freedom of expression and communication.

– Without accessible digital resources, these rights remain theoretical and unattainable for those facing temporary or permanent barriers due to age, functional limitations, disabilities, or insufficient technology or digital skills.

– The requirements imposed by the act also provide an opportunity for service providers and manufacturers to introduce innovations, new technologies, and solutions that enable reaching new groups of customers. Accessibility is not only an obligation but also a strategic market advantage benefiting both consumers and economic entities. We believe that implementing accessibility will increase market competitiveness, support long-term development, and ensure sustainable business success.

BAF's Vision

– Realizing the right to accessibility requires the effort of both public and private entities, as well as deep engagement and cooperation of experts from various fields – from information technology, through law, to universal design and education.

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– It also requires a collaborative dialogue and interdisciplinary cooperation among decision-makers, experts, and technology users to ensure that requirements are clear, rational, and aligned with business standards, and that adopted solutions are not only technically advanced but also user-friendly and accessible to all users.

– We want to oversee the application of the best yet feasible accessibility standards, spread knowledge, and contribute to creating an inclusive society. We want every initiative we support to be a step forward toward equal access to the digital world for all.

Our Commitments

In our commitment to accessibility, we emphasize promoting good practices at both national and international levels. We believe that a shared understanding of accessibility among all stakeholders is crucial for effective implementation within the EU market.

The 10 Accessibility Commandments

We are pleased with the commitment Europe and Poland are showing toward promoting accessibility. However, we must emphasize that enterprises will have limited time to implement accessibility within their organizations, as the act comes into effect on June 28, 2025.

We view the law as a tool for progress, guiding a structured approach to achieving accessibility. At the same time, we recognize significant difficulties in interpreting the subjective and objective scope of the act, which is the first such comprehensive regulation of this type.

Therefore, we declare the BAF's commitment to promoting sustainable, realistic, and business-rational accessibility practices, which we have outlined in the 10 Accessibility Commandments.

Our Commandments demonstrates what is important to us and what we want to share with entrepreneurs, users, and regulatory bodies. We aim to create an open and accessible world.

1. **Flexibility in Implementing the Act's Requirements:**
   Accessibility is an ongoing process, not a one-time action. We aim to adapt implementation schedules to the real capabilities of enterprises. At the same time, we see an information asymmetry regarding the business reality and a technological asymmetry between regulatory bodies.

2. **Harmonization of European Regulations:**
   We promote increasing actions aimed at harmonizing accessibility regulations across the EU. We emphasize the need to eliminate market fragmentation and reduce adaptation costs for businesses by standardizing statutory, executive, and administrative requirements. This will ensure fairer competition and facilitate cross-border trade.

3. **Common Standards:**
   We promote the idea of creating and enforcing uniform accessibility requirements across different economic sectors to prevent fragmentation of national standards. Unified regulations are essential for efficient business operations and equal opportunities for all enterprises.

4. **Understandable Procedures:**
   We highlight the importance of clear and precise accessibility implementation processes. We strive to ensure that they are understandable and easy to carry out for all interested parties.

5. **Transparent Communication:**
   We value transparency in all aspects of accessibility, from clear communication of requirements, through honest informing of economic entities about their obligations, to the openness of regulatory bodies to feedback.

6. **Constructive Dialogue:**
   We aim to build understanding between businesses, users, and regulatory bodies, so that the requirements placed on entrepreneurs are clear, relevant, and flexible, and so that they enable economic entities to implement the requirements effectively yet gradually.

7. **Technological Understanding:**
   We promote a deeper understanding of the challenges related to implementing accessibility by service providers, manufacturers, representatives, importers, and distributors, supporting enterprises in adapting innovations.

8. **Partnership:**
   We commit to educating users and the market about the benefits of accessibility. We want to support businesses in gaining the knowledge and skills necessary to implement accessibility. We also count on the engagement of regulatory bodies in jointly promoting and implementing accessibility.

9. **Investments:**
   We promote the importance of investments in implementing accessibility, which will bring value to people using digital products and positively impact business growth and organizational development.

10. **Using Standards Developed by the W3C Consortium:**
    We emphasize the role of standards developed by the W3C Consortium, especially the WCAG guidelines, as a global benchmark for accessibility. We encourage regulatory bodies and enterprises to use and promote them.

Call to Action

Accessibility is a necessity, not an option. It enables everyone, without exception, to enjoy a wide range of rights and freedoms.

Through our actions, we strive to ensure that no one is excluded in the digital environment. This is important not only in the context of the EAA but also from the perspective of equality and fundamental human rights.

We encourage everyone who identifies with our vision of an accessible world and the demands expressed in the Accessibility Commandments to share the content of the Manifesto.

From Principles to Evidence

Ultimately, the European Accessibility Act sets the obligation, but meaningful accessibility depends on **collaboration, operational insight, and strategic adoption.** By linking regulatory context, governance models, and practical principles to real-world outcomes, this report provides a roadmap for teams seeking to turn compliance into genuine access for all users.

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Progress

About the Two-Year Study

This report exists to bring clarity to the accessibility conversation. Rather than declarations and isolated progress updates, **our goal is conversation – between businesses, NGOs, and regulators in key sectors: banking, e-commerce, and telecommunications in Poland and across Europe.** We approach web accessibility from multiple angles.

What interests us is not just "whether" but "how" – how organizations translate requirements into daily practice and what insights emerge for the broader market.

We compare this year's results with 2023 data to capture change over time: what businesses have accelerated, what remains challenging, and where new ambiguities appear. We seek a deeper understanding of "what works" – which approaches translate into sustainable improvements and stronger user experiences.

Our analysis is designed for conversation and action. It supports boards, product owners, and project teams with practical guidance, clear priorities, and measurable next steps. We invite you to treat it as **a reference point, a support map** that helps you find your next step more easily.

Przemysław Marcinkowski

CTO, Widzialni.eu
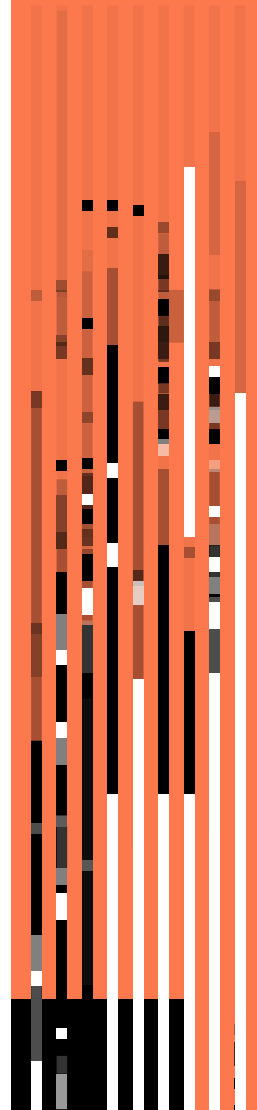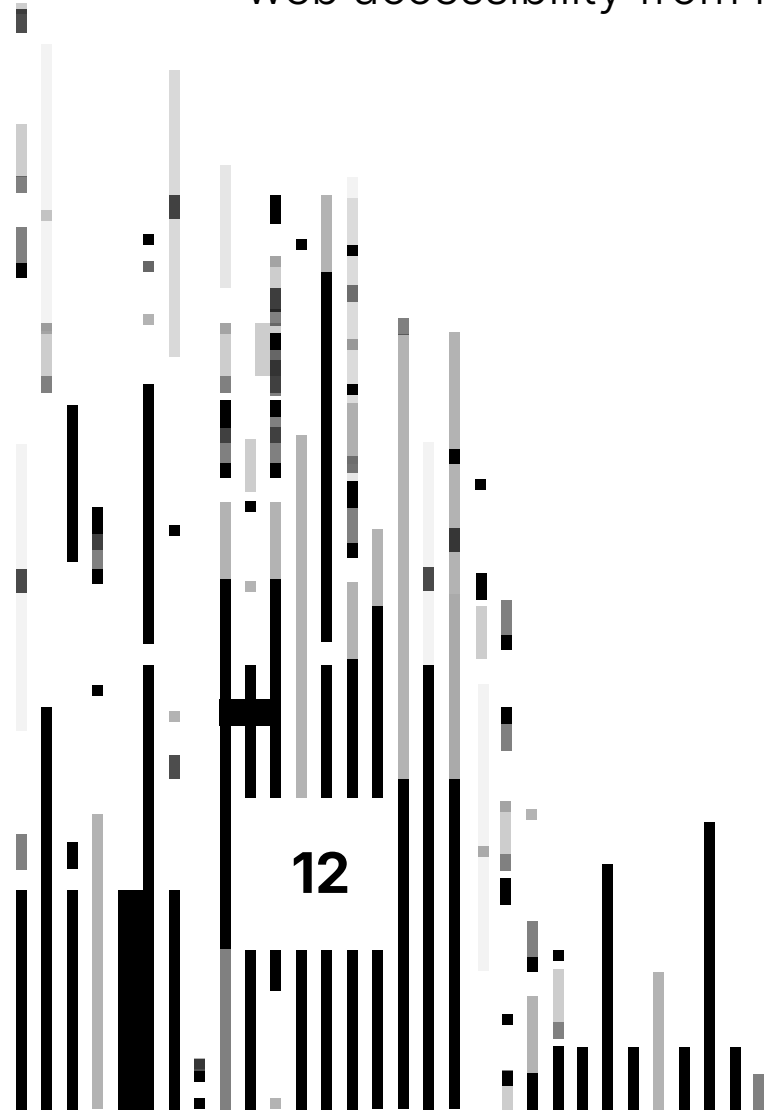
Business Results Post-EAA

Two-Year EAA Tracking Study

We analysed the same organizations we studied in 2023, tracking two years of accessibility progress across EAA-covered sectors. This comparative approach reveals which organizations sustained improvements and which approaches deliver lasting results.

The study's goal was to **verify the extent to which organizations that acted on accessibility in 2023 maintained or improved their results, and how Poland's position shapes up against other European markets following the entry into force of EAA regulations.**

The assessment aimed not only to identify the level of compliance with WCAG 2.1 criteria at AA level, but also to understand how individual sectors manage accessibility implementation as an element of quality management and user experience. An important aspect of the analysis was also to verify whether companies that several years ago began systematic work in accessibility maintain their upward trend and what practices bring them the best results.

What We Found

The findings confirm that where accessibility is treated not as a one-time project but as a process embedded in organizational culture, the effects are lasting and the level of compliance remains high.

Progress Across Industries

Conducting the study on the same sample made it possible not only to capture progress but also to identify gaps and factors differentiating individual sectors. In this year's edition of the report, particular attention was paid to three industries: banking, e-commerce, and telecommunications – constituting the main areas of customer contact with digital services.

Comparison of domestic and European results clearly shows Poland's shift toward higher compliance, while simultaneously revealing variation in the dynamics of change between industries. **A correlation is visible between maturity of implementation processes and sustainability of effects: companies that have been consistently adopting accessibility strategies for several years, developing design systems and regularly conducting audits, maintain stable results.**

The European Context

Comparative analysis at the European level shows how different EAA execution models influence the pace of change. Poland, especially in the banking sector, achieved results above the European average, which testifies to the growing maturity of financial institutions in designing digital services according to accessibility principles. In other sectors – e-commerce and telecommunications – growth dynamics are smaller, but a clear trend toward standardization and consolidation of good practices is observed.

We employed the Solid Foundations Method, focusing on functionalities crucial for users completing essential tasks - logging in, making purchases, contacting support, making payments. Rather than testing every WCAG criterion, we assessed whether users can actually accomplish what they came to do.

The Maturity Factor

This planned analysis enabled capturing actual progress, both in terms of technical compliance with WCAG criteria and organizational maturity, understood as the ability to maintain and develop accessibility standards over time. The results show a clear correlation: organizations that have been consistently implementing accessibility for several years within organized processes (regular audits, work
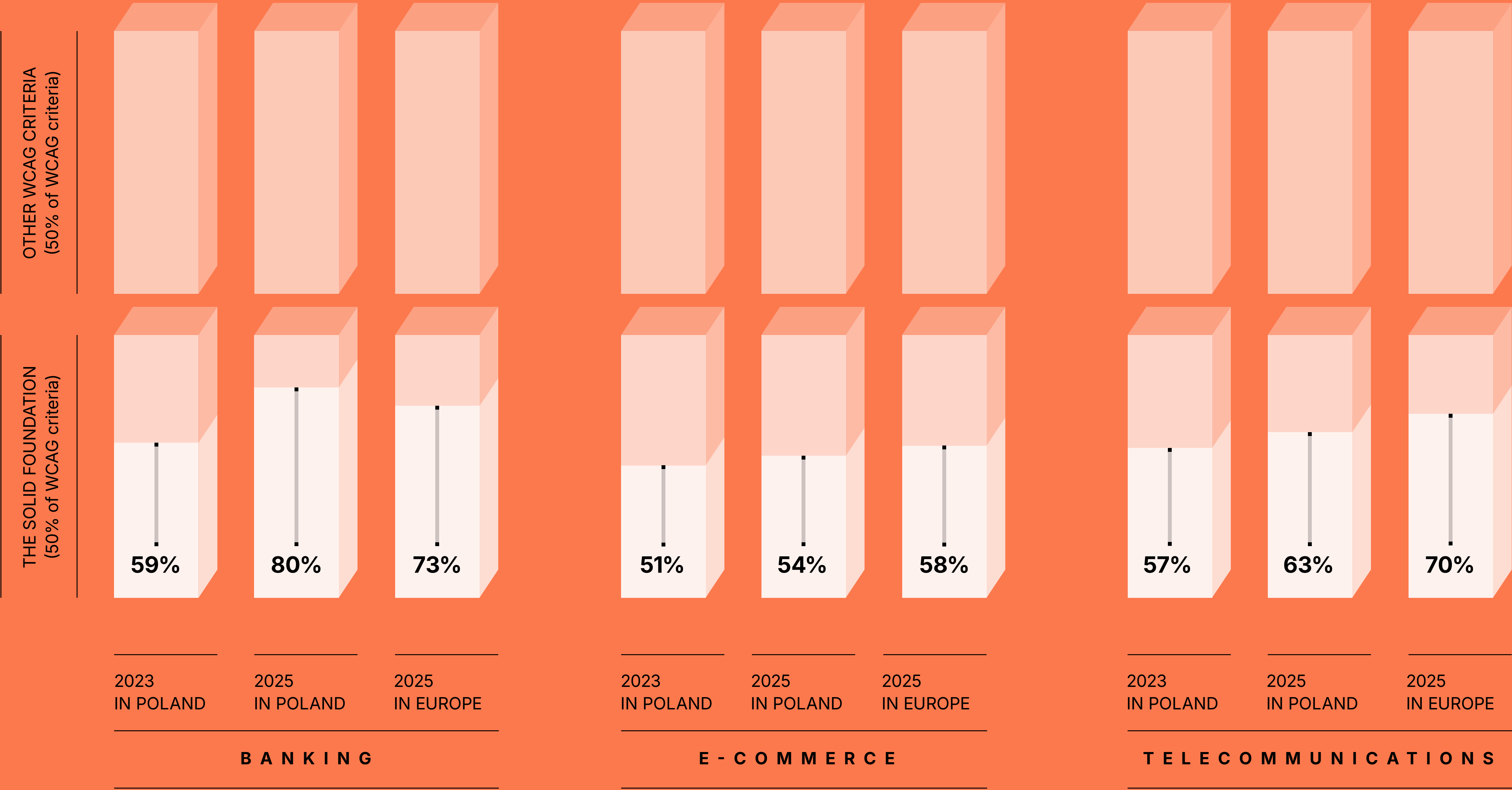
with design systems, testing with users with diverse needs) achieve higher and more stable results.

Comparison of results with data from other European countries allows observation of differences in EAA implementation dynamics and market maturity. Poland maintains a leading position in banking, and the telecommunications sector shows the highest growth rate. In e-commerce, challenges remain visible, but the direction of change remains positive.

The audit results, which we present in graphical form on the next page, constitute a synthetic summary of progress in digital accessibility in the years 2023–2025. Meanwhile, a detailed description of the Solid Foundations Method and the research criteria applied can be found in the final part of the report.

OTHER WCAG CRITERIA
(50% of WCAG criteria)

THE SOLID FOUNDATION
(50% of WCAG criteria)

59% **80%** **73%**

51% **54%** **58%**

57% **63%** **70%**

2023
IN POLAND

2025
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B A N K I N G

E - C O M M E R C E

T E L E C O M M U N I C A T I O N S

What the Numbers Tell Us

Accessibility Transformation

Two years of EAA implementation reveal a striking pattern: systematic approaches win. Organizations treating accessibility as continuous process—not one-time project—achieve and sustain results above 80%.

Here's what the data shows:

1. **Banking: Europe's New Benchmark**
   Polish banking sector achieved 80% compliance compared to the EU average of 73%, marking a dramatic transformation from 59% in 2023. This qualitative shift reflects systematic investment in design systems, dedicated accessibility teams, and regular audit cycles. Polish banks now set the European standard for accessible financial services.

2. **E-Commerce: Incremental Progress**
   Poland's e-commerce sector reached 54% compliance, slightly below the EU average of 58%, with steady growth from 51% in 2023. The sector faces distinct challenges: complex user flows, heavy reliance on third-party integrations, and rapid development cycles. Organizations embedding accessibility into design systems show fastest improvement trajectories.

3. **Telecommunications: Closing the Gap**
   Telecommunications sector demonstrated strong momentum, improving from 57% to 63%, though still below the EU average of 70%. Companies applying banking-sector learnings—systematic audits, design pattern libraries, and regular user testing—are closing the gap most effectively.

Beyond Initial Compliance

Banking can be a good example for other industries.

Maintenance is crucial. Without regular testing and checking of changes, it is not possible to maintain results above 80%. Daily routine is needed: WCAG checklists, tests with screen readers (NVDA/VoiceOver), clear rules for components in the design system, and mandatory accessibility verification before each deployment.

Success Factors

Companies that have well-defined design systems, persons responsible for accessibility, and regularly conduct consultations and audits as well as test with people with diverse needs exceed 80% faster and can maintain that level.

This translates into real growth in compliance with the entire WCAG standard. Banking in Poland clearly above the EU average, telecommunications with a strong growth leader, e-commerce moving from the "bottom shelf" to "solid middle."

Our sample demonstrates a clear correlation: organizations combining external accessibility expertise with systematic implementation approaches – including design pattern libraries and regular testing cycles – achieve 80-90% compliance faster and maintain it more consistently.

What This Means

Poland's banking sector proves European organizations can exceed EAA requirements when accessibility is embedded in culture and process. The challenge isn't knowing what to do, it's building systems to do it consistently.

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Banking Sector Perspective

Paweł Zagaj

Head of Retail Banking
Polish Bank Association

Banks' activities in the area of service accessibility have so far been a grassroots initiative and an effort to create a user-friendly market for all our clients. With the entry into force of the European Accessibility Act, the requirements for the accessibility of banking services have been set out in law. This required us to adopt a new approach and develop new solutions.

We value the fact that we are implementing these changes in dialogue with our clients, non-governmental organizations and supervisory authorities. One area of such cooperation is the Trialogue, a platform bringing together public administration, business and the expert community, aimed at developing practical implementation of recommendations.

Dorota Węgrzyńska-Jarząbek

Attorney-at-law
Polish Bank Association

Implementing new accessibility regulations requires the banking sector to take an innovative approach. It is necessary to act in a multi-product manner (EAA applies to credit agreements, payment services, brokerage services) and taking into account various channels of contact with the client (both traditional and digital).

In the work on implementing EAA, challenges and risks arise in the legal, organizational and product areas. And this requires the creation of new competencies and structures in organizations that will be responsible not only for implementing solutions related to accessibility, but above all for their further, long-term coordination and development.

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Voices

DG JUST

Inmaculada Placencia Porrero

Senior Expert in Disability

Directorate-General Justice and Consumers at the European Commission (DG JUST)

For anyone working in accessibility, **Inmaculada Placencia Porrero** needs no introduction, which is why we are honoured to feature her perspective in this report.

As a Senior Expert in Disability at Directorate-General Justice and Consumers at the European Commission and a member of the UN Committee on the Rights of Persons with Disabilities, she has been instrumental in shaping accessibility policies for over two decades. **She led the preparation of the European Accessibility Act and remains responsible for its implementation since its adoption in 2015 as well as for the related European Accessibility standards.**

We asked her about the challenges behind the legislation, and what comes next.

What was the biggest challenge in balancing ambition with practical implementation when writing the directive?

The challenge was addressing every barrier faced by persons with disabilities while building sufficient legal argumentation. Whenever the Commission takes an initiative, we must answer three fundamental questions.

First, the legal basis. We chose the internal market, which requires demonstrating that divergent national legislation creates barriers. We managed this for products

and services now covered by the Act — but not for other products and services. Civil society asked us to include domestic appliances, for example, but without existing national legislation on accessibility to point to, is not possible to make the case.

Second, subsidiarity — showing that the problem must be solved at EU level because national action alone wouldn't suffice.

Third, proportionality — the cost-benefit analysis of how best to regulate. Finding equilibrium between the objective of an inclusive society and the practical justification required for shaping the legislation.

Looking back at the drafting process, what assumptions about business readiness proved most accurate or inaccurate?

During drafting, some industry voices argued the requirements were too ambitious. They preferred carrots over sticks — focusing only on procurement incentives rather than market entry requirements. Some organisations even said that that companies may withdraw products from the market or even go bankrupt.

This proved wrong. We had evidence from other parts of the world and from countries with existing accessibility legislation that it was feasible. We knew our measures were proportionate. So in that respect, our assumptions held up.

Now that member states are implementing EAA, what has surprised you most?

I expected more attention to implementation from the moment the Act was adopted in 2019. What surprised me was the late reaction from some

organisation — some close to application date said "we don't have time." Well, there were six years. Perhaps I was naïve in hoping everyone would act earlier, but the delay in starting preparing for application genuinely surprised me.

What implementation approaches made you think "that's exactly what we envisioned" — and what made you think "that's not what we meant"?

On the positive side, although late, some sectors came together — raising awareness, developing guidance, reaching out to the Commission, building momentum. That collaborative dynamic is what we envisioned.

On the negative side, close to the application date, some organisations asked whether they could use the "disproportionate burden" article to avoid compliance entirely. We said: that's not what the direcctive intended. These provisions are safeguards, not escape routes. They allow alternatives when specific points create real burden that would be disproportionate — in

production, investment, service delivery — but they were never meant as a mechanism to do nothing.

We were always conscious of proportionality and protecting industry, because ultimately economic operators must implement the directive. But the idea was never to provide an excuse for inaction.

Where do you see European accessibility policy heading in the next decade — is EAA the foundation for something bigger?

The Act requires the Commission to report by 2030 on what has worked and what hasn't, so it's too early to say definitively.

But the Accessibility Act is certainly not the end. It sets common requirements, and we already see other EU legislation referencing it. The AI Regulation, for example, requires high-risk AI to be accessible according to the Act's standards. We see similar references in labelling and other areas. The Act is opening doors — embedding accessibility across wider EU legislation.

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Which emerging technology or social trend will most challenge the EAA framework?

In economically difficult times, accessibility is often questioned as a cost. In the context of competitiveness it gets framed as a burden. I see it differently — accessibility brings competitiveness — but that perception remains a challenge.

Regarding technology, AI is the obvious paradigm shift. Accessibility must be embedded — not just avoiding discrimination and bias, but actively using AI to create assistive solutions. Mainstream products must be accessible, and AI should also be used to develop specific tools for persons with disabilities.

What would success look like to you personally — how will you know the EAA achieved what you hoped?

Success means users with disabilities no longer face barriers, and industry sees accessibility as a competitive edge — investing because it makes business sense, not just because it's required.

The essence of accessibility is personalisation, flexibility, choice and control. These are the features that make products successful. When there are no complaints from users and industry invests because they see competitiveness, we will have succeeded.

Businesses keep asking about return on investment. Is there data?

We're working on it. Together with Accessible EU, we've launched a study asking companies to provide data on costs, benefits, and return on investment.

The challenge is that companies don't track accessibility costs. Those who haven't invested say it's expensive — but can't provide figures. Those who have invested say it's embedded in their processes and is not a major cost.

Here's what I know: thirty years ago, accessibility features like screen enlargement were separate devices, often more expensive than the computer itself. Since then, computer prices dropped exponentially while accessibility features became embedded in the computers and did not significantly impacted the prices.

Interview by Karolina Mendecka
Business Accessibility Forum Director

ILO

Jürgen Menze

Disability Inclusion Specialist

International Labour Organization (ILO)

The EAA doesn't exist in a vacuum. We asked the ILO how accessibility regulation connects to broader inclusion policies and what's still missing.

Jürgen Menze is a Disability Inclusion Specialist in the Gender, Equality, Diversity and Inclusion Branch of the International Labour Organization (ILO), the United Nations specialised agency for the world of work. He is the coordinator of the **ILO Global Business and Disability Network** – a worldwide platform of more than 40 multinational enterprises and over 40 national business and disability networks working jointly for disability employment in the private sector.

Many organizations still try to justify accessibility with numbers and ROI. Do you believe that data can really convince decision-makers, or is something else needed to make accessibility part of normal business practice?

Data is important, but it will never be enough on its own. For some people, data is a kind of "cozy blanket." It makes them feel safe, but it doesn't change behavior. Numbers can help, but they don't inspire.

In the digital world, we've seen this before. Years ago, companies had to prove that investments in cybersecurity made financial sense. Today, no one questions it. You can't run a digital business without it. Accessibility is on the same path.

Excluding any group of customers or employees is costly. The more we show that accessibility benefits everyone — not only persons with disabilities — the less we will need to justify it with hard data.

What works for the ILO Global Business and Disability Network when it comes to helping companies make accessibility part of their operations — hiring, workplaces but also for services?

We work in two main ways. First, we connect companies through events — global and regional conferences, webinars, and workshops. They share what works and what doesn't. Accessibility is always part of those discussions, sometimes as the main topic, sometimes as a cross-cutting issue.

Second, we create practical tools and guidance. For example, we published "Leave No One Offline: A Primer on Engaging Your Company on Digital Accessibility." We also developed a multilingual ILO GBDN Self-Assessment Tool with 47 questions, also including on the physical and digital accessibility of companies.

At the end of 2023, we ran a Network-internal survey among 46 multinational enterprises. Thirteen had a global accessibility lead — less than one-third. That shows there's progress, but also a long way to go. Every organisation should have someone responsible for accessibility — a dedicated role linking internal culture with external action.

Some say accessibility — as the "A" — should be an inherent part of the Diversity, Equity and Inclusion (DEI) framework rather than an addition. From your global perspective, does this integration make a real difference in practice?

What really matters is action. Whether a company calls its work DEI, CSR or Human Rights, the goal is the same — to make disability inclusion part of everyday business. Labels are less important than results.

In many companies, DEI leaders can play a key role as facilitators. They raise awareness and connect the right people — like IT teams and facility managers — to make accessibility happen in practice across the company. When that happens, accessibility becomes everyone's responsibility, not just a specialist topic.

Europe is now implementing the European Accessibility Act (EAA). From your global perspective, what lessons can Europe learn from other regions — and what can others learn from the EU?

For a long time, the United States was seen as the leader with the Americans with Disabilities Act (ADA) — since 1990. Today, the European Union is setting the pace, especially through the European Accessibility Act and the Corporate Sustainability Reporting Directive (CSRD).

At the ILO Global Business and Disability Network, we see growing interest from other regions in how Europe is approaching accessibility, digital inclusion, and even AI. The EU has become a regional leader with clear frameworks and strong momentum. At the same time, exchange goes both ways. We encourage inter-regional cooperation, because every region brings something unique. Europe has strong regulation, while others bring broader experience.

The European Accessibility Act focuses on consumers — on products and services — but doesn't directly address workplace accessibility. From an employment perspective — is that a missed opportunity? Do you see it evolving in future regulations?

I prefer to focus on what we have and how to make it work. The European Accessibility Act is about products and services for consumers, but it can have a positive effect inside organizations too. When companies make their products accessible, they often start looking at their own internal systems — and the other way around.

It also makes sense that the Act began from the consumer side. It's easier to collect data and measure business value there — like ROI — than it is to put a "price tag" on individual employees.

But the Corporate Sustainability Reporting Directive (CSRD) adds another layer. It asks companies to report on disability inclusion when it's relevant to their business, which helps to bring workplace accessibility into focus as well. Several EU Member States also have Disability Employment Quotas which can only succeed if accessibility is taken seriously — digital and physical.

Interview by Karolina Mendecka Business Accessibility Forum Director

Listen to highlights from the interview here.

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EDF

Alejandro Moledo del Río

Deputy Director & Head of Policy

European Disability Forum (EDF)

EDF has been at the heart of EU accessibility policy for decades. We asked **Alejandro Moledo del Río**, Senior Policy Expert at EDF since 2013, what has changed since June 2025 and what businesses still get wrong.

As a Senior Policy Expert, Alejandro has played a key role in shaping EU accessibility laws, including the Web Accessibility Directive and the European Accessibility Act. His work helps ensure that accessibility is treated not only as a technical requirement but also as a human right.

How did you react when you heard about the scope of the Directive? Were you satisfied or did you feel like something was missing?

When the European Commission presented the draft of the European Accessibility Act, EDF was pleased to see a strong focus on ICT products and services. It was in line with what we had been advocating for years – accessibility as a key part of the digital market. We also welcomed the link to public procurement and EU funds which make accessibility part of mainstream policy.

At the same time, something was missing. In every consultation with our members, people pointed to everyday barriers, including inaccessible buildings, transportation, or household products. Unfortunately, the built environment was largely excluded, and Member States resisted extending the scope of the Act. That gap still needs to be addressed because accessibility must reach beyond technology into the spaces where people live and work.

What are your observations concerning the implementation of the law at the European level? Have you noticed any particular trends or any concerns?

Implementation has been uneven. Some countries moved forward quickly, while others struggled or delayed the process. Numerous Member States failed to meet the transposition deadline, forcing the European Commission to start infringement procedures. In a few cases, such as Greece and Bulgaria, national governments either misinterpreted the law or did not transpose it at all. This shows a worrying lack of commitment to accessibility.

EDF does not negotiate with governments directly – that is the role of our national members. However, we provide them with guidance, materials and peer support to strengthen their advocacy. We are also looking forward to the creation of the Working Group where Member States authorities, stakeholders and disability organisations can share progress. Consistency is vital: the EAA regulates products and services on the single market, so implementation must be coherent across the EU.

Different enforcement models also affect results. Some countries have centralised oversight, while others divide responsibilities among several agencies. What matters most is coordination and the meaningful involvement of persons with disabilities. The principle "Nothing about us without us" should also guide every stage of implementation, monitoring and enforcement.

Besides the standards and compliance metrics, what in your and EDF's view would be the real impact when it comes to EAA and accessibility for persons with disabilities?

The EAA is a market access law, but accessibility is much more than a regulatory obligation – it is a human right and a precondition for enjoying other rights such as education, employment, or healthcare. We encourage companies to move beyond compliance and treat accessibility as a driver of innovation, inclusion and customer satisfaction.

Real change happens when businesses involve persons with disabilities in product design and usability testing rather than reacting only to legal deadlines. Compliance is about ticking boxes, inclusion is about changing culture.

Measuring impact should also go beyond statistics. We need to know whether people with disabilities can actually use products and services without barriers. Companies should track both technical compliance and user experience, for example, accessibility testing results, customer feedback and staff training levels. These are meaningful indicators that show whether accessibility delivers real-world results.

Do you see emerging technologies, like AI, as something that could bring accessibility closer to everyone, or as a challenge for the accessibility framework?

Artificial intelligence brings enormous potential for accessibility. It can automatically generate captions, transcribe speech or simplify complex texts. It can make digital content easier to understand and navigate. Yet, AI also poses serious risks if accessibility is not built in from the start.

When data sets do not reflect persons with disabilities, algorithms can and do discriminate. We have seen this in recruitment, education, even in social services, where automated systems flag people unfairly because they fall outside the "average" data profile. That is why EDF worked hard to ensure that the EU AI Act includes fundamental rights safeguards, and is linked to the Accessibility Act so that accessibility becomes a design principle for all emerging technologies.

Regulation rarely keeps pace with innovation, but we are starting to see positive change. New EU initiatives such as the digital wallet, digital euro and e-signature frameworks all reference the Accessibility Act. This shows that accessibility is gradually becoming a built-in requirement across digital legislation, not an afterthought.

Which element of EAA will likely need revision within five years due to technological or social changes?

The first priority for revision should be the built environment. After all, it makes no sense to have a digitally accessible ATM in a bank office or a ticket machine at a station which is physically inaccessible. Accessibility must apply to both physical and digital spaces.

We also need to extend the EAA to cover household appliances and connected devices as these now usually have digital interfaces. Smart home and Internet of Things technologies hold great potential for independent living, provided they are designed inclusively.

Some sectors are still "waking up" to accessibility. Telecom operators, for example, must ensure real-time text and accessible emergency communication under the EAA, yet progress remains slow. Governments should coordinate enforcement more effectively (whether through centralised agencies or coordinated networks) and always include disability organisations in decision-making.

Businesses also have a significant role to play. We tell them not to focus on exceptions and deadlines but on opportunity. Accessibility improves usability, strengthens brands, and creates a fairer internal market. It is both a moral duty and a smart business move.

Looking further ahead, EDF would like to see a dedicated European accessibility agency, similar to what exists in the United States, to provide expertise and to ensure consistency across Member States. For now, cooperation is key to success. The European Accessibility Act laid a foundation. Now governments, companies and persons with disabilities must work together to make accessibility part of everyday life across Europe.

Interview by Karolina Mendecka
Business Accessibility Forum Director

Listen to highlights from the interview here.

Widzialni

Artur Marcinkowski

Founder, Widzialni.eu

Founder of Widzialni Foundation, creator of Business Accessibility Forum, and the mind behind Move 37, a manifesto on human-centered AI. **Artur Marcinkowski** has spent 20 years pioneering digital accessibility in Poland.

In this conversation, we discuss how to make AI systems understandable, controllable, and truly accessible. A must-read for anyone wondering what accessibility means in the age of autonomous systems.

BAF was founded on the belief that business needs a shared space to talk about accessibility. How has the EAA changed this discourse?

The European Accessibility Act has fundamentally changed both the language and the weight of the conversation about accessibility in business. We now talk less about good practices or social responsibility. Regulatory compliance in the design of products, services and processes has now become the central concern. Thanks to the EAA, accessibility is increasingly becoming part of business strategy and risk management. Companies have stopped asking whether investing in accessibility is profitable. There are no longer questions about the number of people with disabilities in order to calculate the ROI. The time has come for the systematic implementation of the requirements set by the EAA.

BAF has become a place where business can discuss legal requirements, interpretative uncertainties, costs, technological implications and the long-term effects of the EAA.

Trialogue brings together business, regulators and NGOs. Which of these groups is currently the readiest for the EAA?

The readiness differs across these groups. Companies are motivated, although to a varying degree, by deadlines and the risk of sanctions. The gap between businesses with and without accessibility awareness is still quite considerable.

However, thus far NGOs and, of course, specialist communities have been best equipped with expert knowledge. They are the ones with the strongest motivation for change and for improving accessibility.

Finally, regulators may be formal accessibility overseers but they operate under conditions of interpretative uncertainty regarding the standards. Despite clear willingness to engage in dialogue, supervisory authorities are still devoid of tools and experience that would allow them to effectively enforce the EAA.

The EAA has entered into force but the world is racing toward AI agents. Are European accessibility regulations keeping up with this change or are we already looking in the rear-view mirror?

European accessibility regulations are solid, but they were designed mainly with classic interfaces and predictable user-system interactions in mind. The world of AI agents fundamentally changes their logic. No longer does accessibility merely concerns website readability and WCAG-compliance (although this remains a binding requirement). It is also about system understandability, foreseeability and user-controllablity. Therefore, we should reorient our thinking about accessibility toward autonomous systems as quickly as possible.

AI can be an adaptive layer for accessibility or a new form of exclusion.

What determines which direction we take?

On its surface, accessibility is already strongly supported by AI, from automatic alt text for images, through better link descriptions, to generating content in plain language. Moreover, at deeper levels, related to system programming and user interactions, AI can become a powerful tool for digital barrier compensation, provided that accessibility is embedded into its design from the very beginning.

If, however, AI is developed solely in terms of efficiency and cost reduction, without control mechanisms and the possibility of user intervention, it will become a new obstacle which might be difficult to identify. Today, in the era of AI, it is the relationship between humans and the system where accessibility becomes significant, in addition to interfaces.

Move 37 manifesto states: "Artificial intelligence must serve humans". How can this slogan translate into the practical implementation of the EAA in companies?

When interacting with AI, user must remain the subject rather than a mere data source. AI-based systems should be designed to be understandable and accessible to people with diverse cognitive, sensory and communication needs. Simultaneously, completing a WCAG checklist ought not to be seen as the finishing line of EAA implementation. The process must take into account user scenarios within the system, including those in which AI makes decisions or recommendations on users' behalf.

If you could add one paragraph to the EAA to prepare the regulation for the era of AI agents, what would it include?

I would add a regulation stating that any system using autonomous, AI-based decision-making mechanisms, must be designed to be cognitively and communicatively accessible, ensuring that users understand how the system operates at a level tailored to their abilities.

Interview by Karolina Mendecka
Business Accessibility Forum Director

IAAP

Christopher Lee

President, CEO Managing Director

G3ict, IAAP

IAAP sets the threshold for accessibility expertise by certifying professionals, building communities, and driving best practices worldwide. We sat down with two leaders shaping this landscape: **Christopher M. Lee** is President and CEO of G3ict and Managing Director of the International Association of Accessibility Professionals (IAAP). With over 20 years of experience advancing accessibility, inclusive education, and global ICT innovation, he's been at the forefront of building the accessibility profession. **Monica Duhem** is Director of Advisory Services at G3ict and an international expert on inclusive digital transformation and public policy. Her work spans continents, helping governments and businesses turn accessibility commitments into practice.

We asked them how companies can prepare for the EAA, what mistakes to avoid, and why accessibility is an investment.

Monica Duhem

Director of the Global Advisory Center

G3ict

The European Accessibility Act has just come into force. How do you feel about this moment? Do you have any concerns?

Christopher Lee: We are excited. At G3ict/ IAAP, we had been preparing for the EAA for years by investing in education, certification, events and community. Now, with little time to spare, the challenge is clear. Companies urgently need employees who understand accessibility. We urge

organisations and professionals to act now and to prioritise training and collaboration.

In your view, what is the most common mistake that you see in business when approaching accessibility compliance?

Christopher: A common mistake in businesses is viewing accessibility as a task to complete once, something you test, fix and then forget. Accessibility is a continuous process. It should be part

of the organisation's DNA, not just a box to tick. Numerous companies still see accessibility purely as a compliance issue rather than as an integral part of their business strategy. We need to show that accessibility equals good business. It drives innovation and customer loyalty.

Monica Duhem: Completely agree. Accessibility is a process, not a result. Companies pour massive amounts of money on testing or remediating, but if they train their teams and embed accessibility early, they save time and funds in the long run. If you fix accessibility only at the finishing line, you spend millions. If you integrate it into workflows, it becomes sustainable.

Christopher: And content accessibility is another major challenge – especially PDFs and other legacy documents that remain inaccessible, but are still widely used. Organisations also need to think beyond websites and make sure that everything works well on mobile devices as that is where most people access digital content today.

What can Europe learn from the US, the most developed country when it comes to accessibility?

Christopher: The US and the EU take different paths toward the same goal. In the US, accessibility practice has long relied on documentation tools like VPATs, which help organisations to report their level of compliance. In Europe, the EAA prescribes clear technical standards through EN 301 549, but leaves room to refine how reporting and enforcement will work in practice. Both regions bring valuable experience. We can all learn from each other to build stronger, more consistent accessibility systems worldwide.

European businesses facing the EAA's 2025 enforcement can leverage the

insights from the U.S. ADA and Section 508 to accelerate their learning. American and European approaches differ – the U.S. places greater emphasis on documentation, whereas Europe focuses on clear technical standards (EN 301 549), leaving some details open. Both frameworks draw heavily on WCAG. The U.S. lessons have shown that maintaining documentation is essential for reducing risk, clarifying procurement processes and ensuring legal defensibility. By understanding the strengths of both regions, namely, the process and reporting practices in the U.S. and the harmonised standards in Europe, companies can build robust global accessibility systems.

How does the legislation in Europe compare to other frameworks? Is it done right? Do you notice any gaps?

Christopher: It is still early to judge how the EAA will perform in practice, but I am optimistic. Its harmonised approach is what makes it truly remarkable, as it unifies accessibility laws across all EU Member States to create a single, consistent framework. For the first time, digital and

ICT providers across Europe have a shared standard with clear technical guidance on how to comply. It is a solid foundation to build on.

Monica: In my view, the EAA standard has become a model far beyond Europe. Countries such as Kenya, South Africa, Mexico and Chile have used the EU framework to shape their own accessibility standards. What makes the EAA truly innovative is that, for the first time, the private sector – not just governments – must comply. It is a real game changer. Globally, many countries have regulations inspired by the UN Convention, but implementation often falls short. The EAA might improve the situation as it places the responsibility squarely on businesses.

Now, with accessibility required in both public and private sectors, how do you see Europe in terms professional workforce ready to implement it in every large institution?

Christopher: Europe's accessibility profession is growing fast. We see more certifications and training, especially in Western Europe. The journey has just

begun. In Central and Eastern Europe, we are merely scratching the surface. Yet, those regions offer tremendous potential. At IAAP, with leaders like Susanna Laurén and our European chapters, we have launched many exciting initiatives. These include online Q&A sessions on the EAA, a LinkedIn community and a video series explaining each article of the Directive. Thousands of professionals are engaging, driving momentum and positive change.

However, growth takes time. To accelerate progress, we need more people, especially those in procurement roles, to take specific steps, pursuing professional certification, sharing accessible procurement resources with colleagues and encouraging

companies to prioritise accessibility in every purchasing decision. By doing so, one will help to ensure that fewer inaccessible products are purchased, directly improving access for all.

Monica: And we need to debunk the myth that accessibility is too complex or too expensive. It is not. What results in high costs is fixing things too late. When people understand their role – whether they are developers, managers or designers – accessibility becomes natural. It is about clarity, not complexity.

What do you think about the future of emerging technologies? How do you anticipate they will impact and challenge accessibility in Europe and globally?

Christopher: I am genuinely excited about AI because it is rapidly reshaping the very foundation of digital accessibility. Current laws were designed for websites and software, but new technologies - AI, XR, multimodal devices, neural interfaces and distributed environments - are already revealing the limitations of today's regulatory models. The next wave will

challenge standards and require proactive adaptation. Emerging AI capabilities are transforming accessibility tooling (captions, alt text, image descriptions), while raising questions about accuracy, bias and accountability. Meanwhile, XR (VR/AR) is expanding into consumer, workplace and industrial use, but standards such as WCAG do not yet address 3D layouts or gestures. Voice UX is becoming standard everywhere. However, reliability still falters for people with speech disabilities or in noisy settings. Adapting our accessibility frameworks to keep pace with these advances is urgent and necessary.

Of all these trends, quantum computing stands out as perhaps the most transformative. As scalability improves, it could revolutionise data processing and accessibility, particularly in complex sectors like healthcare. I believe the next three to five years will determine the future of equitable access to technology.

Monica: Yet, there is a key point: if you do not understand accessibility, you cannot design accessible AI. Technology will not solve barriers automatically. People need

to understand how disabilities interact with digital environments. AI is powerful, but it needs human awareness behind it.

If you were advising a multinational company on building accessibility capabilities across US and EU markets, what would be your top recommendation for creating consistency while respecting regional differences?

Christopher: Consider centralising your accessibility strategy by integrating it with your company's vision, policies and procurement. You might appoint a dedicated accessibility lead or team and investigate selecting accessible platforms and tools from the outset. Using WCAG as your foundation and creating lightweight policy layers could help address regional legal differences. Involving persons with disabilities at every stage of product design is incredibly valuable. Treating inclusive design as non-negotiable, by testing with real users, addressing all disabilities and pledging annual strategy reviews, can help keep pace with evolving technology. It may be beneficial to begin building external partnerships soon.

One of the benefits of being an IAAP organisational member is that we provide a platform for learning from one another's successes and share resources, thereby driving progress together.

Monica: Absolutely. Big tech companies also have a responsibility. Small organisations depend on their platforms, such as Salesforce, Microsoft, AWS, etc., so global tech leaders should help smaller players use accessibility features effectively. Accessibility is not only about compliance. It is about sharing knowledge and building collective capacity.

What advice would you give to companies just beginning their accessibility journey?

Christopher: Start with a core group of engaged employees who believe in the importance of the journey. Build accessibility into the culture, not just your code. Accessibility is not an engineering project. It is a cross-organisational capability that should be integrated into your design and development process. One of the most common early mistakes we see is companies treating accessibility as an audit after launch rather than documenting the process to track it.

Bring together a focus group – include employees with disabilities, accessibility professionals, developers and managers. Talk openly about your products, your gaps, and your goals. You cannot fix what you do not know. That discussion is the first real step.

Monica: And understand what accessibility truly means. Many people confuse it with affordability. Accessibility is about removing barriers, not making things affordable for someone who has no money. Do not be afraid of it - it is not as complicated as it seems. Learn the basics, assign roles and embed accessibility into

every process. That is how you build long-term value.

Christopher: And remember, this takes investment, smart investment. Allocate a budget, plan in phases and measure progress. It is not a cost, it is an opportunity to build better and more inclusive businesses.

Interview by Karolina Mendecka
Business Accessibility Forum Director

Listen to highlights from the interview here.

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B Lab alumni

Wojciech Bagiński, LL.M MBA

Former Board Member of B Lab Global

Polish B Corp movement co-founder, Impactiv.Law

We've reached out to B Lab because the B Corp movement offers a powerful blueprint for what we're trying to achieve with accessibility. They've successfully transformed "responsible business" from regulatory burden into brand identity and competitive edge. That's the same shift we need to catalyze: moving accessibility from legal obligation to genuine business opportunity and inclusion.

In our interview with **Wojciech Bagiński**, former Board Member of B Lab Global and co-founder of the Polish B Corp movement and Partner at Impactiv.Law, we explore what accessibility can learn from this journey.

B Lab successfully transformed corporate responsibility from a compliance checkbox into a competitive advantage and brand identity. What were the critical turning points in that journey, and what parallels do you see with the current state of accessibility in business?

Over the last 20 years B Lab evolved from a small U.S.-based nonprofit with an ambitious mission into a global organization with partners and offices across nearly every continent. In the early days, only a handful of U.S. companies were certified as B Corps. Today, over

10,000 companies worldwide hold certification, with thousands more using our standards to guide their transition toward sustainable business practices.

Several turning points shaped this journey. The introduction of benefit corporation legislation in the U.S. championed by B Lab — and later internationally — sparked significant interest in certification. Since 2010, 51 jurisdictions around the world have introduced stakeholder governance statutes, including Italy (Societá Benefit), Colombia, France (Enterprise à Mission), Spain (Empresas con Propósito), Peru, Rwanda, Uruguay,

Ecuador, British Columbia, and Canada, as well as 44 U.S. states, Puerto Rico, and the District of Columbia (Washington, D.C.). These laws enable the creation of a new type of company, the "Benefit Corporation," that is legally focused on a long-term mission beyond delivering short term profits, and is committed to delivering value to stakeholders beyond shareholders. The European Green Deal (2015–2017) was another tipping point for us, as companies realized sustainability was no longer optional. During COVID, interest surged again as businesses recognized the importance of interdependence and resilience. COVID made evident to a lot of companies that we are all living in an interconnected, interdependent world where success, sometimes survival is dependent on how we show up in the world, how we help

others, how we contribute to the wellbeing of the whole system – not only our own success. These moments collectively drove growth from hundreds to thousands of certified companies.

The parallel with accessibility is clear. Many companies now understand that creating inclusive, accessible environments leads to better ideas, greater resilience, and a broader customer base. Accessibility also strengthens the overall economic system by reducing social exclusion. Yet, not all businesses are aware or convinced they can make an impact — just as we saw early on with B Corps. Regulations and best standards play a critical role, as does building a community of like-minded companies. That's exactly what you're doing now.

How do you create urgency around something driven by social values rather than immediate financial returns? How did B Lab reframe this from "cost" to "investment" in conversations with business leaders?

This is never easy—it takes time. From the start, we've championed a paradigm shift from shareholder primacy to stakeholder value creation. We demonstrated that

companies can thrive while pursuing a purpose beyond profit, using real success stories to make the business case. By having great examples of successful companies in our movement we try to provide evidence that there does not need to be a tradeoff between business performance and pursuing purpose higher than profits. Interestingly, around the end of the pandemic we issued an internal study around the financial performance of B Corps to understand how these impact-driven companies are also functioning as for-profit entities in competitive markets – examining the financial performance and resilience of B Corps. The results of the study showed that in the relevant period B Corps outperformed "ordinary" businesses, in terms of topline growth and that B Corps were more likely to grow their revenue and worker base between 2019 – 2021. Around the world, B Corps were also significantly more likely to survive the pandemic. The study can be found here: https://blab.infogram. com/1tgl93rr6z7d7df4xo1q6xv8d0ip86gl6lq

Over time, growing awareness of climate change and systemic challenges created urgency among forward-thinking leaders. In this sense our work of transitioning companies to make them think more about

stakeholders is easier. Accessibility is part of this same shift — essential for building a more inclusive and resilient future.

B Lab provides structure, community, and credibility to companies pursuing impact. How important was that ecosystem of support in driving adoption? What role does external validation and peer community play?

Community was—and still is—crucial. Early B Corps created a sense of belonging, a "tribe" united by the belief that business can be a force for good. Peer support remains one of the biggest draws for companies joining the movement. The ecosystem also acts as a credibility filter, signaling authenticity and helping maintain standards. Even as multinationals join, the movement retains its pioneering spirit, which inspires companies striving to do better.

B Corp requires genuine organizational transformation, not just policy updates. What have you learned about what actually works (and what doesn't) when companies try to embed social responsibility into their culture?

From my experience advising big as well as mid-size companies through transitions,

culture change rarely works if it's imposed from the top without explanation. When shareholders or managers expect the change to happen without taking the effort to first explain why are we doing it, and why it is good for the organization and the whole. It's vital to start by educating employees and creating change agents within the organization. Embedding purpose in foundational documents—like shareholder agreements—also helps. It provides context and an anchor. It provides accountability. There is a certain magic that happens when you put things in writing, especially if you write down the good things you aim to achieve. In corporate documents – it becomes an agreement and north star for shareholders, managers and employees. This is what the B Corp legal requirement is all about

– embedding purpose in the corporate DNA of companies. This principle applies equally to accessibility: it can and should be embedded in a company's core governance. Having said that - it is important also to emphasize that these commitments are put to practice and ae appropriately overseen. There are many ways this can be done, but ultimately the board members of the company need to ensure that the company is walking the talk.

B Corp operates globally with local nuances. What challenges emerge when scaling a movement across different regulatory environments, business cultures, and economic contexts? Any lessons that could apply to implementing European-wide accessibility standards like EAA?

Scaling globally brings challenges— different regulations, cultures, and economic contexts. If you want to grow organically the way you initially structure a network is different than how you organize if you are a movement that is now in its twenties. With expansion the challenges and priorities shift. We started with a few pioneers and attracted likeminded friends all over the world. It seemed that we grew

organically. Everyone was focused on building a network of likeminded people and companies in their jurisdiction under the main ideas of interdependence and a shift from shareholder primacy to stakeholder value creation. This structure attracted pioneering B Corps but it was harder to attract big multinational companies. Over the 20 years we transformed from a tiny organization of pioneers that promoted quick growth of the movement to a network of B Labs around the world that helped develop the movement further in particular jurisdictions. With this structure it was easier to mold the message to particular regional contexts and attract more companies. Now, as we approach 20 years of this global movement, B Lab is evolving into a more integrated organization. This next iteration of our global network will balance global coherence with local agency to achieve our vision of economic systems change. We expect B Corps to feel the benefits of these changes as we are able to deliver a better experience across markets; invest more in our shared central assets leading to improved products and services; and continue to prioritize community building, advocacy and impact through our local teams. I believe that B Lab now is

among the largest sustainability oriented nonprofits and advocates of positive policy changes in the world. I imagine that your organization could follow in these steps. I feel that the pioneer stage focused on growth is worth exploring at this moment of your organizational life.

Do you see accessibility as integral to responsible business, or is it still an afterthought? What would it take for accessibility to have the same prominence as sustainability in conversations about corporate responsibility?

Accessibility is integral to responsible business, even if it's not yet at the center of the conversation. It's part of the broader sustainability framework, and while sustainability faces headwinds in some regions, the EU remains committed to inclusion. Making products and workplaces accessible is common sense—and essential for long-term success. Your initiative will help bring accessibility into the spotlight where it belongs.

Interview by Karolina Mendecka
Business Accessibility Forum Director

CCIA

Mitchell Rutledge

Policy Manager

Computer & Communications Industry Association (CCIA Europe)

CCIA Europe represents the world's leading technology companies, advocating for open, competitive digital markets across the EU.

We asked **Mitchell Rutledge**, Technology and Security Policy Manager at CCIA Europe, how the EAA is playing out in practice, from delayed standards and fragmented enforcement to what Europe can learn from global tech leaders who've been doing accessibility for years.

Mitchell Rutledge focuses on EU files including cybersecurity, digital accessibility, and transatlantic technology policy. His work spans the implementation of the EU Accessibility Act, revision of the Cybersecurity Act, and a wide range of technology areas, from consumer devices to network infrastructure. He holds a master's degree in European history, Politics, and Society from Columbia University with a focus on EU digital regulation.

With the EAA coming into force, what are the biggest implementation challenges across different EU markets?

CCIA Europe and all its Members strongly support the European Accessibility Act's goals. However, the larger challenges have included the dramatic delays on the side of the European Commission, standardisation bodies and Member States.

Currently, the Act is being enforced in certain Member States, but compliance and derogation processes are still not fully formalised. Moreover, the necessary standards will not be approved until, at least, mid-2026, half a year to a full year after enforcement started. Yet, the Article 28 Working Group, meant as a forum for sharing information, learning

lessons and coordinating stakeholders with regulators, thus harmonising the EAA's implementation, has not been established yet. Consequently, stakeholders have no formal place to provide feedback or input. We know that some regulators deny meeting requests or simply do not respond when formally asked for information, which puts digital sector firms in a difficult position.

Member States have also been delayed in implementation and regulator designation. For instance, Germany only created its centralised regulatory body a few months after the EAA came into force and France published its derogation and non-compliance processes in November of 2025, which is five months after

enforcement began. Their guidance on implementation is either non-existent or only now getting up to speed, while other Member States already have enforcement and official documents in place.

Another major challenge is that non-compliance reporting and derogation requests are not harmonised across the 27 markets. A company operating in multiple EU Member States may have to report in 27 different ways. Some regulators have full-fledged official websites for this purpose aim, while others do not even provide any clarification regarding what needs to be done.

For tech companies operating across multiple EU markets, what is the biggest pain point?

The delayed standards and the lack of guidance are definitely the biggest pain points. While these are even more burdensome for smaller companies, larger companies also struggle to ensure total compliance without clarity and direction.

CCIA Europe has asked Member States for interim guidance during this gap period, but most were hesitant to provide any information as they too were still trying to get up to speed. Some Member

States such as Sweden confirmed they will use existing standards as "good faith measures". Yet, those provided by other Member States have made compliance even more unclear. France, for example, declared they will only look at the EAA for evaluation rather than existing guidelines, which is highly problematic as the EAA has both prescriptive and non-prescriptive obligations. Regulators may end up arbitrarily deciding what counts as 'compliant' before any common understanding has been established.

What these setbacks mean in practice is that companies with a universal design approach, placing accessibility at the core of product development, can actually be delayed in product releases as teams are forced to wait for the EEA standards to ensure compliance.

Beyond compliance, is the EAA driving genuine cultural change around accessibility?

As one of the first wide-ranging accessibility-focused legislations in the EU, it is definitely fuelling an inspiring cultural change, both in companies already focused on accessibility and newcomers to the space.

The major issues we are observing have less to do with the EAA's goals and more with how it is being carried out. Had the standardisation bodies and Commission kept to their timelines, we would be in a different position today, one with strong guidance, harmonised enforcement and clear benchmarks.

Instead, some EU Member States are now enforcing the EAA with varying methods, leaving companies, especially those with fewer resources, focused on box-checking rather than meaningful accessibility improvements. Some countries are even proposing legislation which goes beyond the EAA's scope, thus risking fragmenting the market even further.

What would shift accessibility from regulatory burden to business opportunity in executives' minds?

It is essential to recognise what the disability community calls for. Consistent collaboration between companies and consumers with disabilities shifts the mindset from compliance burden to something positive. This kind of interaction, focused on real-world experiences, shows companies how important these people are to the market and economy. In terms of

industry response, there seems to be very little, if any, pushback to the EAA and its goals, which is extremely rare for any type of new EU legislation, I can assure you.

Yet, the impact is also more practical. For example, when hosting events, not every organisation here in Brussels initially considers wheelchair accessibility, but once someone from the team focuses on these topics, the question becomes, "How do we do this?", rather than, "Why do we have to?". This type of mindset is what the EAA has generated in terms of shifting accessibility perception.

How can we ensure standards keep pace with technological evolution?

Standards already consider product longevity. ICT innovation, though rapid, is

still planned. Also, standardisation boards include people who think ahead about what technology might look like in a few years.

It is important to highlight that standards are guidelines, not rigid requirements. If companies develop innovative technologies that do not perfectly fit standards, but adopt an accessibility-first approach, they are already moving in the right direction. Alternatively, they might achieve the same goal in a different, more innovative way, one that those who set the standards may not have considered.

The EAA review comes in 2030, which is four years after standards take effect. We need forward thinking now, so people are not caught off guard again. Standards must be consistently updated.

What are CCIA's key advocacy priorities around EAA implementation?

CIA Europe's priorities are tangible: getting standards done, holding the Commission to its requirement for the Article 28 Working Group and advocating for harmonised enforcement across all 27 EU Member States.

Yet, most importantly, we are advocating for the EAA to succeed. In the regulatory space, Europe often moves too quickly to the next piece of legislation without letting the current one settle. We need to see how the EAA performs, how enforcement unfolds, and what is missing.

The Commission's new accessibility strategy is expected in June 2026. The question is whether new flagship legislation will duplicate what the EAA already covers. If the EAA fails for whatever reason, will the next legislation simply copy the same approach, repeat the same mistakes and fail too? Until we have hard facts on performance, let us not redo what we may have already done.

Are there tools from outside Europe that could support the EAA's goals?

Indeed, the EU does not always need to reinvent the wheel. Sometimes, the best approach is to look at what is already working elsewhere and adapt it. Many of our Members are global companies that have been pioneers in accessibility for years, long before the EU even started to think about harmonising accessibility standards across its 27 markets.

There is a lot Europe can learn from their experiences. Take Apple, for instance, when they first focussed on accessibility years ago, they started small, by asking how technology could help students with disabilities in classrooms. That practical, real-world focus eventually shaped their wider accessibility strategy. It is a great reminder that education and concrete use cases can be powerful tools in advancing the EAA's goals.

Another example is Google, which has integrated accessibility teams directly into its product development process. Such an approach ensures accessibility is considered from the ground up, across various services and products.

The crucial question is: what can Europe take away from these processes? Companies were not held back by hesitancy or uncertainty before, so we need to make sure that the EEA does not slow down truly transformative technologies going forward.

Interview by Karolina Mendecka
Business Accessibility Forum Director

EIDD

Rama Gheerawo

President

EIDD – Design for All Europe

Ivelina Gadzheva

Vice President

EIDD – Design for All Europe

Design for All isn't about compliance, it's about recognising that exclusion is often created by well-intentioned systems. We spoke with the leaders of EIDD Design for All about why the EAA should be a floor, not a ceiling and why accessibility is about majorities, not minorities.

Prof. Rama Gheerawo is President of EIDD Design for All Europe, Founder of INSTILL, and author of: How to Design the 21st Century Organisation (Penguin, 2025), serves on advisory boards including The Valuable 500, D&AD Awards, Dezeen Awards and the Global Disability Innovation Hub and has led collaborations with Samsung, Toyota, and Panasonic across 40+ countries. Named to the Design Week Hall of Fame, he advocates for accessibility as foundational infrastructure, not optional add-on. **Ivelina Gadzheva** is Vice President of EIDD-Design for All and an inclusive design specialist working at the intersection of design, policy, and innovation. She supports public institutions and businesses in embedding Design for All as a strategic capability, enabling long-term value, resilience, and inclusive impact. An experienced facilitator and researcher with an international portfolio of systemic and sustainable initiatives.

After 30 years of Design for All in Europe, what is still missing from policymaking? What's the hardest thing for decision-makers to understand?

Rama Gheeravo: Design is radically misunderstood. Everything around us is designed — yet in accessibility conversations, design is often missing. We talk policy, economics, sustainability, but we rarely bring designers to the table. Design isn't a cost, it's a capability. Inclusion isn't an add-on —

it's a strategic competence that actually strengthens innovation, resilience, and competitiveness.

The phrase "for all" doesn't mean minority groups. In many EU countries, older people already outnumber the under-25s. We're not talking minorities here, we're talking ignored majorities.

The European Accessibility Act shouldn't be treated as a ceiling. It's the bare minimum, not the ultimate goal. In a diverse, digitally dependent, rapidly ageing Europe, settling for minimum requirements holds back innovation. Bringing law, design and people together is where the magic happens.

Ivelina Gadzheva: What's still missing is not regulation. It is ownership of lived consequences.

Europe has built strong legal frameworks and minimum standards, but Design for All asks for something deeper: the courage to recognise that exclusion is often created by well-intentioned systems. Accessibility is still treated as a technical layer added after decisions are made, instead of a design condition shaping those decisions from the start.

The hardest thing for decision-makers to grasp is simple and uncomfortable: you cannot regulate empathy, but you can design for it. Design for All becomes transformative only when human diversity is treated as normal, predictable, and valuable, not as an exception to be managed.

What can businesses miss by viewing accessibility too narrowly through the EAA compliance lens?

Rama: Three things: a wider market, innovation potential, and employee impact.

Design for All asks who is excluded across many criteria, not just disability. Two

wheelchair users are never the same. A visually impaired person in their 70s might have radically different needs than an individual in their 30s. There are 1.5 billion people with registered disabilities worldwide. Add temporary and hidden impairments, and the market size grows exponentially.

On innovation: subtitles were made for hearing loss, but now 85% of users don't have a hearing impairment. If you were designing a tennis racket, you'd go to Serena Williams — one of the best in the world. People with disabilities drive innovation because they have different needs. Power tools designed with 80-year-olds can outsell everything else because they're easier to use.

Finally, employees. Wheelchair access covers less than 5% of registered disabilities. What about the other 95%? We're missing workplace talent. The EAA is a carrot and stick: happier employees and wider markets are the carrot; future penalties are the stick.

Iva: When accessibility is reduced to EAA compliance, businesses design for a hypothetical "standard user." Real

customers, however, live through change: stress, ageing, illness, parenthood, language barriers, and cognitive overload.

Accessibility is not about "others." It is about your best customer on their hardest day. Design for All builds loyalty in moments of vulnerability. Compliance avoids penalties. Inclusive design builds trust, relevance, and long-term value.

What's the most significant missed opportunity in EAA implementation? What should businesses be doing that they can't see?

Rama: Standards exist but sit on shelves. The missed opportunity is translating words into actions. Accessibility should reach marketers, not just designers or policymakers. We talk to CEOs — but decisions flow through CFOs, CMOs, and COOs.

Start early, don't retrofit. Retrofitting costs more. If you design a building to last 50 years, what will accessibility look like in 50 years?

Companies skip the first section in the Double Diamond Model, namely the discovery phase. A hearing aid company

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designed a beautiful product that could isolate conversations in crowded rooms. But changing the battery required sticking a pin into a tiny hole. When asked why an 80-year-old with arthritis couldn't change it, the engineers said: "It wasn't in the brief." You need to design experiences, not isolated touchpoints. Don't bring in an expensive consultant, tick a box, and say "we've done accessibility." No, you haven't. Accessibility is baked in from the start — you should be able to smell it!

Iva: The biggest missed opportunity is treating accessibility as a legal checkbox rather than a strategic learning tool. EAA implementation should reveal friction, not hide it. Businesses should use it to

identify where people struggle, even when standards are technically met. That gap is where innovation lives. The question should not be "Are we compliant?" but "Where do people still hesitate, struggle, or give up?" Design for All starts exactly there.

How should businesses measure the real value of Design for All beyond compliance metrics?

Rama: Focus on outcomes such as user outcomes, social outcomes, people and planet together. You can't integrate Design for All unless you tackle the barrier of KPIs. We suggest turning KPIs into KPAs: Key Performance Aspirations. Something positive and evolving, not a checklist. If your only metric is only compliance, you've already failed. The EAA doesn't measure emotional experience, dignity, or social belonging. Real integration is about joy and happiness, not checkboxes.

Iva: You don't measure Design for All by counting features. You measure it by what stops happening. Fewer workarounds. Fewer apologies. Fewer

calls for 'basic' tasks. Faster onboarding without explanation. A company has truly integrated inclusive design when inclusion is no longer a project or initiative, but a reflex embedded in everyday decision-making.

If you could add one thing to European businesses' accessibility toolkit, what would genuinely transform their approach?

Rama: My answer is always the same: the only thing any of us can change is yourself. Be the change you want to see. Live accessibility. When you take the words off the page and into people's lives, that's when the EAA comes alive.

More structured approaches include diversity sprints — short, repeatable processes where teams co-design with older people, people with disabilities, neurodiverse folks. Leadership accountability matters too. Unless leaders understand Design for All, you're sowing seeds on rocky soil.

Architects use a Post Occupancy Evaluation to check if buildings work for

people living there. Apply the same to products and services. Nothing exposes superficial accessibility faster than genuine human feedback.

Iva: A mandatory exclusion review. Before launch, teams should ask one question: Who are we unintentionally excluding, and in which life situation? This shifts accessibility from obligation to responsibility. From compliance to care. From rules to leadership. Accessibility prevents harm. Design for All enables dignity, autonomy, and trust. Europe has learned to regulate harm. The next step is designing for human complexity.

Interview by Karolina Mendecka Business Accessibility Forum Director

Listen to highlights from the interview here.

AbilityNet

Robin Christopherson

Head of Digital Inclusion

AbiliityNet

The UK has two decades of accessibility legislation behind it and lessons that Europe shouldn't ignore. We asked **Robin Christopherson** MBE, one of Britain's most influential voices on digital inclusion, what works, what doesn't, and why UK businesses are paying attention to the EAA despite Brexit.

Robin is a founding member of **AbilityNet**, the UK's leading charity advising on digital accessibility. Named in the WHO's "100 Most Influential People in Digital Government" and the UK's "Power 100" most influential disabled people, he serves on the All Party Parliamentary Groups on Disability and Assistive Technology. Robin holds an honorary doctorate from the University of Suffolk and received a medal from HRH Prince William in 2017 for his services to digital inclusion.

What are the most common mistakes businesses make when implementing accessibility? When companies get it right, what are they doing differently?

Organisations that succeed treat accessibility as a risk and resilience issue, not just an inclusion issue.

A common but less visible mistake is separating "user needs" from "commercial reality", assuming that accessibility is a trade-off or optional extra rather than a design constraint that reflects real-world use. This often results in products that technically meet standards but fail disabled users in everyday scenarios such as managing finances, accessing healthcare or completing essential transactions independently.

Organisations that succeed with accessibility recognise that disabled users are often the first to experience friction when systems are fragile, complex or poorly designed. By addressing those needs early, businesses create services that are more robust for everyone. Improving customer experience across products and services and nurtures trust in the brand.

These organisations invest in understanding how accessibility barriers affect people's autonomy, confidence and trust, and then align those insights with product, risk and customer experience strategies.

How do you make the business case for accessibility to sceptical executives? What tangible improvements have you seen beyond compliance?

The most effective business cases connect accessibility directly to how people actually use services, especially when those services are essential. Done well it underpins and aligns with business performance, delivering better customer experience, reducing legal risk and making delivery processes more robust.

Executives respond when accessibility is framed as improving service reliability, customer trust and workforce effectiveness, particularly in high-volume or high-risk services. It will mitigate risks and ensure compliance, but organisations also see improved completion rates, fewer escalations and stronger customer loyalty.

Disabled customers and employees are often forced to rely on workarounds, assistance or abandonment when systems are inaccessible. This creates hidden costs for organisations through increased customer support, dealing with complaints, attrition and reputational damage.

In AbilityNet's experience, when organisations redesign services around real user needs, disabled people gain independence, dignity and consistency of access, while businesses benefit from reduced operational friction.

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What key lessons from the UK experience should European businesses pay attention to as they implement EAA?

The UK experience shows that accessibility fails when it is treated as an abstract obligation rather than a human and operational reality.

Despite long-standing legislation, many organisations struggled because disabled people's experiences were not sufficiently reflected in decision-making. European businesses implementing the European Accessibility Act should prioritise mechanisms that translate user needs into operational priorities.

A key lesson is that accessibility delivers most value when organisations understand where exclusion has the greatest impact on people's lives – such as access to banking, transport, employment services or digital public infrastructure – and then align investment accordingly.

UK organisations that embedded this understanding were better able to justify decisions internally and adapt over time. EAA implementation should therefore focus not only on meeting requirements, but on sustaining access to essential services that disabled people rely on daily.

Are UK businesses paying attention to EAA despite Brexit? What does it mean for UK companies operating in European markets?

UK awareness of EAA is low, but increasing, particularly where disabled users, European customers or partners are directly affected. As well as more general awareness many UK businesses first encounter EAA through user feedback or procurement pressure, rather than legal teams. The responsibilities for EAA compliance run through the supply chain, so will be relevant to B2B organisations as well as B2C.

For UK companies operating in Europe, EAA represents more than compliance; it is about maintaining trust and continuity of access for disabled customers. Failure to meet expectations risks excluding people from essential products and services, with reputational consequences that travel across borders.

Organisations that approach EAA as a shared user expectation, rather than a foreign regulation, are better positioned to serve disabled people consistently and protect long-term market access.

For companies operating in both UK and EU markets, what challenges emerge

from navigating different regulatory frameworks?

EAA is one part of a regulatory jigsaw that is faced by any business with an international outlook, but in a practical sense the greatest challenge is to ensure that disabled customers have a consistent experience, even when regulatory frameworks differ. Fragmented internal interpretations often lead to uneven accessibility, where users face different barriers depending on geography, product version or service channel. This undermines trust and adds unnecessary complexity in internal processes.

More effective organisations adopt a single accessibility vision grounded in user experience, supported by standards that meet both UK and EU expectations.

By focusing on how disabled people interact with services end to end, businesses simplify internal complexity while improving real-world outcomes. The lesson from the UK is clear: regulatory variation should not translate into variable access. When organisations prioritise user needs first, regulatory alignment becomes a by-product rather than a burden.

Interview by Karolina Mendecka
Business Accessibility Forum Director

Zero Project

Małgorzata Grobelna

Programme Manager

Zero Project

Zero Project has been mapping accessibility innovations worldwide since 2008 , connecting 18,000+ experts across NGOs, governments and corporations.

We asked Małgorzata Grobelna what Europe can learn from Canada, Chile and Japan, why the "accessibility is expensive" myth needs to be debunked, and how a small butcher shop in the UK became a model for inclusive business.

Małgorzata Grobelna is Programme Manager at **the Zero Project**, an international initiative of the Austrian Essl Foundation. A lawyer, mediator, public speaker and Honorary Ambassador of Polish Congresses, she has dedicated her career to empowering persons with disabilities, with a particular focus on neurodivergent people and their talents.

Zero Project has been tracking accessibility innovations worldwide since 2008. How does the European Accessibility Act compare to accessibility frameworks in other regions? What can Europe learn from solutions that are working elsewhere?

When examining inclusive policies globally, one immediately sees both similarities and significant differences. A particularly compelling example is that Canada and Poland were developing their respective accessibility acts at almost the same moment in history.

During the Global Policymaker Forum, representatives from both countries expressed a degree of mutual envy. The Accessible Canada Act extends beyond standards and governance; it focuses on cultural change. It asks what needs to shift in education and in societal perceptions of disability and inclusion in order to achieve genuine transformation by 2040. Polish representatives observed that this

approach differed considerably from their initial strategy.

At the same time, Canadian representatives expressed admiration for Poland's Accessibility Plus Programme, which encompassed not only standards but also investment mechanisms, loans and the financial dimension of creating accessible public spaces. This practical funding framework was something Canada did not have.

The uniqueness of the European Accessibility Act lies in its clarity in defining what must be achieved, while leaving Member States to determine how implementation should occur. This is where differences emerge between countries

such as Poland, Germany, Spain, and Italy, although the core principles remain firmly rooted in the United Nations Convention on the Rights of Persons with Disabilities.

Chile adopted yet another model, unifying existing measures into a single strategic framework. All these legislative acts represent efforts to translate Article 9 of the Convention into enforceable structures so that public authorities, businesses, and non-governmental organisations understand their obligations.

What is the biggest misconception about accessibility that you still encounter among businesses and policymakers?

It is important to recognise that a business seeking to be accessible to customers thinks differently from an organisation focused on employment, and both differ from policymakers who may wish to satisfy their voters.

However, one pervasive myth applies to all groups, the belief that accessibility takes a long time to implement. It does not. Basic adjustments can often be introduced quickly and at relatively low cost. Another

harmful misconception is that accessibility must necessarily be expensive. In reality, many persons with disabilities create their own improvised solutions precisely because suitable products are not available, and they certainly do not have access to corporate budgets.

A further fallacy is the assumption that accessibility is unnecessary because persons with disabilities are "not our target group", which is simply appalling. Any customer may become a person with a disability, whether invisible, age-related, temporary or situational. A broken arm, post-operative visual limitations or carrying a child can all alter the way an individual interacts with services.

Finally, there is the false belief that accessibility is purely technical or compliance-driven. The Canadian experience demonstrates that a genuine cultural shift is essential. Accessibility must be understood as strategic and rooted in human rights.

Based on your network of more than 18,000 experts, what is the most

significant disconnect between regulatory requirements and actual implementation?

Many organisations adopt only the bare minimum. If legislation requires that two per cent of employees must be persons with disabilities, they will employ precisely two per cent. The focus often remains on technical compliance rather than lived experience.

Even the most carefully drafted regulations are insufficient if they are not designed or audited in collaboration with persons who have lived experience of disability. The gap between technical compliance and practical usability can be illustrated by something as simple as a wheelchair ramp. A ramp may meet legal specifications yet prove unusable for someone with a different type of wheelchair, thereby requiring assistance.

Co-design with persons with disabilities, ideally representing a range of impairments and needs, is essential. Accessibility is fundamentally about recognising those needs and enabling autonomy.

Zero Project brings together NGOs, governments and corporations. What role do businesses play in accelerating accessibility progress? And, looking at this year's Award nominees, which solutions should European businesses pay particular attention to?

Each Zero Project Conference focuses on a specific theme. In 2026, the central topic is accessibility, crisis response and information and communication technologies. Let me provide two examples of how accessibility can be implemented effectively, one from a global corporation and the other from a small enterprise.

Panasonic in Japan has developed a strong co-design methodology.

The Persona Spectrum is a tool which demonstrates how permanent impairments, temporary limitations and situational challenges affect the use of a product. For example, hearing: deafness may be permanent; wearing headphones may represent a temporary limitation; being in a noisy environment is situational. Panasonic designs its products with all such scenarios in mind. The company maintains a dedicated design team that includes persons with disabilities and publishes selected solutions as open-source resources to enable broader benefit.

Secondly, Morgan's Butchery in the United Kingdom, a small family business, began by asking a simple question: why do customers with disabilities not visit the shop? The owners introduced a ramp, widened spaces, staff training, sign language support, induction loops and additional measures. The result was an increase in loyal customers who returned repeatedly because they finally had access to a shop they could use independently.

These examples demonstrate that accessibility is scalable and replicable

anywhere, with open-source tools, appropriate training and a willingness to look beyond minimum legal requirements. That is precisely the mission of the Zero Project.

How do you assess whether an accessibility solution creates genuine inclusion rather than merely technical compliance? Which indicators matter most?

Numbers are, of course, important. Metrics such as increased application downloads or a higher number of customers identifying as persons with disabilities provide useful insight.

Moreover, social impact indicators are equally significant. Are persons with disabilities recommending your business? Are they saying that the company treated them with respect and can be trusted? Mystery shopping exercises can provide valuable evidence in this regard. Word-of-mouth, social media engagement and advocacy are strong indicators of whether a solution genuinely works.

Ultimately, the essential question is whether persons with disabilities feel

welcomed in your business. If they become advocates for your organisation, you have succeeded. If they indicate that something is not functioning properly, it is imperative to listen carefully and respond accordingly.

Interview by Karolina Mendecka
Business Accessibility Forum Director

Listen to highlights from the interview here.

Microsoft Team

Microsoft is a founding member of BAF and a recognized leader in enabling other businesses to implement accessibility more easily, from developer tools like Accessibility Insights to training resources used by millions worldwide.

We asked their team how they helped shape the EAA, where platform responsibility ends, and what keeps them up at night now that AI is transforming the accessibility landscape.

Microsoft helped shape conversations that led to EAA. Now you're implementing it. Is the final directive what you hoped for, or did something get lost in translation?

Microsoft was proud to partner with policy makers, industry, and disability advocates to support adoption of the EAA. The act does a good job of setting general expectations for the accessibility of covered products and services, which benefits companies, regulators, and, most important, consumers. As with most laws, there are ambiguities that arise when applying the EAA to complex and novel technologies, some of which did not exist when the EAA was drafted. We look

forward to continuing to partner with EU officials and disability advocates to clarify the EAA's requirements and establish centralized mechanisms that facilitate even better industry-regulator communications.

Windows, Office, Azure – you're infrastructure for the internet. When a developer builds an inaccessible app on your platform, where does your responsibility end?

Microsoft is deeply committed to skilling and training. While it's important for all creators to take ownership of the accessibility of the software and content they make, we want to empower them to build accessibly on our platforms. That

starts with meeting accessibility standards for platforms and authoring tools, like those included in EN 301 549 and the Web Content Accessibility Guidelines. It also includes providing tools like Accessibility Insights and GitHub AI Accessibility Scanner and supporting a range of extensions and plug-ins for Visual Studio Code, all of which makes it easier for developers to identify and correct accessibility issues during the design and development stages. And it includes providing robust training resources that are available to all via our Accessibility Resources and Training website.

How do you use your position to influence partners' accessibility practices without being preachy?

We believe strongly in the power of story, and sharing pieces like this one highlighting how AI helps neurodivergent professionals showcase their strengths is one of the core tools we use to encourage partners to think more deeply about their own accessibility practices. To help them on their journey, we provide extensive training and skilling resources, like our Accessibility Fundamentals course that has been taken by more than 6,000,000 learners around the world, and resources to help partners avoid causing disability harms when using generative AI. We also

ground our work in ongoing co-creation with the disability community and their expertise directly informs how we build and evolve our technologies.

EAA references standards that evolve. How do you design for compliance with standards that haven't been written yet?

Future-proofing new technologies is always a challenge, but a few practices have helped us be as ready as we can be for evolving EAA standards. First, existing standards are a good foundation, and we've been focused on standards like EN 301 549 and the Web Content Accessibility Guidelines for a long time. Even where there are no current standards, like for customer service, Microsoft has been an industry leader in creating accessible experiences, like our Disability Answer Desk, which puts us in a strong position when standards are finalized.

Second, we are active in standards-making activities, which helps standards organizations consider the practical implications of the requirements they create.

Third, the language of the EAA, itself, is a good guide. While the EAA isn't always as clear as we'd like, it does a good job of setting out guiding principles.

Fourth, and perhaps most important, we listen to our customers. That includes getting input during the design stage and providing robust customer feedback mechanisms.

AI is transforming accessibility but also creating new barriers. What keeps you up at night?

We're very excited about how AI can eliminate barriers, and we're already seeing how people with disabilities are using Copilot and other AI tools to make the world more accessible. That said, the rapid pace of AI innovation underscores the need for strong accessibility governance and advancements in how we can utilize AI, itself, to create more accessible products. We also recognize the need for robust responsible AI practices to enable generative AI tools to accurately depict disability, which is why we released free AI safety tools for creators and why we've

entered several partnerships to increase the quantity and quality of disability-related data.

If you could mandate one change across the tech industry that would 10x accessibility progress, what would it be?

Generally, the largest members of the tech sector are already deeply invested in accessibility and accessibility innovation. The real leap forward will come when we are able to harness AI tools to make accessible product development faster and more cost effective so that every vibe coder, developer, and tech company can create accessible products despite their resources or know-how.

Interview by Karolina Mendecka Business Accessibility Forum Director

Allegro

Paulina Materna

Senior Test Automation Engineer

Allegro

Agnieszka Sławek-Helwin

Legal Counsel, Senior Compliance Specialist

Allegro

Tadeusz Joniewicz

Sustainability ESG Expert

Allegro

Allegro is a founding member of BAF and Poland's largest e-commerce platform, serving millions of customers across Central Europe.

They joined our 2023 report, and two years later, we wanted to know what's changed.

From grassroots initiatives to company-wide compliance, from WCAG to parcel lockers you can open with your smartwatch: we asked their team how accessibility has evolved and what it really takes to make an entire shopping journey inclusive.

Paulina Materna is a QA specialist turned accessibility advocate, believes digital inclusivity is a standard, not a trend. **Agnieszka Sławek-Helwin,** a legal counsel bridging the gap between compliance and tech, translating regulation into business language. **Tadeusz Joniewicz:** an ESG expert combining sustainability reporting with practical accessibility implementation.

Allegro took part in our 2023 report. What has changed in your accessibility approach since then – and what drove those changes?

The past two years have been a period of significant growth for digital accessibility at Allegro. When comparing our current framework to the situation in 2023, we observe a higher level of maturity in implementation, with a strategic shift from grassroots initiatives toward accessibility becoming an integral part of our Compliance and Technology operations.

A key difference from 2023 is the transition from dispersed activities to a more formalized approach, driven by the implementation of the European

Accessibility Act (EAA). Ensuring accessibility across individual processes and its improvement within existing components has been assigned to the respective business teams, who are supported by representatives from various technological areas. This effort is no longer limited to selected pilots; it now covers all Allegro sales platforms across various Central European markets.

At the same time, we have not abandoned our grassroots initiatives, such as the Accessibility Festival, and we continue to draw on the enthusiasm of our internal community of accessibility advocates, who serve as our in-house innovation hub. We have also maintained and continue to develop our standards for parcel locker accessibility, which serve as a benchmark for physical inclusivity in public spaces.

Implementing accessibility at every stage of platform development requires continuous upskilling. The foundation of this change is our digital accessibility training program, available to every employee and mandatory for those developing our platform. The program fulfills three key objectives:

– Legal Compliance: Building competencies in creating products aligned with the new regulations that came into force in June 2025.

– Empathy and Understanding: Providing insight into the barriers faced by people with disabilities, which translates into solutions that are friendly to everyone.

– Practical Implementation: Delivering concrete solutions to avoid technical debt in new projects and enhance accessibility for our customers.

In summary, the transformation achieved since 2023 represents a transition toward building systemic accessibility that is designed to encompass the entire organization.

Allegro operates in Poland, Czechia, and Slovakia. Each country implements EAA slightly differently, has a different regulatory culture, and varying levels of accessibility awareness. How does Poland compare to other CEE countries?

Allegro's experience in implementing the EAA across different countries shows that the key differences relate primarily

to the prominence of the topic in public debate and, consequently, the approach of regulatory authorities and other stakeholders.

In Poland, what is unique is not only the immense awareness of these regulations but also the openness to dialogue between regulatory authorities, representatives of economic entities, and key stakeholders. Efforts to develop joint positions, understand each other's perspectives, and provide guidance on how to implement the EAA in a practical manner are at a very high level.

It is connected to the fact that awareness of these regulations among consumers is also significantly higher in Poland than in other regions, where we have not observed a similarly intense mobilization and cooperation between various market representatives.

E-commerce accessibility goes beyond WCAG, it's about finding products, understanding descriptions, completing payments. What's the hardest part of the user journey to make truly accessible?

It is true that accessibility in e-commerce extends far beyond the framework of WCAG standards. In an ecosystem as vast as Allegro's, the greatest challenge is not any single element, but maintaining context and user autonomy (the ability to fully utilize the service) across four critical stages:

1. Search and Listings: Combating Cognitive Overload. The main barrier is managing many filters and dynamically appearing results without losing orientation on the page. The technical challenge lies in implementing features such as live regions for critical updates. A screen reader must notify blind users of important changes on the page, regardless of their current focus. A best practice here is predictive design, which anticipates user actions and allows for the storage of accessibility preferences.

2. Product Selection: Quality of Sellers Data. A significant challenge is merging the platform's infrastructure with content created by third-party sellers. A potential solution lies in AI support, which can automatically generate alternative texts or evaluate the semantic structure of descriptions. Seller education is crucial here— improving the accessibility of listings directly expands their market reach.

3. The Cart: Managing Complex Logic from Multiple Selling Partners. Communicating complex page logic involving numerous sellers and varied delivery costs to users with visual or cognitive impairments requires grouping information in a clear and precise manner. The screen reader must explicitly state which items form a single package and which generate separate costs, ensuring the user navigates the entire purchase path safely.

4. Checkout: The 'High-Stakes' Barrier. The transaction finalization stage can also be challenging, particularly when it requires the use of graphical interfaces (e.g., parcel locker maps). The solution is to create accessible alternatives, such as text-based lists of pickup points. It is also essential to programmatically link error messages to specific form fields, so the user knows exactly what needs correction.

It is worth remembering that in the shopping process, the key is to enable the user to complete the entire journey, up to and including the final purchase. Even the most accessible content remains useless if the process becomes inaccessible and blocked at any stage.

What's one accessibility improvement you've made that had an unexpectedly positive impact on all users, not just those with disabilities?

One of the most significant change introduced by Allegro, which brought unexpected benefits to the entire user community, was the implementation of the remote locker opening feature for One Box parcel machines via mobile app and smartwatch.

While the foundation of this solution was the desire to eliminate barriers for people with disabilities, it has become a prime example of Universal Design, redefining the parcel pickup process for every customer.

Key Aspects of the Implementation:

– Remote Opening via Smartphone (Eliminating Physical Barriers): This feature was designed for users with mobility impairments (eliminating the need to interact with a main screen that might be positioned too high) and those with visual impairments (addressing difficulties in reading menus on glossy screens in bright sunlight).
Benefit for all: This solution was adopted by many users as the most convenient way to collect parcels in poor weather,

when their hands are full, or to avoid touching shared screen surfaces.

– Smartwatch Ecosystem: Moving the "Open Locker" function to the wrist was a response to the needs of people with limited mobility or those using assistive devices (crutches, canes), for whom retrieving a smartphone in front of a parcel machine was risky or difficult. **Benefit for all:** The ability to open a locker with a single tap on the wrist has become a "premium feature" for parents carrying children, couriers, or athletes who don't want to dig for a phone buried deep in a backpack.

– Clear Information for the Customer: The use of vibration (haptic feedback) in smartwatches confirms a successful locker opening, which is crucial for blind users.
Benefit for all: In noisy urban environments, sensory confirmation on the wrist gives every user immediate certainty that the process was successful, without the need to listen for the lock mechanism or look at the machine.

The introduction of remote logistical access via wearables and mobile devices has proven that by solving problems for users with specific needs, we create a

better product for everyone. What began as a tool to support inclusivity has become the standard for a modern, frictionless shopping experience enjoyed by many— regardless of their physical capabilities.

This is a natural continuation of our approach to parcel machine design. The physical infrastructure of One Box is a natural extension of our digital accessibility. When designing our machines, we eliminate architectural barriers by ensuring step-free access and adequate maneuvering space. Another vital convenience is the option to choose the locker height—a critical solution for wheelchair users that has become a

convenience standard for everyone. As a result, a parent with a child in their arms or a person of shorter stature does not have to struggle with high-mounted doors. This is further proof that design inclusivity enhances comfort for the entire society, making logistics intuitive and effortless.

Interview by Karolina Mendecka
Business Accessibility Forum Director

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Orange

Yoann Roselier

Accessibility Program Manager

Orange

Orange is a founding member of BAF and a telecom giant serving millions across Europe. We asked **Yoann Roselier,** accessibility program manager with contagious energy and a knack for cross-disciplinary challenges, what EAA implementation really looks like across borders, why empathy is vital, and what happens when companies panic without clear standards.

How much of Orange's accessibility strategy comes from genuine customer need versus regulatory pressure?

I would say 80% is driven by fear of the law and 20% by consumer demand. Awareness sessions can help — when you put people in the shoes of those who suffer from bad design, they start paying attention. But a threat definitely works better. And the EAA helps a lot.

Orange had accessibility initiatives before, but to a lesser extent. Now the EAA is a huge trigger and a massive part of the budget we work with. France was ahead on this, which helped create the governance and structures I work with today.

Can you share an example where an accessibility investment initially made for compliance turned out to drive unexpected business value?

We have several stories, mainly from digital projects — for physical products we've only started compliance training this year, so we don't have enough data yet.

In customer-facing projects, we received feedback that the new designs were more comfortable and our services easier to understand. Orange also started providing French Sign Language interpreters for certain meetings. For many colleagues, it was the first time they could actually follow the discussion. That's the thing people forget — some individuals don't use your

service simply because they know they can't. The moment they realise you've made the necessary changes, you gain new customers.

Dark mode is another example — customers were requesting it, and we added landscape mode for mobile apps too. People are genuinely grateful. We also fixed forms where colour-blind users couldn't understand what information was required. Now they can complete the process.

I should have kept better track of these success stories. Maybe we should write a book — the stories of previously excluded people finally being embraced are really motivating.

What is one accessibility challenge in telecom that keeps getting overlooked in policy discussions but is genuinely hard to solve?

Empathy. Sometimes people miss things because their outlook is too narrow. I've seen colleagues who didn't care until their own life changed or someone close to them started struggling. Then they suddenly understood.

As a large company providing services, accessibility should be your main focus because it's your business. You lose customers daily because they can't proceed to checkout, can't fill in forms, don't know the accepted phone number format. If I had a magic wand, I would change the lack of empathy in our industry.

If you could change one thing about the EAA to make it clearer or more effective, what would it be?

Make sure the standard is ready before asking anyone to follow it. That's fundamental. It's astonishing that compliance is requested without providing the right tools. You get people's attention

with a big announcement, but then lose their focus because there's no clear way to address the requirements.

There might be good reasons — I used to work on standards in telco, and I know how long development takes. But there's a risk: companies panic, spend energy and money moving in circles, and then say "we've done everything, don't bother us anymore." You might have missed the moment.

Still, I'm grateful the EAA exists. It's a first step. Let's hope for clearer standards and stronger enforcement in the future.

How does Orange approach EAA implementation across different countries?

We stick to the European standard and tackle it country by country, because not everyone is ready. In Poland, for example, you might still need to develop structures to handle local responsibility. We have people from Belgium on the communication side, others from IT — accessibility involves many fields that aren't used to working together.

How do local teams react? They freak out. They ask us for help, not knowing what to do. We tell them to take it easy — no regulatory organisation is fully prepared yet. Belgium and Luxembourg seem most advanced. In other countries, like Poland, it's hard to find information. No one on our team speaks Polish, so local expertise is essential.

We provide the same deliverables everywhere: training in French and English, support for digital services and product projects, and reports showing where corrections are needed. Most people are lost because they don't know how to apply requirements and their regulators aren't ready either. That's another gap in the EAA — the directive was launched, laws were written locally, and everyone had to deal with their own politics.

I know that regulatory teams in France have less expertise than my team. Orange dedicates a bigger budget and more knowledge. For now, the risk of fines is low. The real risk is backlash — consumers saying "Orange isn't accessible for blind users." They have every right to do so, and

that can damage the business far more than any fine.

What gives you hope?

Looking at the US, companies have organised themselves — you can't sell anything without an accessibility conformance report. It works because fines are higher and the system is mature. The EAA is just the first step for Europe.

Being transparent helps. That's why we share open-source materials, including an escape game used worldwide to raise awareness. Regulators appreciate that we know the subject and are genuinely trying. Things could be better — but at least we're moving forward.

Interview by Karolina Mendecka
Business Accessibility Forum Director

Listen to highlights from the interview here.

LOT Airlines

Maciej Błażewicz

Accessibility and Inclusive Service Design Expert

LOT Polish Airlines

Aviation is where digital meets physical accessibility in real time, from booking a ticket to boarding a plane. We asked **Maciej Błażewicz,** Accessibility and Inclusive Service Design Expert at LOT Polish Airlines, how an airline navigates the complexity of multiple touchpoints, inconsistent regulations across continents, and the challenge of making travel truly seamless for passengers with disabilities.

Air travel accessibility spans digital (booking, apps) and physical (airports, aircraft). How do you approach this complexity, and where does EAA fit alongside existing aviation accessibility regulations?

At LOT Polish Airlines, we make sure that our digital services are accessible to every passenger, regardless of age or degree of disability. We have implemented the vast majority of WCAG 2.1 guidelines at levels A and AA, and the details are presented on our website: https://www.lot.com/pl/en/journey/special-services/accessible-lot/accessibility-passenger-rights, where passengers and users can also find a form for submitting suggestions regarding digital

accessibility. We are continuously working on further improvements, both for our website and our mobile application.

A passenger's journey touches multiple parties – airline, airport, ground handling, security. How do you ensure a seamless accessible experience when you don't control every touchpoint?

Not all elements of a passenger's journey are entirely under the airline's control, although we believe that the journey with us begins at the moment the passenger decides to purchase a ticket, using our mobile app or website. We also encourage passengers with disabilities to take advantage of the numerous facilities offered by the airline in cooperation with

airports. This includes, among other things, special assistance available in three different options. While assistance is provided by airports, the airline can share comprehensive information with passengers about what this assistance should look like, where to request it, and what steps to take to ensure a smooth experience at this stage of the journey. On board, we offer, among other things, an onboard wheelchair upon request, seating near the toilet or exit, the possibility of traveling with an assistance dog, medical baggage, or equipment such as CPAP devices. All details are described on our website: https://www.lot.com/pl/en/journey/special-services/accessible-lot, and passengers who have booked special assistance also receive a reminder about it two days before their trip.

What's the most underestimated accessibility challenge that travelers and regulators don't fully appreciate?

One of the major challenges remains the lack of passenger awareness about these services. Often, they learn about them only after the fact. That's why LOT Polish Airlines strives to emphasize education by publishing content on our website, participating in various events, conferences, forums and media publications dedicated to these topics and targeted at the right audience. We also use email campaigns to reach passengers, which is why we kindly ask that correct email addresses are always provided during booking. Another issue involves information about batteries in electric wheelchairs. These details are not always placed by manufacturers in a visible location, making it difficult to verify the equipment and determine whether the wheelchair can be transported in the baggage hold. Since organizing special assistance or transporting a wheelchair or

assistance dog requires crew preparation and document verification, passengers should send these documents as early as possible, and we strongly encourage this. The sooner we know, the better we can prepare. Another significant challenge is inconsistent legal regulations depending on the country we fly to. Rules in the USA or Canada differ significantly from those in the European Union, which often causes informational confusion for passengers.

How do you balance standardization (consistent experience across routes) with localization (different airports, different regulations, different cultures)?

This is not easy, and as an airline, we have limited influence over it. However, we strive to make processes easier for passengers, especially those traveling on connecting flights. On our website, we describe the differences in procedures, which mainly concern travel to/from the USA and other destinations.

If you could change one thing about how accessibility is regulated in European aviation, what would it be?

Standardization of rules regarding the transport of assistance dogs and an identical standard of special assistance at all airports.

What innovations or changes in „accessible travel" are you most excited about – or most concerned about?

We want accessibility to become something universal, although currently the whole world is still learning how to achieve it and how to reconcile the needs of passengers with disabilities with flight safety regulations and the safety of all passengers. We look forward to further improvements, especially from the European Union, that will balance the needs of both passengers and airlines. The ultimate goal is equality for all passengers.

Interview by Karolina Mendecka
Business Accessibility Forum Director

Polish Bank Association

Piotr Gałązka

Director, Brussels Representation

Polish Bank Association

Banking sits at the crossroads of EAA and a wave of digital finance regulations: PSD3, DORA, FIDA.

We asked **Dr Piotr Gałązka**, Director of the Polish Bank Association's Brussels office and EU regulatory expert, how banks are navigating this complexity, where the overlaps create real problems, and whether all this regulation is pushing innovation or just paperwork.

Within the context of the broader wave of digital finance regulations (PSD3, PSR, DORA, FIDA), how does the banking sector view the EAA? Is it being integrated strategically, or is it getting lost in regulatory overload?

This is an important question, and it requires addressing three key dimensions. On the one hand, there is horizontal legislation such as the European Accessibility Act, which establishes a general legal framework applicable across the entire market. On the other hand, sector-specific regulations, such as PSD3, PSR, DORA and FIDA, target exclusively the banking sector.

From our perspective, three main challenges arise. The first is regulatory overlap. In numerous cases, the same situation is governed by several legal acts, which makes it unclear how institutions should comply. This is particularly problematic with regard to, for instance, information and adaptation obligations, requirements concerning the form and timing of information or enhanced advisory duties towards customers with lower levels of financial literacy.

The most serious difficulties occur when multiple horizontal and sector-specific regulations apply simultaneously, introducing very similar yet not identical

requirements. As a result, institutions may be forced to report the same information to different authorities multiple times. Even when reports are nearly identical, minor variations can necessitate entirely separate reporting processes, thus significantly increasing the administrative burden.

The second challenge concerns the hierarchy of legal acts. In practice, it is often unclear which regulation takes precedence. While the principle of lex specialis derogat legi generali suggests sector-specific rules should override those of a general nature, this exclusion frequently applies only in selected aspects, which creates legal uncertainty.

Therefore, if the EU legislator considers a new horizontal regulation sufficiently important to supersede existing sector-specific rules, they should conduct a proper review and explicitly state, in the final or transitional provisions of the legislation, which articles are excluded. This would provide vulnerable consumers with a high level of protection without incurring excessive costs that ultimately translate into higher prices for financial services.

The final issue is the notoriously neglected principle of proportionality. Although frequently referenced, rarely is it applied in practice. Supporting individuals with lower financial literacy is essential but overwhelming them with excessive documentation is counterproductive. Research clearly shows that information overload has effects like its deficit, discouraging engagement and undermining consumer protection.

Supervisory authorities and public administrations should therefore focus on obligations that generate real added value for consumers and eliminate those that do

not, as unnecessary requirements harm both consumers and businesses.

A clear example of a missed opportunity in this respect is the new Consumer Credit Directive. The European Commission announced the regulation would reflect the realities of the digital market, acknowledging that many consumer credit products are obtained via mobile devices and small screens.

In practice, however, the new rules fail to accommodate these realities. Regardless of whether a consumer credit is provided by a bank, a non-bank lender or through buy-now-pay-later schemes, consumers still receive lengthy PDF documents that are extremely difficult to read on mobile devices due to small font size.

Let me offer another accessibility-related example. The Commission replaced a single information form with two documents, i.e., a full form and a summary. However, the legislation does not clarify which document prevails in the event of discrepancies. The solution offered is purely formalistic. According to the extensively debated CCD2 (Consumer

Credit Directive 2), for instance, a user is allowed to spread information across two pages if the former provides insufficient space.

Clearly, the key objective is to prioritise essential information. We must move away from the notion that consumers should be inundated with data. In the context of pre-contractual information, it is crucial to communicate that excessive information often leads to confusion, causing critical details to be overlooked. Simply put, less is more.

What is your primary conclusion concerning the regulatory burden that you intend to communicate to EU bodies? Do EU regulators recognise the cumulative impact of all these simultaneous requirements?

At the European level, individual institutions often operate in silos, seeing only a fraction of the regulatory framework. For instance, DG FISMA, the key directorate responsible for banking sector legislation, focuses primarily on sectoral rules. However, they possess limited insight into horizontal instruments,

such as Directive 93/13 on unfair contract terms. This act, while straightforward, is surrounded by extensive CJEU case law that imposes significant costs and burdens, thus requiring banks to keep a close watch on their contractual provisions to ensure they are not abusive.

Similarly, other departments oversee regulations like DORA, which falls under DG CONNECT. Since these directorates lack a holistic view, they frequently argue that banks, not being overly burdened, can 'handle it'. Yet, the cumulative weight of the requirements becomes clear. The issue is not just the volume of regulation but the redundancy – provisions overlap without providing additional value to the protected parties, whether they be consumers,

persons with disabilities or employees. We must constantly ask ourselves if this additional hurdle in the race is truly necessary to achieve our objective. Such holistic assessment is precisely what is currently missing.

Let us also address the positive aspects of the European Accessibility Act. From your experience, has it had a constructive impact on the banking sector and on customer experience?

Undoubtedly, a significant advantage of this Act is that it establishes a clear a benchmark for acceptable standards in serving customers with specific needs. Despite ongoing uncertainties regarding interpretation, it is clear from the trilogue negotiations, at both national and European levels, that there is a genuine willingness to develop a shared understanding of key concepts. This contributes to legal certainty, which is crucial for banks. Knowing what is expected and how compliance will be assessed allows institutions to act confidently without fear of retrospective criticism.

There is also hope within the sector that the directive will contribute to greater financial inclusion. While comprehensive data is not yet available, early indications suggest that accessibility requirements have encouraged banks to introduce internal roles and initiatives focused on people with specific needs and user-centred design.

If you could recommend one change to how EU institutions approach digital regulation for banking, whether it is timing, harmonisation, implementation support or something else, what would genuinely help banks deliver better services while meeting all these requirements?

The most important concept is legal certainty. This means, first and foremost, ensuring that legislators do not develop law in isolation from market realities. Continuous consultation with market participants from the earliest stages of the legislative process is essential to better understand practical implications and to avoid creating concepts that are detached from how the market actually functions.

The European Commission's workshops seem a particularly inspiring illustration, as they offer a platform for questions and concerns raised by stakeholders, and subsequently develop Q&A documents. Recently, for example, in connection with the Instant Payments Regulation in euro, following two or three workshops attended by representatives from different payment markets, the Commission published official guidance outlining its interpretation of the rules.

Although such documents are accompanied by numerous disclaimers, most notably that only the Court of Justice of the European Union is empowered to provide binding interpretations, they nevertheless offer a valuable point of reference. In the event of disputes, banks and payment service providers can rely on these Q&As as interpretative guidelines. Such initiatives are a tangible step toward increased legal certainty and more coherent regulatory implementation.

Another example of good regulatory practice is the Payment Accounts Directive (PAD), which has successfully

harmonised a wide range of concepts across the market. Under this directive, a bank is required to clearly specify which legal definitions it relies on when offering payment services.

For instance, when a customer enters into a payment account agreement, the bank must explicitly define "payment account" within the meaning of the Directive's specific provision. In this way, banks align their internal rules with EU-level definitions, simplifying compliance and interpretation. Despite requiring some upfront effort, this approach creates legal certainty by ensuring that products, services, and fees are unambiguously classified. It prevents situations in which different concepts are confused or inconsistently applied, and

allows both institutions and consumers to understand precisely how a given product is regulated.

What is your honest assessment regarding the wave of digital regulation such as the EAA? Is it pushing European banking toward genuine innovation in customer service, or primarily creating competitive disadvantage compared to less-regulated markets?

The growth of any market, particularly the digital one with its vast user base, must be built on a foundation of consumer security. It is only when individuals feel safe that they are willing to spend money on intangible goods or remote transactions. They must be certain that if the product is damaged, of poor quality or not delivered, they will receive a full refund. Otherwise, the transaction would not happen, and, consequently, the market would not develop.

Undoubtedly, the European Union's commitment to consumer protection is what constitutes one of its greatest strengths, directly bolstering the

internal market – the cornerstone of its independence from external suppliers.

Furthermore, apprehension acts as a barrier to innovation. Scared buyers will not embrace even the most cutting-edge products. It took a while before BLIK, for example, gained Poles' trust. As soon as it did this payment method experienced exponential growth.

In conclusion, the digital world can be daunting for many, as innovation inherently carries certain risks. Therefore, it is crucial that we engage in a mutual dialogue to clarify our needs, identify areas of misunderstanding, and define what is essential. In this context, the role of organizations representing people with special needs is vital. They provide us with representative, data-driven insights that allow us to focus our efforts on what truly matters.

Interview by Karolina Mendecka
Business Accessibility Forum Director

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Leaders

The insights and principles presented in this report – from the EAA framework and the Trialogue to the Accessibility Manifesto – find practical expression in organizations that have embedded **accessibility into their DNA.**

Despite ongoing regulatory ambiguities, **Business Accessibility Forum's members are advancing accessibility as a strategic priority rather than waiting for perfect clarity.**

The following case studies illustrate how leading brands translate regulatory requirements, collaborative guidance, and strategic principles into concrete actions.

They showcase different dimensions of the transformation journey: aligning accessibility with ESG and business strategy, adopting innovative technological solutions, embedding inclusive design in operational processes, fostering cultural change, and sharing knowledge across teams.

Together, these examples demonstrate that real progress comes not from compliance alone, but from organizations proactively integrating accessibility into their core practices – turning regulatory challenges into opportunities for meaningful, sustainable impact.

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The EAA has brought into sharp focus something accessibility professionals have known for years: legislation marks the beginning, not the end of this journey. The real work starts when organizations must embed regulatory requirements into their daily operations, processes, and internal communications.

Accessibility implementation is not a checkbox project – it requires building organizational culture founded on empathy, accountability, and genuine cross-team collaboration. We are seeing growing numbers of European companies recognize that meaningful change occurs when accessibility becomes integral to how they think about products, services, and ultimately, their customers. This report examines how different countries and organizations tackle this challenge, identifying approaches that can help businesses move from regulatory compliance to genuinely accessible user experiences.

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Widzialni

Understandability – A New Dimension of Accessibility

Accessibility is just the beginning. Today, we go further – toward understandability.

The European Accessibility Act (EAA) introduces the obligation to communicate information in an understandable way but doesn't explain what understandability is or how to measure it. And since it has become mandatory, it must be researched and reported.

Widzialni (the Visibles) has developed a research methodology that fills this gap and helps organizations genuinely meet EAA requirements. We combine technology, plain language, and user experience – the three pillars of modern accessibility.

Three Pillars

The model is based on three mutually complementary elements:

1. **Expert evaluation** – assessing compliance with WCAG principles,

2. **User testing** – analysing the experiences of people with specific needs,

3. **Plain language assessment** – evaluating language, logic, and structural intuitiveness.

Because a website, an app, or a document can be technically accessible yet still not understandable. True accessibility begins only when users understand where they are, what they need to do, and what the outcome of their action will be.

What Affects Understandability

Understandability is influenced by technical, linguistic, and cognitive factors. Our methodology combines these into one coherent model that analyses complexity, depth, texts, and navigation structure – so that content is logical, predictable, and cognitively friendly.

To truly measure understandability, we consider criteria from the three WCAG Understandable principles. We overlay technology with a linguistic layer – plain language. And plain language here isn't

decoration but a tool for equal access to information. It's a communication standard that helps audiences quickly find the content they need, understand it better, and act more effectively.

Combining these two perspectives – technical and linguistic – is precisely what understandability means. Even the best-designed, technically accessible content won't be effective if users don't understand its meaning. Because accessibility without understandability is only half the journey.

This Method Works

This methodology is a tool that organizes processes, supports reporting, and helps genuinely fulfil legal requirements. But most importantly – it transforms the user experience: from "I'll manage" to "I'll do this efficiently."

Because WCAG compliance is just the beginning. Understandability is the goal.

Microsoft

Microsoft's mission is to "empower every person and every organization on the planet" – and accessibility is key to this mission. Since the 1990s, the company has been incorporating accessibility features into its products, believing that technology should serve everyone, regardless of ability. Today, with over 1.3 billion people with disabilities worldwide, this mission is strengthened by new tools: artificial intelligence (AI) gives us new capabilities to realize the vision of a barrier-free world.

One of the most well-known solutions is Seeing AI – a free digital assistant supporting blind and low-vision people. It can describe surroundings, recognize faces, texts and objects, and thanks to generative AI, can also interpret photos or documents in detail. "Technology should adapt to people, not the other way around" – says Neil Barnett from Microsoft. Seeing AI also gives people with visual impairments independence, enabling them to independently "hear" the world around them.

AI also supports everyday work and learning. Microsoft 365 Copilot – an assistant in Word, Outlook and Teams applications – helps summarize long messages, extract key points from meetings or suggest simpler formulations. For people with dyslexia, ADHD or concentration difficulties, such support can be life-changing. EY studies show that over 90% of employees with disabilities consider Microsoft Copilot a technology that supports inclusivity and effectiveness.

In Microsoft's solutions, accessibility also means easier communication: live captions and transcriptions in Microsoft Teams, improved Voice Access in Windows or the "Read aloud" function in Microsoft Edge browser. The same tools that support people with sensory impairments improve work comfort for all users – demonstrating that accessibility is simply good usability.

Artificial intelligence also supports culture and entertainment. A joint project between Microsoft and Rijksmuseum generates descriptions of artworks, allowing blind people to experience the museum's collection in a new way. In gaming,

Microsoft Gaming Copilot – a virtual assistant for players – makes gameplay easier without taking away its emotion.

These examples show that accessibility is not an add-on, but a source of innovation. AI becomes an extension of human senses and capabilities, helping to build a barrier-free world. As **Jenny Lay-Flurrie, Chief Accessibility Officer at Microsoft,** emphasizes: "**Accessibility is a fundamental right and a continuous process of improvement.**" This approach is inspiring – because a world designed without barriers is simply better for everyone.

Orange Polska S.A.

Equal Doesn't Mean the Same

For years, we have been working to ensure accessibility and a friendly environment for people with disabilities, collaborating with patients' advocacy organizations and the Equal Treatment Foundation. We have been the signatory of the Diversity Charter since 2020.

Yes for Health – "work environment"

The key focus of our "Yes for Health" Program is building a friendly and accessible work environment, especially for employees with disabilities. Ahead of its launch, we conducted a survey to identify employees' needs and launched several initiatives based on the findings.

As part of the employee wellness program, employees with disabilities can access, among other things: financial support, medical and legal consultations, an adaptive physical activity program. The program is constantly evolving, currently being double tested to fit the hybrid work model. Another important component is educational activities aimed at raising awareness of the needs of people with disabilities, especially among team leaders.

Currently, approximately 2% of Orange Polska employees have declared a disability. Last year, the program indicator reached only 0.8%.

Orange Without Barriers – "customer"

We are one of the few companies to proactively address digital inclusion, which is why Orange meets the needs of customers with disabilities. We work on eliminating barriers for seniors and people with disabilities.

In our points of sales we ensure, among other things:

– free access without architectural barriers.

– personalized customer consultations that also help with phone configuration.

– the ability to receive correspondence via enlarged font documents.

– the option of sending recorded information by MMS with sign language interpretation for Deaf clients. A sign language interpreter is also available at helpline.

Orange Warsaw Festival – a barrier-free festival – "society"

Music connects people. That's the idea that has guided us in organizing Orange Warsaw Festival – a meeting place for fans of live music from around the world. From the beginning, our goal was to ensure that everyone could come here, experience the festival for themselves, and fully enjoy it. We aim to break barriers wherever we can.

The festival offers special N-Category tickets for individuals with disabilities, allowing entry accompanied by a support person. On-site, there is a Priority Service Point staffed by trained personnel and volunteers, providing assistance and support. Accessibility is ensured through measures such as adapted transportation for wheelchairs, a "Kiss and Ride" zone, paved pathways, and ramps to facilitate movement. Additionally, platforms with induction loops and audio description services are available at the main stage to ensure an inclusive experience for all attendees.

Allegro

Comprehensive Approach and the Accessibility Festival at Allegro

At Allegro, due to millions of offers and a wide range of services for customers, ensuring digital accessibility requires a comprehensive approach and great commitment. Therefore, actions are implemented on many levels. Systemic solutions have been introduced, including appointing responsible persons in individual subsidiaries and in specific technological areas. Regular audits and studies with users with disabilities are carried out, and mandatory training for developers has been introduced. A very useful tool is also the error register, which enables the successive repair of identified problems.

However, to further increase awareness, events are needed that will introduce employees to accessibility issues in an accessible and interesting way. That is why the Accessibility Festival is annually organized. This event serves to increase the knowledge and awareness of employees regarding the challenges faced by people with various types of disabilities who want to use the platform and other Allegro services.

This year, the first day of the Festival was entirely dedicated to specialized training. Allegro teams, including UX Designers, Product Managers, Researchers, Frontend Developers, Software Architects, and QA Testers, deepened their knowledge of inclusive design, WCAG 2.1 guidelines, and the practical implementation of accessible interfaces (ARIA, semantic HTML). Participants also gained knowledge about the methodology and tools for accessibility testing, with a discussion of practical cases from the Allegro platform.

On the second day, the Accessibility Hackathon was organised at the company's conference center in Poznań. Allegro employees worked in teams to improve selected elements of the platform in terms of accessibility. Practical actions were aimed at the immediate implementation of the acquired knowledge.

The event was also accompanied by activities aimed at integration and deepening sensitivity, including a short, interactive lesson on the basics of Polish Sign Language (PJM) and an accessibility knowledge quiz.

Throughout the Hackathon, Allegro teams could count on the support of consultants, external experts in the field of digital accessibility. They provided ongoing assistance, answered questions, and conducted audits of the solutions being created.

The Allegro Accessibility Festival is a place where increasing awareness and sensitivity can be combined with building specific expert knowledge, which is essential to emphasize Allegro's commitment to social responsibility and its pursuit of being a place that is accessible to everyone.

Santander Bank Polska S.A.

Accessibility Academy at Santander Bank Polska

In 2024, Santander Bank Polska brought to life a unique initiative in the Polish financial services market, creating a comprehensive educational platform. The Accessibility Academy was established in collaboration with the SGH Warsaw School of Economics. Its mission is to develop skills pertaining to equal treatment, communication, and designing inclusive customer experiences. The Academy brings together experts from the business, academic sector and public sectors, as well as social organizations, and offers them the opportunity to share knowledge and best practice in the field of accessibility.

Academy's Idea and Mission

The Accessibility Academy was created to raise awareness and popularise culture of accessibility, as well as to build market competencies in providing equal access to financial services and information. Its goal is to inspire systemic change, promote solutions based on universal design principles, and support implementation of the European Accessibility Act (EAA).

Implementation and Themes:

The first edition of the Academy took place on March 5, 2024 and focused on, introducing key issues around accessibility – what exactly does it mean, what role do modern service standards play, and what benefits do they bring. The second session, held on October 22, 2024, was dedicated to communication accessibility and provided to Deaf and hard of hearing individuals. Experts discussed solutions allowing to expand inclusion of such customers in the service, including through visual communication, translation into Polish Sign Language, and use of assistive technology.

The next meetings took place in 2025:

– March 19, 2025: the Academy addressed digital accessibility – the role of intuitive design, WCAG standards, user experience and solutions facilitating the use of banking solutions by persons with various needs.

– May 22, 2025: the Academy focused on inclusive language – participants debated on how to communicate in a way that considers (neuro)diversity and how to eliminate language barriers in marketing, documents and customer service without making customers feel overlooked or excluded.

Each Academy edition was organized in an accessible format – with PJM (Polish Sign Language) interpretation, live transcription, and expanded support for people with various sensory and motor needs.

Strategic Importance of the Initiative

The Accessibility Academy is an element of Santander Bank Polska's broader strategy and confirms its consistent efforts toward ensuring equal access to services. This practical implementation of the mission is to create an institution friendly to all customers, regardless of their situation, capabilities, or means of communication.

More about the Academy on the website: Akademia Dostępności Santander Bank Polska – Santander

InPost Group

Accessibility at InPost — For Everyone, Always

Accessibility means more than meeting legal requirements. It's a mindset and daily practice – we design our services, communication, and workplaces so that using InPost feels natural and barrier-free for everyone. All customer-facing websites and applications across InPost's markets are undergoing audits and improvements to move us closer to full accessibility.

How We Do It

– **Content:** Plain language, readable fonts, clear contrast, and prominent interactive elements.

– **Terms and policies:** We've introduced plain language as the standard in InPost documents and information materials, simplified language in consumer terms and conditions, and are gradually extending this approach to documents for all customer groups.

– **Structure:** Logical navigation, screen reader compatibility, and keyboard shortcuts.

– **Multimedia and graphics:** Alternative descriptions, captions, and transcripts for video content.

– **Interactions:** Appropriate touch target sizes, keyboard support, and voice navigation options.

– **Marketing and communication:** Workshops, designer guidelines, and accessible content templates – ensuring materials work for everyone.

– **Social media:** We plan and publish with accessibility in mind.

– **Contact channels:** Convenient and multi-channel.

– **For blind and low-vision users:** High contrast, text magnification, image descriptions.

– **For Deaf and hard-of-hearing users:** Video chat with Polish Sign Language interpreters and written contact; we're gradually expanding captions and transcripts.

– **For users with mobility limitations:** Full keyboard support, larger buttons, voice navigation.

– **For users with cognitive challenges:** Simplified content, fewer distractions, no flashing elements.

Our call centre and couriers have tools supporting communication, and complaint procedures and customer materials are adapted to digital accessibility standards.

People and Continuous Improvement

Accessibility is a process – that's why we invest in people: we train trainers, consultants, and couriers, create training materials and knowledge tests, run workshops with experts, and conduct user testing. We collaborate with NGOs and listen to feedback that guides practical improvements.

We think and design inclusively from the very first idea, ensuring solutions address diverse needs from the start.

LUX MED Group

Advancing Digital Accessibility and ESG Commitments

In 2025, LUX MED Group took decisive steps toward full digital accessibility, fulfilling our commitments under the ESG strategy and our dedication to patient-cantered care. We conducted comprehensive audits for compliance with WCAG 2.1 and EN 301 549 standards across our key digital platforms – including the luxmed.pl website, online store, and Patient Portal (web and mobile applications).

We developed detailed accessibility guidelines for our design and development teams, launched dedicated training programs, and appointed a Digital Accessibility Coordinator. Collaborating with experts and industry organizations – including within the Business Accessibility Forum – we are working to build inclusive and transparent digital standards. Our initiatives respond to the growing needs of patients and the requirements of the Polish Accessibility Act.

In 2026, we plan the next stage of our journey – achieving full compliance with WCAG 2.2, introducing automated accessibility testing, and embedding inclusive design processes from the concept stage of every project. We will expand our internal knowledge base and develop new tools to support teams, ensuring that accessibility becomes an integral part of every digital initiative.

Our goal is to guarantee that every person – regardless of age, ability, or assistive technology – can use our services easily, safely, and comfortably. This is not only a legal requirement but, above all, an expression of social responsibility and our commitment to enhancing patient experience.

Digital accessibility is an investment in the future and a cornerstone of our ESG strategy. Through these actions, we strengthen trust, build competitive advantage, and demonstrate that innovation and empathy can go hand in hand.

LUX MED Group continues to lead in healthcare, delivering solutions that unite technology with values – for the benefit of all patients and society as a whole.

BLIK

Since its launch in 2015, BLIK has been designed to be a central element in banking apps. Its advantage was its simplicity and universality. Payments used a 6-digit code, which looked slightly different across banks but worked similarly using a single scheme in each institution. They didn't require extra devices or complicated configuration. This model lowered the entry barrier for everyone, especially those less familiar with technology. From the start, the foundation has been ease of use, universality, and responsiveness to individual needs and preferences.

This commitment to simplicity fuelled BLIK's dynamic evolution over the following years. Originally a tool for ATM withdrawals and in-store payments, BLIK has grown into a comprehensive payment ecosystem. It now enables online payments, phone number transfers, contactless payments, and integrates with new financial solutions such as „buy now, pay later" (BNPL) and recurring payments. All these features are developed in the spirit of simplicity and intuitiveness, to

be accessible to the widest possible audience, regardless of their sensory, motor, or cognitive abilities. Thanks to this, in collaboration with banks, BLIK genuinely supports digital accessibility standards while enhancing the quality of everyday financial services use.

BLIK's development is based on constant responsiveness to user needs and technological changes. Each new feature is designed with simplicity, speed, and security in mind, and innovations introduced are closely tied to the user experience in everyday transactions. We also consider how we can support attention mechanisms, minimize cognitive load, and effectively assist people using different perception channels. As a result, BLIK continuously evolves while maintaining interface consistency and predictability of actions, allowing users to easily adopt new capabilities and derive full value from the ecosystem.

Another important step for us was adapting the BLIK mobile payment system documentation to legal requirements related to ensuring accessibility of services for people with disabilities and other

functional limitations. We deeply believe that throughout the entire payment journey, users should understand what they're doing and make conscious choices to use BLIK in a safe and convenient way. Implementing the provisions of the so-called Polish Accessibility Act, we've documented functional and usability recommendations for our system participants to create accessible BLIK-related services.

It's also worth emphasizing how important research is in our work. Regular usability testing of BLIK increases the inclusiveness of our solution and provides a complete perspective of payment applications. We invite children, elders, people with various visual impairments, different levels of financial literacy, and varying digital capabilities to participate in our research. Through research among a broader group of recipients, extending beyond our main users, we identify previously unknown needs, generate new ideas for product development, and anticipate potential problems. As a result, we can create a more universal, useful, and ethical product.

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VeloBank S.A.

In the world of digital banking, accessibility and user convenience are becoming increasingly important.

VeloBank responds to these needs by introducing **Vela** – an intelligent AI assistant that not only simplifies everyday banking but also supports people with special needs.

Older adults, people with visual or motor impairments and neurodivergent individuals often face barriers when using banking applications:

– Difficulties with navigation

– Problems reading small text

– Lack of intuitive assistance

Vela comes to the rescue – a **digital guide** that provides intuitive support in using VeloBank mobile app:

– You can ask her questions by speaking or typing. This ensures comfort and flexibility in communication – users can choose the form that suits them best.

– Vela maintains context throughout the conversation, eliminating the need to repeat information.

– Vela suggests where to find documents, how to activate notifications or how to block a card – speeding up navigation through different app functionalities.

– She is available 24/7, meaning clients can access essential information at any time, enhancing the comfort of everyday banking.

– Vela saves clients' time – she can help generate a BLIK code, redirect to the correct screen where a client can, for example, make a transfer or check exchange rates and much more.

Thanks to Vela, VeloBank clients gain:

– Greater independence for users with limitations

– Reduced need to contact the call centre or visit a branch

– Improved comfort and speed when using banking services

Vela is more than just AI – she is a digital guide who truly supports all our clients, including those with special needs, in using VeloBank's mobile banking.

And that's what **Velo** is all about!

ING Bank Śląski

Plain Language at ING Bank Śląski

Banking should be simple and accessible. That's why at ING, we make sure our services are easy to use and understand – for everyone. No matter your needs, our goal is clear: all our communications and documents, even the most complex ones, should be transparent.

Simple!

We've been leading the way in clear communication since 2014. To make this happen, we created Prostomat, a smart app that helps us simplify texts quickly and effectively. Thanks to it, we've already streamlined thousands of documents. Even key agreements are shorter – for example, our account opening agreement is now 58% easier to read.

Knowledge sharing

We believe good communication should be shared. That's why we make our language principles available to everyone – you can download them from our website as a handy bookmark.

Every autumn, we host a Plain Language Conference, bringing together top communication and language experts. It's a space to learn, exchange ideas, and explore how to create messages that are clear, accessible, and impactful.

We also collaborate with other banks. ING is part of the Polish Bank Association's Plain Language Declaration, working alongside 20 other banks to make banking language simpler. We know this is the right direction.

mBank

mKanon – mBank's Communication Standard

mKanon is our communication standard, created in accordance with plain language principles. The main idea behind mKanon is to approach communication from the recipients' perspective. We apply mKanon in both external and internal communication. We ensure that our brand personality is characterized by communication that is concise, comprehensive, clear, honest, empathetic, conversational ("we"-focused), linguistically correct.

Content Review Tool

We created a tool that helps us produce content in line with mKanon. It highlights linguistic forms that make text unclear, showing what should be changed in our communication to make it more user-friendly. All our employees can use this tool. For convenience, we integrated it into email streams and other applications where we create content daily.

mKanon Ambassador Team

We established a team of mKanon ambassadors – people who ensure all our communication is accessible and compliant with mKanon principles. Together with the mKanon team, they ensure that our communication follows established guidelines.

Inclusive Communication

Our communication – in line with mKanon – aims to be empathetic, which means it should consider recipients' perspectives. Therefore, we ensure our content is as universal as possible and doesn't exclude anyone. We adapt our communication to recipients' needs and use gender-neutral language.

Linguistic Quality Mark (Językowy znak jakości)

The Polish Language Foundation (Fundacja Języka Polskiego) awarded us three certificates confirming that our communication complies with plain language principles, and that we are an institution committed to clear and understandable communication. We received three certificates in the categories: PEOPLE, TEXTS, and INSTITUTION.
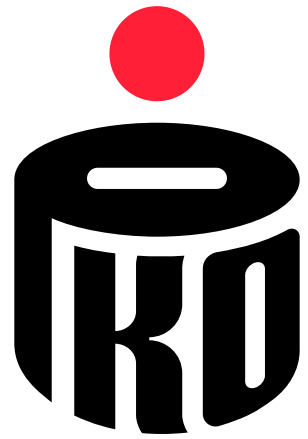
PKO Bank Polski

PKO Prosto – A Plain Language Ecosystem

PKO Bank Polski created a system that connects people, processes, and technology so that communication is simple, clear, and friendly. For everyone – because understandability is the foundation of accessibility.

In 2023, Poland's largest bank launched the PKO Prosto project. Today, more than 12 million bank clients can handle their affairs quickly and intuitively. The Polish Language Foundation appreciated the systematic approach to language simplification – in May 2025, the bank received the prestigious Language Quality Mark for institutions.

People, Tools, and Awareness

Plain language at PKO Bank Polski consists of:

– **PKO Prosto app** – helps employees simplify texts. Its core is powered by artificial intelligence.

– **ambassador program** – 80 people from different teams whose competencies were confirmed and certified by the Polish Language Foundation.

– **Jira system** – allows measuring the scale and effects of simplification.

– **internal rules** – clearly state that plain language in communication with clients is an obligation, not an option.

– **workshops** – including legal design for 100 experts who work on legal documents and for all plain language trainers.

– **communication and education** – articles, guides, competitions, and meetings with experts on the intranet, as well as educational campaigns for clients.

Behind all this stands a communication and plain language support team that coordinates activities, aggregates texts, and makes decisions – in the channel and beyond.

Ready for the Polish Accessibility Act

In 2025, the plain language ecosystem at PKO Bank Polski passed an extremely difficult exam – the Polish Accessibility Act. Thanks to the systematic approach to simplification, the bank could meet the requirements of the law, which imposes the obligation to communicate in an understandable way.

Simplification under the law took place on an enormous scale:

– **8 million characters** went to the plain language workshop. That's approximately 7 thousand pages, or 6 „Lalka" books by Bolesław Prus or 3 Trilogy by Henryk Sienkiewicz.

– **32 units** submitted materials for simplification, and hundreds of employees were involved in work on contracts and regulations.

Conclusion: Revolution from Best Practice

Since October 2025, new rules for creating internal regulations have been in effect at the bank. According to them, every internal regulation must be shorter, more specific, and understandable for every employee.

This is a real revolution that started as a voluntary initiative and today is part of the bank's strategy that supports accessibility throughout the entire organization.

Source: PKO Prosto – 2 years in 4 minutes

Credit Agricole Bank Polska

Plain Language Connects, Doesn't Exclude – Plain Language and Accessibility Days at Credit Agricole

Credit Agricole organized Plain Language Days for the fourth time, and this year combined them with accessibility topics. This year's edition was divided into interactive experience stations and online meetings dedicated to creating communication that is simple, understandable, and accessible to everyone.

The program included 11 webinars.

Experts discussed what distinguishes accessibility from comprehensibility, how language affects user experiences, and how to simplify messages so that no one feels excluded. Participants learned the principles of creating digital content compliant with WCAG requirements (international guidelines that support the creation of websites and digital services accessible to all users), discovered how to use plain language in internal and product communication, and how to design messages tailored to different groups. The program also covered topics related to linguistic flexibility, inclusive language, ETR principles (Easy-to-Read text), and the use of assistive technologies.

Change Your Perspective

The on-site portion took place at Credit Agricole Group headquarters in Wrocław. Participants visited 8 experience stations, prepared in collaboration with the TAKpełnosprawni Foundation and HR Fair Play. The initiative allowed participants to experience the daily lives of people with various disabilities and better understand the challenges they face. Credit Agricole volunteers also participated in the activities.

Plain Language Days is a recurring event that supports the development of a culture of plain, understandable, and accessible language in banking communication. Reports from the event are available on Credit Agricole's LinkedIn profile.

Source: LinkedIn

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ZWIĄZEK BANKÓW POLSKICH

Polish Bank Association

Good practices for accessibility and plain language

Long before the EAA entered into force, Polish banks had already been involved in developing good practices, educational initiatives, and staff training focused on ensuring service accessibility.

Since 2012, under the auspices of the Polish Bank Association, banks have published:

– 3 editions of Good Practices for Serving Persons with Disabilities in Banks

– 3 parts of Good Practices for Plain Banking Communication.

The "Let's Talk About Accessibility" series

In 2023, the Polish Bank Association organized a series of meetings for bank employees responsible for accessibility under the theme "Let's Talk About Accessibility."

Speakers included practitioners – solution providers and representatives of organizations supporting people with disabilities.

Plain language standard

Within the framework of the Polish Bank Association, banks have reached an agreement on the clarity of language in retail banking services, working in collaboration with plain language experts.

The purpose of the agreement is to complement the supervisory authority's guideline on the comprehensibility of information.

Through this agreement, banks aim to confirm the sector's common approach to the EAA's requirement for clear and understandable information, based on plain language and expanding on previous sector initiatives (in 2020, banks signed a declaration on the standard for plain language).

Accessibility implementation standards and guidelines

Within the Polish Bank Association, banks in workshop meetings have developed common standards and guidelines for implementing accessibility, including:

– interpretative clarifications to accessibility regulations

– a service accessibility map (standards and templates for assessing the compliance of services with accessibility requirements)

– standards and templates for information on service accessibility and information on architectural accessibility.

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Polish Development Bank

"Accessibility is not a privilege, it's a standard. How Bank Gospodarstwa Krajowego implements social responsibility through accessibility"

In one of our recent podcasts, a provocative question was raised: "Is accessibility a luxury or a standard?" In an era where technology is meant to drive social change, such questions shouldn't even be rhetorical. For Bank Gospodarstwa Krajowego (the Polish Development Bank, BGK), the answer is clear: accessibility is not a luxury, but one of the fundamental pillars of a financial institution's social responsibility.

Why "accessibility is not a luxury"

The podcast we're referring to highlights a paradox: we often talk about accessibility as something "above and beyond," rarely as an obligation. Meanwhile, the experiences of people with disabilities, seniors, and so-called people with special needs tell a completely different story — that the everyday functioning of public institutions, banking, and digital services

must be designed barrier-free from the start. Why? Because these aren't special needs, but everyday needs of all of us.

This voice — a reminder that accessibility is every person's right, not charity — is key to the conversation about inclusive development. At BGK, we embrace this as a challenge: not to "catch up" with standards, but to create them. "For me, accessibility is not an add-on — it's the foundation of our institutional responsibility." — Julita Dul-Tomczuk, BGK Accessibility Coordinator.

How BGK implements its accessibility policy — examples in action

Below, I'll outline some of the pillars we're putting into practice so that accessibility isn't just an idea, but an everyday reality.

1. **Barrier-free infrastructure:** In BGK headquarters and branches, we design spaces according to universal design principles – we eliminate architectural and communication barriers, we improve what we already have, and we know that accessibility must always be top of mind.

2. **Digital accessibility – designing with everyone in mind:** BGK's online services and systems undergo accessibility testing and continuous development. We ensure compatibility with screen readers, intuitive navigation, contrast modes, and keyboard functionality. We don't forget about the crucial aspect of positive user experience for the client.

3. **Training and internal culture shift:** Accessibility isn't just about technical implementation – it's about changing organizational culture. At BGK, we conduct training for product teams, customer service, and management. We want every employee to understand that accessibility is a quality element of every product and service. "When I talk with teams, I emphasize: Don't ask 'do we have to make this accessible?' — ask 'how do we make this accessible?' It's a mindset shift, not just another project." — says Julita Dul-Tomczuk.

4. **Monitoring, evaluation, and continuous improvement:** Implementation isn't enough — you must listen. We gather user feedback, report on accessibility status, identify gaps, and make corrections. It's an ongoing process. "I don't believe in one-time accessibility audits – I believe in a cycle: implement, test with users, improve. That's what ensures our efforts don't become dead documentation." – Julita Dul-Tomczuk.

A message for the financial sector and beyond

It's not enough to talk about "accessibility" – you need to implement it comprehensively and with heart – for people, not just legal requirements. The podcast we mentioned reminds us that while many people think accessibility is a luxury, those who face barriers daily know it's a necessity.

Banks, financial institutions, organizations – each can look at responsibility differently: not as marketing, but as the foundation of

fair and equal service to clients. "I want accessibility to be so natural that no one needs to ask: 'Will this bank serve me?' – they just can." – Julita Dul-Tomczuk.

BGK doesn't just talk – it acts. And we invite others to join us in creating a world where accessibility is not a luxury, but a standard. "The best accessibility is invisible. The kind that naturally ensures no one is excluded from the very beginning. My dream is that one day the bank will have systems so well prepared that we can freely employ a blind person" – concludes the Bank Gospodarstwa Krajowego's Accessibility Coordinator.

COI Centralny Ośrodek Informatyki

Centre for Information Technology

"How to Prepare and Conduct UX Research with People with Disabilities"

From late 2023 through mid-2025, we conducted research on solutions developed by COI with people with various disabilities.

Study participants included blind and low-vision individuals, people with hand mobility impairments, and Deaf users.

In 2025, we began sharing the knowledge gained from this research.

We developed practical guides helping UX professionals and researchers prepare for and conduct such studies (https://www.gov.pl/web/cyfryzacja-badania-i-projektowanie/inclusive-research).

We also shared this expertise at international conferences—delivering lectures and workshops at UXInsight in Edinburgh and IDesign in Wrocław, among others.

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Community

Who We Are

Business Accessibility Forum (BAF) is Europe's leading cross-sector platform uniting 30+ lovebrands committed to transforming accessibility from regulatory obligation into strategic business value.

Founded in 2022 by Widzialni (the Visibles), Microsoft, Allegro, Orange, Santander, BAF represents the unified voice of European business in shaping the future of accessible products and services. Our community spans accessibility specialists, UX designers, ESG and marketing teams, legal and compliance experts, and business leaders across industries and borders, working together to make sure that business perspectives inform policy implementation while advancing practical, scalable accessibility solutions that benefit everyone.

As of February 2026, our community includes:

– PKO Bank Polski,

– InPost Group,

– Rossmann,

– BLIK,

– ING Bank Śląski,

– Credit Agricole Bank Polska,

– YES Biżuteria S.A.,

– VeloBank S.A.,

– Foundation of Integration,

– LOT Polish Airlines,

– mBank,

– Bank BNP Paribas,

– Lux Med Group,

– Nationale-Nederlanden,

– Alior Bank S.A.,

– Centre for Information Technology,

– Polish Development Bank,

– Responsible Business Forum,

– IAB Polska,

– Polish Bank Association.

BAF is growing dynamically. New, well-established brands join our community on a regular basis, confirming the increasing interest in and trust placed in our initiative.

BAF operates on two fundamental pillars

First, we bridge business and policy by actively participating in European Accessibility Act transposition processes, contributing to national consultations, and representing the business community.

Second, we drive accessibility education and knowledge exchange through our comprehensive training programs, monthly workshops, a podcast, and international collaboration with organizations.

BAF vision

Our vision is clear: build an inclusive ecosystem where accessibility is no longer an afterthought but a standard of modern business practice. Through knowledge sharing, collaborative problem-solving, and strategic advocacy, BAF empowers organizations to see accessibility as a source of innovation, competitive advantage, and long-term business value – while ensuring that Europe's commitment to inclusion becomes a lived reality for all users.

Join Us

Business Accessibility Forum exists to support organizations navigating the complexity of accessibility implementation. Whether you are beginning your accessibility journey, seeking to accelerate existing efforts, or looking to connect with peers facing similar challenges, we welcome dialogue with business leaders, accessibility professionals, policymakers, and advocates committed to building a more inclusive digital economy.

For organizations interested in BAF membership, we invite companies committed to accessibility excellence to join our community of over thirty leading European businesses. Membership provides access to our comprehensive training programs, monthly workshops led by accessibility experts, participation in policy consultations shaping EAA implementation across Europe, and connection to a network of practitioners sharing real-world implementation insights. Our community spans sectors and borders, creating opportunities to learn from peers navigating similar challenges in different contexts. Beyond knowledge access, members contribute to shaping the future of accessibility standards and business practices across Europe, representing the unified voice of committed organizations in dialogues with policymakers and regulatory authorities.

METHODOLOGY APPENDIX

About the Method

The Solid Foundations Method was applied, which includes checking home pages and, when necessary, key subpages (typical for the nature of the service, e.g. contact) according to 14 criteria covering approximately 50% of WCAG 2.1 AA requirements. Only elements without which real accessibility cannot be discussed.

The method is preliminary in nature. It does not replace a full audit but allows reliable determination of whether a given site meets basic accessibility requirements. The limited scope of the study (covering selected criteria and views) is a deliberate approach and results from the analysis assumptions: the goal is quick but reliable verification of key accessibility elements.

Solid Foundation Method Criteria

1. Alternative text for graphic elements
2. Form field labels
3. Heading structure
4. Use of lists
5. Text contrast
6. Contrast of graphic elements
7. Page title
8. Link clarity
9. Keyboard navigation and visible focus
10. Page language
11. Skip links (direct access)
12. Search function
13. Use of colour
14. Screen responsiveness

Description of Criteria in Expert Analysis

In the expert evaluation, a maximum of **24 point**s could be achieved.

Alternative Text for Graphic Elements

0	Major omissions
1	Partial absence
2	No significant issues

Alternative text for graphic elements is important for several reasons.

It primarily ensures access to information for users with visual impairments who rely on assistive technologies such as screen readers.

It also provides a fallback when images cannot be displayed due to errors, slow connections, or user settings.

Additionally, alternative text supports image indexing and discoverability in search engines.

Alternative descriptions should be **clear and concise** yet contain all information necessary to understand the meaning and function of the image. They should **avoid repetition** of surrounding text or captions.

Form Field Labels

0	Major omissions
1	Partial absence
2	No significant issues

Form field labels make it easier and more intuitive for users to complete forms. They allow users to quickly identify what type of information should be entered in each field – a crucial feature for those using screen readers.

Without proper labels, such users may not know what is expected in each field.

Labels should also remain **visible to all users,** regardless of screen size, helping users always stay oriented within the form.

Heading Structure

0	Major omissions
1	Present but incorrect structure
2	Correct

Headings are key to organising content on a website. A proper heading hierarchy creates a coherent, logical structure that reflects the purpose and meaning of each section.

It enables users to navigate the page more easily, locate content quickly, and understand how different parts relate to each other.

Well-structured headings also improve **usability and accessibility** for users with varying needs – including those using screen readers, people with dyslexia, older users, and those with limited digital literacy.

Additionally, a correct heading structure can **enhance SEO performance**.

Use of Lists

0	Major omissions
1	Poor use
2	Correct

Lists (bulleted, numbered, or definition lists) help present information in a structured and easy-to-read way, improving clarity and comprehension.

They visually group related elements and can also make navigation more efficient for screen reader users, who can scan grouped links or items more effectively.

Text Contrast

0	Mostly incorrect
1	Some elements with low contrast
2	Correct

Adequate text contrast against its background helps users distinguish content and navigate pages more easily, regardless of their visual abilities.

The contrast ratio should be at least **4.5:1** for normal text.

Good contrast also improves readability under various lighting conditions and enhances the **overall aesthetics and quality** of the website.

Contrast of Graphic Elements

0	Mostly incorrect
1	Some elements with low contrast
2	Correct

Interactive graphic elements (e.g. buttons, form field borders, charts, icons) must be visually distinct from surrounding content.

Low contrast may make them difficult or impossible to perceive for some users, reducing usability and accessibility.

The **minimum contrast ratio** for such elements should be **3:1**.

Page Title

0	Ambiguous
1	Clear

The page title is a key element that helps users identify the content and purpose of a page.

It appears in the browser tab, bookmarks, history, and search engine results.

For screen reader users, it's the **first piece of information announced** when a page loads.

A good title should be **unique for each subpage**, clearly describe its topic, and typically follow the format *[Page name]* – *[Organisation name]*.

Link Clarity

0	Major omissions
1	Some unclear links
2	Clear

Clear and descriptive link text helps users understand where a link leads and what to expect after clicking.

This is especially important for screen reader users, who often navigate by tabbing through links only, without surrounding context.

Unclear or vague links can mislead or discourage users and may also negatively affect **SEO**.

Keyboard Navigation and Focus Visibility

0	Major omissions
1	Some elements inaccessible
2	Correct

Keyboard accessibility ensures that all interactive elements (links, buttons, forms, etc.) can be operated **without a mouse or touch input.**

Visible focus indicators help users know which element is currently active – often shown by a border or colour change.

This is particularly important for users with visual or cognitive impairments, or those navigating without a mouse.

Proper keyboard navigation is also beneficial in various contexts, such as when a device lacks a functional touchpad or touchscreen.

Page Language

0	Missing or incorrect
1	Correct

Specifying the page language in the website's code helps assistive technologies, such as screen readers or translation tools, correctly interpret and pronounce text.

If the language is undefined or incorrect, content may become **incomprehensible** to some users.

When multiple languages are used, each section should be correctly marked.

Skip Links (Direct Access)

0	Missing or incorrect
1	Correct

Skip links allow users to **bypass repetitive sections** (like navigation menus or headers) and jump directly to the main content.

They are crucial for screen reader users and those navigating via keyboard, who would otherwise have to tab through every element repeatedly.

Without skip links, navigation can become frustrating and time-consuming.

Search Function

0	Missing or non-functional
1	Present and functional

A search feature enables users to **find information quickly,** without browsing the entire website.

It's particularly valuable for users of assistive technologies and mobile devices.

A search function should be **keyboard-accessible,** clearly labelled, and provide understandable instructions and error messages.

Use of Colour

0	Major omissions
1	Some elements distinguished by colour only
2	Correct

Colour must not be the **sole means of conveying information** or distinguishing visual elements.

Users with colour vision deficiencies (e.g. protanopia, deuteranopia, tritanopia) may be unable to interpret colour-based cues.

Other visual indicators – such as text, symbols, or patterns – should be provided.

Similarly, links and highlights should include **non-colour-based styling** (e.g. underlines or bold text) to ensure clarity.

This also supports users relying on **high-contrast modes** enforced by browsers or operating systems.

Screen Responsiveness

0	Major issues
1	Minor usability problems
2	Correct

Responsive design ensures that content adapts to various screen sizes, particularly on mobile devices.

Users should be able to view content comfortably without horizontal scrolling.

Lack of responsiveness may hinder readability, make links harder to select, and reduce the overall usability and accessibility of the site.

The **Solid Foundations Method** presented in this report was developed by Widzialni's team and reflects years of practical experience working with organizations across sectors. Widzialni (the Visibles) is one of the founding members of Business Accessibility Forum and its operational backbone, providing expert analysis, methodology, and consulting services.

For accessibility consulting and implementation support, Widzialni **offers comprehensive services** – from conducting audits and user testing to developing accessible design systems, establishing sustainable processes, and training teams across all organizational levels.

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An independent news outlet with an economic focus, going beyond business and market topics. It also publishes content related to new technologies, politics, sports, and culture.

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The platform operates on a subscription-based model, prioritizing reliability, in-depth analysis, and responsible journalism. At the same time, it consistently develops the digital accessibility of its products to ensure that high-quality information is available to the widest possible audience.

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