

UPowerWAD

MODEL CURRICULUM



How to teach people with disabilities to provide actionable feedback on web accessibility issues



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PROJECT

UPowerWAD: Involving, empowering, and training end users with disabilities to fully participate in the Web Accessibility Directive objectives.

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Model curriculum to set up vocational education and training courses on how to train people with disabilities to provide relevant and actionable feedback on web accessibility issues.

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Abbreviations

Abbreviation	Meaning
AS	Accessibility Statement
EU	European Union
PSB	Public Sector Body
UDL	Universal Design for Learning
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
WAD	Web Accessibility Directive
WAI	Web Accessibility Initiative by the World Wide Web Consortium (W3C)

Key documents

Web Accessibility Directive (WAD): Directive 2016/2102 on the accessibility of the websites and mobile applications of public sector bodies in the European Union (EU). Full text of the Directive is available in all EU languages.

European Standard EN 301 549: Harmonised European Standard on accessibility requirements for Information and Communication Technologies (ICT) products and services. Annex A contains the technical requirements for presumed conformance to the Web Accessibility Directive.

United Nations Convention on the Rights of Persons with Disabilities (UNCRPD): All Member States of the EU, and also the European Union itself have ratified the UNCRPD and therefore committed themselves to taking appropriate measures to ensure access for persons with disabilities.

Methodological Toolkit: The UPowerWAD Consortium provided a document on how to capture and categorise feedback from users in the context of web accessibility.

Interactive Repository: The UPowerWAD Consortium provided a document with best practices on how to give structured feedback regarding web accessibility issues.

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Introduction

The Web Accessibility Directive ensures the right for end-users to provide feedback on existing barriers on websites of public institutions. However, end-users are often not aware of this right and/or do not know how to use the existing feedback mechanisms. This model curriculum aims to empower end-users to provide actionable feedback on existing barriers.

The model curriculum provides teaching modules on actionable web accessibility feedback. The modules cover relevant aspects to empower users with disabilities to support public sector bodies (PSBs) by providing structured and actionable feedback on accessibility problems.

The training modules can be applied to heterogeneous groups and used for the development of user group specific training programmes.

To support the intended learning outcomes, the model curriculum is practice oriented. The proposed teaching methodology is based on established educational techniques. Information on Educators competences can be found in the [European Framework for the Digital Competence of Educators](#).

The content and the quality of the curriculum was developed with continuous assessment within the project, using different scientific methods. This included surveys with end-users and professionals from PSBs, interviews with end-users with disabilities, webinars and workshops.

Even though the curriculum will refer only to websites, the content of this curriculum covers both websites and mobile applications, as this is the scope of the Web Accessibility Directive.

Audience

The target group of this model curriculum are Vocational Education and Training providers across EU Member States and Organisations of Persons with Disabilities interested in providing training courses for their members as well as the general public.

Description

The Web Accessibility Directive (WAD) ensures the right for end users to give feedback on accessibility issues. To facilitate this, PSBs must set up a feedback mechanism for their websites. This is based on the right of persons with disabilities to express their opinion as set in Article 21 of the [United Nations Convention on the Rights of Persons with Disabilities \(UNCRPD\)](#).

The EU Member States' monitoring reports at the end of 2021 have shown that since the implementation of the WAD, there has been almost no feedback from users on existing accessibility issues on PSBs' websites (See the [Executive Summary of the evaluation of the WAD's application](#)).

The main objective of the UPowerWAD project is to raise awareness, empower and train people with disabilities to take an active participation in the implementation and the enforcement of the WAD. This will leverage the knowledge of people with disabilities in improving the accessibility of public sector websites and mobile applications and provide them with the opportunity to be an active and essential part of the digital community. Apart from supporting PSBs in becoming more accessible, users trained on web accessibility will also have better possibilities to participate in society, better access to higher levels of education and better preparation for employability opportunities.

This curriculum is based on the results already developed in the project:

A methodological toolkit on how to capture and categorise feedback from users in the context of web accessibility:

➤ [UPowerWAD methodological toolkit](#)

An interactive repository of best practices on structuring and reporting web accessibility issues:

➤ [UPowerWAD interactive repository](#)

Together, both results cover relevant aspects from the user's viewpoint and provide relevant information for PSBs.

Accessible Training

When organising a training course, accessibility should always be considered.

The teaching methodologies provided by Universal Design for Learning (UDL) respect the needs and abilities of all learners and remove unnecessary obstacles in the learning process. It creates a flexible learning experience, where information is offered in various ways.

UDL facilitates the creation of an inclusive environment in a classroom where learners feel that they are respected, encouraged and valued. The core notion in UDL is that barriers to learning are in the environment's design, not in the learners themselves. If these barriers are removed, the learning outcomes will be maximised for a broad range of learners.

- ▶▶ [Getting started with UDL \(Understood for All, PDF, 73,7 KB\)](#)
- ▶▶ [The UDL Guidelines \(Cast\)](#)

Instructors can find additional information on how to ensure accessibility and adaptation to the specific requirements of persons with disabilities via the following links:

- ▶▶ [Manual for trainers \(ENTELIS+ project, PDF, 10,9 MB\)](#)
- ▶▶ [Guidelines for Accessible Information \(European Agency for Special Needs and Inclusive Education\)](#)
- ▶▶ [Information on Developing Web Accessibility Presentations and Training \(WAI\)](#)
- ▶▶ [Guidelines for teachers for conducting online-only courses \(Certified Digital Accessibility Training project, PDF, 518 KB\)](#)
- ▶▶ [How to Make Your Presentations and Meetings Accessible to All \(World Wide Web Consortium\)](#)
- ▶▶ [Repository of Accessible Digital Tools and Resources \(European Association of Service providers for Persons with Disabilities\)](#)
- ▶▶ [Catalog of Accessible Content, Platforms & Tools \(UNICEF\)](#)

Furthermore, adhering to web accessibility requirements while developing a course will benefit all students, including those with visual, hearing, mobility, and cognitive disabilities.

How to use the curriculum

The suggested usage for this curriculum ranges from using the modules together in a singular workshop to a longer and more detailed training course. The content should be adjusted to the actual target group's needs, knowledge and interest (learner-centred approach). The curriculum can be used either in online or on-site training or in a combination of those.

Below, instructors can find an example on how to design a singular workshop as well as a more detailed training package based on this curriculum.

Instructors should allocate sufficient time for interactive and engaging learning activities, practical exercises, allow for sufficient reflection and evaluation and use established educational techniques like brainstorming, focus groups, etc. The learning activities must take into account the needs and abilities of all participants.

Example 1: Singular workshop

The curriculum and its content can be used in a singular workshop (90 minutes training), to raise awareness and to provide an introduction and an overview to the subject of actionable accessibility feedback.

Introduction (10min)

- Share the learning objectives for the workshop.
- Encourage the audience to participate and share their experience

Part 1: The Web Accessibility Directive (10min)

- Outline the necessity of web accessibility.
- Provide an overview of the WAD and its requirements for PSB websites and mobile applications.
- Explain the feedback mechanism outlined in the directive and how it can be used to report accessibility issues.

Part 2: Actionable Feedback (20min)

- Introduce the concept of actionable feedback and explain its importance in the context of web accessibility in compliance with the WAD.
- Show examples of different feedback channels and talk about how they can meet the different user needs.
- Discuss the students' views on these feedback channels (pro/contra).
- Present the requirements and components of actionable feedback.

Part 3: Practice on Giving Actionable Feedback (40min):

- Discuss accessibility issues of a (sample) website and/or mobile application.
- Work in groups: each group practices giving feedback.
- Discuss the groups' work.

Conclusion (10min):

- Summarise the key points of the workshop, including the requirements of the WAD and the principles of actionable feedback.
- Provide additional resources for participants who want to learn more about the directive and providing actionable feedback.

Example 2: Detailed training course

The curriculum and its content can be used for a detailed training course (e.g., 8-15 units, 60-90 minutes per unit), aiming to reach an in depth understanding of the feedback on web accessibility, with emphasis on both theoretical, and practical knowledge transfer.

Unit 1: Introduction

- Allow participants to share their experience and their user needs.
- Share the agenda and the learning objectives for the training.
- Discuss expectations, wishes, needs, and interests.
- Assess the knowledge of your training group on web accessibility and actionable feedback and their accessibility needs.

Unit 2: Web Accessibility – Overview

- Outline the necessity of web accessibility.
- Incorporate real-world examples of accessibility issues: show participants concrete examples of websites and discuss their experience and the challenges they face.

Unit 3: Specific User Needs

- Give students the time to try websites and mobile applications, discuss the accessibility issues the students found and how they relate to different user needs.
- Instruct the student group(s) to prepare presentations of life situations and experiences of poor accessibility.
- Discuss accessibility needs related to various disabilities.

Unit 4: The Web Accessibility Directive

- Provide an overview of the WAD and the requirements for public sector websites and mobile applications.
- Explain the feedback mechanism and how it can be used to report accessibility issues.
- Present real-life examples on national/regional adaptations of the feedback mechanism to the training group.

Unit 5: User Feedback

- Assess the knowledge, experiences, and opinions on feedback of your participants.
- Discuss the importance of end-user involvement.
- Encourage reflection on how feedback can drive positive change and improve outcomes. Support your training with real-life examples.

Unit 6: Feedback on Accessibility: Challenges & Solutions

- Present and discuss challenges regarding giving feedback on accessibility.
- Break the group into pairs/small groups and assign each group one challenge.
- Each group prepares a presentation on how to overcome this challenge.

Unit 7: Feedback Mechanism – Deep Dive

- Provide an overview of the different types of feedback mechanisms and how they relate to different user needs.
- Instruct the training group to prepare presentations on different feedback mechanisms, considering also how they can meet user needs.
- Discuss different opinions on these feedback channels (pro/contra).
- Present and discuss best practices.

Unit 8: Giving Actionable Feedback

- Introduce the concept of actionable feedback and explain its importance in the context of web accessibility in compliance with the WAD.
- Present and explain the components of actionable feedback.
- Present actionable feedback preferences (e.g., style).
- Demonstrate how to give actionable feedback.
- Provide an overview of the follow-up possibilities and the enforcement procedure.

Unit 9: Practice on Giving Actionable Feedback

- Practise with the participants providing feedback on accessibility issues on real PSB websites (and possibly on mobile applications)
- Follow-up with group discussions and provide feedback to the students.
- Students send finalised feedback to the PSB. Discuss response received from the PSB – somewhen during the course, if timing allows.

Unit 10: Summary & Conclusion

- Recap the key points of the training, including the necessity of web accessibility, the requirements of the WAD and the principles of actionable feedback.
- Provide additional resources for participants who want to learn more about the directive and providing actionable feedback.

Content Overview

This resource is divided into three modules addressing the basic knowledge on actionable feedback on accessibility for PSBs websites in the context of the WAD. These modules are designed to be used flexibly in order to allow for adjusting to a wide range of end users.

Module 1: Web Accessibility ➞ page 17

- Overview ➞ page 18
- The Web Accessibility Directive ➞ page 20

Module 1 contains materials to support the training on web accessibility. This section focuses on the knowledge on web accessibility as well as discussing the implementation of the WAD. This knowledge is useful and may facilitate communication with website owners, but actionable feedback on accessibility issues has to do with the lived user experience and not web accessibility expertise. Users should be able to give actionable feedback even without knowledge about web accessibility. This module is only relevant if the topic is new to the participants or to make sure that the group has a similar understanding of the topic.

Module 2: Understanding Feedback ➞ page 24

- The Importance of User Feedback ➞ page 25
- Discussing Feedback on Accessibility ➞ page 26
- Feedback Mechanism: Channel & Location ➞ page 28

Module 2 addresses the importance of user feedback, focusing on the challenges when reporting accessibility issues or requesting information in an alternative format, as well as on getting to know the feedback channels.

Module 3: Actionable Feedback → page 32

- Actionable Feedback Content → page 33
- Essential and more detailed feedback → page 34
- Follow-Up Process → page 36

Module 3 provides an overview on necessary basic information for actionable feedback. This module will focus on discussing components needed for the feedback to be actionable, and how to describe the barriers the user faced.

Each module contains the following components:


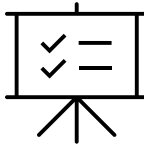
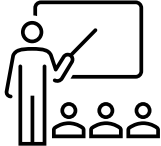
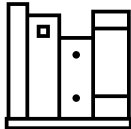
 Expected Learning Outcomes¹	 Units, Suggested Content & Assessment
 Suggested Methods	 Relevant Resources

Figure 1. Components

¹ The expected learning outcomes are related to the [European Qualifications Framework \(EQF\)](#)

Module 1: Web Accessibility

“Web accessibility allows everyone, including people with disabilities, to perceive, understand, navigate and interact with the Internet” ([Web Accessibility, European Commission](#))

The Web is an increasingly important resource in many aspects of life today. Therefore, it is necessary that it is designed to work for all people. Web accessibility means that web content and functionality are properly coded, designed and published, so that people with disabilities can use them.

The WAD has been in force since 2016 and it was adopted with the goal to harmonise accessibility requirements across the EU, to support the internal market as well as to ensure better access to websites and mobile apps of public services for people with disabilities. The directive was part of the European Commission's work to build a social and inclusive "Union of Equality". The enforcement of WAD involves three groups of stakeholders:



Public sector bodies: need to publish and regularly update an **accessibility statement** for each website and mobile app, including a **feedback mechanism**.



End users: have **the right to provide feedback** to point out accessibility issues or request content that is not accessible in an alternative format.



Member States: need to **regularly monitor the accessibility** of public sector websites and **report the results** to the European Commission.

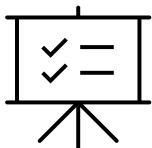
Prerequisites

- **Students:** Should have experience with using the web.
- **Instructors:** Should have in-depth knowledge about the WAD, web accessibility concepts and terminology and understanding of how people with disabilities use the web.



Expected Learning Outcomes

Knowledge	Skills	Autonomy
Students understand what web accessibility means to different user groups.	Students are able to recognise accessibility issues they perceive when using websites and mobile applications.	Students are empowered and motivated to act on accessibility issues.



Units, Suggested Content & Assessment

Overview

According to the UNCRPD, to enable people with disabilities “to live independently and participate fully in all aspects of life” it is necessary to ensure access “on an equal basis with others to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public” ([UNCRPD Article 9: Accessibility](#)). Therefore, the accessibility of information and communications technologies, including web accessibility, is not only just an issue of technical standards, web

architecture and design, but a right for persons with disabilities to access information and services on an equal basis.

Web accessibility means that websites and mobile applications need to be accessible to ensure equal access for people with disabilities ([Web Accessibility, European Commission](#)). The term covers all abilities that affect access to the Web. People in general have diverse and individual needs and people with disabilities also have a wide range of individual needs and many of them can be met by using accessible solutions.

To better understand the wide range of user needs, it is helpful to group them according to human abilities. Below is an adapted overview, considering the accessibility principles from the European Standard EN 301 549 and the [Web Content Accessibility Guidelines 2.1](#):

→ Visual

- Usage without vision
- Usage with limited vision
- Colour vision disorders

→ Auditory

- Usage without hearing
- Usage with limited hearing

→ Physical/Motor

- Usage with limited manipulation or strength
- Usage with limited reach

→ Usage without vocal capability

→ Usage with limited cognition

→ Minimising photosensitive seizure triggers

Additionally, other factors can also influence user needs: for example, the device used, the environment where the interaction is happening, built-in or client based assistive technology, etc.

Accessibility requirements help to provide accessible solutions and to ensure that the interface is not excluding groups of users. As a result, web accessibility aims to allow everyone to perceive, understand, navigate, and interact with the internet and contribute to the web. In summary, web accessibility benefits all people.

Suggested Content

- **Definition of web accessibility**
 - Benefits of web accessibility
 - Common accessibility issues
- **Different target groups and the wide range of individual accessibility requirements**
- **Other factors that influence accessibility user needs**

Assessment

- ➔ Understanding the meaning of basic web and app terminology.
- ➔ Being able to describe the basic concepts of web accessibility issues, from the end user perspective.
- ➔ Explaining the basic concepts of web accessibility, from the end user perspective.
- ➔ Identify common web accessibility issues in terms of different user needs.

The Web Accessibility Directive

The WAD aims to make PSBs websites more accessible, and to harmonise varying standards within the EU. The goal is to allow EU citizens, particularly those with a disability, to gain easier access to public services as well as supporting the internal market.

EU member states must ensure that websites and mobile applications of PSBs are accessible by making them perceivable, operable, understandable, and robust. For some content types, the directive lists what it covers, including for example pre-recorded “time-based” media (meaning audio, video, and animation embedded on websites and mobile applications, that are not live), as well as PDFs and other documents.

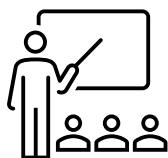
The directive has been in force since December 2016 and was transposed into national law by all Member States in September 2018. Since 2020, all aspects of the directive should apply in all EU Member States. The WAD is a minimum harmonisation directive, which means

that EU Member States can choose to go beyond the minimum requirements, but not to reduce them. Also, they can extend the circle of organisations affected by the law. Some countries, like Germany and Finland, have chosen to go beyond the minimum, and it is useful to explain what the national legislation covers (e.g., in some countries / regions the entire websites of schools are in scope while in others only parts of them, some legislation covers the websites of utilities, etc.).

In addition to complying with the accessibility requirements, PSBs must provide a detailed, comprehensive, and clear **accessibility statement** on how their websites and mobile applications comply with this directive. This includes:

- ➔ an explanation for any inaccessible element and information on accessible alternatives.
- ➔ a description on how a user may report any failure to comply with this directive or request information that is excluded from the scope of this directive.
- ➔ a link to a complaint mechanism that can be used if the response is inadequate.

Suggested Content
<ul style="list-style-type: none"> ▪ Background <ul style="list-style-type: none"> ○ Easier access to public services for EU citizens ○ End-user involvement ▪ Coverage and Scope <ul style="list-style-type: none"> ○ Minimum accessibility requirements ○ The three pillars of enforcement ○ Relevant local/regional implementation and conditions for the training group
Assessment
<ul style="list-style-type: none"> ➔ Describing the coverage and scope of the WAD. ➔ Identifying the specific local conditions.



Suggested Methods

The following section contains indications for methodological approaches to teach the presented module and units:

Open discussion & Self-Reflection:

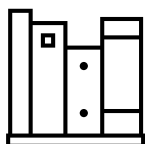
- What do you know about web accessibility?
- What springs to mind when you hear the word web accessibility?
- Why is web accessibility important?
- Discuss common user needs and accessibility issues.
- Reflect on personal experiences with accessibility issues.
- Discuss the influence of other factors (e.g., assistive technology).

Familiarise participants with the Directive:

- Provide participants with a comprehensive overview of the WAD.
- Explain its purpose, scope, the obligations it places on PSBs and the rights of the users.

Practical session:

- Discuss examples of barriers created by inaccessible content / design / technology.
- Present examples of accessible PSB websites & apps



Relevant Resources

The following section contains examples of relevant sources that can be used for the development of course material:

Introduction to Web Accessibility

- [Introduction to Web Accessibility and W3C Standards \(Video; WAI\)](#)
- [Overview on Accessibility, Usability and Inclusion \(WAI\)](#)

Users & Web Accessibility

- ▶▶ [Web Accessibility Perspective Videos: Explore the Impact and Benefits for Everyone \(WAI\)](#)
- ▶▶ [Diverse Abilities and Barriers \(WAI\)](#)

Content of the Web Accessibility Directive

- ▶▶ [Toolkit on the directive on accessibility of the websites and mobile applications of public sector bodies \(European Disability Forum, PDF, 682 KB\)](#)
- ▶▶ [Web Accessibility Directive - FAQ \(WAI-CooP project\)](#)

Background information to the Web Accessibility Directive

- ▶▶ [Conclusion of the review of the WAD by the European Commission \(European Disability Forum\)](#)
- ▶▶ [WAD – Standards and harmonisation \(European Commission\)](#)
- ▶▶ [Member States' bodies in charge of monitoring the Web Accessibility Directive \(European Commission\)](#)
- ▶▶ [National transposition measures communicated by the Member States concerning the WAD](#)

Module 2: Understanding Feedback

The WAD focuses on the accessibility of public sector bodies in the EU. One of the main components of the WAD is the obligation to integrate a feedback mechanism for PSBs websites so users can report accessibility problems or request further information about non-accessible content.

When creating and maintaining websites, feedback can come in many different forms and via different input channels. User feedback is one way for understanding the users' needs and it helps to optimise the accessibility of a website which is an essential component of a positive user experience.

For most users the feedback process can be summarised in four steps:

1. Identifying accessibility issue(s).
2. Finding the Accessibility Statement (AS) for information on the feedback mechanism.
3. Identifying the feedback channel adequate for the user's needs.
4. Reporting the accessibility issue.

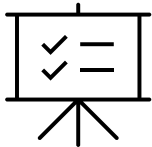
Prerequisites

- **Students:** Should have experience with using the web.
- **Instructors:** Should have a good understanding of the WAD, expertise in digital accessibility and inclusion, knowledge about feedback in general and on feedback mechanisms, experience in working with people with different disabilities.



Expected Learning Outcomes

Knowledge	Skills	Autonomy
Students know about the benefit and value of feedback.	Students are able to reflect on the main barriers they perceive and possible methods/concepts for giving and receiving feedback.	Students are empowered and motivated to find and use feedback channels to report accessibility issues.



Units, Suggested Content & Assessment

The Importance of User Feedback

End user involvement is a key aspect of successful implementation of the WAD. With the responsibility of PSBs to provide a feedback mechanism on their websites the WAD ensures the right to give feedback on accessibility and if the feedback results in action, it will facilitate the right of access to information and public services.

Facilitating user feedback on the accessibility of PSB websites can help to support the website owners in improving their accessibility (and comply with the directive), and to understand what user needs are not fulfilled. At best, user feedback helps to identify and prioritise areas to be remediated. Furthermore, feedback that helps improve the accessibility of websites can improve the user experience of other end-users.

Suggested Content

- **Responsibility of PSBs**
- **Feedback Functions and Characteristics**
 - Digital participation
 - Feedback as a right to express user needs
 - Feedback as a form of dialog
- **Feedback Value**
 - Feedback Value for the user (direct)
 - Feedback Value for other people (indirect)
 - Feedback Value for PSBs

Assessment

- ➔ Understanding how feedback can highlight user needs.
- ➔ Explaining the PSBs obligations in relation to accessibility.
- ➔ Describing the importance and value of feedback for different stakeholders involved.

Discussing Feedback on Accessibility: Challenges & Solutions

Reporting barriers can have several aspects of impact on fixing accessibility issues on websites provided by PSBs. When reporting accessibility issues, there should be three essential conditions that the user can expect from the PSB:

- The AS and feedback mechanism should be easy to find. At least a link to the AS should be placed on the homepage of the website and made available on every webpage.
- The AS needs to describe the feedback mechanism and provide a link to it.
- The AS and the feedback mechanism itself need to be accessible. It also means that in order to meet different user needs, various feedback channels should be provided.

There are different types of challenges to providing feedback itself – especially, when the conditions mentioned above are not considered

sufficiently. This unit focuses on discussing these challenges and possible solutions.

Challenges include:

- ➔ the user is not aware of the feedback mechanism or their right to give feedback,
- ➔ the user cannot find the feedback mechanism,
- ➔ the feedback mechanism is difficult to use,
- ➔ the user does not know how to give feedback,
- ➔ the user is uncertain about their accessibility knowledge and whether the issue faced violates a legal requirement,
- ➔ the user is not motivated to give feedback.

Details about these challenges and suggestions on how the user can address them can be found in the [Methodological Toolkit](#).

Suggested Content

- **Awareness & Findability**
 - The right to give feedback and how to exercise it.
 - How to find the feedback channels?
 - What can the user expect from PSBs?
 - How can interest groups and stakeholders spread awareness and increase the amount of feedback given?
- **Complexity**
 - How to overcome discouragement due to the complexity of the feedback mechanism?
 - What can be the easy and convenient ways for different end-users to give feedback?
- **Knowledge & Confidence**
 - How much does a user need to know when giving feedback?
 - How to address technical details?
- **Motivation**
 - What aspects might affect motivation?
 - How to overcome previous negative experience of contacting authorities, etc.?

Assessment

- Describing different challenges regarding feedback on accessibility
- Explaining on how to overcome these challenges

Feedback Mechanism: Channel & Location

Users should be able to find the AS and a contact option in the AS on websites that may have different structures. The AS can usually be found at the bottom of a webpage. For mobile apps, the statement is either published on the download page of the app or on the website of the PSB.

As there are no exact specifications for the implementation of the mechanism, there are different approaches for implementing the feedback mechanism and for receiving and processing feedback. It is relevant to understand the different approaches and to discuss why end-users might have problems in finding or using them.

The students also need to be aware of the possibility of using a generic communication channel, that is not dedicated to accessibility feedback. This might be necessary if there is no accessibility feedback mechanism, it is difficult to find, it is not accessible or if it does not meet the specific user needs.

For users who want to give written feedback:

- The feedback channel can be provided **as a form**. Feedback forms can vary greatly regarding their **structure, complexity, and other aspects**.
- Other written feedback options are for example free formats like **e-mail** or a **written live chat**.

For users who prefer voice communication:

- Phone
- Voice/Video Message
- Live Videochat

Other relevant factors that need to be considered for all feedback channels:

- General system for any feedback or system for reporting only accessibility issues.
- Level of guidance provided by the mechanism.
- Access possibility on the website.
- Style of communication and response.

Furthermore, the training group might identify additional factors that are relevant.

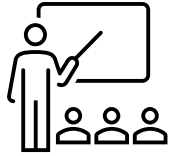
All feedback channels, their combinations and different factors have advantages and disadvantages for different user groups as well as individual user needs and expectations.

Suggested Content

- **Feedback channels**
 - How can users find the feedback mechanism or alternative feedback opportunities?
 - Written feedback channels
 - Channels for voice communication
 - Other channels (e.g., video, use of generic feedback channels)
- **Other relevant factors (structure, level of guidance, etc.)**

Assessment

- Explaining how one can find feedback mechanisms.
- Explaining the connection between the AS and the feedback mechanism.
- Describing different feedback channels.
- Reflecting on the pros and cons of different feedback mechanism characteristics for different end-user groups.



Suggested Methods

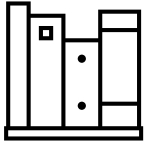
The following section contains indications for methodological approaches to teach the presented module and units:

Open discussion & self-reflection:

- What do you know about feedback?
- What springs to mind when you hear the word ‘feedback’?
- Do you have positive/negative experiences with giving feedback?
- What might be a possible subject of feedback in the context of web accessibility and user needs?
- How can PSBs use user feedback, and what can be the obstacles that hinder PSBs to address a feedback?
- Discuss the importance and forms of end user participation related to web accessibility.
- Encourage reflection on how feedback can drive positive change and how the outcomes of feedback can be improved.
- Reflect on the presented challenges when it comes to providing feedback and how to overcome those.

Practical session:

- Discuss real-life examples where feedback has led to improvement.
- Discuss the opinions on different feedback channels (pro/cons for end-users).



Relevant Resources

The following section contains examples of relevant sources that can be used for the development of course material:

General:

- [Methodological Toolkit](#)
- [Interactive Repository](#)

Feedback:

- [Helping people with a learning disability to give feedback \(NHS England, PDF, 174 KB\)](#)
- [Helping people with a learning disability to give feedback \(Easy to Read Version; NHS England, PDF, 1961 KB\)](#)
- [Getting Feedback From Users to Improve Accessibility \(Bureau of Internet Accessibility\)](#)
- [Prioritising accessibility at Microsoft with feedback from people with disabilities \(Microsoft\)](#)

User testing approach, showing the importance of user involvement:

- [Involving Users in Web Accessibility Overview \(Video; WAI\)](#)
- [Involving Users in Web Projects for Better, Easier Accessibility \(WAI\)](#)
- [Involving Users in Evaluating Web Accessibility \(WAI\)](#)

Module 3: Actionable Feedback

There are various ways to describe accessibility barriers. To ensure that the feedback describes issues in a way that a PSB can effectively act on it, it is preferable to deliver the feedback in a way that facilitates identifying the issue and remediate.

This module provides guidance on how to give actionable feedback about accessibility issues.

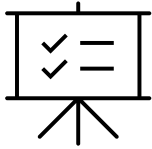
Actionable, in this case, means that the feedback is clear, and has the relevant and necessary information that helps the website owner to solve the accessibility issue. It is also important that it is given in a style that can be understood and well received.

Prerequisites
→ Students: Have a basic understanding of the importance of user feedback and knowledge on how to provide feedback and which channel to use.
→ Instructors: Have a good understanding of the WAD, expertise in digital accessibility and inclusion, knowledge of accessibility principles and feedback mechanisms, and experiences in working with people with different disabilities.



Expected Learning Outcomes

Knowledge	Skills	Autonomy
Students know about the key components of actionable feedback content.	Students are able to report accessibility issues in an actionable manner and style.	Students are empowered and motivated to report accessibility issues in an actionable manner.



Units, Suggested Content & Assessment

Actionable Feedback Content

This module helps to understand what actionable feedback means and what the main aspects of actionable feedback are. The main components are:

- ➔ What happened and when?
- ➔ Where was the issue found?
- ➔ How does the issue create a barrier for the user, and whether assistive technology is involved?
- ➔ What are the technical aspects (e.g., system and/or assistive technology used)?

Furthermore, if a user has the competence to communicate concisely, they should aim to do that when describing the issue. An overview on actionable feedback content can be found in the [Methodological Toolkit](#).

If the feedback mechanism allows, the user can choose to stay anonymous when providing feedback. The students should be made aware that it restricts the dialog between the user and the PSB. It can create limitations for the follow up (for example, if the PSB would like to ask more details from the user or inform them on solving the issue). It might also prevent the user from using their right to complain to a supervisory body.

When using a generic channel, the users may need to adjust their feedback, for example, by making it easier for the receiver to identify it as an accessibility feedback.

For some users in specific user groups, it may be useful to create individual feedback templates with practical guidelines or supporting documentation on actionable feedback. Such supporting material can, for example, help users with cognitive impairment facilitating a lower-effort and time-saving feedback process; provide easy access to

adequate terminology for persons that were born deaf, or help assistive technology users filling in information about the technology they use. These guiding materials should be prepared by or together with the students, so that it considers their specific abilities, needs and preferences.

A template can, for example, summarise the important steps of giving feedback (e.g., where to find the feedback mechanism) and a structured guidance on how to give actionable feedback (e.g., feedback structure, sample phrases, follow-up process, important resources). This can also help the students to review important information after the training session.

Suggested Content
<ul style="list-style-type: none"> ▪ Actionable feedback content <ul style="list-style-type: none"> ○ Providing information on what happened, where and when ○ Explaining how the issues create a barrier ○ Adding information on the technical aspects (e.g., device, operating system, browser, assistive technology used) ▪ Other related and relevant aspects <ul style="list-style-type: none"> ○ Pros and cons of anonymous feedback ○ Use of generic feedback channels ▪ Creating individual support material (feedback templates, guidelines, documentation, etc.)
Assessment
<ul style="list-style-type: none"> ➔ Describing the components of actionable feedback. ➔ Reflecting on different aspects that influence actionable feedback.

Essential and more detailed feedback

Providing actionable feedback on accessibility issues can help improve the overall user experience for people with disabilities and all other users and can lead to positive changes in website design and development.

In order to make the feedback as effective as possible, this unit explains the essential elements of feedback, and also the components to providing

a more detailed feedback with additional context and clarity for website owners.

Furthermore, the [Interactive Repository](#) lists best practices that the PSBs can use to improve their feedback mechanisms in order to get better feedback. Learning about these practices can help the students to better understand feedback mechanisms.

Feedback essentials

- Identifying accessibility issue(s)
- Locating and finding Accessibility Statement for feedback mechanism
 - The link to the accessibility statement can usually be found at the bottom of a webpage
 - For mobile apps, the statement is either published on the download page of the app or on the website of the public body
- Reporting digital barrier to the PSB
 - Providing specific details about the actual problem
 - Explaining where it occurs on the website
- The public body must respond to the feedback
 - If there is no answer or the digital barrier is not removed, the user can contact the so-called enforcement body
 - The contact should be in the AS

More detailed feedback

There are additional aspects of feedback that may require knowledge and competence, which might not be available to all users, like:

- Giving examples of how the accessibility issue is impacting the user experience on the website.
- Providing specific recommendations for how to address the accessibility issues.
- Adding detailed information on technical aspects.
- Including screenshots or images to illustrate the accessibility issue.

Additionally, if the end-user has the web accessibility expertise, they might provide information on the WAD and/or national legislation and links to additional resources and tools that can help the PSB fix the

barrier. End-users, if they are up to it, can also offer to provide further feedback or assistance in addressing the accessibility issue and might help the PSB to prioritise the issues.

Suggested Content
<ul style="list-style-type: none">▪ Feedback essentials<ul style="list-style-type: none">○ The feedback workflow○ Identifying the essential elements of accessibility feedback○ How to use the essential elements in different channels▪ More detailed feedback for expert users<ul style="list-style-type: none">○ Providing examples and specific recommendations○ Adding detailed information and context
Assessment
<ul style="list-style-type: none">➔ Explaining and describing the essentials of providing feedback.➔ Explaining and describing optional detailed information when providing feedback.

Follow-Up Process

It is important to note that the PSB is required to respond to the feedback. If the user does not get a response within a reasonable time or if the user is not satisfied with the response, the user may try to follow up with the PSB. If the user does not receive an answer or the digital barrier is not removed, it is also possible to file a complaint. In some Member States the complaints are handled by the monitoring agencies, in others by a separate enforcement body. The information about the complaint mechanism (enforcement procedure) and the national enforcement body must be included in the accessibility statement.

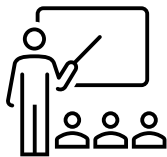
Suggested Content

▪ Follow-up process

- The PSBs obligation to respond and its deadline
- Possibilities to follow-up with the PSB
- The right to use the complaint mechanism
- Approaches on handling unsatisfying replies from PSBs

Assessment

→ Explaining the follow-up process.



Suggested Methods

The following section contains indications for methodological approaches to teach the presented module and units:

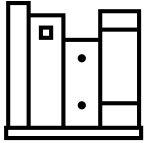
Open discussion & Self-Reflection:

- Discuss the key elements and purpose of actionable feedback.
- Engage participants in discussions about the value of actionable feedback.
- Discuss different approaches on handling unsatisfying replies.
- Describe examples of feedback that effectively identifies specific issues, provides clear suggestions for improvement, and focuses on being actionable.
- Discuss examples of responses received from PSBs.

Practical Application:

- Discuss actionable feedback based on existing barriers.
- Use simulated scenarios and role-play, where participants can act as “end users” providing feedback and as “website owner” responding to the feedback.
- Prepare feedback on existing accessibility issues, if possible, on real PSB websites / mobile applications. Send feedback to the PSB after discussing and finalising it.

- If time allows, document and discuss the response (if any) from the PSB.
- Develop feedback templates to help facilitate future feedback.



Relevant Resources

The following section contains examples of relevant sources that can be used for the development of course material:

General:

- [Methodological Toolkit](#)
- [Interactive Repository](#)

Feedback Process:

- [Seven Keys to Effective Feedback \(Association for Supervision and Curriculum Development, PDF 1319 KB\)](#)
- [Delivering Actionable Feedback \(Association for Talent Development\)](#)
- [Contacting Organizations about Inaccessible Websites \(WAI\)](#)

Feedback Mechanism:

- [Make It Easy to Find Help and Give Feedback \(WAI\)](#)
- [How do you handle WCAG errors and feedback from external sources, such as users, clients, or regulators? \(LinkedIn Collaborative Article, 2023\)](#)
- [3 Key Components in Dealing With Accessibility Feedback \(EQUIDOX\)](#)

Follow-up Process:

- [Member States' bodies in charge of monitoring the Web Accessibility Directive \(for escalating feedback to the enforcement bodies \(European Commission\)\)](#)

The Organisations Behind the Model Curriculum



European Blind Union

EBU is a non-governmental, non-profit-making European organisation founded in 1984. One of the six regional bodies of the World Blind Union, it represents the interests of 30 million blind and partially sighted persons at European level. EBU aims to protect and promote the interests of all blind and partially sighted persons in Europe and works towards an accessible and inclusive society with equal rights and opportunities for them to fully participate in all aspects of social, economic, cultural and political life.



Funka

Funka was started in the 1990s as a joint, non-profit initiative among all disability organisations in Sweden. The knowledge, staff and technology of the non-profit was turned into a privately owned company in 2000. Today, Funka is market leader in the field of accessibility and enjoys a close relationship to end user organisations, ensuring a unique level of quality control.



SYNTHESIS Center for Research & Education

SYNTHESIS Center for Research and Education is a pioneering organisation which initiates and implements projects of social impact, with a focus on social inclusion and integration of people with fewer opportunities. SYNTHESIS is the leading organisation in Cyprus in the fields of social entrepreneurship and social innovation.



TU Dortmund University

TUD participates in the project with the Department of Technology in Rehabilitation, which is part of the research cluster “Technology, Inclusion, Participation”. Research and teaching focus on new technologies, digitalisation processes, assistive technologies and accessibility and their use to support people with disabilities.