**WAI-CooP Meeting – 19 April 2022**

**Summary of presentations and key points discussed**

First session

**Speaker: Ainars Freimanis, Policy Officer at the European Commission (EC)**

With a directive, the EU defines the outcome but leaves it up to the Member States (MS) how this is achieved. Some MS already had relevant accessibility legislation in place, while other MS had to create entirely new laws. The Web Accessibility Directive (WAD) sets minimum requirements, but MS were able to set stricter rules if they wanted.

National law had to include ‘*an adequate and effective enforcement procedure’.*  Anyone who thinks their national law is not correct, or not applied correctly, can follow that national procedure, and ultimately also bring a case to the European Court of Justice.

The WAD has several policy objectives, including: to improve accessibility to public sector information & services; to stimulate innovation and to ensure MS learn from each other and share experiences

Monitoring and reporting obligations are described in some detail both in the WAD and in [the EC’s implementing decision of October 2018 (the 'Monitoring decision')](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018D1524).

Member States must:

* designate a body to perform the monitoring and reporting functions’
* periodically monitor the compliance of websites and mobile applications of public sector bodies (PSBs) with the accessibility requirements set out in the WAD.
* Report on their monitoring by 23 December 2021, and every three years thereafter. This report must be published in accessible format.

The Commission has to:

* adopt an *‘implementing act establishing a methodology for monitoring the conformity of websites and mobile applications with the accessibility requirements set out in the directive’ (*the‘Monitoring decision’)
* carry out a review of the application of the WAD by June 2022. This review has to take into account the MS reports on the outcome of the monitoring.

The first monitoring and reporting exercise coincide and cover 2 years for websites (January 2020-December 2021) and just 6 months for mobile apps (June-December 2021). Monitoring will then take place annually but the next MS reports are due by 23 December 2024.

Almost all MS have now published and submitted their reports, with the last 2 expected soon.

What is the overall purpose and added value of monitoring?

The [‘Monitoring decision’](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018D1524)  adopted in consultation with MS representatives states: ‘In order to help PSBs meet the accessibility requirements, the monitoring should also raise awareness and encourage learning in Member States’.

The added value of monitoring results is to help PSBs to correct accessibility deficiencies by creating a virtuous feedback circle. Monitoring and reporting also seek to ‘foster the sharing of best practices and to promote transparency’ by asking MS to make public how they monitor.

Monitoring should not hinder innovation: MS should be able to use more advanced monitoring technologies, promote innovation, to avoid imposing barriers on the market and to ensure that the monitoring methodology is technology neutral.

The monitoring methodology does not define any specific tests to measure accessibility. Instead, it sets requirements for the methods to verify compliance and to detect non-compliance, based on the EN standard. If national standards are used, a correlation table should be provided to allow comparability of the monitoring results.

The Monitoring decision includes detailed rules on sample sizes for websites and mobile apps, periodicity, what in-depth and simplified testing methods should cover, as well as the format and content of the reports.

The first report asks for information on consultation with stakeholders (especially, organisations of persons with disabilities and of older people, social partners, industry and others); publicity on developments in accessibility policy; experiences and findings from the implementation of the directive; and information on training and awareness-raising activities

WADEX role in monitoring/reporting

The WAD also requires the EC to facilitate cooperation at Union level between MS, and between MS and relevant stakeholders. The objective is to exchange best practices as well as review the monitoring methodology, market and technological developments. This has been done, primarily, through [the Web Accessibility Directive Expert Group (or WADEX)](https://digital-strategy.ec.europa.eu/en/policies/web-accessibility-expert-group), which comprises members from all MS and observers from stakeholders. Over the last 2 years, many WADEX meetings have been dedicated specifically to monitoring and reporting issues.

In a WADEX online poll, most MS representatives (62%)identified time as the most challenging aspect of monitoring, followed by available expertise in-house (38%) and external (19%), while financial resources were mentioned only by one fifth (22%).

The [reports received to date, and English translations, are available on the Commission website](https://digital-strategy.ec.europa.eu/en/library/web-accessibility-directive-monitoring-reports)

Collectively, MS performed simplified tests on nearly 10,500 websites – each with hundreds or thousands of web pages – and in-depth tests on over 750 websites, as well as almost 300 mobile app tests. Deque Systems called this exercise the ‘World’s Largest Accessibility Test’.

Three quarter of MS used both internal and external accessibility experts**.**

The MS reports feed directly into the WAD review. The EC will analyse them with the help of an external team. The full data sets on the public consultation will be published soon on the [EU’s ‘Have your say’ portal](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12537-Accessible-web-%26-digital-content-for-people-with-disabilities-review-of-EU-rules/public-consultation_en).

Some key points:

* Almost no website or mobile app is completely error-free, but the situation is improving compared to what was in place before the WAD.
* There is increased awareness of the limits of testing, including automatic testing – and correlation between test results and whether the website is still usable by persons with disabilities. For example, a WADEX member suggested getting rid of the 'zero error doctrine' and putting more focus on the performance of PSBs regarding the accessibility of their websites and apps. Another suggested more usability tests.
* Many MS made a full list of their PSBs’ online presence to establish the required samples.
* At the time of adopting the WAD and the Monitoring decision, MS did not want to define specific tests or methods on how to test compliance and verify non-compliance. Now there are requests for such specific guidance or templates.
* Comparing monitoring results between MS and across the EU was difficult due to varying metrics, methods, tools and interpretations
* Although mobile apps seem to be more accessible than websites, testing them is more challenging, due to the proprietary source code of the apps.
* MS reports met most content requirements, but there are gaps including on correlation mappings to the EN standard, as well as the enforcement procedure and its use.

To address some of the challenges, the EC has been advocating for use of EU funding (e.g. Recovery and Resilience Facility and EU Cohesion funding) for MS to invest in accessibility, to ensure that further digitalisation of public services is accessible by design and by default, and to include web accessibility training of experts, especially persons with disabilities, as part of digital skills.

**T**he MS monitoring reports are a valuable source of data, and a visible sign of the investment MS have made to improve online accessibility since the WAD was adopted. Along with the final evaluation report on the WAD review, they will be of interest to the wider stakeholder community, the industry and service providers, not least in light of the upcoming European Accessibility Act, as both private and public sector prepare for its practical application in 2025.

**Speaker: Susanna Laurin, Chief Research and Innovation Officer, Funka**

Susanna provided an overview of key points from the MS monitoring reports and interviews with stakeholders such as users, PSBs, monitoring industries, industry as well as policy makers.

Positive findings:

* the vast majority of the PSBs are happy to be monitored
* the monitoring exercise increased awareness about digital accessibility in PSBs but also in the industry and ICT market
* PSBs in scope of the WAD are positively trying to make things better
* Organisations of persons with disabilities in several MS commented on the lack of involvement of end users but some were involved and in general user involvement is seen as important

Room for improvement:

* Users complained about the inadequacy of the feedback mechanism. This is an important pillar of enforcement, but PSBs haven’t focused on it yet.
* Quite a few MS didn't monitor the actual requirements of the WAD - Annex A of the EN301549.
* There is a bias towards some user groups while others are not as well catered for.
* Lack of knowledge and expertise is an issue, in the public sector and in the market

Main results from the end user perspective:

Disclaimer: some MS they have not reported on all the data points below and 2 MS have yet to send their reports.

Accessibility statement (one of the important pieces of the WAD from an end user perspective):

* 21 MS claim to check whether there is an accessibility statement on the website. Yet the implementation decision states that the accessibility statement page needs to be part of the sample, so those MS who don't check the availability are not following the rules.
* Only 2 MS tested what is actually required, i.e. the full EN301549 Annex A
* 5 MS picked some parts of Annex A.
* 8 MS covered the Web Content Accessibility Guidelines (WCAG) criteria. 10 MS did even less than that as they selected parts of the WCAG success criteria.

Tools used when testing:

* 14 MS used free or open-source tools
* 3 MS used commercial tools or plan to pay for the tools they use
* 6 MS developed their own tools
* All MS had a proportion of manual testing
* Some of the MS who outsourced the monitoring don't really know what their suppliers were doing, so there could be more tools used

User involvement in actual testing:

* 9 MS claim to do actual user testing (checking how a user with a disability is experiencing the interface).
* 13 MS claim to test with a screen reader.
* Only 2 MS test with assistive technology other than screen readers, indicating a bias towards some user needs

Reporting on compliance status: According to the implementation decision, MS are supposed to report when websites and apps are fully compliant, or partially compliant. 18 MS did this but 8 did not: they either didn’t report on this at all or they invented other ways of doing compliance status reporting. As a result, the data is not comparable at all. A few MS who did the compliance status reporting as required said it is not good enough.

12 MS say they publish the results of their monitoring, and 12 MS say they do not publish these results; instead, they share results with the PSB in charge of the website or app. 2 MS didn't share the monitoring results with their PSBs but plan to do so.

Some MS went beyond the minimum requirements (e.g. including plain language or sign language) and scope of the WAD. For example, some added parts of the private sector. While MS were allowed to exclude schools, kindergartens and nurseries from the scope, 10 MS decided not to do so. Some MS also monitored live and pre-recorded video and third party content.

Recommendations will include:

* a reporting template for all MS: it will make it much easier for them to report and for anyone to read and compare
* making sure that MS are aware of all the requirements and all user needs and monitor all of them.
* compliance status to be refined so that all MS use the same criteria
* MS that were most successful put their focus on training and support
* There is a need for certification of tools and quality assurance

**Speaker: Bruno Tot, Assistive Technology Expert, Croatian Blind Union**

The Croatian blind union has worked with the Office of Information Commissioner, the institution handling the enforcement and handling complaints regarding digital accessibility. Bruno described auditing and participating in the monitoring exercise as ‘quite an undertaking’.

His first impression of the EN301549 was that it was not quite as clear as initially thought. Bruno felt it would be helpful to make the EN more focused and less complicated.

He focused mostly on manual testing, tested with a screen reader and criteria that would mostly impact visual impairment while a colleague with other disabilities checked for all of the other criteria and accessibility statement, widgets and contrast. They found many cases where they wondered how to evaluate certain things such as a website which was only a single page with logos and icons for various businesses, but when he tried to go through it with a screen reader all that was described was who the mayor was. Technically it's accessible and there is really no informative content there beyond what the website is and a single sentence, however the latter is invisible unless you are using a screen reader. How to evaluate something like that?

Another point of contention was seemingly overlapping criteria. For instance, two criteria referred to sensible navigation through websites, but both were worded slightly differently.

There were also some criteria which seemed not really applicable to desktops, for instance the handling of different orientations - whether it's landscape or portrait - that is a client-side issue. And similarly with the criteria that refers to the replacement for gestures like pinching and double taps. Bruno explained that a screen reader on his phone changes all of the activation gestures to double taps unless he sets it up otherwise. The same applied to other criteria. Most assistive technologies focus on replacing the standard methods of input but screen readers actually do require code adaptations. They require text to be accessible by the screen reader and then you can choose if you want it in Braille or in speech.

Bruno also highlighted the need for more experts and more training for people who will actually be auditing because he is currently the only expert auditing for vision impairment in Croatia.

Bruno argued that the current state of accessibility of web content is mostly due to lack of perspective, lack of awareness of those developing content. As a result, there are now a range of accessibility widgets or overlays that defeat the purpose for screen reader users. For example, they are placed at the bottom of the screen, and not at the top which shows a lack of understanding about how screen reader users access content. Accessibility overlays and widgets do not guarantee accessibility and can impair it. Many widgets do not work with screen readers and can mess with navigation as they add invisible elements that people have to go through with their screen reader for instance. There are some widgets which do incorporate a screen reader; this is also pointless because if people do need this specific screen reader for a website then that website is probably not well designed. In addition, if a person is a screen reader user, then they will also use it to reach your website.

Session 2: the challenges of monitoring

**Speaker: Carlos Duarte, Professor in the Department of Informatics, Faculty of Sciences, University of Lisbon.**

Carlos is the product owner of an automated accessibility evaluation tool used in the monitoring activities in Portugal and leads the development team responsible for software tools that AMA (Portuguese accessibility monitoring body) use in their monitoring activities. His team was invited to conduct the monitoring activities and report on them.

The monitoring exercise took longer than expected. Carlos explained the context of the monitoring and the challenges it raised.

First challenge: time

Simplified monitoring of both websites and mobile applications and report writing were carried out in under 4 months. This made the whole process very challenging.

Mistakes were made along the way, which cost time. For example, completing the automated evaluation of the sample of websites took longer than a week and was done more than once due to issues found when reviewing the results. But the main challenge timewise was the time it took to complete the evaluation of websites and mobile applications, and the latter were more challenging to assess.

Second challenge: human resources

The time challenge contributed to the human resource challenge. The lack of human resources inside AMA led to Carlos’s team being appointed. Having less time to complete the monitoring meant the team had to recruit additional human resources. Finding resource able to complete accessibility audits is not easy, although being in a research lab with access to resource familiar with this type of work, Carlos was able to assemble a team of 8 people with different roles. Some focused on website evaluation and others on mobile evaluation. However, some were less experienced than others and required assistance from more experienced members.

Specific challenges: sampling

The first decision to be made was sampling of websites. Here the team had limited input because this was handled by AMA. The team needed to sample 181 websites and asked for feedback from users’ organisations. So there was interaction with users from this stage onwards. The team also made sure that the sample was representative of multiple service areas provided by PSBs. The initial sample was reviewed to ensure that all the selected websites were online and not undergoing maintenance throughout the monitoring period or had not been moved to a different URL. There were a few instances of this, so these had to be replaced in the sample.

Then the second decision to make was about the size of the sample of pages. There were two possibilities. On the one hand, the homepage and all the pages linked from the homepage, the ‘home plus sample’. On the other hand, all pages on the website up to 2000 pages, the ‘2K sample’. If resources are available, Carlos would recommend monitoring the larger sample. The team’s findings showed a higher frequency of issues on average per page in the larger sample. So it does look like the pages near the home page get more attention and have fewer issues than the other pages deeper in the hierarchy. But those pages are there and need to be accessible and accounted for, therefore the larger sample is more representative of what one can find on a website.

Another challenge: tooling

The team used 2 crawlers complementing each other. The crawling itself had some challenges because it involved deciding what are the boundaries of the website and this is something that could not be done automatically. Some websites linked to pages in sub domains. Some of these pages were clearly the same website, just using a sub domain for a specific service that the PSB provides but some sub domains were clearly another website. As these emerged, the team needed to review this manually and decide on a case-by-case basis which pages or sub domains needed to be removed from the website and this took significant time.

For the accessibility itself, the team used 2 tools. The team used one of AMA’s evaluation engines, called ‘Access Monitor’. The other tool was ‘QualWeb’ the tool the team developed in their research lab. QualWeb is also the engine behind Access Monitor.

Access monitor offers a score for each of the evaluated pages. The team ended up having a score to work with and looked at scores for pages in the sample and for the websites in the sample. Access Monitor scores pages from zero to 10. The team found that the score for websites and pages was in the 5 to 6 range. This is a poor result, especially when bearing in mind that an automated tool is unable to check half of the problems that can impact a webpage. However, it was useful to have a score to compare and compute averages, something that isn’t possible when looking at the compliance with the EN and the criteria. In any case, the team found that no website was fully compliant and that 3 EN clauses were not complied with by over 95% of the websites in the sample, while another 3 clauses were not complied with by the over 80% of the websites. It is a grim result but useful overview, though not as easy as stating that most websites fell within the ‘5 to 6’ score.

Challenges of in-depth monitoring:

First, there is the testing methodology. Neither the WAD nor the EN state how to test compliance. The first challenge was to establish a methodology that could be uniformly applied by a team of 5 different testers for websites and 4 testers of applications. The team opted to start to test with WCAG criteria and now needs to complement with testing 2.1 WCAG criteria and adapt several of the tests to be able to test mobile applications.

Currently this mobile testing is the biggest challenge. Testing web pages with the EN clauses is one thing, but testing mobile applications with the same EN clauses is way more challenging and at times it simply felt totally inappropriate. The EN does not copy all of the WCAG success criteria but it still keeps some that are clearly webpage inspired such as, for example, checking if a non-web document is titled. This forced the team to interpret what some concepts from the web context might mean in the mobile context and it was far from perfect. It is probably also the reason why MS found that mobile applications seemed to be more accessible than websites. The team also came to that conclusion but probably mostly as a result of the inadequacy of the evaluation procedure for mobile applications. The team tested 8 iOS applications and 8 android applications. Both offer support for different features and some are testable in one but not the other. So mobile testing is the biggest methodological challenge that the team faced and this needs to be updated in the future.

Involvement of users with disabilities:

The team asked users with disabilities to review the website sample. There are other ways to involve people: one is usability testing - something the team regularly does. Blind people, deaf people and people with motor impairments were involved. For each of these groups’ websites and applications were picked with the worst compliance for the corresponding functional performance and 2 or 3 tasks representative of the services were selected for each website / mobile application. The team had to be somewhat creative with some of the tasks; for example, they created some tasks that required interacting with video content for the usability testing with deaf participants even though that was not part of the any of the services provided on the website. But it was the only way to get people to interact with audio content since the website didn’t incorporate audio as part of its services.

The other way users were involved was through the feedback mechanism. It was challenging to get some feedback. Over the 2 years of the monitoring period, the team only found 4 instances of compliance through the feedback mechanism. This of course reflects the lack of awareness about the feedback mechanism but is also a consequence of the lack of accessibility statements published.

AMA designed an accessibility statement format for users in Portugal. The team put in place an accessibility statement generator that any institution in the country could use to develop an accessibility statement. The statement could be downloaded in a format that can be customized to any website. The file generated includes HTML attributes to support machine reading of the accessibility statement. This enabled the team to automatically identify published accessibility statements; these were found in approximately 4% of the sites sampled. The team also found a small number of accessibility statements that had been created or generated but then stripped of those attributes and more often found accessibility pages that did not follow the model designed by AMA. This made it more challenging to identify the published accessibility statements. Overall, around 17% of the websites had an accessibility page. The team did not find any accessibility statement in mobile applications.

Session 3: the case for harmonization of monitoring.

**Speaker: Wilco Fiers, axe-core and axe Linter Product Owner, Deque System; WCAG 3 Project Manager; Facilitator, Accessibility Conformance Testing Task Force**

Reading the MS monitoring reports, several key points stood out:

* 45 accessibility testing tools used as part of the monitoring
* 8 different testing methodologies (these are just the ones reported)
* Many MS reported no metrics. Those that did used different ways of measuring and ended up counting in different ways so results have become difficult to compare.

One of the difficulties with testing accessibility is consistency. When doing tests, people will often find that guidelines are generic; they work across the different technologies that are using the web but require a bit of translation to apply to each technology individually.

Going from the generic language to the technology specific can be done in different ways. These decisions are made and often codified; we call them a ‘testing methodology’. It is something that a lot of organisations have, it is their own step-by-step guide on how to test. Organisations do this to make testing more consistent. If you follow those steps, you are more likely to get the same outcome. The issues become easier to reproduce. By sharing a monitoring report and the methodology used, others will find it easier to find other instances of the problem identified and also know whether or not the issue was fixed.

There are some examples of methodologies being establised throughout Europe, for example RGAA by the French government. Trusted Tester - developed in the United States - is also used in Europe.

There were over 45 tools used. The most commonly used are Wave, CCA, a HTML Validator, and light house chrome extension. These tools are often different from the methodology.

Wilco has been working on a potential solution for the problem of inconsistent results as part of the Accessibility Conformance Testing (ACT) Task Force, a group set up within the W3C to develop ACT rules. An ACT rule is a plain language description of how to test a specific type of content for a specific aspect of an accessibility requirement.

Over 90 ACT rules were created over the last couple of years; these rules help in the translation from generic requirements to technology specific ways of testing. Alongside these rules, test cases were developed; these are critically important to make sure that when using a tool or a test methodology, people can figure out if they test the way that was intended.

The ACT Task Force are creating more consistency across different tools of methodologies. Right now there are 7 tools that have publicly implemented ACT rules to show how they perform against all of the test cases.

More information: **W3.org/WAI/standards‑guidelines/act/rules.**

For the monitoring, a recommendation is for monitoring agencies to have a methodology and to describe what that methodology is, and then to make it public so that organisations can understand what is being done. When using a methodology, check how that methodology compares to the ACT rules so that you know that your methodology is broadly consistent with the methodology that others are using.

For EU monitoring, for the monitoring metrics, it would help if the EC could develop some generic metrics that can be used so that we can start seeing which countries are doing well, or how they improved. This would enable comparison of different initiatives and understanding of what works well and what doesn’t, as this is useful information for others. Data driven solutions are really important for doing this monitoring and improving overall accessibility. Without metrics and a way to compare results between countries, learning from each other becomes really difficult.

Monitoring is a very good thing but there is a potential risk as well. If we have methodologies and tools, we could have a situation where, for example, the Dutch government uses a particular tool and a particular methodology now, so everybody in the Netherlands or at least Dutch government agencies are incentivised to use that methodology and tool. If the Dutch government created their own tools and methodology that means Dutch accessibility experts and Dutch accessibility tools are going to be highly favoured within the Netherlands and it limits what accessibility institutions outside the Netherlands can do. It creates a barrier to that market rather than opening up the European market. It's something to be aware of.

Summary of key points and questions discussed

w3.org/WAI/ COOP (sign up for updates)

* **Working on standardisation**: anyone who wants to join standardisation bodies to improve the EN should join their national standardisation organization and then contribute to work on the EN standards.
* **Does the monitoring methodology differ between HTML and documents such as PDF's Word, excel and PowerPoint?** This depends on which version of the EN is used. In version one, harmonized until last summer, offline documents such as PDF and PowerPoint were not part of the Annex although there is information on how to make them accessible as well. In the new version of the EN (3.2.1) offline documents are included.
* **The WAD does not apply to European Commission websites. Is the EC planning to improve the accessibility of its own websites?**The Disability Rights Strategy released in 2021 includes the publication of Web Accessibility ‘action plan’ for the EC, focusing on its websites, unfortunately this action plan, planned for 2021, has not yet been published. The EC has committed itself to make its websites fully accessible. The Web Accessibility action plan has been drafted but not yet been politically approved. However, some EC websites already have accessibility statements, exactly as in MS, so work is already happening. These accessibility statements include the feedback mechanism. This is being rolled out. However, the EC’s top level domain has 800 websites, with thousands of pages, so the roll out may take longer than a year.
* People who have been involved in the monitoring of the WAD felt that this generated more requests for training and increased their outreach and training activities as a result. In Portugal for example, there has been a lot of requests from developing teams responsible for the websites of multiple PSBs. They reached out to the monitoring body, AMA, asking for training to improve the accessibility of their websites. AMA itself understood the need to train resource to be able do the monitoring so that they are not reliant on outside institutions to conduct this, so training activities for both of these types of resource are being prepared.
* On many websites, the accessibility statement doesn't contain the feedback mechanism. Some MS haven't checked the statement at all despite this being part of the monitoring requirements. Most monitoring agencies are aware that it is a problem and say that for the next period they will focus on the feedback mechanism and accessibility statements.
* The situation differs between MS but most are now aware that they need to focus on the accessibility statements as well. The biggest problem is that only a minority of MS are validating the accessibility statements.
* Accessibility statements are a great opportunity and an important piece of the WAD that hasn't been exploited yet. Accessibility statements need to be easy to find and easy to understand. Right now they can be difficult to understand, they are too technical and many PSBs don't understand that they are meant for monitoring but are also important for end users, so they should not be written in a way that only an expert can understand.
* The European Disability Forum did a survey on the WAD implementation in 2020. Many end users said that when there was a feedback mechanism, and when they used it, often there was no response so then the risk is that over time people stop using the feedback mechanism because they lower their expectations about getting a response. There is work for all stakeholders to do in terms of raising awareness of that process.
* **Is the accessibility statement a band‑aid to hide a failure to deliver?** One point of point of view was that accessibility statements are sometimes produced in order to ‘tick a box’ by people who don't know what they meant and do tests that they don't understand. Another view was that an accessibility statement was a way of defining a strategy for delivering accessibility and for measuring your ability to do so, measuring your impact and measuring the degree to which you have delivered on the strategy you have articulated.
* The accessibility statement is a way of making sure that PSBs are not just reacting to monitoring but are being proactive and understand how accessible their websites (and PDFs etc.) are and that they document this information. If everything is bad, then the accessibility statement will be very long. It is also useful information for end users: they will know if a service cannot be accessed with their assistive technology and that someone has already reported the issue and that it is – hopefully – being fixed.
* PSBs know they need to document issues; the accessibility statement acknowledges that they are aware of these issues. If their supplier or expert believes that their website is accessible when it is not the case, they are not necessarily trying to lie, it simply means that there is a competency issue. Many PSBs are not really aware and may actually believe they are fully compliant while not being close to that. We all need to raise awareness about this and make sure that they are competent.
* Another aspect regarding the value of the statements: in Portugal the statements are a usability and accessibility sale requirement that can be displayed on a website, and this was more motivating than the statement itself. PSBs don't really see the value of the statement itself, which is a shame.
* Every Dutch website has a personal data protection statement because very strict penalties apply when these are missing. There is‑a huge difference between the WAD and the General Data Protection Regulation (GDPR): data protection and privacy are treated much more seriously than accessibility right now, but hopefully in the future we could have validation from an accessibility point of view given similar importance.
* To find out more about the WAI CooP project, visit: <https://www.w3.org/WAI/about/projects/wai-coop/>
* The WAI-CooP project created a dedicated website with Frequently Asked Questions about the WAD: <https://web-directive.eu/> - the website includes a helpdesk function where you can ask questions.
* To sign up for WAI-CooP project updates: <https://www.w3.org/2002/09/wbs/1/WAI-CooP_newsletter/>

ENDS.