Accessibility is a human right. It should also be noted that in Articles 20, 21 and 26, the Charter of Fundamental Rights of the European Union, an integral part of the Lisbon Treaty, prohibits any form of discrimination on account of disability and recognises the right of persons with a disability to benefit from specific measures; for its part, the United Nations Convention on the Rights of Persons with Disabilities commits member states to take adequate measures to ensure access for people with disabilities, on an equal basis, to information and communications technologies, including the internet.

**Online open consultation on Internet and Accessibility**

**“Access to Internet for Persons with Disabilities and Specific Needs”**

## **QUESTIONNAIRE**

### **Question 1: Challenges**

**What are the different challenges facing persons with disabilities and specific needs (e.g. lack of ICT skill sets etc.) in accessing and using the Internet?**

Answer to question 1:

* The European programmes and the Bulgarian operational programmes do not take sufficient account of the special needs of people excluded because of disabilities, particularly when it comes to mastering e-skills and digital literacy and gaining a place in the digital work market;
* existence of different types of disabilities, different degrees of disability, multiple disabilities, which may limit or hinder the use of the Internet (for example, a deaf person with low vision can use text instead of audio, but only if the text is of a suitable size or colour);
* existence of people with health problems that affect their endurance, dexterity and concentration (presence of pain, fatigue, etc.) and affect the length or quality of their work on the Internet;
* high costs of hardware, software and peripheral for people with disabilities and specific needs;
* small number of specialized training programs for people with disabilities;
* small number of special schools for children with disabilities.

### **Question 2: Best practices**

**What possible approaches and examples of good practices are available to address these challenges?**

Answer to question 2:

The Ordinance on the Electronic Administrative Services includes requirements and criteria for the levels of accessibility in conformity with those set by the European Commission for the websites of public administrations. In addition, the Ordinance stipulates the conditions for meeting the requirements of current Internet technologies, adhering to the standards of the World Wide Web Consortium - Web Content Accessibility Guidelines 2.0 (WCAG 2.0) and reaching "AA" level of compliance. Website content should be presented in standardized formats in accordance with the WCAG 2.0 requirements. Using formats that are not included in WCAG 2.0 (Flash, PDF, JavaScript, etc.) is permitted only in exceptional circumstances. In these cases, the content must also be available in a standard format. The interfaces of the tools used to create and update content on websites must also comply with the accessibility requirements.

The compliance of each website with these requirements is determined with tests before its publication on the Internet, as well as when changing to the source code of the software product that supports the website.

In order to overcome the barriers for people with disabilities in the online environment it is recommended:

* audio content to be accompanied by text or sign language;
* to use media players that allow captions and sound control;
* to use media players that allow adjustment of the size and colour of the text;
* to provide web services that allow interaction not only through voice;
* to provide sign language translation of relevant information and difficult to read texts;
* to clearly structure content, which facilitates reading and comprehension;
* to number and arrange buttons, forms, etc. logically;
* to use predictable links, functionality and overall performance of the website;
* to use navigation options such as a hierarchical menu or a search function on the website;
* to have the option of disabling flickering, flashing or distracting effects;
* to use a simplified text accompanied by images, graphics and other illustrations.

### **Question 3: Gaps**

**What are the gaps in addressing these challenges and how can these gaps be filled?**

Answer to question 3:

The Bulgarian government, and more specifically the Ministry of Education, is taking serious steps towards developing a more inclusive education. In accordance with the Law on Integration of People with Disabilities, the Ministry of Education and Science provides a supportive environment for the integrated education of children with special educational needs. Children with disabilities are guaranteed a seat in state kindergarten and school admission process. Special attention is being paid to vocational education and training and the inclusion of ICT in them. Accessible ICTs are thus vital for allowing people with disabilities to compete under equal conditions in a growing digital market and be part of the digital society. All schools in the country have internet access, but further serious funding is necessary for upgrading the facilities, training of teachers, converting the educational materials to a digital format and more. The government is also working on increasing the digital literacy, e-skills and digital inclusion of people with disabilities at the post-secondary education stage. Other Bulgarian institutions such as public libraries have successfully developed similar projects with the co-financial support of the relevant European programmes. The Bulgarian government is aware of the importance of public libraries when it comes to education and training in the digital society.

Our country supports the recommendation of European Economic and Social Committee accessibility aspects to be included in all initiatives in the digital field, ensuring that e-learning programmes, ICT, materials and tools (both online and offline) are accessible to people with disabilities and to all vulnerable individuals. Special care should also be taken to include people with disabilities in the new ICT positions which the EU intends to create.

### **Question 4: Role of governments**

**What is the role of governments in addressing these challenges and gaps?**

Answer to question 4:

Bulgarian government has taken steps towards the implementation of appropriate measures to ensure that people with disabilities have access to the digital society and enjoy equal conditions in relation to new technologies.

There is legislation (Law on Integration of People with Disabilities) in the country for the integration of people with disabilities and a Strategy for Ensuring Equal Opportunities for People with Disabilities. The strategic document aims to effectively implement the policies of the Bulgarian government concerning the improvement of the quality of life of disabled people, not allowing discrimination on the grounds of "disability", ensuring equal opportunities, as well as full and active participation in all aspects of public life. Achieving the measures set in the Strategy should eliminate all barriers (psychological, educational, social, cultural, professional, financial and architectural) for the social inclusion and equal integration of people with disabilities.

The strategy was adopted in accordance with the implementation of the recommendations of the Council of Europe, the best practices of Member States, the principles in the UN convention on the rights of persons with disabilities, the UN Standard Rules for the Equalization of Opportunities of Persons with Disabilities, and the UN Children’s rights Convention.

Interdepartmental working groups to the relevant ministries, with the participation of various organizations of people with disabilities, have developed conceptions for changes in the country’s legislation in accordance with the implementation of the articles of the United Nations Convention on the Rights of Persons with Disabilities. Numerous additions and amendments relating to the needs of people with disabilities have been made in a number of legal acts. Once the legal framework was in place the government shifted its focus to the development of specific policies and programs for people with disabilities. An example are the additions to the Public Procurement Act that give priority to companies which consist of at least 20% people with disabilities in the process of selecting a contractor for certain activities, which guarantees employment for the majority of these enterprises.

The Bulgarian government is following the EU recommendations on the accessibility of websites, which along with solving a few other key issues should help ensure equal rights:

- The development of infrastructure that provides access to high speed (broadband) internet for every citizen;

- Opportunities for every citizen to use personal or public devices (hardware);

- Availability of software that is easy to understand for all users, ensuring ease of use, including for people in a situation of social exclusion.

• Access to electronic information for people with disabilities. (E-inclusion).

• Specialized software (eg JAWS for Windows Screen Reading Software).

• The use of standards and technological neutrality. Guidelines for Web Content Accessibility (WCAG 2.0), issued by the World Wide Web Consortium (W3C) - technology-neutral specifications.

One of the requirements for administrative bodies is people with disabilities to be consulted during the development of new standards and new communication and information systems.

At the national level, efforts are being made:

* to provide official information to people with disabilities in accessible formats and technologies that acknowledge the needs arising from different impairments (for example Braille, audio cassettes and easy-to-read versions);
* to organize training and other actions aimed at encouraging the use of information and communication technologies by people with disabilities;
* to ensure the accessibility of e-learning materials for people with disabilities through compliance with existing accessibility standards;
* to take into account the fact that people with disabilities can use sign languages, Braille, and alternative means and modes of communication (including advocacy services), and to apply them in official interactions whenever possible. A person that summarizes the content should be available during meetings and conferences when requested;
* to make communication systems more accessible for people with disabilities through the use of new technologies such as text communication;
* to ensure that authorities and other public bodies make their information and communications accessible to people with disabilities, including their websites, which must comply with the current international accessibility guidelines;
* to encourage all private bodies, particularly those that receive public funding, to make their information and communication channels accessible for persons with disabilities;
* to encourage the development, production and distribution of affordable assistive information and communication aids;
* to encourage compliance with universal design principles when it comes to all new information and communication technology;
* to implement Resolution ResAP (2001) 3 "Towards full citizenship of people with disabilities through inclusive new technologies".

### **Question 5: Contact Details**

Organization you are representing: **Ministry of Transport, Information Technology and Communications**

First/Last Name: **Hristina Dobreva**

Title: **Chief Expert at Information Technology Directorate**

Country: **Bulgaria**