

Regulatory environment for platforms, online intermediaries, data and cloud computing and the collaborative economy (EN)

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Is your organisation registered in the Transparency Register of the European Commission and the European Parliament?

Note: If you are not answering this questionnaire as an individual, please register in the Transparency Register. If your organisation/institution responds without being registered, the Commission will consider its input as that of an individual and will publish it as such.

xYes

- No
- Non-applicable

Please indicate your organisation's registration number in the Transparency Register

Our Interest Representative Register ID is 42378755934-87

I object the publication of my personal data

- Yes

xNo

Please provide a brief justification.

Have you encountered, or are you aware of problems faced by consumers or suppliers when dealing with online platforms?

"Consumer" is any natural person using an online platform for purposes outside the person's trade, business, craft or profession. "Supplier" is any trader or non-professional individual that uses online platforms to provide services to third parties both under their own brand (name) and under the platform's brand.

xYes



No



I don't know

Please list the problems you encountered, or you are aware of, in the order of importance and provide additional explanation where possible.

The continuing inaccessibility to many blind and partially sighted people of these platforms is an ongoing problem. We have given some examples, below. However, these are only illustrative. It is impossible, really, to list them in order of importance, as they are all important when the user needs them. Web and other accessibility guidelines exist, such as the WCAG guidelines, but these are too often ignored, giving rise to the problems we outline below.

E-Learning and E-Assessment Platforms:

E-Assessment is now a standard way of carrying out tests for students throughout the education system. In general, assessment platforms are tied down in such a way as to prohibit information from being obtained from outside the system (often the pc or laptop is in "kiosk mode" meaning screen-reading technology and any other intervention is seen as an intrusion.) To our knowledge there is not one educational assessment system that is accessible other than the ECDL platform, which is quite specific.

Regarding E-Learning, again, there is a serious lack of accessible systems. Often these platforms carry content that is inaccessible, or have screen-based information that is delivered graphically.

Kiosk-based Platforms:

These are machines that are delivering on-line information with a specific purpose. This could be anything from check-in systems through to health service, ticket purchasing, payment or transaction systems, and so on.

Although these kiosks are often closed systems, they are tied in to on-line and often real-time booking or purchasing engines. Ticket vending, or any other type of transactional or patient information system, and systems that allow access to services or product, all fall into this category.

Some work has been done on the accessibility of these sorts of platforms, such as in the area of ATMs, and the companies behind these are aware of the challenges of accessibility. However, progress has been very slow.

Web-based delivery:

We are all too aware of government and other consumer-facing websites being inaccessible, often because of failure to deploy well-known accessibility mechanisms at the time of building, or because inaccessible templates are used for the delivery of sites. (These are off-the-shelf, drag-and-drop styles of building websites which have underlying code that cannot be adjusted).

Additionally, again, the information on these sites is often inaccessible, particularly either where image-based information is delivered with no alternative descriptor, or where inaccessible documents need to be downloaded (These are often PDF, but not always).

WCAG guidelines should be followed closely to achieve accessibility.

Touchscreen- based terminals:

These often appear in all kinds of environments from airports and on aircraft through to service provision such as post office services, banks, etc. Today, the platforms underlying these systems could be made accessible but they very rarely are.

Design for All/Universal Design principles should be followed to ensure accessibility. Apple's products are generally-speaking a good example of such an approach in the context of IT.

Apps:

Many blind and partially sighted people who use online platforms prefer the app version because in most cases these are more accessible than the website version. However in most cases apps have a lower functionality, i.e. not all the options on the platform are available. In other cases an option available on the app cannot be switched off. This is the case for the Facebook app, for instance.

Online forms:

Forms on the web are becoming more and more a challenge to make accessible.

This is because developers overlook the basic tools which exist, which could easily be made accessible, such as a select box, a checkbox and a radio button. These tools lend themselves to good interaction with the browser, the text-to-speech screenreader and the end user.

These days, the visual aesthetic of a website seems to be more important today than the functionality. This often gives rise to a working approach whereby the look of a form is designed first, and then the

work with Javascript begins to match that visual concept. Since screenreaders do not "understand" the custom controls used in such cases, the developer then finds him or herself having to do many extra things to make the form/ website work for keyboard and screenreader users. This is very complex work and often incorrectly done, leading to a lot of confusion and frustration for the user. Such problems are avoidable where the starting point is well known existing concepts in HTML.

A blind user's experience of two websites:

Booking.com is a website that I like a lot but their price table is too complex, so that I am never sure which price includes breakfast or cancellation fee.

Most of these sites are interactive and include forms which are often inaccessible. There will often be a filter mechanism in the shape of an inaccessible form.

Blind and partially sighted people are generally more motivated to learn to work with a site like Facebook (because they so want to be part of it). They are not willing to spend the same amount of time on learning to find their way through the tax declaration website which they use once per year and which is a less fascinating activity!

How could these problems be best addressed?

- market dynamics
- regulatory measures
- self-regulatory measures

X a combination of the above

TRANSPARENCY OF ONLINE PLATFORMS

e) is there any additional information that, in your opinion, online platforms should be obliged to display?

Yes. These platforms should provide accessibility-related information, i.e. how the given platform has been made accessible to disabled people, including, of course, blind and partially sighted people. Also, the platform should supply an obvious name/ contact person for users

to contact if they have a problem with a platform's inaccessibility/
question about accessibility.

ACCESS TO DATA

As a trader or a consumer using the services of online platforms did you experience any of the following problems related to the access of data?

d) discriminatory treatment in accessing data on the platform

X Yes

Please share your general comments or ideas regarding access to data on online platforms

We experience these problems as consumers / users, in so far as many platforms are still inaccessible or only partly accessible to blind and partially sighted people, as explained in more detail above.