# WAI-CooP online event 14 November 2023 - Summary report

## Introduction: Robin Massart, European Commission

Robin gave a brief overview of the [WAI-CooP project](https://www.w3.org/WAI/about/projects/wai-coop/), an EU-funded three-year project to support member states in implementing the web accessibility directive. This project updated and created new resources such as [www.web-directive.eu](http://www.web-directive.eu) but also organised meetings and symposia.

The most universal standards are the Web Content Accessibility Guidelines (WCAG) published by the W3C, with the most recent version WCAG 2.2 published in October 2023. The European accessibility standard EN 301549 leans heavily on the WCAG criteria. The European standard is now being updated through a mandate, called M/587, under the European Accessibility Act. The aim is for this to be adopted by the European standards organisations by September 2025. It will then be harmonised by the European Commission within about 12 months of its adoption. The new version of the standard will become the new conformity benchmark for the web accessibility directive, and for the relevant parts of the European Accessibility Act.

The European Commission supports many technologies, such as translation into sign languages, artificial intelligence, XR/VR; it supports technologies that improve accessibility. Currently, Artificial Intelligence is being seen as a solution to many problems. While it can help with some accessibility challenges, it is a long way away from replacing trained persons. The European Commission is regulating technologies where this is necessary and to protect human rights, diversity, and inclusion.

## Panel 1: Overview of WAI-CooP resources

**Carlos Duarte** of Lisbon University presented the WAI course list. This project task was aimed at developing a new list of digital accessibility training and certification resources. The first version of that list is online at [www.w3.org/WAI/courses/list](http://www.w3.org/WAI/courses/list). It is a list of courses, training and certifications on digital accessibility from different providers. People can use it to make informed decisions on what resources are most appropriate to improve on their existing level of expertise. The course list is not solely focused on web accessibility. but on digital accessibility, so there are also offerings on PDF accessibility or Microsoft Office documents accessibility.

Most offerings are entry-level courses. They do not require more than previous accessibility knowledge. Almost all offerings are online or hybrid resources. Unfortunately, most require payment. There are resources available in nine different languages from 17 different countries.

There is reasonably extensive characterisation of all the listed resources. People can filter and search for the resources that are more likely to be useful to them. Course providers were asked to describe the content based on another WAI resource, [the WAI Curricula on web accessibility](https://www.w3.org/WAI/curricula/), a set of modules that target different roles in accessibility (e.g. designers, developers and so on.)

There will soon be a filter based on different curriculum models, so this list is a living entity and is still being improved. If people have resources they want displayed on the list they can use a form available at [www.w3.org/WAI/courses/submission](http://www.w3.org/WAI/courses/submission) to submit them. Course submissions will be reviewed by at least three different individuals to ensure the information published on the list is correct; this work is currently done by members of the WAI-CooP project but will soon be taken over by the W3C.

**Question**: What are your tips to assess the quality of online courses?

**Answer**: First, looking at different offerings to assess how experienced the course providers are, and if they have practical knowledge, not just theoretical knowledge about accessibility or inclusive design. Real-world examples and case studies are very valuable, because they help us to understand what the real challenges are, not just theoretical challenges. Then looking at the curriculum and the course content, try to match the offering with the different modules of the [WAI web accessibility curricula](https://www.w3.org/WAI/curricula/); that will give a good idea of the course coverage and how the provider relates to WCAG, if it's a course on web accessibility. Then ensure you pick courses that have up-to-date content. We now have WCAG 2.2 and although we cannot expect all courses’ content to switch overnight to 2.2, having up-to-date content is important. Another important criterion: if the course offers certification on completion, then check if that is from a recognised entity as it gives better insurance of quality for the content. Finally, look at the accessibility of the course content itself. If it is a high-quality course on accessibility, the course itself should be accessible; the best way to exemplify how to create accessible content is to ensure all the learning materials used as part of the course are accessible.

**Eric Velleman** of Han University gave an update on the redesign of the [WAI evaluation tools list](https://www.w3.org/WAI/ER/tools/). This tools list is a gigantic overview of tools. To redesign it, Eric’s team worked on the requirements, looked for use cases, scenarios and interviewed developers, designers, testers, monitoring bodies and persons with disabilities. Then a series of prototypes were produced and tested, and the team eventually came up with a new design, in coordination with the W3C WAI outreach working group.

The new page will include a help tool to make it easier for people to see what these evaluation tools measure. This new evaluations tools list is still in the process of being published, so it's not yet online.

Another document updated is the [WAI list of accessibility laws and policies](https://www.w3.org/WAI/policies/). Eric’s team created a new workflow and worked with law students to revise all the entries of accessibility laws and policies. The team prioritized EU member states and added as many other countries as possible. This resource is expected to be published in its final version by the end of 2023.

The team also assessed what documents or resources should be revised from the list at [www.w3.org/WAI/EO/wiki/WAI-CooP\_Priorities](http://www.w3.org/WAI/EO/wiki/WAI-CooP_Priorities), with input from helpdesk questions raised in WAI-CooP open meetings and from the community.

The team also updated the [WAI template for evaluation reports](https://www.w3.org/WAI/test-evaluate/report-template/) to follow the web accessibility directive and the [WAI WCAG-EM report tool](https://www.w3.org/WAI/eval/report-tool/). They will also soon look at the [WAI easy checks](https://www.w3.org/WAI/test-evaluate/preliminary/) and are working on a related card set that could be used by anyone working on web accessibility.

**Question**: How to find out if the testing tools are accessible and if can they be used by people with disabilities?

**Answer**: There is a checkbox in the tools list to indicate what tools have an accessibility statement where their level of accessibility can be checked.

**Wilco Fiers** from Deque Systems explained that to test consistently and harmonise testing requires a great deal of work because while WCAG requirements make it possible to test different technologies, there is some interpretation involved. And interpretations can vary. There is no standard basis for how to apply WCAG; that is up to the individual testers. It makes WCAG future proof, but it also means that differences can creep in. This is particularly relevant in testing tools. It's very easy to run these tools and get different results.

Differences can come for different reasons. It can be because the tools used do different things. There is confusion there, so that is why we started the [Accessibility Conformance Testing (ACT) rules](https://www.w3.org/WAI/standards-guidelines/act/) project. These rules are technology specific descriptions of how to test part of a WCAG requirement. Most of the rules are for HTML, in the browser. Along with these rules a set of test cases were developed to show what it looks like when the rules are relevant, or not relevant.

The project created almost 90 such rules, 30 of which are approved, and another 58 are still proposals going through extensive quality checking.

For the WAI-CooP project the objective was to develop a [list of different tools, different testing methodologies that have implemented these ACT rules](https://www.w3.org/WAI/standards-guidelines/act/implementations/).

Any tool vendor or methodology vendor can submit a tool or methodology for this list.

Consistent testing and harmonising how we test accessibility is very important. This is very theoretical, and most people are not going to be using these rules, but it is important to reduce differences between tools. By harmonising how these tools and human evaluators do tests, there is more transparency and clarity. If we all test in the same way, it increases trust in how WCAG is being tested.

You can find ACT rules online: [www.w3.org/WAI/standards-guidelines/act/rules](http://www.w3.org/WAI/standards-guidelines/act/rules). People who want to work on this can join a community group at [www.w3.org/community/act-r](http://www.w3.org/community/act-r) .

**Question**: Will these rules be updated to WCAG 2.2?

**Answer**: Yes. For existing rules, there is very little to update but the project team is currently working on at least one new rule for WCAG 2.2. There will be more to follow.

**Question:** What do panellists see as key challenges for the future?

**Answers:**

Machine learning and AI: on the one hand it’s an incredible opportunity but it is also a big risk for accessibility standardisation. Standardisation is a slow process and if technologies are evolving fast, there is a risk. The challenge for the standardisation community is to keep up and to keep the standards relevant.

Keeping up with other technological advancements, such as virtual reality and all other types of ‘realities, is another challenge as we need to make sure they are accessible to everyone.

## Panel 2: Looking to the future

### Presentations

**Fernando Machicado** provided an overview of the [AccessibleEU Resource Centre](https://accessible-eu-centre.ec.europa.eu/index_en), an EU-funded knowledge hub to support implementation of EU accessibility legislation; connect stakeholders; and to train accessibility professionals.

AccessibleEU are a consortium supporting activities related to accessibility. There are 34 national experts, at least one in each country. They produce one study a year on a selected topic in Europe. They are not responsible for the implementation of accessibility laws, or for implementing solutions. They are not doing consultancy work. They do not fund projects. They are not advocating for accessibility policy. They are not responsible for control and assessment of products and services.

AccessibleEU created an online library on accessibility and knowledge. They also created a community of practice – this is currently a LinkedIn group with 1400 members. The project also organises workshops, networking events and online training.

In addition, they issued guides and support materials on accessibility and implementation of accessibility standards. All documents are freely available on the AccessibleEU website. AccessibleEU are also monitoring accessibility in the EU with several indicators.

On standardisation, the project team has two main objectives: promoting participation in EU level standardisation projects and, in particular, the participation of organisations of persons with disabilities in standardisation.

**Alastair Campbell** provided an overview of WCAG 3.0.

WCAG 2.0 was published in 1999 and several updates followed, including 2.2. WCAG 3.0 is a new set of reformulations that is not intended to be carrying on from the previous guidelines; it's not starting again but it is reconfiguring everything. There is a subtle change: the ‘web content accessibility guidelines’ will become the ‘W3C accessibility guidelines‘; this is acknowledging that things are more complicated than just looking at a website or app, or a particular digital project. There is an ecosystem: the device used makes an impact, the tools used to create that product have an impact as well. WCAG 3.0 is looking to provide more guidance.

Why change from WCAG 2 and focus on WCAG 3.0, especially as WCAG 2.2 has just been published? WCAG 2.0 has been very successful and useful. It has been incorporated into legislation around the world. It's one of the reasons W3C wanted to keep the acronym WCAG, because it has become recognisable in the world of accessibility. But we are aware of its limitations. For example, the scope of testing is a ‘page’ and all the guidelines are written around the assumption that you are looking at a webpage. That does not translate easily into things like electronic books or single page web apps where the URL might stay the same, but the content of the page changes a great deal. It's also very difficult to account for context. Another limitation is backwards compatibility: even though we know of many barriers using digital technology it's very hard to add new things.

Another major limitation is the setup of having binary yes/no answers for each success criteria; this limits what can be included. One of the goals is to change how this works. It's complex.

One of the first parts of the project is to work with researchers and stakeholders and come up with some goals. Part of it was to update the guidelines to better address and accommodate new technologies. Not just AI, but also VR, XR. The modern mobile phone didn't exist when WCAG 2.0 came out, so some more adaptability was needed. We wanted to incorporate tool guidance to better integrate that. If you're creating a website, you can achieve accessibility in different ways. You can use a particular tool or get into the code yourself. It would be good to define clear testing procedures and allow for multiple approaches.

We might also want to meet the needs of regulators and allow for more frequent updates. Another thing would be to define ways to claim conformance for things other than webpages. Something we are interested in is how to define conformance for a specific task or journey instead of a webpage.

Another objective is to make it easier to read and easier to use, where possible. Starting with the top line that is plain language and easy to understand. Then easy routes into more technical or detailed information. We want to make WCAG 3.0 based on research. Lots of research went into previous iterations of WCAG; we want to connect the dots between the guideline and where they came from. This will help to outline where things are lacking research, or where more research could be used.

The structure for WCAG 3.0 is not set. We want to have guidelines, some of which have been in WCAG 2.0, but instead of success criteria we are looking at outcomes. Instead of saying ‘this content needs to do this thing’, the objective is to look at the outcome for the user and whether it works for the user. Underneath, there would be detailed information on how to do that for each technology.

In terms of the timeline, this work started in 2016/17, with lots of research around the requirements. Some conformance prototypes were created. We published our first public working draft in 2021. The aim is to go through review and iteration and then towards the end of the current two-year period, we have scheduled how the structure, the first draft content and the conformance are going to work. To find out more, please have a look at the [WCAG 3.0 working draft](https://www.w3.org/TR/wcag-3.0/). You can provide feedback on [www.github.com/w3c/wcag3/issues](http://www.github.com/w3c/wcag3/issues) where people complain about things or make suggestions.

### Questions and discussion:

**Question**: Is there a way for people who are not digital accessibility expert to reach the WCAG 3.0 taskforce?

**Answer:** Yes, there is an email contact on the [WCAG 3.0 Task Force webpage](https://www.w3.org/WAI/GL/task-forces/silver/).

**Question**: Can you give an example of a new requirement or outcome of WCAG 3.0? Will you be able to tackle cognitive accessibility which has been very difficult to implement in previous WCAG?

**Answer:** One example is plain language. It's not something you can answer with a yes or no. There is work going on in combination with the [WAI cognitive accessibility task force](https://www.w3.org/WAI/GL/task-forces/coga/) and international task force, because it needs to work across every language effectively. We are working through things like popular word lists for each language and other things.

**Question:** What key lessons learned from the implementation of the web accessibility directive? What will help, or may hinder, the implementation of digital accessibility in the private sector as we look towards the implementation of the European Accessibility Act?

**Answers:**

One of the lessons is that there is a general lack of accessibility specialists, and of accessibility training. Hopefully by the time digital accessibility must be implemented in the private sector, there will be more accessibility expertise and training courses available, as well as a bigger market in terms of accessibility testing and support.

From a policy making perspective, the web directive was the first legislation that specifically addressed digital accessibility. The European Disability Forum tries to refer to digital accessibility requirement in all new pieces of legislation and the Commission is also doing this in some instances. We see accessibility mentioned in EU legislation on digital ID, digital wallets, digital Euro, including reference to the role of persons with disabilities as active citizens and reference to harmonised standard or the feedback mechanism. These elements can be used by the private sector to comply with the European Accessibility Act. But something that has hindered the implementation of the legislation - and it is creeping up again - is that some entities are focusing on how they can make use of exemptions instead of putting their effort into implementing changes.

The good thing with the European Accessibility Act compared to the web directive is the stronger enforcement mechanism. The web directive has an enforcement mechanism, but it doesn't have teeth. In the European Accessibility Act there are levers for the private sector to take thing seriously. But the lack of expertise remains an issue, as well as some new technologies and processes being used, for example multifactor authentication.

There are similarities, but the good thing is that the awareness is there. The resources and the communities of practice are there too.

When the public sector regulations came in, we saw how each public sector body was trying to deal with it. There were many organisations getting in touch just two weeks before the deadline. They had no clue how long it was going to take them to get everything tested and working towards meeting accessibility. People who are working in digital in general have little awareness of accessibility and don't know what it involves. Organisations need to be actively working on issues well in advance, well before any kind of deadline or enforcement.

**Question**: With the web directive, we saw the emergence of solutions that were marketed as ‘quick fixes’ for accessibility. Are you concerned about the fact that such products may be on the rise again?

**Answers:**

Applications of AI etc. are a reminder of what happened in the built environment sector regarding accessibility. Many people used to say: we don't need to do this because this is going to be accessible with personal measures, such as exoskeletons and similar things in the future. But these are a long way ahead. We cannot say that everything will be fixed tomorrow and affordable for everybody. That is another factor. We need to make sure that things are accessible right now.

EDF and the International Association of Accessibility Professionals (IAAP) published a [joint statement on accessibility overlays](https://www.edf-feph.org/accessibility-overlays-dont-guarantee-compliance-with-european-legislation/) and what these technologies can and cannot do.

When you are creating an interface, the computer doesn't know what's appropriate. Artificial Intelligence (AI) might help with that in the future. But the models are built now, with data from the open web. The default on the open web are things that aren’t accessible because that is what the average is. Until someone can solve that problem, there is not going to be an automated solution.

When it comes to solutions that are run on AI, it’s worth noting that persons with disabilities are always outliers in data sets. Therefore, it will be very difficult for AI tools to take into account the full diversity of humankind. We welcome innovation to make it easier to create accessible content. We see that tools that run on AI such as accessibility checkers are useful. But this innovation or this promise of innovation shouldn't stop people taking responsibility for the accessibility of their content.

Accessibility is not something that is going to be solved by technology. Technology can help, but if we don't have processes in place, it's not going to help. We need accessibility embedded in our design processes. If it's not done at the outset, there is no technology that can solve issues at the end. Therefore, the focus must be on the process, not so much on the technology.

Ends.