

Digital Accessibility

A snapshot of our capabilities

Our Digital Accessibility Team comprises a group of highly experienced global lawyers with an in-depth understanding of global digital accessibility requirements, trends and regulatory moods.

We have a long history of advising leading players of the digital economy on a wide range of issues, from monitoring legislative processes to lobbying (including on digital accessibility). We have an impressive knowledge of the intricacies of the various requirements to enable us to provide solution-oriented advice to our clients. We lead in helping to bring innovative products to market – and digital accessibility has become front and center for many of our clients.

What does digital accessibility mean?

The growing regulatory focus on digital accessibility is long overdue but well deserved. The COVID-19 pandemic has only accelerated the way in which we access goods and services online. Whilst we may already be very familiar with operating virtually and digitally, regulation has had to play catch up in order to ensure that vulnerable users and individuals with disabilities can participate in the digital world fairly and equally.

Governmental and other public bodies have had to comply with accessibility obligations for some while; not only in respect of physical access to e.g. buildings, but also in respect of digital access to e.g. their online services. Over time, the focus of lawmakers has expanded to include the private sector and there is an ever-increasing regulatory expectation for private product manufacturers and service providers to also take steps to ensure that individuals with disabilities and functional limitations (such as the elderly) can use and access their products and services online in the same way as everyone else.

We have seen a global shift and more legislation has been, and continues to be, introduced to promote digital accessibility and require a range of products and services to be designed in a way that ensures such technologies are accessible by vulnerable users. Not only do companies need to ensure they comply with specific digital accessibility laws that may apply to their products and services, but requirements may also derive from broader legislation, such as equality laws, anti-discrimination laws and laws relevant to specific sectors or functions (e.g. healthcare and education).

Our experience includes advising clients on:



Digital accessibility requirements applicable to a leading technology client's broad range of consumer products, platforms and applications across 60 markets.



Compliance with requirements arising from the EU Web Accessibility Directive and its implementation in EU member states.



Country-specific accessibility requirements and penalties for non-compliance in e.g. France and Italy, including the drafting of compliance plans, accessibility statements, and training materials in both jurisdictions.



The ongoing implementation of the EAA across the EU and EFTA markets.



Engagement with Italian legislators to clarify and amend the scope of accessibility language and penalties in respect of the EAA implementation.

Your key contacts

Digital accessibility hub



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Together, we advise in a number of jurisdictions, including:

- EU
- UK
- U.S.
- France
- Italy
- Hong Kong



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Developments in the EU

The EU has been at the forefront of regulatory efforts with the recent adoption of the European Accessibility Act (the "EAA") which aims to strengthen the rights of persons with disabilities by setting EU-wide minimum accessibility requirements for products and services, including:

- **Products:** general purpose computer hardware systems (e.g. computers, laptops) and operating systems; equipment with interactive capability used for electronic communications services or for accessing audiovisual media services (e.g. smartphones, TVs, tablets); e-readers; and payment terminals and certain self-service terminals (e.g. ATMs, ticketing and check-in machines); and
- **Services:** electronic communications services; services providing access to audiovisual media services; some elements of passenger transport services; consumer banking services; e-books; and e-commerce services.

The EAA sets out specific obligations that apply to manufacturers, importers and service providers, with a particular focus on compliance with the "accessibility requirements" laid out in Annex I of the EAA.

As the Act is a Directive (which means it sets binding accessibility goals but leaves it to the individual Member States to decide how they want to achieve them), it must be transposed into national law (the deadline was 28 June 2022) and it will apply to products and services on the EU market as of 28 June 2025. Although the 2025 deadline may still seem a while away, companies will need to be thinking about acting sooner rather than later to ensure accessibility is incorporated into the design of their products or services.

Where the EU has taken the lead on digital accessibility, other jurisdictions may soon follow, and we are closely monitoring regulatory developments across the globe.