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EDF is a network of around 100 organizations of persons with disabilities that defend the interests of over 100 million persons with disabilities in the EU. Our work aims for the full implementation of the Convention on the Rights of Persons with Disabilities (CRPD) in the EU and its Member States. We are an advocacy organization that tries to influence the work of the European Union through the meaningful participation of persons with disabilities in policymaking.

1. How well do you think the current RRF country digital transformation strategies account for inclusion of persons with disabilities?

It can be crucial, a turning point. So, when it comes to Information and Communication Technologies (ICT) our goal is to ensure that these new technologies are available, affordable, and accessible for persons with disabilities. This is achieved in two ways:

- One, through the legislative scope, pushing for legal environments that make it mandatory, or at least support, the development of accessible ICTs.
- The second, helping organizations and companies in the process of developing this accessibility scope for ICTs.

Therefore, public procurement is the link between these two approaches.

As Mr. Humberto Insolera explained, in the past years, much progress has finally been achieved in the EU in these spheres, and the RRF also gather this progress. For instance and coming to the point of discussion regarding the legal point of view, the Accessibility Act applies to EU Funding as well, included Recovery and Resilience Funds. It contains a series of accessibility requirements for ICT, supported by the world's most advanced technical norm for digital accessibility, the European Standard EN 301 549 on accessibility requirements for ICT products and services.

This standard must be referenced in the public procurement and funding technical specifications. Therefore, if a government implements a new digital solution (as it can be a new platform for the judiciary system, or a new digital app to facilitate access to public services), they must abide with the standard EN 301 549.

All this together with the accessibility requirements of the Common Provision Regulations for the period 2021-2027, conform a comprehensive legal acquis that sets a correct basis for our advocacy objectives.

Regarding procurement, the Public Procurement Directive from 2014 makes it as well mandatory to include accessibility in the technical specifications of every call for tenders (through its article 42). But and this is crucial, it also allows to use accessibility as an award criterion.

Then, we just need to focus on the second point, to advocate for countries to fulfil this requirement.

Many countries have already made clear that they will both:

Invest directly into accessibility plans,

Ensure they fulfill the accessibility criteria set in the regulations.

Therefore, we are starting to assess, through our national members, that these investments, as well through procurement, are safeguarded. We cannot control with the indicators whether this has been fulfilled. We cannot but analyze each Plan individually, and then ask our members to assess the accessibility and disability perspective applied for every implementation.

However, we have seen how other mandatory criteria crucial for preserving or improving the rights of persons with disabilities, such as the prohibition of investment into institutions that segregate persons with disabilities, or – coming back to accessibility- investment into inaccessible infrastructures, as built environment, are still being programmed and executed. Sometimes this is justified with unacceptable excuses. We must make sure that this is not happening as well with the public contracts, and for that we need the support of public institutions and private companies and ICT developers.

2. What is the risk if these digital transformation investments and procurements are not inclusive and of accessible technology?

Well, we can count with two kinds of risks:

Leaving 100 million Europeans behind, not abiding with the UNCRPD. If that's not enough, I don't know what else could it be. Given the paramount situation that the Digital transition brings, being left beside means something more than being unskilled, unemployed. Means, almost, being illiterate, impossible to communicate, to inform oneself, to be socially and economically included. That is a huge risk.

But also, the market loses millions of users, clients. For public services it's mandatory, and reaching the whole population is the only chance to achieve good results for European funded projects – there is no co-funding if result indicators are not optime-. For private entities, it's an opportunity. That little step that accessibility means opens the gate for millions of users worldwide. It's a market opportunity, and we have seen already how adding accessibility to the design of technological and digital advances is profitable. Think about the elderly population, the huge demographic trend that the EU is facing. Accessibility is a must.

3. How are you monitoring or planning to monitor the compliance with accessibility and non-discrimination horizontal principles by national governments?

Mainly through our national members. We analyze the regulations, plans, operational programs for ERDF and ESF+, and we advocate at the same time with the European Institutions, supporting national members to do the same job at country level, with their governments and/or intermediate bodies. Afterwards the job is to open them – national organizations, beneficiaries, persons with disabilities in general- to channel complains whenever this is not fulfilled and gather them to boost our advocacy job at European level. We as well plan European-wide research on the main funded projects, to guarantee their accessibility and, in the end, develop a full report on the achievements, deficiencies and missed opportunities.

But, in general terms, the most important phase is to support.