



# Disability-inclusive Digital Compass Policy Programme

European Disability Forum  
Recommendations

By Mher Hakobyan | July 2021

**EDF reply to roadmap consultation on the Digital  
Compass Policy Programme.**



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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.

## EDF reply to Roadmap Consultation on the Digital Compass Policy Programme

The European Disability Forum (EDF) welcomes the European Commission's planned [Digital Compass Policy Programme initiative](#), which seeks to set up a robust governance framework providing structured cooperation between the Commission and the Member States to achieve the EU's digital targets, foster European digital capacities and monitor progress on digital principles. We also welcome the aim to translate the EU's digital ambition into concrete actions.

This ambition is set in the [European Commission's Communication "2030 Digital Compass: the European way for the Digital Decade"](#) of 9 March 2021, which presents the overall vision for Europe's digital transformation by 2030. The Digital Compass Policy Programme will then set the focus on delivery and commitment towards the common digital targets. We note however, that the scope of the Communication addressing digital rights and inclusion of persons with disabilities is extremely limited. The Communication mentions accessibility of and digital participation of persons with disabilities only in relation to provision of public services and administration.

We however welcome the plan to formulate set of digital principles in the form of a joint inter-institutional solemn declaration of the European Commission, the European Parliament and the Council, based on a proposal from the European Commission. We call on the European Institutions to ensure inclusive digital transition, by committing to improve accessibility and digital inclusion of persons with disabilities in all areas of public and private life, so that they equally benefit from EU action rather than be left behind due to the digital transformation.

To make sure that the Digital Compass Policy Programme benefits persons with disabilities in the EU, it must:

- Establish an obligation for the European Commission and Member States to harmonize and mainstream accessibility and interoperability of digital technologies in the EU. It should also oblige the EU and Member State to ensure digital participation of persons with disabilities beyond public services which is the only area currently mentioned in the European Commission's Communication "2030 Digital Compass: the European way for the Digital Decade". Persons with disabilities have the right to participate freely and equally in all areas of digital public and private life, not only when it comes to accessing public services. As State Party to the [UN Convention on the Rights of Persons with Disabilities \(UN CRPD\)](#), the EU and Members States are obliged to take appropriate measures to ensure that persons with disabilities have access, on an equal basis with others, to information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas (Article 9).
- Ensure that monitoring and reporting considers accessibility and digital participation of persons with disabilities. This will require including accessibility and disability-focused indicators in the enhanced Digital Economy and Society Index (DESI) and in the regular annual reporting by the European Commission, i.e., in the European State of the Digital Decade Report – ESDDR.
- Ensure that all public funding, such as those under Recovery and Resilience Facility, IPCEIs, Technical Support Instrument and the Digital Europe Programme, incorporate accessibility as funding criterion. This will ensure that when EU funds are used, new technologies equally benefit persons with disabilities, rather than create further digital barriers for them. Additionally, targeted funding should be provided to projects aiming to improve accessibility for persons with disabilities, for example through the development of assistive technologies.

- Meaningfully engage organizations of persons with disabilities, accessibility experts in the planned stakeholder forum, and possible expert group for implementation of the Digital Compass. It is often assumed by policymakers that new technologies can help fix social issues by default. However, technical engineers, ICT experts are not equipped with expertise on human rights, non-discrimination and social equality to bring positive social change on their own. Therefore, to ensure that technological innovation brings positive change to individuals and all social groups equally, instead of putting their rights, privacy, and social inclusion at risk, civil society actors should be a crucial part of the discussions and development of innovative solutions. It is also the obligation of the EU and Member States, as State Parties to the UN CRPD, to involve persons with disabilities, including persons with intellectual or psychosocial disabilities, and their representative organizations in the formulation, implementation and monitoring of legislation, policies and other measures relevant to the Convention (Article 4). Views of persons with disabilities, as rights-holders, should be taken into account and not only listened to, otherwise EU risks having a tokenistic approach to disability-inclusion and stakeholder consultation will be no more than a 'ticking a box' exercise.

## Background Documents

- [EDF reply to Roadmap consultation on Europe's digital decade – 2030 digital targets](#)
- [EDF reply to Roadmap consultation on Declaration of Digital Principles – the 'European way' for the digital society](#)
- [CERMI \(EDF member\) reply to EDF reply to Roadmap consultation on Declaration of Digital Principles – the 'European way' for the digital society](#)
- [EDF position on the EC Proposals for Digital Services Act and Digital Markets Act](#)
- EDF joint letter with EDRI - [Red lines for the use of Artificial Intelligence](#)
- EDF Position on AI White Paper - [We need Artificial Intelligence that does not discriminate](#)

## Document credits

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