

Accessible disability-inclusive information during COVID-19

European Disability Forum Position Paper

By Mundo Madou | January 2021

**A short guidance note for health ministries in the WHO Europe region.**

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# Introduction

### The European Disability Forum

The European Disability Forum is an independent NGO that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

### Acknowledgements

Thanks to all who participated in the drafting of this position paper.

## Executive Summary

This paper serves to provide guidance on ensuring the effects of COVID-19 on people with disabilities are addressed. It also serves as a short technical support to health ministries on accessible disability-inclusive information. EDF has also produces another guidance note, to guide organizations of persons with disabilities (DPOs).

# Easy to Read

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| The Easy to Read logo. An image of a person smiling behind an open book. | | This page is about **recommendations to European health ministries regarding COVID-19 and the rights of persons with disabilities** in Easy to read. |
| This paper serves to provide guidance on ensuring the effects of COVID-19 on people with disabilities are addressed. | | |
| It also serves as a short technical support to health ministries on accessible disability-inclusive information. | | |
| EDF has also produces another guidance note, to guide organizations of persons with disabilities (DPOs). | | |
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# Background information

The COVID-19 pandemic has highlighted systemic failures to consistently include persons with disabilities in global crises. While all [53 World Health Organization (WHO) European Members States](https://www.euro.who.int/en/countries) have ratified the [UN Convention on the Rights of Persons with Disabilities](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html#Fulltext) (CRPD), their policies and institutional approaches to the rights of persons with disabilities often remain ad hoc and can potentially contribute to the marginalisation of persons with disabilities. In the case of the COVID-19 crisis, this had dreadful consequences as persons with disabilities were often an afterthought in government actions. Lack of timely access to relevant information about prevention and treatment of COVID-19 and the availability of support has greatly contributed to the disproportionate impact of the pandemic on persons with disabilities and their families.

The [WHO Europe](https://www.euro.who.int/en/home), in collaboration with the [European Disability Forum](https://www.edf-feph.org/) (EDF), want to support national governments, and, in particular health ministries, to identify priority actions to make COVID-19 related public health information accessible to persons with disabilities. With financial support from the WHO Europe, EDF has created the following two videos:

* Video 1: <https://www.youtube.com/watch?v=fUg5uq-7aPc&t=1s>
* Video 2: <https://www.youtube.com/watch?v=uVxt2jvuvXU>

This guidance note complements the videos and serves as a short technical support to health ministries on accessible disability-inclusive information. EDF has also produced another guidance note, to guide organisations of persons with disabilities (DPOs).

# Overview: The “gold” standard

COVID-19 related information must be produced using the principles of **Universal Design**, so that information can be equally accessed by as wide a range of people as possible. This information also needs to be easy to find. Persons with disabilities must have access to the same amount and quality of information as non-disabled people, including live news. Features such as accessibility for screen readers, interpretation into the national sign language, easy-to-read and plain language, captions and Braille must be present throughout, depending on the medium. This applies equally to live news and pre-prepared information. Persons with disabilities in institutional settings must have direct access to information on an equal basis with others.

In addition to the accessibility of information targeting the general population, national governments must ensure that persons with disabilities also have access to information that may be specifically relevant to them. This includes targeted information about continuity of support, rehabilitation and healthcare services, procurement and reparation of assistive products during the quarantine, and availability and accessibility of ongoing and emergency support measures, respite services, etc.

# Priority areas for short and long-term interventions to facilitate the accessibility and inclusiveness of public information

## Accessibility of emergency communications and public health information

Public health information and emergency service telephone numbers must be fully accessible to everyone. For example, in many countries, inaccessible emergency numbers mean that, some people who are deaf, hard of hearing, blind or deafblind, with intellectual and psychosocial disabilities or with speech impairments, are prevented from communicating with potentially life-saving emergency and essential support services. In some countries, where relay communication services are organised by the disability community, they are not financially supported by the government. Steps must be taken immediately, in order to ensure full accessibility of emergency service numbers.

**Recommendations for the short term:**

* Ensure **accessibility of emergency information** through audiovisual media services, including public communications and announcements in natural disaster situations or other emergencies. This means ensuring provision of access services such as subtitles for the deaf and hard of hearing, sign language interpretation, audio-description, and others as required following minimum standards for quality of these services. The [European Audiovisual Media Services Directive (AVMSD)](https://www.edf-feph.org/audiovisual-media-services-directive/) in fact requires Member States to “ensure that emergency information, including public communications and announcements in natural disaster situations, which is made available to the public through audiovisual media services, is provided in a manner which is accessible to persons with disabilities.”
* In EU countries, ensure that Public Safety Answering Points (PSAPs) for the single European emergency number ‘112’ **comply with the accessibility and interoperability requirements** of the European Accessibility Act for PSAPs, responding to emergency calls by real-time text and total conversation services. National emergency numbers and dedicated numbers for providing COVID-19-related information and services must follow the same requirements.
* Public warnings, emergency information and communications must be **accessible through more than one sensory channel** (for example text and audio) and easy to understand. Clear, easy to understand instructions for behaviour should follow (for example, stay inside, do not open windows, etc.) Pictograms can make the information accessible for viewers who might not understand the language, or persons with cognitive disabilities.
* Ensure that **track-and-tracing apps for COVID-19 are accessible** for persons with disabilities, respecting their right to privacy and EU data protection rules.
* **Put in place remote relay services** for deaf and hard-of-hearing persons, facilitated by sign language interpreters and palantypists. This service must be provided in a sufficient volume free of charge to all persons who need it in urban and rural areas.
* **Consider procuring** the organisation of such services from qualified professional associations.
* Mandate the use of **clear transparent face masks and shields**.

**Recommendations for the long term:**

* Ensure **accessibility of emergency numbers**, including the single European emergency number 112, national emergency numbers, and other essential support services (such victim support lines, missing children lines, child helpline, services providing transport assistance for passengers with reduced mobility, etc) in national legislation in line with Article 9 of the UN CRPD as well as EU accessibility legislation, notably the [Electronic Communications Code](https://www.edf-feph.org/electronic-communications/) and [European Accessibility Act](https://www.edf-feph.org/content/uploads/2020/12/final_edf_transposition_toolkit_accessibility_act.pdf) that require countries to ensure full accessibility of essential and emergency services and their interoperability between different countries of the European Union.
* In EU countries, ensure timely **deployment of Advanced Mobile Location (AML) systems for calls and text** to the single European emergency number ‘112’ and national emergency numbers. This is a technology that allows locating the person making the emergency call or sending the emergency text by identifying the location of the device they used for emergency communication.
* Ensure the **deployment of Next Generation ‘112’** to enable high quality accessible emergency communication using real-time-text and total conversation services over internet protocol.

## Accessibility of public sector websites

In the digital 21st century, the internet is the leading medium for spreading and collecting information. Many persons with disabilities have found the COVID-19 related digital communications in their countries to be inaccessible, excluding them from timely access to potentially life-saving information.

**Recommendations for the short term:**

* Ensure strong transposition and effective implementation of European accessibility legislation, in particular as noted, the Audiovisual Media Services Directive, European Accessibility Act, European Electronic Communications Code, as well as the [Web Accessibility Directive](https://www.edf-feph.org/web-accessibility-directive/) which requires public sector bodies across Europe to have accessible websites and mobile applications.
* **Apply simple accessibility guidelines** developed by the global disability community, such as [10 Rules to Improve Web Accessibility](https://www.edf-feph.org/web-accessibility/), [Making Information Accessible for All](http://www.euroblind.org/publications-and-resources/mak) or [Easy-to-read Checklist](https://www.inclusion-europe.eu/wp-content/uploads/2020/06/Easy-to-read-checklist-Inclusion-Europe.pdf).
* All key information, such as daily primetime news and all extraordinary pandemic-related announcements, should have **live subtitles and interpretation into national sign language**.

**Recommendations for the long term:**

* Commit to developing and implementing a **national web accessibility standard** which should be based on universal design and inspired by the international [Web Accessibility Content Guidelines](https://www.w3.org/WAI/standards-guidelines/wcag/) (WCAG).  The objective of such a standard should be to render all public sector websites and mobile apps accessible.
* **Adopt legislation** to implement the national standard and provide for sanctions when it is not respected.

## Role of Organisations of Persons with Disabilities (DPOs)

Organisations of Persons with Disabilities (DPOs) are best placed to advise on how to identify vulnerable persons with disabilities in their community and share information about COVID-19. The national governments should rely on their expertise proactively, establishing systemic and deliberate meaningful cooperation with persons with disabilities through their representative organisations (DPOs) and earmarking budget for DPO-led initiatives.

**Recommendations for the short term:**

* **Involve DPOs in all interagency coordination and response meetings** at the national and local levels and consult them in preparation of all messages to the population.
* **Ensure the accessibility** to all consultation procedures and meeting information, documents, platforms for communication, online and offline meetings for persons with disabilities (e.g. using platforms which are accessible to screen readers, ensuring sing language interpretation for deaf and hard of hearing participants, hiring real time captioners, providing documents in easy to read format, etc. when having online meetings).
* **Consider releasing emergency funding** to disability organisations for the provision of accessible and inclusive services to persons with disabilities, such as translation and interpretation, provision of accessible informational content, support and respite services, delivery of essential goods, etc. For instance, organisations of persons with intellectual disabilities often prefer to be consulted and involved in the co-production of easy to read documents. Not all DPOs have the technical expertise but it is important they are consulted so they can provide guidance on how to outsource these services.

**Recommendations for the long term:**

* Take measures to **ensure that DPOs systematically participate** in all activities to plan and improve public health communications. This includes training of relevant actors in disability-inclusive and accessible messaging and communication and monitoring of public health communications for compliance with national and international standards, including the [CRPD General Comment No 2 on Accessibility](https://documents-dds-ny.un.org/doc/UNDOC/GEN/G14/033/13/PDF/G1403313.pdf?OpenElement).
* In developing the mechanisms for meaningful participation of DPOs, ta**ke account of the** [**CRPD General Comment No. 7**](http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhsnbHatvuFkZ%2bt93Y3D%2baa2pjFYzWLBu0vA%2bBr7QovZhbuyqzjDN0plweYI46WXrJJ6aB3Mx4y%2fspT%2bQrY5K2mKse5zjo%2bfvBDVu%2b42R9iK1p)**,** including capacity building of such organisations, where required.

## Free, informed and explicit consent

All decisions concerning a person’s treatment or forthcoming vaccination against COVID-19 must be made in accordance with the person’s explicit and informed consent. For persons with disabilities this means, firstly, access to objective and clear information about the planned intervention and that this be made continuously available upon the person’s request to facilitate retention of information. Secondly, this means that the person should be empowered to make the decision themselves – either independently or with support from another person(s). Persons with disabilities deprived of their legal capacity or living in institutions are often prevented from making informed decisions about their lives.  When providing information about their health and disability to access health-care and vaccination against COVID-19, persons with disabilities should be made adequately aware of how their data is being stored, used and processed. This should be done strictly in line with EU data protection rules.

**Recommendations for the short term:**

* Put in place measures to ensure that the **information about COVID-19 treatment and vaccination is available in diverse formats**, including easy-to-read, and reaches persons with disabilities, including those in residential settings.
* **Train the support staff** in communicating this information to persons with disabilities and, if relevant, supporting the person with a disability to make their informed decision about the course of treatment or vaccination.

**Recommendations for the long term:**

* **Urgently initiate the reform of legal capacity legislation** and develop services to enable supported decision-making for all persons with disabilities in accordance with the [CRPD Committee General Comment No 1 on equal recognition before the law](about:blank).

# About EDF

The [European Disability Forum](https://www.edf-feph.org/) is an **independent NGO that represents the interests of 100 million Europeans with disabilities.** EDF is a unique platform which brings together representative organisations of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

# About WHO Europe

The World Health Organization (WHO) is the authority responsible for public health within the United Nations system. The [WHO Regional Office for Europe](https://www.euro.who.int/en/about-us) (WHO/Europe) is one of WHO’s six regional offices around the world. It serves the WHO European Region, which comprises 53 countries, covering a vast geographical region from the Atlantic to the Pacific oceans. WHO/Europe staff are public health, scientific and technical experts, based in the main office in Copenhagen, Denmark, in 3 technical centres and in country offices in 30 Member States.

# Further reading

* WHO (May 2020): [Policy Brief of the UN Secretary-General: A Disability-Inclusive Response to COVID-19](https://www.who.int/publications/m/item/policy-brief-of-the-un-secretary-general-a-disability-inclusive-response-to-covid-19)
* WHO (2020): [Disability considerations during the COVID-19 outbreak](https://www.who.int/publications/i/item/WHO-2019-nCoV-Disability-2020-1)
* WHO/Europe (2020): [Support for rehabilitation self-management after COVID-19-related illness](https://www.euro.who.int/en/health-topics/Life-stages/disability-and-rehabilitation/publications/support-for-rehabilitation-self-management-after-covid-19-related-illness-2020-produced-by-whoeurope)
* WHO EMRO (2020): [Regional technical brief on ‘Protecting people with disability during the COVID-19 pandemic](http://www.emro.who.int/health-topics/corona-virus/technical-guidance-notes.html?format=html) (available in Arabic and English)
* WHO (2020): [Summary report on considering disability in COVID-19 hygiene programmes](https://resources.hygienehub.info/en/articles/4097594-summary-report-on-considering-disability-in-covid-19-hygiene-programmes)
* EDF (2021): [Human Rights on COVID-19](https://www.edf-feph.org/human-rights-report-2021-covid19/)
* EDF (updated daily):  [Resources](http://www.edf-feph.org/covid19) on COVID-19
* EDF (2021): [WHO Europe’s regional leadership engages to reinforce inclusion of persons with disabilities in the COVID-19 response](https://www.edf-feph.org/world-health-organisations-regional-leadership-engages-to-reinforce-inclusion-of-persons-with-disabilities-in-the-covid-19-response/)

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