



NETIA product compliance

European Directive 2019/882



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Introduction

This document presents an analysis of the compliance of NETIA solutions with the European directive 2019/882. Firstly, it sets out the key points of the directive that apply to NETIA. This is followed by a detailed analysis of the various NETIA products based on these aspects.

Finally, an overall assessment, including a compliance score and areas for improvement, is proposed to optimise compliance with these directives.

Reminder and key points of the directive:

Here are the paragraphs of the directive relating to NETIA's sector of activity, i.e. computer software for people working in public institutions.

Key paragraphs

The overall objective of the Commission Communication of 6 May 2015 entitled "A strategy for Europe's Digital Single Market" is to deliver sustainable economic and social benefits through a connected Digital Single Market, [...]. It is therefore necessary **to harmonise accessibility requirements in the Digital Single Market and to ensure that all EU citizens, regardless of their abilities, can enjoy its benefits.** *(Page 2 - Paragraph 11)*

The United Nations Committee on the Rights of Persons with Disabilities has identified the **need for a legislative framework that provides concrete, binding and time-bound criteria for monitoring the progressive implementation of accessibility measures.** The Convention calls on its parties to undertake or encourage research and development, and to encourage the provision and use of new technologies - including **information and communication technologies**, mobility aids, devices and assistive technologies - that are appropriate for persons with disabilities. *(Page 2 - Paragraph 13&14)*

Even where a service is wholly or partly outsourced to a third party, its accessibility should not be compromised and **service providers should comply with the obligations of this Directive. Service providers should also ensure that their staff are adequately and continuously trained to ensure that they have a sound knowledge of the use of accessible products and services.** *(Page 3 - Paragraph 20)*

These hardware computing systems are characterised by their multi-purpose nature and their ability to perform, **with appropriate software**, the most common computing operations requested by consumers, and are intended to be used by consumers. **Examples of hardware computing systems are personal computers, including desktops, laptops, smartphones and tablets.** Specialised computers embedded in consumer electronic products do not constitute hardware computer systems for general use by the general public. This Directive should not apply to single components with specific functions, taken separately, such as motherboards or memory chips, which are or could be used in such systems. *(Page 3 - Paragraph 25)*

For the purposes of this Directive, access to audiovisual media services should mean that **services providing access to audiovisual content are accessible, as well as mechanisms enabling users who are persons with disabilities to use their assistive technologies. Services providing access to audiovisual media services could include websites, online applications**, applications embedded in set-top boxes, **downloadable applications, [...].** *(Page 4 - Paragraph 31)*

The four principles of accessibility for websites and mobile applications, as set out in Directive (EU) 2016/2102, are:

- **Perceptibility: in other** words, the information and components of user interfaces must be presented to users in such a way that they perceive them.
- **Operability:** i.e. the user interface components and navigation must be usable.
- **Comprehensibility: in other** words, the information and use of user interfaces must be understandable.
- **Robustness:** i.e. the content must be robust enough to be reliably interpreted by a wide variety of user agents, including assistive technologies. These principles also apply to this Directive.

(Page 7 - Paragraph 47)

The obligations of this Directive should apply equally to public **and private** sector economic operators. *(Page 8 - Paragraph 57)*

All economic operators should act responsibly and in full compliance with applicable legal requirements when placing products on the market or making them available on the market, or when providing services on the market. *(Page 10 - Paragraph 73)*

For **the conformity assessment of products**, this Directive should use **the internal control procedure** [...], insofar as it enables economic operators to demonstrate, and competent authorities to ensure, that products made available on the market **comply with accessibility requirements, without imposing an undue burden on them.** *(Page 11 - Paragraph 79)*

Member States should monitor whether services comply with the obligations of this Directive and follow up complaints or reports of non-compliance to ensure that corrective action has been taken. *(Page 11 - Paragraph 55)*

Directives 2014/24/EU and 2014/25/EU of the European Parliament and of the Council on public procurement **establish procedures for invitations to tender and design contests for certain works, supplies and services. They specify that, for all contracts for products or services intended for people, whether the general public or the staff of the public entity, the technical specifications must, unless there are justified exceptions, take account of accessibility for people with disabilities or universal design.** Furthermore, if accessibility requirements have been established by Union law, the technical specifications must be based on these standards *(Page 12 - Paragraph 90).*

Member States should ensure that **adequate and effective means exist to ensure compliance with this Directive** and should therefore put in place **appropriate control mechanisms**, such as ex-post controls by market surveillance authorities, in order to verify that the exemption from the application of accessibility requirements is justified. *(Page 13 - Paragraph 95)*

Sanctions should be appropriate to the nature of the infringements and the circumstances so that they do not replace compliance by economic operators with their obligations to make their products or services accessible. *(Page 13 - Paragraph 98)*

In order to give service providers **sufficient time to adapt to the requirements of this Directive**, it is necessary to provide for a transitional period of **five years after the date of application of this Directive (2020)**, during which products used for the provision of a service which have been placed on the market before that date need not comply with the accessibility requirements of this Directive, unless they are replaced by service providers during the transitional period. *(Page 13 - Paragraph 101)*

This Directive shall apply to the following products placed on the market after 28 June 2025: [...] **services providing access to audiovisual media services**; *(Page 14 - Article 2)*

Some definitions set out in the directive:

"Persons with disabilities" means persons with a long-term physical, mental, intellectual or sensory impairment whose interaction with various barriers may hinder their full and effective participation in society on an equal basis with others; *(Page 15 - number 1)*

"Economic operator" means the manufacturer, authorised representative, importer, distributor or service provider; *(Page 16 - Number 21)*

"Small and medium-sized enterprises" or "SMEs" means enterprises with fewer than 250 employees and an annual turnover not exceeding EUR 50,000,000 or an annual balance sheet total not exceeding EUR 43,000,000, excluding micro-enterprises; *(Page 16 - number 24)*

"Operating System" : software that, inter alia, manages the interface to peripheral hardware, schedules tasks, allocates storage space and presents a default interface to the user when no application program is running, including a graphical user interface, whether such software is an integral part of computer hardware for general use by the general public or is stand-alone software intended to run on computer hardware for general use by the general public, but does not include operating system loaders, basic input/output systems or other firmware required at boot time or during installation of the operating system; *(Page 18 - Issue 38)*

"Interactive computing capability" means a functionality that facilitates interaction between the user and the device that enables the processing and transmission of data, voice or video or any combination thereof; *(Page 18 - Issue 40)*

Obligations of service providers

Service providers shall draw up the necessary information in accordance with Annex V and **explain how the services meet the applicable accessibility requirements. The information shall be made available to the public** in written and oral form, including in a manner accessible to disabled persons. **Service providers shall keep this information for as long as the service is available.**

(Page 22 - Article 13 - Number 2)

Where the service does not comply, service providers shall **take the necessary corrective measures to bring it into conformity with the applicable accessibility requirements.** In addition, where the service does not comply with the applicable accessibility requirements, **service providers shall immediately inform the competent national authorities of the Member States in which they provide the service,** giving details, in particular, of the non-compliance and of any corrective measures taken. *(Page 22 - Article 13 - Number 4)*

Economic operators shall carry out **an assessment to determine whether compliance with the accessibility requirements referred to** in Article 4 would introduce a fundamental change or, on the basis of the relevant criteria set out in Annex VI, impose a disproportionate burden, in accordance with paragraph 1 of this Article. *(Page 22 - Article 14 - Number 2)*

Economic operators shall provide **evidence to support the assessment referred to** in paragraph 2. **Economic operators shall keep all relevant results for a period of five years from the date on which a product was last made available on the market** or a service was last provided, as the case may be. At the request of the market surveillance authorities or the authorities responsible for monitoring the conformity of services, as the case may be, economic operators shall provide them with a copy of the assessment referred to in paragraph 2. *(Page 23 - Article 14 - Number 3)*

Possible sanctions / assessment procedure

Member States shall lay down the rules on penalties applicable to infringements of the national provisions adopted pursuant to this Directive and shall take all measures necessary to ensure that they are implemented. *(Page 28 - Article 30 - Number 1)*

Internal production control is the conformity assessment procedure whereby the manufacturer fulfils the obligations laid down in points 2, 3 and 4 of this Annex **and ensures and declares on his sole responsibility that the products concerned satisfy the applicable requirements of this Directive.**

The **technical documentation shall be drawn up by the manufacturer.** It shall make it possible to **assess the conformity of the product with the accessibility requirements** referred to in Article 4 and, where the manufacturer has relied on Article 14, to demonstrate that conformity with the accessibility requirements would introduce a fundamental change or impose a disproportionate burden. **The technical documentation shall specify only the applicable requirements and shall cover, to the extent necessary for assessment, the design, manufacture and operation of the product.**

Where appropriate, the technical documentation includes at least the following elements:

- **a general description of the product**
- **a list of the harmonised standards and technical specifications** the references of which have been published in the *Official Journal of the European Union* and **which have been applied in full or in part**, together with a description of the solutions adopted to meet the accessibility requirements referred to in Article 4 where these harmonised standards or technical specifications have not been applied. **In the event of partial application of harmonised standards or technical specifications, the technical documentation shall specify which parts have been applied**

Accessibility requirements :

Directive	RA	RAO
Compatibility with assistive technologies		
Software must be compatible with assistive technologies commonly used by people with disabilities, such as screen readers, alternative pointing devices or Braille keyboards.	Screen reading for the visually impaired	Screen reading for the visually impaired
Navigation and user interface		
Software must offer easy and intuitive navigation, including via keyboard shortcuts, voice commands or other alternative means.	A set of keyboard shortcuts implemented in the various modules	Not carried out
User interface elements must be easy to identify, manipulate and understand	The layout of the application, with its two adjustable panels, makes it easy to organise data and tools. All buttons have an icon and/or text.	The layout of the application, with its two adjustable panels, makes it easy to organise data and tools. All buttons have an icon and/or text.
Software must allow access to functions and information by different means (visual, auditory, tactile).	Visual: yes Auditory: compatible with JAWS and NVDA Tactile: not optimal	Visual: yes Auditory: compatible with JAWS and NVDA Tactile: not optimal
Where the product or service requires manual actions, it shall provide at least one mode of use enabling users to use the product by means of other actions not requiring control based on fine motor skills, manipulation or manual force, or the use of more than one control at the same time.	Most functions can be accessed via keyboard shortcuts or context-sensitive buttons and menus. RadioAssist is compatible with the use of specific boxes such as StreamDeck from Elgato to simplify keyboard shortcuts.	The functions can be accessed via a button and/or context menu.

Where the product or service has a manual mode of use, it provides at least one mode of use enabling users with a limited range of movement and strength to use the product.	Most functions can be accessed via keyboard shortcuts or contextual buttons/menus. RadioAssist is compatible with specific devices such as StreamDeck from Elgato, which simplifies keyboard shortcuts.	The functions can be accessed via a button and/or context menu.
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Presentation of information		
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The text must be legible and adjustable in terms of size and colour, without the user losing any information or functionality.	The texts are written in 8 or 10. The font is configurable. The colours and size can be configured in the FEDERALL tab.	The size can be changed using the browser's zoom function. The texts are at least in 12
Visually displayed information must be provided audibly or tactilely for people with visual impairments.	Screen reading possible using JAWS and NVDA tools	Some of the interface elements can be read using the JAWS and NVDA tools
Visually displayed information must also be accessible to users with colour perception difficulties.	Only available in FEDERALL	Not carried out
Conversely, auditory information must be provided visually or by other alternative means for people with hearing impairments.	Access to audio content via audio transcription. All notifications are visual (window, colour display, etc.).	Access to audio content via audio transcription. All notifications are visual (window, colour display, icon, etc.).

Response time and interaction		
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Software must allow users to extend response or interaction times when these are limited by the system.	No response time required	No response time required
Indications must be provided to users when actions require a reaction or confirmation	Performed for major actions with a confirmation modal (example: confirmation for the deletion of one or more items)	Performed for major actions with a confirmation modal (example: confirmation for the deletion of one or more items)

Alternatives for non-text content		
Images, graphics, sound or other non-text content must be accompanied by a text description or an alternative accessible via assistive devices.	Audio content can be transcribed	Audio content can be transcribed
Access to assistance services		
Software must provide access to assistance services, either via integrated interfaces or via links to accessible external services, such as call centers that support interaction by text, voice or video with sign language interpretation.	Using the JIRA help desk service	Using the JIRA help desk service

Updating and maintenance		
Software updates must be designed in such a way as not to introduce additional barriers to accessibility. Any new version must maintain or improve the level of accessibility.	An "Accessibility" test plan for the major tools is carried out on a regular basis during updates and upgrades.	Not carried out.
Information on the compatibility of updates with assistive technologies must be provided	The information is contained in this document and in the release	The information contained in this document
Instructions concerning the installation, maintenance, storage and disposal of the product which are not provided on the product itself, but are available by other means such as a website, shall be made available to the public when the product is placed on the market.	System documentation: documentation can be accessed via file-sharing sites	System documentation: documentation can be accessed via file-sharing sites

<p>Installation instructions are available on several channels, presented in an understandable way, in an appropriate font and size with sufficient contrast.</p>	<p>PDF document compatible with assistive technologies. The documentations are illustrated by numerous visuals / screenshots that are easy to read.</p>	<p>PDF document compatible with assistive technologies. The documentations are illustrated by numerous visuals / screenshots that are easy to read.</p>
<p>Documentation and instructions</p>		
<p>All documentation, whether in digital or printed format, must be available in accessible formats, including Braille, enlarged text or digital versions compatible with assistive technologies.</p>	<p>PDF document compatible with assistive technologies. The documentations are illustrated by numerous visuals / screenshots that are easy to read.</p>	<p>PDF document compatible with assistive technologies. The documentations are illustrated by numerous visuals / screenshots that are easy to read.</p>
<p>Instructions for use must be clear and comprehensible to all users, including those with cognitive or sensory limitations.</p>	<p>The documentation is clear and includes visuals to make it easier to understand</p>	<p>The documentation is clear and includes visuals to make it easier to understand</p>
<p>The information is available through several sensory channels, presented in a way that easy to understand and perceive.</p>	<p>The documentation is compatible with assistive reading applications.</p>	<p>The documentation is compatible with assistive reanding applications.</p>
<p>The Information is presented using a font of a size and shape appropriate to the foreseeable conditions of use, with sufficient contrast, and with adjustable space between letters, lines and paragraphs.</p>	<p>The documents use the "Segoe UI" font in 11</p>	<p>The documents use the "Segoe UI" font in 11</p>
<p>The information includes a description of the product's user interface (handling, control and feedback, input-output).</p>	<p>Content in the user documentation</p>	<p>Content in the user documentation</p>
<p>When the product uses colours to convey information, indicate an action, request a response or signal elements, an alternative solution to colour is proposed</p>	<p>Some of the information displayed in colour is accompanied by a specific icon or text.</p>	<p>Some of the information displayed in colour is accompanied by a specific icon or text.</p>
<p>When the product uses sound, a volume and speed control function is provided, as well as advanced audio features,</p>	<p>The product does not use sound for documentation and instruction.</p>	<p>The product does not use sound for documentation and instruction.</p>

including interference reduction from nearby products and clarity of hearing.		
Concrete examples given		
Use the same terms consistently, or in a clear and logical structure, so that people with intellectual disabilities can better understand the information.	Implemented, use of a specific business vocabulary. The vocabulary is consistent between applications.	Implemented, use of a specific business vocabulary. The vocabulary is consistent between applications.
Ensure that the text can be read by visually impaired people.	Only available in one application module (FEDERALL)	The font size is set to suit requirements and the browser's zoom function can be used to change the size of the text.
Provide electronic files that can be read by a computer using screen-reading software so that blind people can use the information.	Our files are in PDF format	Our files are in PDF format
Enable users to enlarge text, zoom in on a specific pictogram	Not carried out	Browser zoom function

or enhance contrast, so that visually impaired people can perceive the information.		
As well as giving the option of pressing the green or red button to select an option, the options are written on the buttons, so that colour-blind people can make their choice.	Partially completed	Partially completed
When a computer emits an error signal, display a text or image indicating the error, so that deaf people know that an error is occurring.	Directed	Directed

<p>Make the buttons on the touch screen larger and separate them, so that people with tremor can press them.</p>	<p>Application not suitable for touch use</p>	<p>Application not suitable for touch use</p>
<p>Ensuring that the software reacts in a predictable way when a certain action is performed and leaving enough time to enter a password, so that the product is easy to use for people with mental disabilities.</p>	<p>Directed</p>	<p>Directed</p>
<p>Provide text descriptions of images, make all functionalities accessible from a keyboard, allow users sufficient time to read messages, make content appear and function in a predictable way, and ensure compatibility with assistive technologies, so that people with various disabilities can consult and interact with a website.</p>	<p>Partially completed</p>	<p>Partially completed</p>
<p>Provide the ability to select, personalise and display access services such as subtitling for the deaf or hard of hearing, audio description, audio subtitling and sign language interpretation, by providing means for effective wireless connection to hearing technologies or by providing the user with controls to activate</p>	<p>Not carried out</p>	<p>Not carried out</p>
<p>access services for audiovisual media services at the same level as primary controls.</p>		
<p>Ensuring that a person with dyslexia can read and hear the text at the same time</p>	<p>Not carried out</p>	<p>Not carried out</p>

Ensure that the information available on a product's accessibility features is not deleted.	Completed, dedicated test plan	Completed, dedicated test plan
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Analysis summary

Subjective rating

There are a total of 37 comparison criteria:

	RadioAssist	RadioAssistOnline
ACTUAL ELEMENT	22	19
SEMI-REALIZED ELEMENT	9	10
UNREALIZED ELEMENT	6	8
SCORE*	26.5/37	24/37

* SCORE = 1 point per element achieved + 0.5 per element partially achieved

These results show semi-compliant accessibility

Areas for improvement

THEME	RA	RAO
Compatibility with assistive technologies	More detail in the items read by the JAWS and NVDA screen reader.	More detail in the items read by the JAWS and NVDA screen reader. Have all the interface elements readable by screen readers
Navigation and user interface	Make all keyboard shortcuts visible (Tooltip, documentation, etc.) Text size can be configured in the interface	Make all keyboard shortcuts visible (Tooltip, documentation, etc.) Text size can be configured in the interface Improving interface adaptability when zooming the browser/screen size
Presentation of information	Work on user preferences for tools other than FederAll (size, font, colour, etc.)	Further develop the application's global user settings (size, font, colour, etc.) Develop screen reading via a wizard for all CAD tools and elements

<p>Alternative for non-text content</p>	<p>Suggest the possibility of adding a written description for all images (particularly index card covers) that would be read by the screen reader for the visually impaired.</p>	<p>Suggest the possibility of adding a written description for all images (particularly index card covers) that would be read by the screen reader for the visually impaired.</p>
<p>Updating and maintenance</p>	<p>Improving the accessibility test plan to cover the entire software package</p>	<p>Draw up an "Accessibility" test plan to ensure that the functionalities enabling accessibility are improved or not regressed.</p>
<p>Documentation and instructions</p>	<p>The Segoe UI font is legible and suitable for reading on screen, but font 11 is a little small (12 or even 14 is recommended). Make sure that all the information associated with a colour also has a specific text or icon to distinguish it.</p>	<p>The Segoe UI font is legible and suitable for reading on screen, but font 11 is a little small (12 or even 14 is recommended). Make sure that all the information associated with a colour also has a specific text or icon to distinguish it.</p>
<p>Concrete examples given</p>	<p>Ensuring that the entire RadioAssist suite is easy to read for people with visual impairments (partially sighted, colour blind, severe sight problems, etc.). Improve interface customisation for different users (text size, letter spacing, choice of typeface, etc.)</p>	<p>Ensuring that the entire RadioAssistOnline suite is easy to read for people with visual impairments (partially sighted, colour blind, severe sight problems, etc.). Improve interface customisation for different users (text size, letter spacing, choice of typeface, etc.)</p>

Recommended technology

NETIA tests this software using various screen readers. [NVDA](#) and [JAWS](#) are compatible with RadioAssist and RadioAssist Online applications. A number of customers have chosen JAWS for its ease of programming, which makes the tools even more accessible.

NETIA applications are also compatible with physical interfaces such as Elgato's StreamDeck to simplify the use of RadioAssist.