

Σε ανταπόκριση σχετικού αιτήματος, υποβάλλω παρατηρήσεις σχετικές με το site www.eu2003.gr που αφορά στην Ελληνική Προεδρία της Ευρωπαϊκής Ένωσης το πρώτο εξάμηνο του 2003.

Στη διάθεσή σας για περαιτέρω σχολιασμό και διευκρινίσεις.

In its recent Communication¹ to the European Council, the European Parliament, the Economic and Social Committee and the Committee of the Regions, the Commission notes that socially disadvantaged people are still lagging behind in computer access and training. Thus, promoting 'e-Inclusion' remains a priority for eEurope. Accessibility to information and communication systems for people with disabilities should be a particular concern with a view to the year of people with disabilities in 2003².

The Commission, also, notes in its Communication³ to the European Council, the European Parliament, the Economic and Social Committee and the Committee of the Regions that the eEurope Action Plan adopted by the Feira European Council in June 2000 is a wide-range initiative designed to speed up and extend the use of the Internet to all sectors of the European society. Thus, one of the said Action Plan's targets is to improve access to the Web for people with disabilities and older people who face a range of technical barriers in terms of their capacity to access the Internet.

The Commission's Communication COM (2001) 562 Final, 25.9.2001 estimates that in Europe there are 37 million people with disabilities⁴.

The site of the 2003 Greek Presidency to the European Union seem to have performed poorly—in terms of its design—to include people with disabilities within its target audiences. Assuming that a mere one third of their number has a connection to the Internet, a population with disabilities in Europe larger than the population of Greece might have been discriminated by the Government of the Hellenic Republic through its site for the 2003 Greek Presidency to the

¹ See **eEurope Benchmarking Report**, COM (2002) 62 Final, Brussels 5.2.2002.

² See *ibid.* COM 62/2002, conclusion viii, p. 17-18. See also **eEurope Action Plan 2002—An Information Society for All**, of the Council of the European Union Commission of the European Communities, Brussels 14.6.2000, p.17, according to which "Public sector web sites and their content in Member States and in the European Institutions must be designed to be accessible to ensure that citizens with disabilities can access information and take full advantage of the potential for e-government."

³ See **eEurope 2002: Accessibility of Public Web Sites and their Content**, COM (2001) 562 Final, Brussels 25.9.2001.

⁴ See *ibid.*, COM 562/2001, p. 3. See, also, speech of the Commissioner Erkki Liikanen on "Making Websites accessible to people with disabilities" in the URL http://europa.eu.int/information_society/topics/citizens/accessibility/web/wai_2002/cec_lkn_speech_web_wai_2001/index_en.htm

European Union⁵ [hereinafter, "site"]! Moreover, the assumed discrimination takes place in 2003, i.e. the year of people with disabilities.

The official adoption of the World Wide Web Consortium's (W3C) Web Accessibility Initiative (WAI)⁶ guidelines and the practical implementation plan for existing and future public websites has been the subject of deliberations under the auspices of the Secretary for Information Society of the Hellenic Ministry of National Economy⁷.

The site's design should cater for most cases of people with disabilities in which assistive technologies⁸ may provide enhanced accessibility. These cases include the following⁹:

1. People with color blindness
2. People with blindness
3. People with central-field vision loss, or low vision
4. People with deafness or hard of hearing
5. People with dyslexia or dyscalculia
6. People with cognitive disabilities
7. People with memory impairments

In the following lines, you may read guidelines which are included in W3C/WAI and which are appropriate for the site, in my opinion.

1. Ensure that all information conveyed with color is also available without color.
2. For all non-text content¹⁰ that can be expressed in words, provide a text equivalent of the function or information the non-text content was intended to convey.
3. Provide synchronized media equivalents for any time-dependent presentation such as the live interview of the Prime Minister of Greece Mr. Costas Simitis and the President of the European Commission Mr. Romano Prodi. The said Webcasting should have been

⁵ See *ibid*, COM 562/2001, p. 3, according to which "With the development of government online services, there is a serious risk of social exclusion of a large percentage of the population."

⁶ See W3C/WAI, **Web Content Accessibility Guidelines Version 1.0**, Recommendation 5.5.1999, and See W3C/WAI, **Web Content Accessibility Guidelines Version 2.0**, Working Draft 8.1.2003.

⁷ You may also refer to the Foundation for Research and Technology—Hellas (FORTH) at the URL www.ics.forth.gr/hci [contact person: Mr. Constantine Stephanidis | E: cs@ics.forth.gr] which is the Greek Contact Center for the European Design for All e-Accessibility Network (EDeAN) at the URL <http://www.eaccessibility.org>. In addition, you may trace links to public and private (NGOs or commercial) activities and organizations relevant to the topic of people with disabilities accessibility to the Web in the Accessibility site of the European Union in the URL http://europa.eu.int/information_society/topics/citizens/accessibility/web/wai_2002/ms_coe_links/index_en.htm

⁸ Assistive technologies are products used by people with disabilities to help accomplish tasks that they cannot accomplish otherwise or could not do otherwise. When used with computers, assistive technologies are also referred to as adaptive software.

⁹ See W3C/WAI, **How People with Disabilities Use the Web**, Working Draft, 4.1.2001.

¹⁰ Non-text content may include images, text in raster images, image map regions, animations, ASCII art, images used as list bullets, spacers, graphical buttons, video or audio files, applets etc.

available to the public in real time captions of a text document that describes all audio and visual information included.

4. Emphasize structure through presentation, positioning, and labels. For example, any data table should have all its groups of rows and columns labelled with headers.
5. Ensure that foreground content is easily differentiable from background for both auditory and visual presentations. For example, no text content is presented over a background picture, color or pattern that seriously interferes with readability unless the background image can easily be removed.
6. Ensure that foreground and background color combinations provide sufficient contrast when viewed by someone having color deficits or when viewed in a black-and-white screen.
7. Provide information needed for unambiguous decoding of the characters and words in the content. For example, abbreviations and acronyms are clearly identified where they occur so that technologies used to render the text, e.g. voice synthesizers, can identify correctly the information.
8. Allow users to control any time limits on their reading, interaction or responses unless control is not possible due to the nature of real-time events or content. It is recommended that the site's content is designed in such a way as to remove time-limits from its essential part. For example, if blinking text is used to convey a message¹¹, the user should have been given the option to deactivate the use of scripting in his/her browser or override the use of scripts with a user style sheet.
9. Avoid the creation of periodically auto-refreshing pages until user agents provide the ability to stop the refresh.
10. Always provide structure within content. For example, always include titles on major sections of long documents and paragraphs.
11. Provide consistent and predictable responses to user's actions. The user should always be warned for changes in the site's context. Considered changes in the site's context are actions such as the opening of a new browser window without any non-visual cue, or the provision of captions that do not identify a change in speaker.
12. Provide methods to minimize error and provide graceful recovery. If error is detected by users, feedback should be provided to the user identifying the error.
13. Supplement text with non-text content. Non-text content should be added to the site for key pages or sections specifically to make the site more understandable by users who cannot understand the site only through text. While the site does not provide a text-only version of it, non-text content is missing, especially in long-text content.
14. Ensure that technologies relied upon by the content are declared and widely available as well as that the site does not exclude content versioning in all most widely used

¹¹ Blinking text is being used in the site of the Ministry of Foreign Affairs (www.mfa.gr).

technologies. For example, the site's multimedia content is not available in Real Player and QuickTime, despite these technologies being widely used.

15. Ensure that user interfaces are accessible or provide an accessible alternative. User interfaces must have been tested using a variety of assistive technologies and preferably real people with disabilities who use assistive technologies to determine that assistive technologies can access all contained information.