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Digital accessibility

Organising, managing and equipping large organisations for scaling up

May 2026

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EDITORIAL

Whilst the rapid pace of technological revolutions fuels our commitment as CIOs, it is clear that the history of computing, from the emergence of the first processors to the widespread adoption of personal computers, has at times progressed at the expense of inclusion, leaving certain users behind.

Consequently, the race for innovation has inadvertently resulted in high-performance applications that are often difficult to access. It is time to set ourselves a new ambition: to make accessibility the norm, and to engage all our communities at every level. Digital accessibility is certainly a matter of regulatory compliance, but above all it must be the true benchmark for a universal quality of user experience, whether for our staff or our customers.

This conviction, help by Cigref, has led to the creation of a working group dedicated to digital accessibility and its widespread implementation across our organisations.

The success of this working group lies in the deeply cross-functional nature of its subject matter, which concerns CIOs, CSR departments, HR and business units alike. The collective intelligence approach has demonstrated that accessibility is a strategic lever that now extends beyond the purely technical sphere.

To successfully make our applications and services accessible, I believe four key areas require attention: governance, methodology, training and awareness-raising, and finally, tools.

Building on these four areas, this report brings together a range of lessons learnt with the aim of providing all Cigref members with a pragmatic action plan. We have also sought to give you a real-world insight by including a video featuring a first-hand account from one of the working group's leading participants.

We can also hope, and this is my wish, that our IT training courses will eventually incorporate accessibility skills, just like any other subject taught, thereby creating a major catalyst for future progress.

I am deeply proud to have led this passionate working group, which brought together such a wealth of expertise. I am proud of the smiles I saw throughout our meetings. This report is proof that accessibility is no longer an isolated initiative, but a collective endeavour that is essential to our organisations.

I urge you to embrace these drivers without delay. Accessibility is a journey, and the time has come to quicken our shared pace.

Enjoy reading this and take action,

Yannick PUGET,

Director of Operations and Customer Experience at iMSA

EXECUTIVE SUMMARY

Digital accessibility represents a **major corporate transformation**, comparable in its strategic and organisational implications to GDPR (General Data Protection Regulation) compliance. It engages the entire organisation — digital, CSR, HR, procurement, and business departments — around an issue that goes beyond mere regulatory compliance: that of guaranteeing **fair and autonomous access** to digital products and services for every employee and citizen.

The regulatory framework has been significantly strengthened in recent years, notably with the transposition of the European Accessibility Act (EAA), which extends obligations to certain private companies with a turnover exceeding €2 million. Large organisations, although often committed to inclusion policies, face considerable challenges in implementing accessibility across complex digital portfolios comprising hundreds or even thousands of heterogeneous applications and platforms.

To address these challenges, this report is divided into four complementary parts. The first provides an **overview of the regulatory landscape and the strategic issues** surrounding digital accessibility, with the aim of equipping each organisation with the tools to gauge the scale of the issue. The second part deals with the **structure of governance**: how to define a clear vision, assign responsibilities and embed accessibility within the organisation in a sustainable manner. The third part addresses **operational management and tools**, detailing how to integrate accessibility into the project lifecycle, which indicators to monitor and which tools to utilise. Finally, the fourth and last part sets out **guiding principles to support scaling up**, by identifying priority areas for action and providing concrete recommendations based on feedback from working group participants.

Beyond the analysis, this report provides **directly operational tools**: a KPI dashboard to track the progress of the initiative, prioritised recommendations based on feedback from the field, and an identification of **priority areas** for action — structured governance, targeted training, and integration by design within project cycles. These deliverables are intended to provide practical support to teams as they scale up their efforts.

Far from being merely a compliance requirement, digital accessibility is a strategic driver in its own right: access to a wider market, reduced legal risk, an improved user experience for all, and a driver of innovation…

Digital accessibility is built over time. This report reflects a shared conviction: the organisations that successfully scale up are those that have managed to make it not a one-off obligation, but a collective reflex, embedded in every stage of the design and roll-out of their digital services.

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INTRODUCTION

Digital accessibility is a pillar of current digital inclusion challenges and forms an integral part of organisations' responsible digital strategies. Digital inclusion encompasses a wide range of topics: fighting information overload, bridging the digital divide for employees and clients (through training, maintaining alternative physical setups, etc.), as well as ensuring the digital accessibility of products and services for people with disabilities. It is this last topic that drove the reflections of the working group members, as it is subject to increasingly precise regulatory frameworks on one hand, and addresses long-term technical, operational, and organisational challenges on the other.

Digital accessibility is a fundamental right for citizens and a key legal obligation for economic and public sector bodies. In France, the obligation for public bodies has been enshrined in law since 2005 (Act No. 2005-102, Article 47, subsequently amended by Act No. 2016-1321, Article 106, and subsequently by Law No. 2018-771, Article 80), and has been extended to private companies with an annual turnover exceeding 250 million euros (Article 2 of Decree No. 2019-768 of 24 July 2019). At European level, Directive 2016/2102 strengthened this framework for the public sector, and Directive 2019/882, known as the "European Accessibility Act" (EAA)[1] marked a major shift by extending accessibility to a wider range of digital products and services in the private sector (provided that annual turnover exceeds a threshold of 2 million euros), making it a requirement for placing products and services on the market.

For large organisations, the key challenge is to make digital accessibility an ongoing process that is integrated into business processes and embedded in working practices. The main difficulty lies in scaling up, which presents strategic, organisational and operational challenges, and requires deep, cross-functional integration into the work processes of every department (IT, procurement, communications, HR, etc.).

The complexity of the digital landscape in large organisations makes operational roll-out particularly challenging. It is not simply a matter of making a few websites accessible, but of managing a portfolio of hundreds, or even thousands, of diverse digital platforms: websites, intranets, business mobile apps, customer extranets, e-commerce platforms, etc. Each of these platforms has its own legacy, its own technology and its own lifecycle. Each context will require a tailored remediation or design approach: new projects can incorporate accessibility by design; existing systems will need to undergo audits and gradual corrections; and certain legacy platforms may be subject to a complete overhaul, minimal compliance measures, or even decommissioning.

In light of these challenges, digital accessibility appears to be a genuine enterprise-wide transformation project. In any case, it should be regarded as such, bearing in mind that it is also a driver of long-term performance. A relevant example of this is taking into account the cost of non-accessibility and its consequences in terms of legal implications, corporate reputation, additional production costs, as well as customer retention and access to a wider range of customers.

[1] Digital accessibility and disability: entry into force of the EAA

This report analyses how large organisations, driven by cross-functional coordination between various key stakeholders (digital departments, CSR, HR, etc.), are integrating digital accessibility through sustainable governance, appropriate tools and an effective strategy for embedding it within business processes. Its aim is to provide digital and CSR departments, in particular, with a methodological and operational framework to **organise, manage and equip the organisation-wide roll-out of digital accessibility** within their organisations.

1 CONTEXT AND CHALLENGES OF DIGITAL ACCESSIBILITY

1.1 DEFINITION AND UNDERSTANDING OF THE LEGAL FRAMEWORK

1.1.1 DEFINITION

Digital accessibility is defined as the ability of people with disabilities to access and use digital content. This concept encompasses people with visual, hearing, motor or cognitive impairments. In total, "in mainland France and the overseas departments and regions (DROMs), the number of children and adults with disabilities (aged 5 or over), whether they live at home or in care, can vary – depending on the criterion or combination of criteria used, from 5.7 million to 18.2 million people."[2]

Digital accessibility is based on a structured regulatory framework at both international and national levels. The Web Content Accessibility Guidelines (WCAG)[3] , published by the W3C (World Wide Web Consortium)[4] constitute the international standard. In France, these standards are operationally implemented in the General Framework for Improving Accessibility (RGAA)[5] , which constitutes the reference framework for compliance applicable, on the one hand, to public bodies and private-law legal entities entrusted with a public service mission[6] , and, on the other hand, private companies with a turnover exceeding 250 million euros (Decree No. 2019-768 of 24 July 2019) or companies in certain sectors, excluding micro-enterprises, as specified in the European Accessibility Act.

The four fundamental pillars of digital accessibility proposed by the WCAG are based on the following criteria:

- **Perceptible**: the user must be able to perceive the information and interface components using any of their senses: sight, hearing or touch (via the keyboard).
- **Operable**: the user must be able to navigate and interact with all interface components without difficulty.
- **Understandable**: the user must be able to understand the information and how to use the interface.
- **Robust**: the content must remain compatible with a wide variety of assistive technologies. This requires designing the code and interfaces to be modular so as to accommodate any future developments in assistive technologies.

[2] *Disability in Figures*, 2024 Edition, DREES Report

[3] Access to the Web Content Accessibility Guidelines

[4] W3C website

[5] DesignGouv "The General Framework for Improving Accessibility (RGAA)"

[6] These requirements apply, regardless of turnover threshold, to public-law legal entities, private-law bodies entrusted with a public service mission, and private-law legal entities created specifically to meet needs of general interest (other than industrial or commercial) that are dependent on the public sector. See the section "Scope of the RGAA".

The RGAA (General Accessibility Improvement Framework) applies to websites, mobile applications, intranets, extranets and digital documents; it defines a set of verifiable criteria for assessing compliance; and it provides a framework for audits and reporting obligations. Compliance with the RGAA is a regulatory requirement, but it does not, on its own, guarantee genuine accessibility from a user perspective. This is why any accessibility initiative must combine technical compliance (RGAA) with validation through actual use (user testing).

In a business or public sector context, digital accessibility is not limited to the mere compliance of a few websites. It is a cross-organisational and strategic approach aimed at ensuring that all digital products and services (websites, business applications, intranets, office documents, etc.) are designed, developed and maintained in such a way that they can be used by everyone. This requires a proper organisational structure with the associated governance (a topic we will explore in Part 2).

1.1.2 UNDERSTANDING THE LEGAL FRAMEWORK

At national level, two pieces of legislation govern accessibility measures:

- Act No. 2005-102 of 11 February 2005 (Articles 47 and 48) promoting equal rights and opportunities, participation and citizenship for people with disabilities. This Act laid the foundations for digital inclusion for people with disabilities, establishing a legal framework whose implementation has, however, proved slow and laborious.
- Decree No. 2019-768 of 24 July 2019 on the accessibility of online public communication services for people with disabilities. This decree extends the provisions to private companies with a turnover exceeding 250 million euros, which must:
    - publish an accessibility statement based on the RGAA guidelines;
    - display their compliance status on the homepage of their websites;
    - publish a multi-year roadmap and three-year action plans;
    - appoint an in-house accessibility officer;
    - set up a reporting system for users and undertake to address any issues raised within a reasonable timeframe.

At European level, two directives set out the accessibility requirements for the use of digital tools and services:

- Directive (EU) 2016/2102[7] , on the accessibility of websites and mobile applications of public sector bodies. This directive enables, for the first time, the harmonisation of accessibility rules for public services across Europe, which must comply with the requirements set out in the European standard EN 301 549[8] , which incorporates the success criteria of the Web Content Accessibility Guidelines (WCAG).

[7] Legifrance, Directive (EU) 2016/2102

[8] Standard EN 301549, V2.1.2

- Directive (EU) 2019/882, also known as the **European Accessibility Act** (EAA), concerning accessibility requirements for products and services**, has been transposed into national law and has been in force since 28 June 2025**[9] . The operational framework is set out in Decree No. 2023-931 of 9 October 2023[10] and the technical specifications are detailed in the Order of 9 October 2023 laying down the accessibility requirements applicable to products and services[11] . This directive extends the obligations to new private sectors such as banking, telecommunications, e-commerce and transport. A wider range of products and services now falls within the scope of the EAA: websites (intranets, extranets), mobile applications, business applications, software packages, as well as digital street furniture, IT equipment and operating systems.

In summary, several requirements and reporting obligations now apply to organisations covered by this legislative framework:

- Products and services must **comply with the technical requirements** set out in the Directive, based on harmonised standards such as the European standard EN 301 549, which itself is based on the WCAG.
- Manufacturers and suppliers must draw up **technical documentation** and affix a conformity **marking** (CE marking) to the products.
- A **declaration of conformity** must be drawn up to certify compliance with accessibility requirements.
- Organisations must **provide information on the accessibility of their products and services** in the documentation and via accessible support services (call centres, technical support).

The digital accessibility regime for products and services allows businesses freedom of choice as to the method they use to comply with accessibility requirements. The key is to comply with the framework and technical specifications set out in the Order of 9 October 2023. However, Article D412-59 of the Consumer Code stipulates that *"services that comply with harmonised standards or parts of harmonised standards […] are presumed to comply with the accessibility requirements set out in Article L. 412-13, insofar as those standards or parts of standards cover those requirements*". A presumption of compliance applies to services that comply with a harmonised standard, such as the European standard EN 301 549. The RGAA (General Framework for Improving Accessibility) specifically enables compliance with this harmonised European standard (EN 301 549) to be assessed. Consequently, an organisation can assess its compliance with the RGAA to demonstrate that it meets the requirements.

1.1.3 WHO IS AFFECTED?

Until 2025, only a few categories of organisations were covered by French legislation on accessibility:

[9] Economie.gouv: 'The new European "Accessibility" Directive: for products and services accessible to people with disabilities'

[10] Legifrance, Decree No. 2023-931 of 9 October 2023

[11] Legifrance, Order of 9 October 2023

- The public sector (government departments, local authorities, etc.);
- Non-profit organisations entrusted with a public interest mission;
- Entities entrusted with a public service mission (public transport, water, energy, etc.);
- Private companies with an annual turnover in France of 250 million euros or more.

Since June 2025, however, **the legislator has extended the legal obligation to a few other sectors, concerning only B2C services** (although B2B relationships may also be indirectly affected[12]):

- Banking, credit, investment and payment services;
- Telephony and electronic communications services (videoconferencing);
- E-books;
- E-commerce websites and platforms;
- Audiovisual media services;
- Passenger transport services (websites, mobile apps, self-service terminals, information screens);
- Emergency services.

In all these sectors, the rules now apply **to all businesses marketing products or services on the European market, regardless of the country in which their head office is located**, with the exception of micro-enterprises – that is, those with fewer than 10 employees and a turnover of less than 2 million euros. However, this exemption for micro-enterprises applies only to the provision of services falling within the scope of the EAA, and not to products covered by the directive (payment terminals, computers, smartphones, e-readers, etc.).

1.1.4 WHAT IS THE TIMETABLE FOR COMPLIANCE WITH THE EAA?

The timetable for compliance with the EAA is divided into two phases:

1.1.4.1 A date, in principle, set for 28 June 2025

From this date onwards, products placed on the market and services provided must be accessible. This encompasses all websites, mobile applications and interfaces enabling the provision of a B2C service. However, it is clear from the text of the EAA that the 28 June 2025 deadline does not apply in exactly the same way depending on whether it concerns a product or a service:

- for products, the text uses the term “placing on the market”;
- for services, the text uses the concept of “provision”.

For products, given their physical nature, the date of 28 June 2025 allows for a distinction to be made between two “stocks”. On the one hand, products already placed on the market before that date are exempt from any obligation (by definition, they were already on the market before the standard came

[12] Although the primary scope of Directive (EU) 2019/882 (EAA) explicitly targets the protection of the end consumer (B2C), its legal framework inevitably has a knock-on effect on business-to-business (B2B) relationships. Indeed, whenever a service or digital component supplied in a B2B context forms part of the value chain of a final service intended for the consumer, responsibility for overall compliance rests with the B2C operator.

into force; they cannot, in principle, therefore be made accessible retrospectively). On the other hand, all products placed on the market after that date must comply with accessibility standards.

For services, the concept used is that of a service provision, whether referring to the service provided or to the activity of providing services. Unlike a product, which exists in physical form, a service cannot be regarded as a stock. At most, one might, metaphorically speaking, regard it as a flow, provided continuously or at a specific point in time. Furthermore, a service may be a commercial activity in its own right or an ancillary part of a product-related activity.

Thus, all services provided after 28 June 2025 – that is, services performed after 28 June 2025 – must be provided in an accessible manner. For example, on the same e-commerce platform, a sale made on 27 June 2025 is not subject to the accessibility requirements, whereas a sale made on 29 June 2025 is subject to the accessibility requirements.

1.1.4.2 An exceptional transitional period until 28 June 2030

This date marks the end of a period known as the "transitional measure", which arises from two exemptions provided for by law.

- **Firstly,** service providers will be able, until that date, to continue using the products they were lawfully using prior to 28 June 2025 to provide similar services. This is because the characteristics of the product used influence those of the service provided and determine its accessibility. Furthermore, this additional period, between 28 June 2025 and 28 June 2030, is intended to enable service providers to find an accessible product on the market through which they can provide an accessible service. A typical example is an electronic payment service. In this example, the service relies on the use of a physical product, whether it be electronic payment terminals (EPTs), cash machines, ticket vending machines or self-service check-in kiosks. If the product does not comply with accessibility requirements, the service will not be accessible either.

  Self-service terminals are also subject to a specific deadline, expressly referred to in Article 32(2) of the Directive, which, as an exception to the exception, provides that service providers offering services *via* such terminals may continue to use them lawfully until *"the end of their economically useful life, this period not exceeding twenty years from the date they were put into service"*[13] .

- **Secondly,** the derogation applies to service contracts concluded before 28 June 2025, which may be performed without modification until their expiry, and at the latest until 28 June 2030[14] . This exception applies to services provided on an ongoing basis, rather than on an ad hoc basis, under a contract concluded before the date on which the Directive came into force. For example, if a subscription contract for the production of a daily newsletter was concluded before 28 June 2025, the newsletter may continue to be distributed without complying with

[13] Directive 2019/882

[14] Act No. 2023-171 of 9 March 2023

the accessibility criteria after that date, until the end of the contract (no later than 28 June 2030).

It is important to emphasise that **services provided without the intermediary of a physical product** between the service provider and the consumer are not eligible for the extended deadline until 28 June 2030. This applies to online services characterised by an entirely digital activity, carried out remotely via digital interfaces, such as a website or a mobile app. The only exemption concerning services applies to archives: thus, the accessibility requirement does not apply to *"the content of websites and mobile applications that are considered to be archives, namely those that only display content which is not updated or modified after 28 June 2025"*[15] .

It should also be noted that **bringing a website or mobile application into compliance** does not depend on conditions beyond the service provider's control, as is the case for products placed on the market, and that they are therefore not eligible for the additional transitional period until 2030. In this regard, it is worth recalling the case law of the Court of Cassation, which holds that a **contract for the design of a bespoke website is not a contract of sale**, since it does not involve the transfer of ownership of movable property (Court of Cassation, 1st Civil Chamber, 28 May 2026, No. 25-14.507).

Finally, according to Article 14 of the Directive (transposed into Articles L. 412-13 and D. 412-60 of the Consumer Code), there **is a possibility of an exemption for "fundamental changes and a disproportionate** burden", as follows:

"The accessibility requirements referred to in Article 4 apply only insofar as compliance:

- *does not require a significant modification of a product or service that results in a fundamental change to its nature;*
- *does not impose a disproportionate burden on the economic operators concerned*."

1.1.5 SANCTIONS

At the French level, under the 2005 Law on Equal Rights and Opportunities, Participation and Citizenship of Persons with Disabilities and the Order of 6 September 2023, failure to publish an accessibility statement may be penalised with a fine of €25,000 per website and up to €50,000 for non-compliance with the regulations.

In addition, since 2025, specific penalties defined by the Member States have been in place, including the risk of withdrawal from the European market, following the transposition in France of the European Accessibility Act (EAA) by the law of 9 March 2023, which came into force on 28 June 2025.

Inspections and sanctions are overseen by the **DGCCRF** (Directorate-General for Competition, Consumer Affairs and Fraud Control), a cross-sectoral supervisory authority with jurisdiction over all products and services covered by the European directive, with the exception of e-books. As part of these remit, five other new supervisory authorities have been empowered since 2025 to monitor organisations' progress towards accessibility:

[15] Point (e) of paragraph 4 of Article 2 of the Directive; and point 5° of paragraph III of Article D. 412-50 of the Consumer Code

- **ARCEP** (Regulatory Authority for Electronic Communications, Postal Services and Press Distribution) for online communication services;
- **The ACPR** (Prudential Supervision and Resolution Authority) and **the AMF** (Financial Markets Authority) for banking services;
- The **Banque de France,** concerning the accessibility of payment methods, identification methods, electronic signatures, etc.;
- **ARCOM** (the Regulatory Authority for Audiovisual and Digital Communications), which is authorised to oversee digital services (websites, mobile apps, intranets, etc.).

Furthermore, Article D412-57 of the Consumer Code stipulates that *"in the event of non-compliance of the service, service providers shall take the necessary corrective measures to bring it into compliance with the applicable accessibility requirements. Furthermore, where the service does not comply with the applicable accessibility requirements, service providers shall immediately inform the market surveillance and enforcement authorities of the Member States in which they provide the service, providing details, in particular, of the non-compliance and of any corrective measures taken*". To meet this requirement, the DGCCRF has, since November 2025, implemented an online procedure for reporting non-compliance with digital accessibility obligations or for claiming an exemption from such obligations:[16] .

Compliance with digital accessibility requirements is also closely monitored by certain organisations, such as the French Federation of the Blind and its "observatory on compliance with digital accessibility obligations"[17] .

Once again, in regulatory matters, **the European Union exerts a normative influence on the market** (often referred to as the "Brussels effect"): any international company selling its products or services in the EU will also have to comply with these accessibility requirements. As a result, digital accessibility transcends the legal framework alone to become a fundamental economic and strategic performance issue for large organisations.

In conclusion, it is crucial for organisations to implement a comprehensive roll-out strategy for their digital accessibility compliance. To do so, they must:

- **Prioritise new developments** to ensure they meet the requirements from the outset ("accessibility by design" approach).
- **Assess and plan for the compliance** of all the services they provide, prioritising **the most critical or most widely used** services.
- **Integrate accessibility into** business **processes**, **CSR policies** and investment **budgets** to ensure the sustainability of the approach.

[16] Declaration of non-conformity or invocation of an exemption from digital accessibility obligations

[17] French Federation of the Blind

1.2 A STRATEGIC AND ECONOMIC CHALLENGE

Digital accessibility is still too often viewed solely through the lens of budgetary constraints. Yet it would benefit from being reassessed as a strategic investment, capable of generating tangible economic gains.

As one working group participant pointed out: *"Admittedly, we have an idea of the cost of making things accessible, but do we have any idea of the cost of a lack of accessibility?*" Indeed, a lack of accessibility potentially represents a **significant loss of customers**, estimated – in the specific case of one participating company – at 20 per cent of digital service users. People with disabilities, as well as their families and carers, favour platforms that offer them a more usable experience. Accessibility therefore makes it possible to tap into this "hidden market" and build loyalty amongst a significant proportion of the population.

Digital accessibility also necessitates the application of best design practices (clean code, logical structures, clear navigation). Accessible websites often benefit from a lighter and more resilient technical architecture, as **performance optimisation – a recurring theme in eco-design guidelines (RGESN [18]) – is a requirement shared with accessibility**. These improvements benefit all users, including those with slow connections or using older devices, thereby enhancing customer retention and satisfaction. Furthermore, accessibility requirements (correct use of semantic tags, heading hierarchy, and alt text for images) are directly linked to **search engines' quality and relevance criteria**, and result in better search engine optimisation (SEO) for accessible websites.

Finally, compliance with digital accessibility standards, both internally and externally, strengthens the company's image, its consistency with its CSR strategy and its credibility with stakeholders.

Beyond simply meeting legal obligations, digital accessibility can therefore be seen as a strategic performance driver. It helps to expand the potential customer base, reduce the legal risks associated with non-compliance, optimise the efficiency, quality and usability of digital services for all users, and safeguard the reputation of the company or public authority.

1.3 CURRENT SITUATION IN LARGE ORGANISATIONS

While most organisations do not separate the subject of **accessibility** from that of **inclusion**, some consider themselves more mature on accessibility as such than on inclusion, which moreover encompasses issues such as digital divides, digital illiteracy and information overload. This subject of digital inclusion is nonetheless essential: the digital divide is a societal issue that goes beyond the strict regulatory framework (around 20% of the population is in digital "fragility"[19]).

Accessibility is therefore part of an inclusion policy, which helps to strengthen support networks within organisations. Furthermore, **having staff with disabilities within the organisation raises**

[18] A French standard dedicated to eco-design issues

[19] National Agency for Combating Digital Exclusion: 'Digital Exclusion in Figures'

awareness of the difficulties faced and thus facilitates the implementation of measures to improve accessibility. Indeed, it is often necessary to have experienced these issues first-hand within one's own organisation in order to apply them effectively externally.

Today, the recurring challenges that large organisations face in integrating digital accessibility mainly concern governance, fostering a culture of accessibility within teams, and operational management. Indeed, despite a regulatory framework that is now well-established, the majority of organisations have not yet integrated digital accessibility as an operational standard. Several structural limitations persist:

- an approach focused on documentary compliance rather than actual usage;
- an over-reliance on automated tools;
- insufficient involvement of users with disabilities in projects;
- difficulty in managing large-scale legacy systems.

1.3.1 GOVERNANCE AND BUSINESS TRANSFORMATION

Whilst the scale of the shift towards accessibility standards is similar to the transition to the GDPR, the appointment of a digital accessibility lead to spearhead the project is not yet standard practice, nor is the establishment of dedicated funding. However, the establishment of a structured governance framework – through the allocation of responsibilities, coordinated and integrated monitoring, and a dedicated budget – appears essential. These issues are all the more crucial given the need to engage non-digital business departments, which must also take accessibility considerations into account right from the design stage of their projects.

One organisation reports having set up a "digital responsibility" committee dedicated exclusively to digital accessibility (comprising representatives from HR, communications, corporate social responsibility, procurement and senior management) to involve as many stakeholders as possible, make decisions and secure the necessary budget.

A tripartite arrangement (or co-sponsorship) between the compliance, CSR and digital departments appears particularly effective in ensuring that accessibility is embedded in the day-to-day operations of business units and across the organisation's practices. Furthermore, in an international context, this governance structure must extend its scope to the entire value chain, in particular by ensuring that suppliers and service providers also comply with digital accessibility standards.

1.3.2 TRAINING AND AWARENESS-RAISING FOR TEAMS

Whilst training the teams directly involved (developers, designers) is a common first step, the aim must be to instil a culture of accessibility amongst all staff. This involves creating and distributing operational guides and implementing training programmes tailored to different roles.

One of the major obstacles highlighted by participants is the difficulty in selecting and identifying digital services companies (DSCs) that are genuinely trained and qualified to work on accessibility issues. The accessibility of services provided, integrated or deployed by DSCs must, as with in-house developments, be subject to a third-party audit.

Motivating teams and recognising their progress are key to kick-starting and sustaining momentum. In this regard, compliance scores must be handled with care: labelling a result as insufficient for a website achieving 70 to 80 per cent compliance risks demotivating teams, whereas such a level actually represents a solid, albeit intermediate, performance. It is far more beneficial and constructive to emphasise progress and continuous improvement.

The issue of cultural embedding must, in fact, be seen as an ongoing process: indeed, a website respecting accessibility criteria at a given point in time can quickly deteriorate if new untrained developers work on it without knowledge of these criteria, or if contributors who update the site on a day-to-day basis fail to describe images or use appropriate colour contrasts. Long-term cultural embedding and the implementation of verification processes help to establish digital accessibility as an ongoing process. Proactive communication about successes (or “access-washing” in a positive sense), when applications achieve a high level of compliance, can also boost internal engagement.

1.3.3 MANAGEMENT AND TOOLS

To successfully implement these changes, it is necessary to put in place effective governance and even dedicated tools. Teams need a governance dashboard that allows them to quickly visualise the compliance status of their projects, identify which fixes to prioritise, and finally provide an analysis of the “ROI” (reduction in support tickets, lower costs of late rectification, improved completion rates, etc.), highlighting the remaining costs of achieving compliance against the costs of inaction (fines, loss of customers, damage to reputation, etc.).

The integration of an accessibility framework such as the “RGAA” (France's General Framework for Improving Accessibility), or the “RAAM”(Mobile Applications Accessibility Framework) for mobile applications, must take place as early as possible in the project lifecycle. This requires ongoing awareness-raising and training for developers. It is particularly important to remain vigilant regarding the claims made by certain tools purporting to automatically monitor and assess whether IT projects comply with digital accessibility criteria. Organisations warn that there is no such thing as a “miracle tool” and that using them without a proper framework and support can be counterproductive and create a false sense of legal certainty. Indeed, these “overlay” tools are often technical cosmetic fixes that apply changes at a superficial level rather than at the source code level. Furthermore, they can interfere with assistive technologies by altering certain settings.

Case Study: ENEDIS

Digital accessibility management at Enedis

1. Presentation of Enedis' Responsible Digital Programme

"The Responsible Digital Programme embodies Enedis' vision for Responsible Digital. It sets the course for Responsible Digital transformation by 2027, building on a high level of maturity stemming from a commitment made in 2018.

The Responsible Digital Programme (RDP) is derived from the CSR policy: the "RDP" is structured around the three pillars of CSR and meets Enedis' mission-based corporate objectives. The cross-cutting foundation ensures the roll-out and embedding of transformations internally, as well as the promotion of Responsible Digital initiatives externally.

More specifically, the digital accessibility initiative falls within the "For Women and Men" pillar of the Responsible Digital Programme, under the responsibility of the digital accessibility lead.

2. Digital accessibility commitments as part of the Responsible Digital certification

As part of Enedis' Level 2 Responsible Digital certification, two commitments have been made regarding digital accessibility:

Integrating digital accessibility – Commitment No. 7

- To continue integrating digital accessibility;
- Update and publish the multi-year plan on enedis.fr;
- Monitor the accessibility of priority external websites and bring them into compliance (compliance rate >70%);
- Check the accessibility of priority internal websites used by staff for digital purposes (HR, health and safety, training) and improve their accessibility (compliance rate >70%).

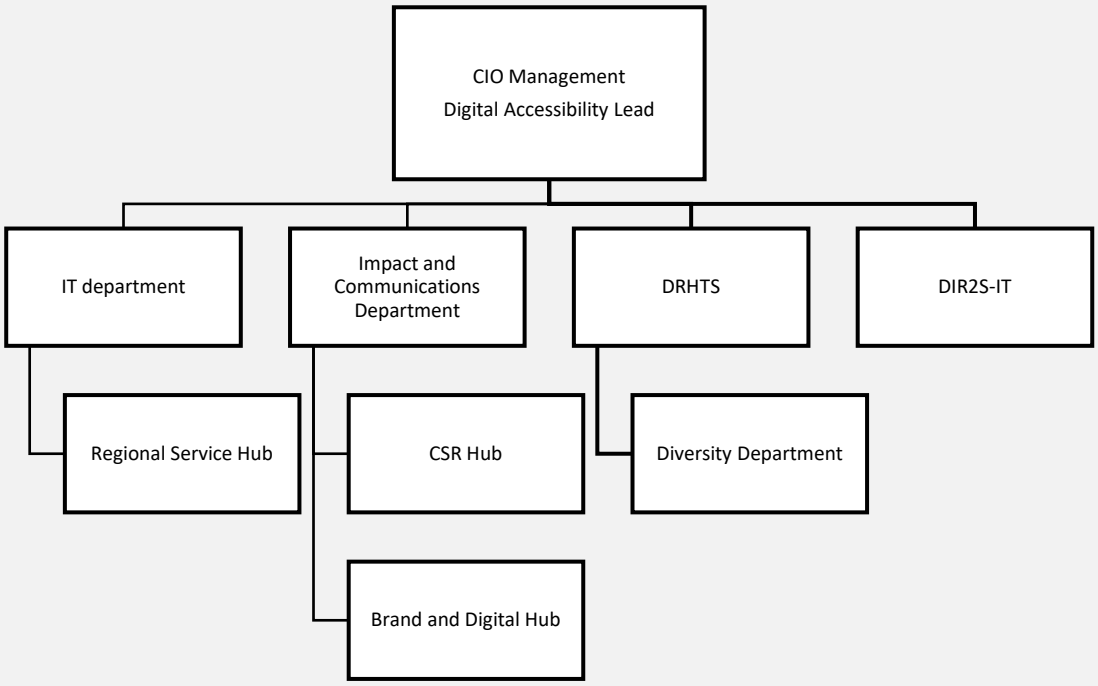
Make its communications a showcase for its commitment NR – Commitment No. 12

- Integrate accessibility and eco-socio-design criteria into procurement and communication services;
- Communicate and distribute eco-socio-designed communication materials;
- Raise awareness within the communications department of best practices in eco-socio-design;
- Raise staff awareness of the available templates and tools;
- Examine the possibility of amending Enedis' digital charter to improve its accessibility.

3. Governance

Digital accessibility is managed by the IT Department as part of the Responsible Digital programme. This role is led by the Digital Accessibility Lead.

A digital accessibility governance framework has been in place since October 2023, through the Digital Accessibility Steering Committee, whose members are:



- DRHTS : Human Resources, Transformation, Health and Safety Directorate
- DIR2S-IT: DIR2S – IT & Telecoms

The quarterly Digital Accessibility Steering Committee aims to:

- Share regulatory updates, general topics and Enedis news;
- Share progress on the action plan, successes and issues;
- Jointly approve the points to be raised at the Strategic Committee of the Responsible Digital Programme."

Claire Quintanar, Responsible Digital Programme Lead at **ENEDIS**

Key points

- The EAA (European Accessibility Act) extends the legal scope of digital accessibility to all organisations operating within the European Union, with the exception of micro-enterprises (i.e. those with fewer than 10 employees and a turnover of less than 2 million euros), and businesses in sectors not specified by the directive (see pages 13–14 of this report) ;
- The legal framework (EU Directive 2016/2102, EAA) is based on the European standard, which in turn is based on the WCAG: the earlier these design standards are incorporated, the easier it will be to achieve compliance;
- From June 2025, all products placed on the market or services provided must comply with digital accessibility criteria. This raises the challenge of maintaining compliance over the long term;
- It is essential to establish a governance structure, comprising at least three parties (compliance, CSR and digital management), with a dedicated budget and co-sponsorship, and to appoint a digital accessibility lead with significant authority;
- Inaction is costly: quantifying the cost of poor accessibility to justify investment in this area can be a powerful strategic argument;
- Compliance does not guarantee accessibility. Accessibility cannot be achieved without testing against real-world usage.
- Accessibility is a marathon, not a sprint: a compliant website can quickly deteriorate without ongoing training, cultural embedding and verification processes.
- Automated audit tools can be useful, but they are no substitute for human expertise, industry standards such as the RGAA, and the acculturation of teams.

2 STRUCTURING THE GOVERNANCE APPROACH

2.1 DEFINING YOUR AMBITION AND ASSIGNING RESPONSIBILITIES

2.1.1 VISION AND AMBITION OF THE ACCESSIBILITY APPROACH

Beyond the minimum legal requirements, the structure of the governance approach depends, first and foremost, on the vision and ambition that each organisation defines and wishes to uphold in terms of accessibility. For the participants in the Cigref working group, digital accessibility is a social responsibility that falls to organisations and must enable the creation of environments suited to the most vulnerable, without compromising the activities of the wider public.

The foundation of this approach lies in the inclusion of all people with disabilities, whether they are employees of the organisation or members of the public using its services, on the understanding that digital accessibility is the “intangible” counterpart to an urban and physical environment adapted to everyone.

The aim is to enable people with disabilities to gain greater independence through digital accessibility and to create the conditions for them to contribute to the social fabric.

2.1.2 ROLES AND RESPONSIBILITIES OF THE DIGITAL ACCESSIBILITY LEAD

Defining the roles and responsibilities assigned to the digital accessibility lead is one of the most fundamental elements of the process. Indeed, the organisational structure of the roadmap, or multi-year plan, will become the central document of the governance process, and the role of digital accessibility lead will be its driving force.

For the digital accessibility lead, the development and implementation of the digital accessibility strategy across the organisation involves a range of activities:

- **Initiating the implementation of a** digital accessibility **strategy** and rolling it out;
- **Developing indicators and processes to monitor the performance** of the digital accessibility policy, and overseeing the management and achievement of objectives;
- **Organising awareness-raising, training and cultural integration campaigns** on digital accessibility for the various stakeholders and fostering their long-term development of skills, both methodologically and organisationally;
- **Monitor developments on an ongoing basis** and adapt the digital accessibility policy to regulatory and standard-setting requirements, particularly in terms of the resources to be deployed;
- **Provide appropriate reporting** to the various stakeholders.

Several examples of job descriptions for digital accessibility officers (as well as for experts, consultants and testers) are provided in the OPIIEC study "Producing content and services that comply with digital accessibility standards"[20] .

Determining the reporting line for the digital accessibility lead is the second key step in structuring the roadmap. For most organisations in the working group, digital accessibility forms part of the inclusion policy underpinned by the HR department's CSR strategies. The comprehensive accessibility approach is then integrated, in the same way as environmental eco-design, into a "responsible digital design" framework applied to all the organisation's products and services.

Regardless of the model chosen and the department to which the lead officer is actually attached (IT, HR, CSR, Communications, Legal and Compliance, or other), the issue of accessibility must retain its cross-functional nature and engage the organisation's various departments.

The working group recommends, however, that the CSR lead be positioned at a senior level (at Executive Committee level or reporting directly to the CSR function), as this is the only level that can guarantee the authority to make decisions, exert influence and carry out their duties, as well as access to resources and, ultimately, the impetus required for a cross-functional approach. In some large organisations, digital accessibility is already, amongst other metrics, a criterion for awarding bonuses to Executive Committee members.

It should be noted that the RGAA regulations impose an obligation to have a digital accessibility lead, but do not restrict this to a single individual. It may also be a committee or a network of leads.

[20] OPIIEC, 'Producing content and services that comply with digital accessibility standards' (pp. 57–60)

Case Study: ENEDIS

Role and responsibilities of Enedis' digital accessibility lead

- **Overseeing digital accessibility audits of Enedis' websites** (prioritising sites that are essential to users and the most frequently visited sites):

"Accessibility audits are carried out by specialist firms under a multi-supplier contract.

They are carried out on priority websites and mobile apps: external digital services open to the public and internal digital services essential for Enedis employees and service providers.

As part of its "Responsible Digital" certification, Enedis is committed to ensuring that the audited websites achieve a compliance rate of at least 70 per cent.

- **Drafting and publishing Enedis' multi-year plan:**

In 2024, Enedis published its first multi-year plan [21] (available on the corporate website enedis.fr). Every year, Enedis publishes its action plan for the current year as well as a review of the previous year's action plan.

The digital accessibility lead is responsible for monitoring and publishing the progress reports and action plans. She will also be required to draft the multi-year plan for 2027–2029, in coordination with the Impact, Communication and Diversity Department, which is responsible for the equipment provision for the company's employees with RQTH status.

- **Ensuring the smooth progress of commitments 7 and 12 of the Responsible Digital label:**

The digital accessibility lead ensures that commitments 7 and 12 (see section on digital accessibility commitments under the Responsible Digital label on page 20) are progressing in line with the timetable and objectives set by the Responsible Digital Programme.

- **Sensitise the IT "makers" to digital accessibility:**

The digital accessibility lead organises a monthly two-hour session on the topic of digital accessibility, open to all staff and contractors within Enedis' IT department. This awareness-raising initiative has three objectives: to explain the "why" behind digital accessibility and the challenges it presents; to clarify "who" is responsible for ensuring digital accessibility; and to present the tools available to ensure that digital projects and services are as accessible as possible.

In addition to these awareness-raising sessions, the Responsible Digital programme organises monthly 30-minute webinars on various topics related to Responsible Digital.

Examples of webinars:

- "The RQTH scheme and digital accessibility";
- "Information overload and digital collaboration: feedback from the Centre-Val de Loire Regional Directorate";
- "Designing useful, sustainable and accessible digital solutions: analysis and testimonials from IT project teams".

➢ **Commissioning DINUM's flash accessibility audits[22] for IT projects as part of responsible design:**

The Responsible Digital programme supports projects in adopting responsible design. At Enedis, responsible design is defined as taking into account eco-design principles and digital accessibility guidelines.

In this context, the accessibility lead supports projects in carrying out flash assessments, at the very least as part of their technical acceptance testing, prior to conducting a full accessibility audit where necessary.

Ambitions for the future:

At present, the issue of digital accessibility is managed by the Responsible Digitalisation programme, and in particular by the digital accessibility lead, across the whole of Enedis.

Once the roll-out of responsible digitalisation on an industrial scale and the digital programme have been completed, the IT Department aims to set up a dedicated accessibility team comprising the lead and technical specialists capable of carrying out compliance audits and supporting projects through to completion.

It will also be necessary to continue raising awareness and providing training for all IT and business project teams, as well as to monitor and disseminate information on technological and regulatory developments."

Claire Quintanar, Responsible Digital Programme Lead at **ENEDIS**

[21] ENEDIS, Multi-Annual Accessibility Plan 2024–2026

[22] DesignGouv: Quick Assessment

2.2 STRUCTURING THE APPROACH AND ESTABLISHING DEDICATED GOVERNANCE

As digital technology permeates business processes and users' day-to-day lives, the establishment of accessibility governance has become essential. The sheer volume of digital services within organisations now justifies a structured approach to meet the needs of every user. This dedicated governance framework aims to organise the coordination, management and tools required to scale up accessibility. It must provide a clear, shared and dynamic framework that addresses the need for cross-functional collaboration. It must not be solely a matter for the digital department.

The technical framework outlined is, in certain respects, prescriptive, with the aim of ensuring compliance with users' rights and legal obligations. As such, dedicated governance encompasses:

- Compliance with the legislative framework: implementation of Directive (EU) 2019/882, known as the European Accessibility Act (EAA), transposed into national law in 2023 and in force since June 2025;
- Technical compliance: alignment with reference standards (RGAA or WCAG);
- Regulatory management: drawing up the multi-year accessibility implementation plan and accessibility statements;
- Digital transparency: management of mandatory notices and pages across all websites and services.

However, the primary purpose of this governance framework is to sustainably foster a collective drive to promote accessibility. Rather than prioritising purely reactive compliance at a specific "point in time", the aim is to cultivate a proactive mindset. The key challenge is to gradually build a robust and sustainable corporate culture, transforming accessibility into a shared reflex across the entire organisation.

To achieve this, the establishment of a governance framework dedicated to accessibility must take into account, simultaneously, a strong organisational foundation (1), a detailed understanding of the digital scope (2), short- and medium-term operational preparedness (3) and a committee structure that effectively brings together the various stakeholders (4).

2.2.1 ORGANISATIONAL ANCHORING

The aim is to ensure that digital accessibility has a relevant organisational affiliation, supported by high-level sponsorship, in order to legitimise the initiative and mobilise a sufficient number of cross-functional contacts at the appropriate hierarchical level.

There are several ways to embed the concept of digital accessibility firmly in people's mindsets and practices. In this regard, demonstrating accessible websites or giving key stakeholders a first-hand experience of living with a disability can play a decisive role in fostering understanding, adoption and commitment to the digital accessibility approach.

The relationship between digital accessibility governance and other forms of governance must be consistent (at departmental or group level) and constitute a key focus to ensure the effectiveness of the initiative and defuse any organisational or interpersonal conflict.

Finally, care must be taken to ensure that digital accessibility is integrated into the group's CSR strategy as well as into disability agreements (HR department), so that it becomes a cross-cutting and structuring lever.

2.2.2 UNDERSTANDING THE DIGITAL SCOPE AND POLICY

The digital accessibility policy led by the designated representative is based on **a preliminary analysis of the relevant digital scope, the target audiences for the initiative, and the key internal stakeholders to be involved** (CIO, Procurement, HR, Legal, etc.). For Cigref member organisations, this approach forms part of the ongoing process of drafting the multi-year digital accessibility plan.

This mapping exercise enables the lead officer to identify the current level of accessibility and areas for improvement, before prioritising projects based on criteria such as the number of users affected, the criticality of the activities involved, or whether the required fixes are critical or not.

To harmonise the work to be carried out across the various units of the same organisation as much as possible, it is advisable to introduce maturity frameworks and checklists that take local regulatory constraints into account.

The aim is therefore to define a realistic, targeted and consistent policy to be implemented by the accessibility lead.

2.2.3 SHORT AND MEDIUM-TERM OPERATIONAL PREPARATION

The principles of the digital accessibility policy must be translated into concrete objectives, focusing on the one hand on bringing digital services and products into compliance and, on the other, on training the users targeted by the initiative.

Furthermore, a combination of different levels of granularity for the objectives is necessary to ensure the accessibility strategy is as realistic and progressive as possible:

- Firstly, the definition of objectives must be applicable across the entire accessibility lifecycle, both at the organisation-wide level and at the local level (by subsidiary, department or entity).
- Secondly, the definition of objectives must be spread out over time, with a common three-year timeframe for multi-annual plans.

2.2.4 APPROPRIATE GOVERNANCE AND COMMUNICATION

Finally, developing an accessibility strategy requires the resources to drive the process forward, make adjustments, update it and maintain it over time.

In this regard, the creation of dedicated committees and bodies makes it possible, on the one hand, to organise decision-making at different levels (strategic, organisational, operational) and, on the other hand, to steer and monitor the accessibility initiative (prioritisation, trade-offs, etc.).

Finally, to ensure the long-term engagement of key stakeholders, the accessibility liaison team can draw on strategic partners: the communications department for raising awareness and sharing information (digital community, in-house or specialist magazine, newsletters, etc.) and a network of accessibility ambassadors on the ground, within each business unit or IT project. This network not only helps to mobilise internal staff and external users, but also transforms user feedback into drivers for service improvement.

Case Study: EQUANS

Digital accessibility approach at Equans

"The Equans Group offers its services in over 20 countries. Our first step was to understand how to approach digital accessibility in line with regional regulations such as the EAA (European Accessibility Act) or local regulations such as Section 108 in the United States, for example. We also wanted to understand how to address this issue in relation to the standardisation of some of our information systems, and the existence of a common framework (which to choose between WCAG or RGAA?). This led us to carry out an analysis lasting several months.

- **To structure our approach**, we also benefited from sponsorship on two levels: one at the Bouygues Group level, with Olivier Hoberdon (BYSA CIO), who set up a working group dedicated to digital accessibility bringing together all six entities; and the other at the level of Equans' CIO Group, with Emmanuel Gachet, who appointed me to his "Sustain IT" teams to work on both the carbon footprint and digital accessibility simultaneously.
- **To address the cross-cutting nature of this issue**, which lies at the intersection of inclusion and independence, a map of the stakeholders involved, their roles and their responsibilities has been drawn up. It involves:
    - external communication for websites,
    - internal communications for intranet sites,
    - the brand management team, for the visual identity guidelines,
    - procurement teams for updating tenders and contracts,
    - supplier management teams to follow up with suppliers and influence them on this issue at each quarterly or half-yearly review,
    - Human Resources teams regarding their HRIS tools, to raise awareness of the Group's initiatives on digital accessibility and to integrate them into our recruitment process,
    - the various roles within IT, such as developers, project managers and product owners,
    - the CSR team,
    - the company's disability liaison officer,
    - the legal team, to support us in understanding the relevant legislation and its application,
    - the IT teams responsible for Group applications,
    - and representatives from two countries – France and the United Kingdom – to stay in touch with the reality on the ground.
- **Together, we have set up a steering committee for digital accessibility** at corporate level, with the aim of replicating this governance structure at MBU level in the future.

Our journey has enabled us to:

- Confirm our target audience,
- Understand the legal requirements at French, European and international levels,
- Divide our approach into two parts and treat existing information systems and new information systems separately, seeking to:
    - For existing systems, to gain a high-level understanding of our IT environment and the people who make decisions and take action on a day-to-day basis to keep it running and improve it,
    - For newcomers, let's look at the key aspects involved in purchasing a new system (technical governance and the procurement process).

It is important to note that our participation in Cigref's working groups has been essential to our approach to digital accessibility, as discussions with other companies and the various presentations by experts in the field have helped shape our development.

There is still a long way to go, and our aim is to raise awareness of digital accessibility a little more each day – whether amongst developers, project managers, employees creating documents, software vendors selling us their applications, or many others. This will help to make our IT environment more accessible every day."

Barbara DEVAUX, IT Integration Programme Director, **EQUANS**

Case Study: Direction du Numérique des Ministères de la Transition écologique et de l'Aménagement des territoires

Analysis of the current situation and definition of the target audiences for the accessibility initiative

"The development of the "Handi et Numérique" strategy began by listening to people with disabilities and by bringing together the initiatives already in place at the time the roadmap was drafted. This initial phase culminated in 2022 in the production of a strategic document, drawn up in collaboration with all key stakeholders in the initiative (line departments, operators, decentralised services), and supported by a 'surprise' report.

The new "Handi & Numérique" programme aimed to put the roadmap into practice by overhauling it, enabling collective progress. Today, this programme is led at a high level by the General Secretariat and the Director of Digital (providing both high-level sponsorship and operational oversight), with a target date of 2027 to deliver nine actions across three areas:

1 – Supporting project owners in developing digital products accessible to all;

2 – Developing the Ministry's digital products and tools with users and staff with disabilities in mind;

3 - Providing staff with training in digital accessibility so that they can take action.

The target audience for the Ministers for Ecological Transition and Spatial Planning's initiative also includes staff with disabilities. Particular and distinctive attention has therefore been paid to the creation of the Helen Keller Laboratory, a space offering, in particular, equipment, accessories and workstations dedicated to people with disabilities. Indeed, digital accessibility is not limited to the digital realm, just as disability is not limited solely to RQTH (recognition of status as a disabled worker). We need a multi-equipment approach that takes into account the entire physical and digital working environment, and, for example, provides facilities for guide dogs, copies of speeches and minutes for the hard of hearing, and adapted desks...".

Marie-Laure Bouthière, Programme Manager for the "Handi & Numérique" programme,

Jean-Philippe Simonnet, Digital Accessibility Project Manager,

Geoffrey Arthaud, Head of the "Methods" Group,

Laetitia Legrand, UX/UI Designer,

General Secretariat, Digital Directorate, Ministries for Ecological Transition, Regional Planning, Transport, Cities and Housing

Case Study: Caisse des Dépôts

Development of a multi-year plan

"The multi-year plan is a strategic roadmap designed to steer digital accessibility, which provides for:

- Sustained implementation led by the Directorate (approved by the Caisse des Dépôts' Chief Information Officer);
- Precise, time-bound planning (with weekly progress reviews and quarterly reviews);
- Budgeted actions;
- Monitoring and updating in line with developments;
- Clearly defined and shared responsibilities;
- A public document available on the organisation's website (a true reflection of the work carried out internally).

The publication of this general policy document and the setting of objectives are mandatory and must be made public. This may take some time (between 4 and 6 months), given the need for approval by the various committees, but it also helps to involve decision-makers in this process.

With regard to the target audiences, consideration for users with disabilities applies both internally to staff and externally to customers or service users.

The role of accessibility leads is quite distinctive at the CDC, as they work directly with business analysts or UX/UI designers (for functional design) and with developers (for technical aspects). They have a dual role of providing support and monitoring compliance.

In terms of committee structure, a body (comprising sponsors and senior management) has been set up to share progress on accessibility and meets twice a year. Establishing a body with sponsors is essential for managing accessibility."

Yann Goupil, Digital Accessibility Lead at **the Caisse des Dépôts public institution**

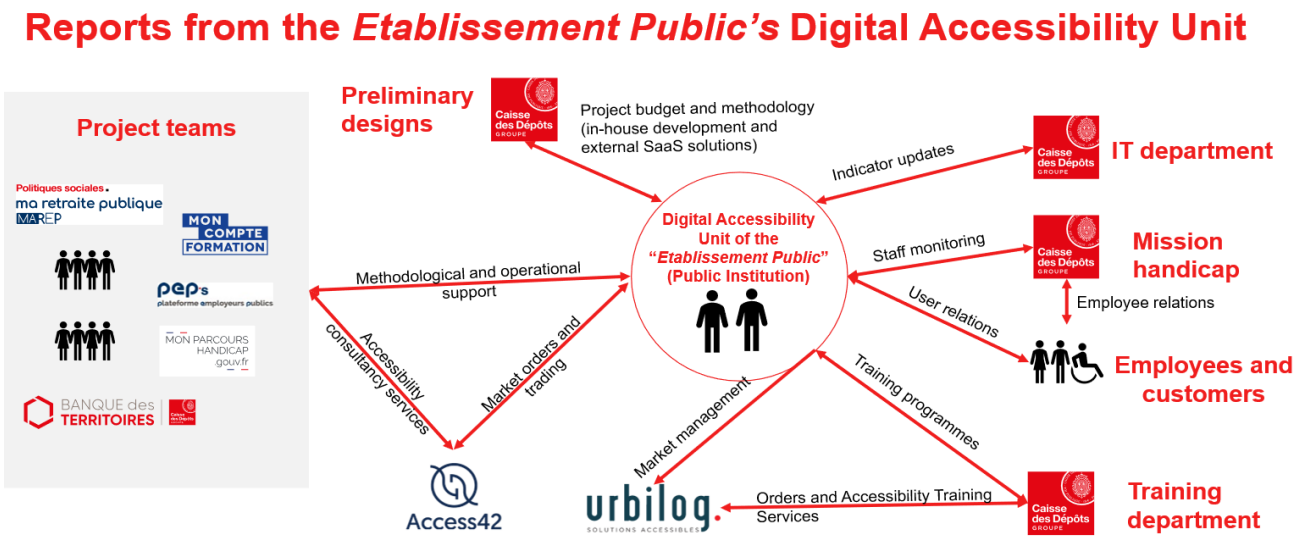
Délia Garbarini, Digital Accessibility Lead, **CDC IT**

2.3 RELATIONS WITH THE ORGANISATIONAL ECOSYSTEM

2.3.1 MAINSTREAMING DIALOGUE BETWEEN STAKEHOLDERS

To ensure that the establishment of governance does not remain a dead letter, it seems essential to rapidly build the capabilities of the entire project design and monitoring chain, both internally and externally with service providers, through an iterative cycle of validation and testing that must be standardised as much as possible.

Internally, the digital accessibility unit must foster interactions with a wide range of stakeholders and ensure these are sustained over the long term. The main stakeholders include the department to which the accessibility lead belongs, the IT department, teams responsible for procurement, user relations (staff and customers), any training departments, project teams, service providers, etc., as illustrated in the diagram below from the Caisse des Dépôts, which shows all the relationships maintained by the digital accessibility unit of the "Établissement Public" (Public Institution):



®Caisse des Dépôts_Presentation to the Cigref Working Group_2024

The aim of this "centring" approach is to foster cross-functional collaboration and to position accessibility at the appropriate organisational level.

Various actions can therefore be undertaken:

- **Raise staff awareness** of digital technology use for people with disabilities, targeting both digital staff and managers of departments less directly involved in these issues, in order to gradually spread awareness and embed this issue throughout the organisation. Provide a minimum amount of training (for example, two hours) before any project is launched; produce and share testimonials from people with disabilities about their everyday digital lives, including demonstrations of practical use cases, as was done as part of our working group with Jamshid Kohandel, Accessibility Officer at DINUM and a person with visual impairment, whose

testimony can be found in our video "Digital accessibility in everyday life: testimony and demonstration by Jamshid Kohandel".

- **To promote the ongoing professional development** of staff by making training on digital accessibility a compulsory part of organisations' training programmes (project management, interface design, content writing, auditing digital services, etc.);
- **To disseminate best practices** to be incorporated into projects in order to comply with relevant legal obligations (methodological resources);
- **Provide information on the subject and foster a sustainable** accessibility **community** or ecosystem (news, monitoring, events, etc.).

Case Study: DINUM

Overseeing and coordinating the accessibility approach across several organisations

"The DINUM (Interministerial Directorate for Digital Affairs) has set up a digital accessibility support programme structured around three main areas of action: **expertise**, **training and awareness-raising,** and **funding**.

This initiative, led by the **Digital Intervention Brigade** (DIB), aims to ensure that government digital products are designed, developed and operated in accordance with best practice to maximise the service provided to users.

Through the DIB, DINUM works directly with government departments to provide them with **technical expertise**, although responsibility for the products and services remains with the departments themselves. This expertise is channelled both towards **users**, for the most frequently used procedures, and towards **civil servants**, via tools designed for them, adopting an approach that gives equal attention to both users and civil servants.

These expert interventions can take several forms:

- **Audits and assessments**: conducting RGAA audits (flash or full) via the ARA website[23] ;
- **Technical recommendations**: drawing up recommendations to make a service accessible and organising technical discussions with development teams;
- **User testing**: organising service testing by users, particularly those with disabilities, which raises genuine awareness of the real impact of inaccessibility.

The BIN also provides **training and awareness-raising** on accessibility, and offers e-learning modules. This is crucial to ensuring that accessibility is maintained over time. Staff are, in particular, made aware of the need to produce accessible content and to carry out simple checks on the accessibility of developments provided by their service providers.

Finally, the DINUM offers **a funding scheme**: government departments can apply for financial support to make their digital services accessible (essential procedures and staff tools). It should be noted that private companies are not eligible for these measures due to resource constraints and competition considerations."

Jamshid KOHANDEL, Accessibility Project Manager at **DINUM**

Stéphanie NAZARIAN, Head of the Digital Intervention Unit at **DINUM**

[23] ARA website

Case Study: Direction du Numérique des Ministères de la Transition écologique et de l'Aménagement des territoires

A structured governance framework for scaling up

The first ministerial roadmap on accessibility was drawn up in 2022 and updated in 2025. It is implemented through a dedicated project-based governance structure, featuring a committee that meets regularly and includes two staff members with disabilities. This committee is responsible, in particular, for monitoring the progress of the initiatives. The programme includes a programme director and six digital accessibility lead for the roadmap's various components and actions; here are some concrete examples to be rolled out by 2027:

- Supporting project owners in developing digital products that are accessible to all.
  - Examples of actions: 1. Strengthening the compliance of digital products with the RGAA (France's General Framework for Improving Accessibility); 2. Assisting with the implementation of the government's design system for digitally accessible products.
- Develop the Ministry's digital products and tools with users and staff with disabilities in mind.
  - Example of action: empowering staff to play an active role in the transformation.
- Provide staff with training on digital accessibility so that they can take action.
  - Example of an initiative: raising awareness amongst all staff, and providing more targeted training for other stakeholders whilst ensuring the continuity of expertise.

Marie-Laure Bouthière, Programme Manager for the "Handi & Numérique" programme,

Jean-Philippe Simonnet, Digital Hospitality Project Manager,

Geoffrey Arthaud, Head of the Methods' Group,

Laetitia Legrand, UX/UI Designer,

General Secretariat, Digital Directorate, Ministries for Ecological Transition, Regional Planning, Transport, Cities and Housing

2.3.2 INVOLVING PROCUREMENT DEPARTMENTS, SERVICE PROVIDERS AND SOFTWARE PUBLISHERS

At the interface between internal and external operations, procurement processes must incorporate accessibility requirements, whether in calls for tenders, specifications, contractual clauses (see the

case study on “La Poste Group” below), or contract renegotiations. Two types of measures can facilitate this integration:

- **For providers of digital products and services and intellectual services, the provision of a document setting out accessibility requirements** is a key differentiating factor for its integration at all levels.

  Digital accessibility must form part of the selection criteria, regardless of the type of product or service, provided that it offers graphical user interfaces (website, cloud platform, mobile app, e-learning module, etc.), whether through the establishment of standard clauses or by requiring training for service providers. For example, the Ministère de l’Intérieur (Ministry of the Interior) has drawn up a model digital accessibility clause for its calls for tenders. This model can be adapted to suit the needs and constraints of each organisation[24] . In May 2026, the Economic Observatory for Public Procurement (OECP) also published a guide entitled “Clauses and recommendations for digital accessibility in public procurement”, which is a leading methodological resource and from which private companies can draw useful inspiration for their own practices[25] .

  Consulting a specialist lawyer enables the drafting of standard documents that safeguard contract clauses and tender documents by clearly defining responsibilities at an early stage. This proactive approach prevents numerous misunderstandings and the additional costs associated with any subsequent corrective back-and-forth. However, it remains difficult to contractually impose a strict obligation of result on a service provider in terms of compliance, as this depends heavily on parameters specific to the client. To this end, it may be worthwhile adopting a win-win approach, with criteria to be met for new calls for tenders and for contract renegotiations, possibly including an offer for an initial audit. Furthermore, the digital accessibility unit must ensure that external requirements placed on service providers are no less stringent than internal ones. To ensure this, it can introduce measures such as the systematic provision of minimum training for service providers and software suppliers, if only to highlight technical difficulties and compatibility challenges with legacy systems.

- **With regard to procurement departments, mapping out the main scenarios for service provision** helps to simplify the integration of digital accessibility into the preliminary project methodology. The case study from the Caisse des Dépôts presented below illustrates how breaking down these scenarios in terms of financial and man-hour costs can provide transparency and standardisation that facilitate decision-making and the allocation of fixed and recurring resources.

[24] Ministry of the Interior, Model digital accessibility clause: accessible via the DesignGouv website or via this direct download link.

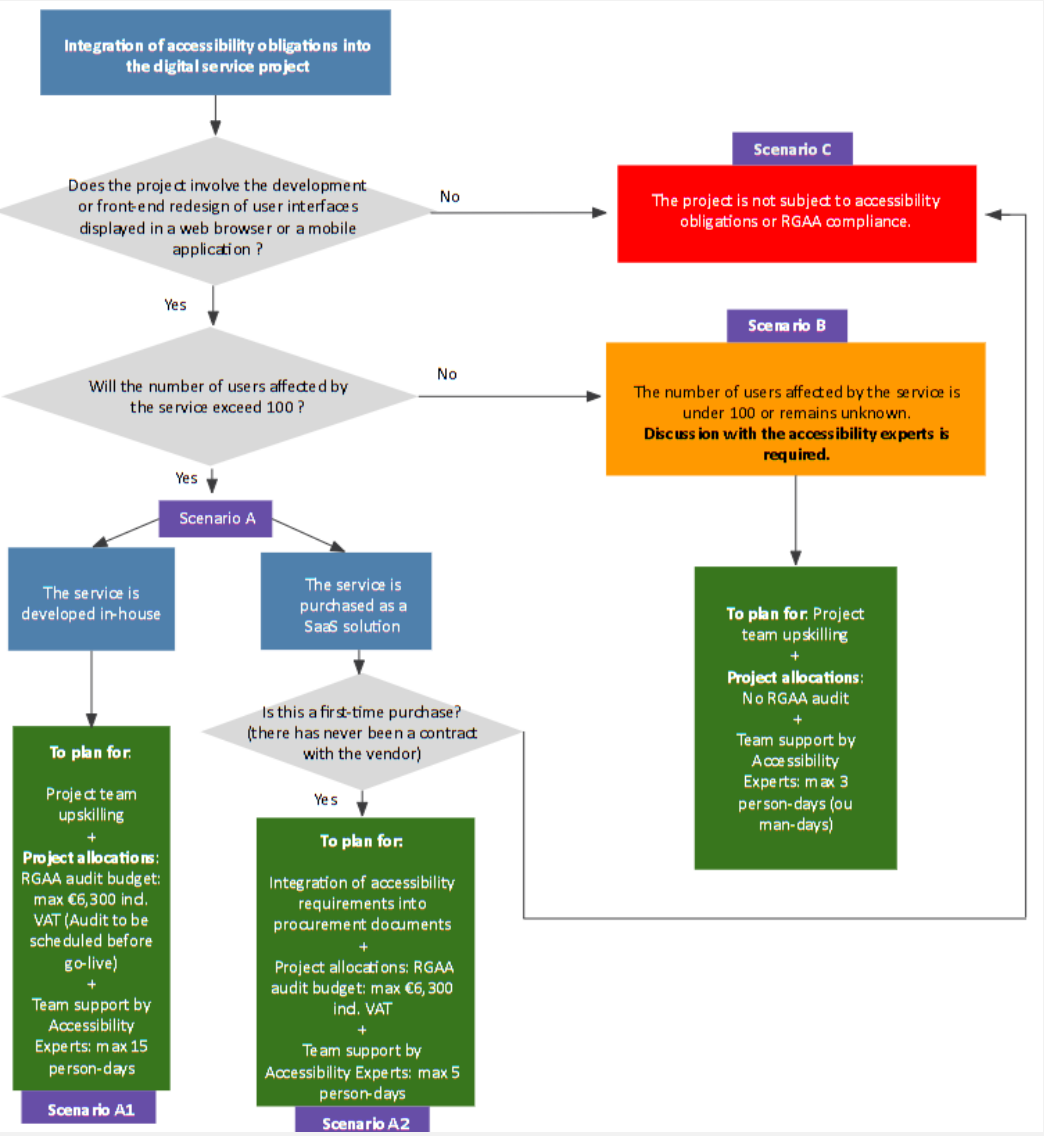
[25] OECP – ‘Clauses and recommendations for digital accessibility in public procurement’

Case Study: Caisse des Dépôts

Preliminary design methodology

"To determine how to organise the integration of digital accessibility requirements into the project phase in practical terms, the Caisse des Dépôts team responsible for digital accessibility developed four distinct scenarios, proposing a procedure for each possible case:

1. Scenario A1: **The digital service is developed in-house** and implements user interfaces aimed at more than 100 people. This involves upskilling the teams (Product Owner, business analysts, developers), an accessibility budget to be covered by the project – including the cost of an RGAA audit (up to €6,300 including VAT) – and the allocation of a maximum of 15 man-days of support.
2. Scenario A2: **The digital service is a SaaS solution contracted with a software provider** and features user interfaces intended for more than 100 people. This involves incorporating digital accessibility requirements into the tender documents, an accessibility budget to be covered by the project (including the cost of an RGAA audit, up to €6,300 including VAT) and the allocation of a maximum of 5 man-days of support.
3. Scenario B: **The digital service is intended for fewer than 100 users,** or the target number of users is unknown at this stage. It is necessary to contact the accessibility leads to discuss the scope and objectives of the project. Following these discussions, the project will either transition to scenarios A1/A2 or continue under scenario B, which therefore applies to a project with a very limited scope (from a functional perspective or in terms of target users, or even budget) and which will involve a small amount of skills development and brief support from the accessibility leads (up to 3 man-days of support).
4. Scenario C: Accessibility considerations do not apply if **user interfaces** are not implemented."



Flowchart of scenarios_Caisse des Dépôts

Yann Goupil, Digital Accessibility Lead at **the Caisse des Dépôts public institution**

Délia Garbarini, Digital Accessibility Lead, **CDC IT**

Case Study: La Poste Group

Criteria applied during procurement processes for digital accessibility on the i-TEAM side, regardless of the IT procurement area

"i-TEAM, a division of La Poste Group's IT Department, delivers digital services to internal customers (the general public, mail and parcels, postal banking, subsidiaries), historically via the shared IT system, the HRIS, the Finance IT system and all corporate IT systems. i-TEAM has over 1,000 staff spread across 10 sites." As a public service organisation, La Poste is committed to promoting ethical, inclusive and resource-efficient digital solutions. The Group is implementing an end-to-end approach to integrate accessibility from the early stages of projects right through to operation, including the procurement phase.

A target of at least 70 per cent compliance is being pursued as an interim step, both internally and in relation to software vendors. As the software industry is not considered sufficiently mature, the contractual requirement is structured around progress plans and roadmaps rather than exclusionary thresholds during consultation. All IT contracts include standard clauses on digital accessibility.

Here are a few examples:

Functional area	Objective	Questions	Evidence to be provided
AN-01	Check that the solution complies	Software package: - Do you comply, for digital solutions produced in-house or outsourced (software, digital solutions or components) / and for the digital media generated (PDF documents, screens, web pages, etc.), with all or part of the General Accessibility Improvement Framework (RGAA) version 4.1.2? Development services: - For your in-house or outsourced development work, do you comply with all or part of the General Accessibility Improvement Framework (RGAA) version 4.1.2? *N.B.: RGAA version 4.1.2 is based on the European standard: EN 301 549 V2.1.2 (2018-08), which is itself based on the Web Content Accessibility Guidelines (WCAG) 2.2.*	Software package: Please provide, for your digital solution, the latest available RGAA V4.1.2 compliance audit report and a declaration of conformity. Development proposal: A detailed compliance checking procedure applied systematically and manually (not solely via an automated verification tool) during application development and deployment.

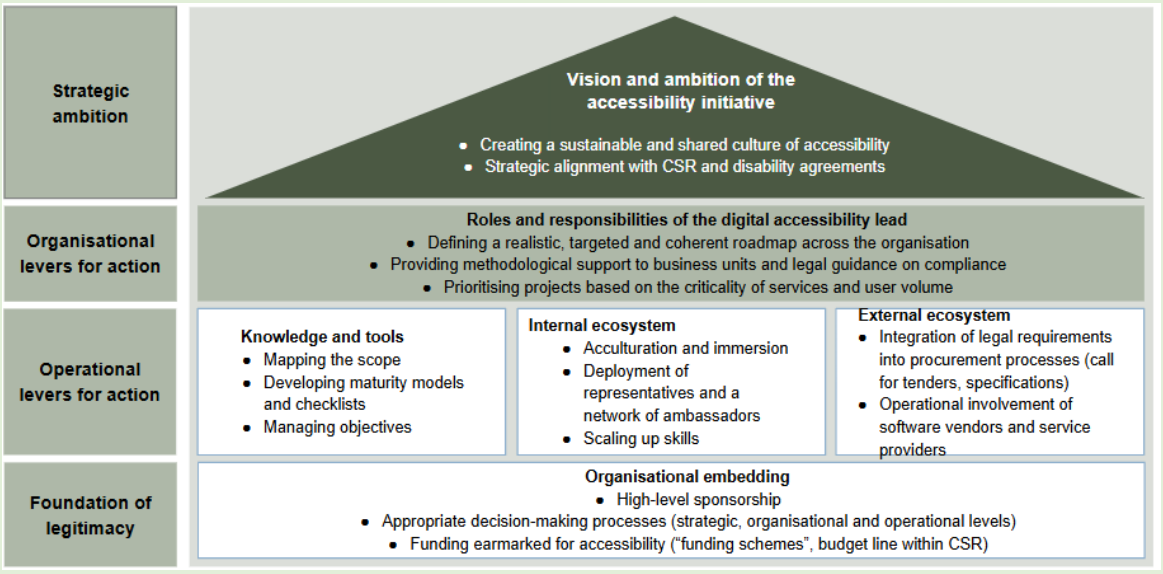
AN-02	Check that the solution is usable	- Are there any user experience reports on the use of your digital solutions by people with disabilities? (Documents and digital materials generated by the application, including the user manual). A usability test using assistive technology for the materials provided may be carried out in-house by La Poste.	List of company contact details and designated points of contact. A note describing the use of your digital solutions (including documents and digital materials) with various assistive technologies.
AN-03	Check that the solution is usable	- Are there usability checks in place during the development phases of your solution? => keyboard navigation, with screen readers (JAWS, NVDA, VOICEOVER, TALKBACK etc.), => text magnification (ZOOMTEXT, SUPERNOVA, magnifying glass, etc.).	Procedure for checking usability with assistive technologies.
AN-04	Check that the solution is robust	- Is your solution (developed website / software package web interface / mobile interface) usable in terms of digital accessibility (AN) with the main web browsers currently available on the market and the assistive technologies listed in RGAA v4.1.2? (Microsoft Edge/Edge Chromium, Mozilla Firefox, Google Chrome desktop, Safari on iOS and Google Chrome on Android). - Is your solution fully responsive (adapting to screen resolutions from PC to tablet and smartphone formats)?	Note describing the solution's digital accessibility compatibility with the main web browsers and assistive technologies.
AN-05	Check that the solution is robust	- Are works to ensure the digital solution's digital accessibility included in the roadmap and in the solution's implementation schedule?	A description of the roadmap and planned schedule, including provisions for digital accessibility.
AN-06	Check that staff at the company and any subcontractors are trained in digital accessibility.	- Do the service provider and any subcontractors have internal staff trained in digital accessibility? Specify the roles (project manager specialising in digital accessibility, developers trained in accessible development, screen reader experts, etc.) and the level of training in digital accessibility, etc.	List of certified training courses completed, and the organisations providing such training.

Mickaël Bouteiller, Digital Accessibility Expert at **La Poste Group**
Anne Tozzolino, CSR Project Manager at **La Poste Group**

Key points

The implementation of a digital accessibility governance framework involves several key actions:

- Establishing a strategy or multi-year plan for digital accessibility;
- Defining the roles and responsibilities of the accessibility lead;
- Provide staff with the necessary tools, for example by creating a centralised page on the intranet that brings together resources on digital accessibility testing and training;
- Carry out a compliance review every six months;
- Take into account changes in the law and the risks associated with non-compliance;
- Carry out regular benchmarking;
- Manage the expenditure associated with the initiative;
- Instruct the digital accessibility lead to include digital accessibility clauses in procurement contracts and to identify service providers capable of supporting implementation;
- Equip the lead officer and steering committees with cross-functional skills: they must be able to engage with HR, training and procurement departments, etc. As they have no binding authority, digital accessibility lead officers must be supported by decision-making bodies.



3 MANAGING AND EQUIPPING THE ROLL-OUT OF DIGITAL ACCESSIBILITY

Taking digital accessibility into account as early as possible in projects and processes ensures a more effective and less costly approach than retroactive implementation. It is then essential to manage its integration over time and ensure that it is applied in working methods and embraced by teams.

3.1 INTEGRATING ACCESSIBILITY INTO THE PROJECT LIFECYCLE

The cost of failing to integrate an accessibility approach is operational rather than financial. Solutions that propose adding accessible configurations after delivery in no way guarantee an accessibility approach that meets standards. At best, they allow for improved usability, but only for certain users, and in the form of an application revamp (i.e. a redesign of the application). But the risk is that this will be done superficially or, as one participant put it, that it will be merely a “change to the façade rather than the structure”. Indeed, from a technical perspective, digital accessibility cannot be achieved by simply adding an extra layer. It is achieved either through a complete overhaul or through continuous integration into development processes and into every “user story”, whether for front-end (visible interface) or back-end tasks.

To address the project lifecycle comprehensively, three aspects must therefore be taken into account: the management of existing legacy systems, integration **by design**, and **long-term** management.

3.1.1 LEGACY MANAGEMENT

The implementation of governance dedicated to digital accessibility must be both comprehensive and cross-functional within the organisation. Harmonising the level of accessibility of digital assets requires incorporating specific management of existing or legacy systems into the multi-year plan, taking into account the project lifecycle.

Integrating accessibility into existing systems requires a deep dive into the systems’ architecture to identify bottlenecks: missing documentation or obsolete frameworks, critical data flows and business processes, etc. The real challenge lies in striking the **right balance** between **corrective maintenance**—which would ensure a certain degree of compliance through minimal, regular patches and fixes—and a **complete overhaul**, which would allow accessibility criteria to be integrated natively and more easily. The first solution, whilst less costly in the short term, risks becoming more expensive in the long term, whereas the second requires a substantial initial investment, but one that can pay for itself in the medium to long term and rapidly reduce production costs. The choice between these two solutions will depend on organisational contexts and the criticality of the services.

Case Study: Direction du Numérique des Ministères de la Transition écologique et de l'Aménagement des territoires

Some priority actions for redesigning a website

"In the event that a website or application redesign is deemed necessary to achieve compliance, members of the "Accessibility & Digital" team adopt a three-pronged approach, ensuring that accessibility is integrated from the design stage:

- Start with a **strategic study using a UX/UI approach,** defining *personas* that reflect the diversity of users and their disabilities, and the implications for the interfaces to be designed (specific considerations regarding colours, contrasts, etc.);

- **Use of the Government's Design System**[26] , which ensures quality and consistency across all "*.gouv"* websites and certain government bodies such as "Pôle Emploi" and the "CNSA" (French National Solidarity Fund for Autonomy). The standards of this Design System incorporate accessibility by default into all its components (buttons, forms, navigation, etc.), thereby ensuring a high compliance score from the very start of development. It is, moreover, the most effective tool for standardising accessibility and rolling it out at scale.

- **Ongoing evaluation by users with disabilities**: from the earliest design phases and at every product iteration, people with disabilities are actively involved in evaluating the service. This approach is essential as it reveals usability issues that are not always detected by RGAA-based compliance audits. **A website may be technically compliant, but still offer a cumbersome user experience** (poorly accessible in terms of UX). It is also an essential requirement for working with suppliers trained in accessibility."

Marie-Laure Bouthière, Programme Manager for the "Handi & Numérique" programme,

Jean-Philippe Simonnet, Digital Hospitality Project Manager,

Geoffrey Arthaud, Head of the Methods' Group,

Laetitia Legrand, UX/UI Designer,

General Secretariat, Digital Directorate, Ministries for Ecological Transition, Regional Planning, Transport, Cities and Housing

[26] Government Design System

3.1.2 INTEGRATION BY DESIGN

To ensure and maintain a high level of compliance whilst reducing remediation costs, accessibility must be integrated right from the project scoping stage (or by design), rather than as an afterthought at the end of development. Under these conditions, the accessibility budget is no longer treated as an adjustment variable and includes, within any digital project undertaken, audits and man-days of support outside of development. According to one participating organisation, this represents no more than 15 days of expert involvement.

From the very start of a project, it is crucial to engage a digital accessibility lead or appoint an ad hoc lead. Their role will be to support the teams (UX/UI, project owners, developers) at every stage of the project (design, development, testing, deployment).

On the one hand, sharing best practices and appropriate tools will enable digital accessibility to be integrated as effectively and systematically as possible. On the other hand, the use of clearly defined indicators will enable it to be rolled out on an industrial scale, facilitating scaling up.

Integrating accessibility at an early stage helps to avoid bottlenecks later on. If every role (designer, developer, copywriter) knows their part, accessibility is no longer the responsibility of a single expert at the end of the process, and we can thus prevent a last-minute audit from revealing critical issues and delaying the go-live.

3.1.3 LONG-TERM MANAGEMENT AND MONITORING

Throughout the lifecycle of a service, accessibility requirements must be integrated directly into the functional and technical specifications of the products or services being developed, as and when required. For example, for a contact form, the specifications must specify the inclusion of labels clearly associated with the fields, explicit error messages and smooth keyboard navigation.

During development, and more specifically during interface design, certain criteria – such as colour contrast or the inclusion of a simple user flow – must take interoperability into account to enable users to navigate effectively between different assistive technologies (screen readers, magnification software, etc.).

It is worth noting here that accessibility benefits all users, far beyond those with disabilities alone. For example, an interface designed to be compatible with screen readers requires clarity and a clear hierarchy of information, which makes navigation smoother and more intuitive for everyone. This approach therefore also enhances the user experience in many so-called “situational” disability contexts, such as using a device in direct sunlight, in a noisy environment or when experiencing visual fatigue.

Once the design phase has been approved, accessibility requirements must be verified, or even audited, throughout the development process:

- **Pre-audits and audits**: from the start of the project phase, and in order to integrate digital accessibility as effectively as possible, pre-audits should be carried out at an early stage to avoid additional costs, followed by final audits to validate the project’s compliance. It is

possible to use specialist agencies, but it is also an option to train a member of staff to carry out these audits, in order to reduce costs and build in-house expertise.

- **Integration into testing processes**: accessibility testing must form an integral part of the acceptance testing plan. In particular, tests can be automated within the continuous integration/continuous deployment (CI/CD[27]) pipeline to detect accessibility regressions as soon as new features are deployed.
- **Use of external expertise**: for final and official validation, it is also possible to engage agencies specialising in accessibility. These experts carry out comprehensive audits in accordance with current standards.
- **Testing with end users**: the most effective approach to validating the user experience remains testing with people with disabilities. These tests reveal usability issues that may be missed by technical audits and enable the design of interfaces to be validated in a practical and inclusive manner. The management of user reports should also provide an opportunity to prioritise fixes for critical non-conformities and for a follow-up audit to be carried out by accessibility leads, with the accessibility statement updated accordingly.

[27] *Continuous Integration/Continuous Delivery*

Case Study: Ministère de l'Intérieur

Standardising user testing

- "In many cases, services declared to be compliant remain difficult to use in real-world conditions. This is why **user testing is an essential tool for ensuring effective accessibility**.

  These tests must be:

  - systematic;
  - carried out at every key stage of the project;
  - based on diverse test groups (visual, motor, cognitive, auditory).

  These tests enable us to:

  - identify issues that are not apparent in technical audits;
  - validate the relevance of design choices;
  - familiarise teams with the product.

- Given that user testing should become **standard practice in the same way as security or performance testing**, the Ministère de l'Intérieur (Ministry of the Interior), like many organisations, has therefore decided to systematise the integration of these tests within a "product" approach.

  These tests are therefore based on:

  - permanent panels;
  - partnerships with organisations;
  - internal measures involving the relevant staff."

Johanna DANIEL, Head of the Office for Ministerial Digital Policies,
Ministère de l'Intérieur (Ministry of the Interior)

Case Study: CACD2 (Crédit Agricole Digital Consulting and Development)

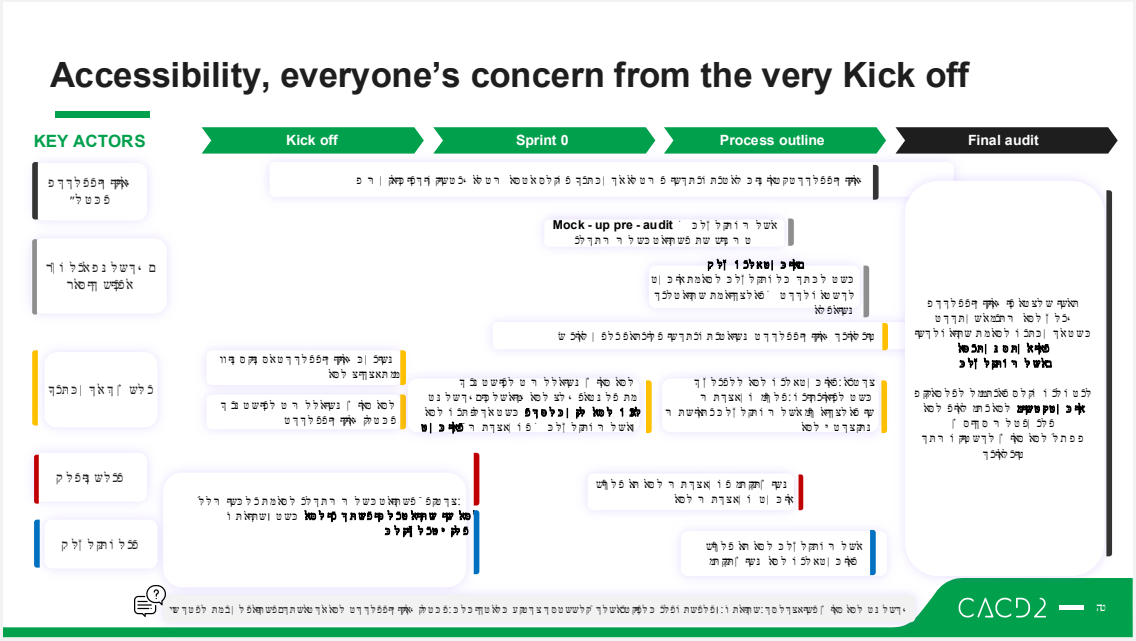
Methodology for the operational integration of digital accessibility into a project

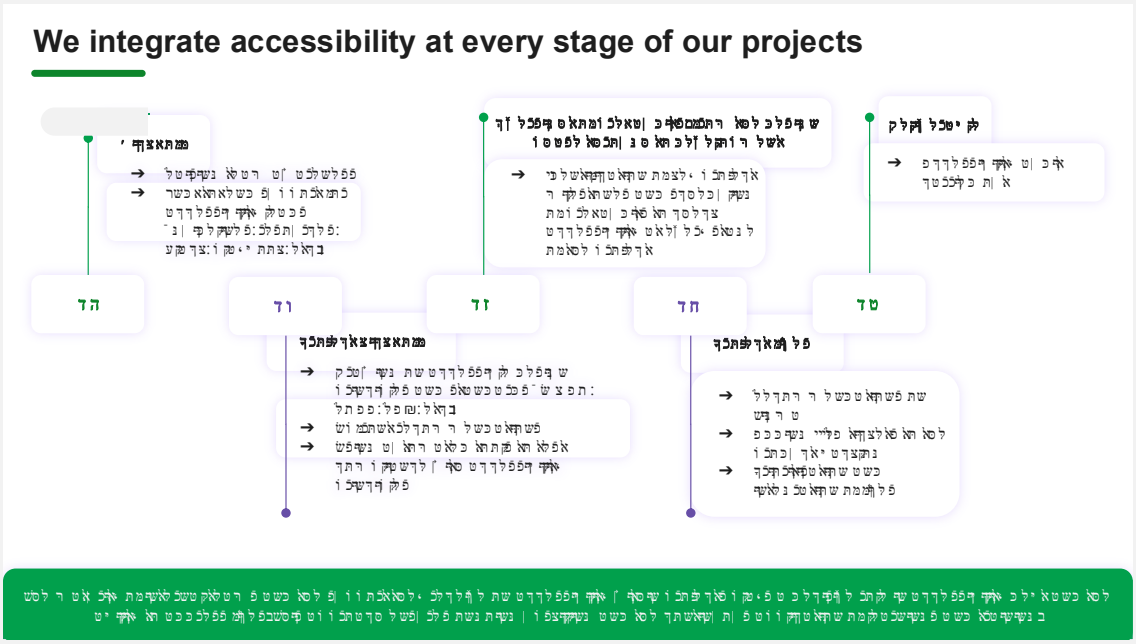
"To ensure the operational integration of accessibility into projects, CACD2 has prioritised the development **of robust in-house expertise** to support and guide the group's teams. This strategy has taken the form of a **hub of multidisciplinary specialists** (product managers, UX/UI designers, developers, …), with expertise in digital accessibility, whose primary role is **to provide support to project teams** (both internally at CACD2 and across the group's entities) **from the outset and throughout the project lifecycle**, and to **promote best practice** within the Crédit Agricole Group.

At the same time, CACD2 is developing **partnerships with agencies specialising** in digital accessibility to remain at the cutting edge and draw on the expertise of recognised market leaders: since 2024, ***Ethic First*** has been collaborating with CACD2 to deliver digital accessibility services, in particular to meet the relevant legal obligations and to combine their expertise to offer a comprehensive and integrated digital accessibility solution.

CACD2 has made **raising awareness and training** all its staff a key priority. In particular, the organisation ensures that accessibility issues are taken into account in all digital practices.

Here is a summary of the methodological timeline for integrating digital accessibility into a project:





The results of these initial actions have been positive:

- Training, continuous learning and the ”accessibility by design” approach have **significantly reduced project management, development and UX/UI design times**;
- CACD2 is committed to the continuous professional development of its staff: developers, for example, receive **regular training and support to enhance their expertise**, notably through the **Access42 certification**, recognised for its high standards and its key role in promoting digital accessibility;
- The commitment of staff to the A11y (Accessibility) division illustrates CACD2’s **collective drive** to embed digital accessibility into its practices on a long-term basis;
- Thanks to this support and training, the **number of pre-audits required has been reduced by two-thirds**;
- The showcase website is **100% compliant with the RGAA** (cacd2.fr certified[28]);

Digital accessibility should no longer be seen as a budgetary constraint, but as an essential pillar to be taken into account on a par with security or ROI.”

Elodie Vuarchex, Digital Accessibility Lead and Product Owner at **CACD2**

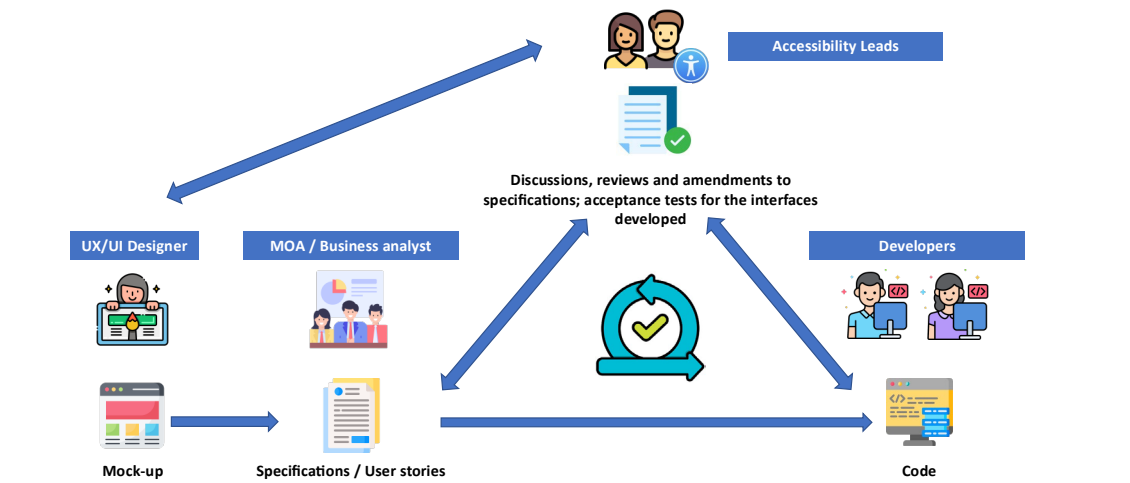
[28] The reporting body must be named: link to RGAA ‘Accessibility Statement’

Case Study: Caisse des Dépôts

How can the digital accessibility process be standardised?

"Standardising the digital accessibility process enables us to support staff and service providers at every key stage of the digital value chain.

A document setting out accessibility specifications is systematically made available to those involved in the design of digital services (project owners, business analysts, UX designers, etc.), who are responsible for drafting rules describing how user interfaces function.

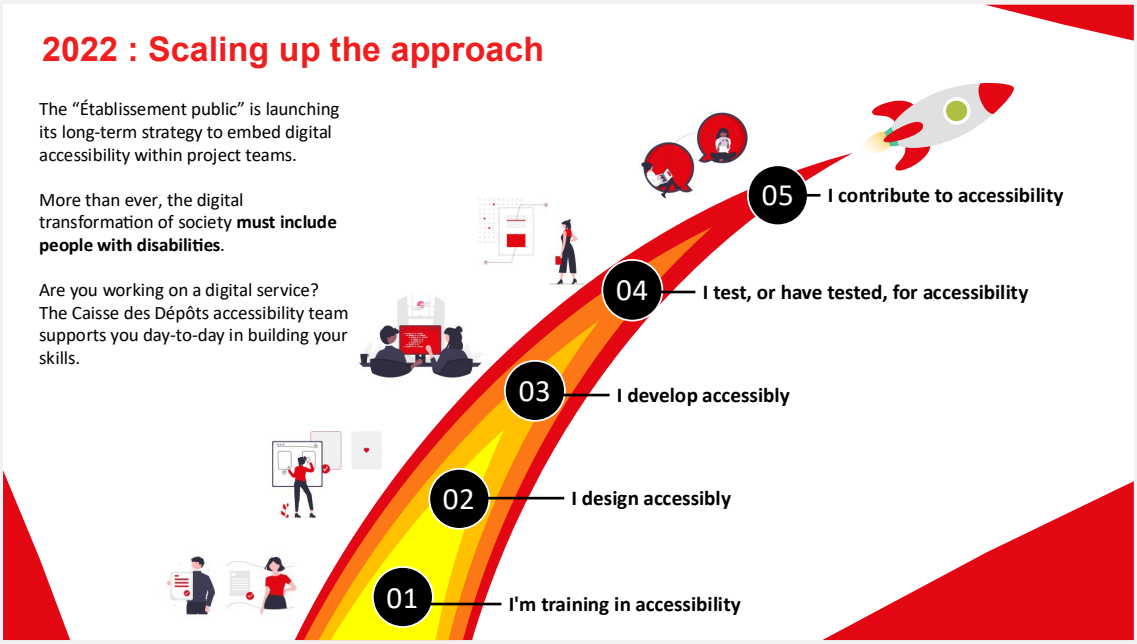


Here is how the organisation was structured around the roll-out of digital accessibility on a large scale:

1. Prerequisite: all those involved in the creation process are, at the very least, informed – or even made aware of – accessibility, or, better still, trained in accessibility and its mandatory nature in their work;
2. The person responsible for designing mock-ups (UX/UI Designer) creates mock-ups which are submitted to the subject matter experts and then sent to those responsible for the functional specifications (Project Owners/Business Analysts);
3. The latter produce functional specifications or product documentation, following the checklist and the specifications document drawn up by the subject matter experts. They may consult the accessibility subject matter experts for any further details or clarifications;
4. The functional specifications are sent to the developers;
5. The developers follow the functional specifications and technical specifications provided when developing the interfaces;

6. Project owners and business analysts carry out an initial acceptance test to verify that the accessibility specifications have been met;
7. The accessibility leads carry out a second-level acceptance test and validate the compliance of the developments.

NB: It should be noted that the relationship between the accessibility leads, the project owner and the developers is triangular and iterative, progressing in line with the development sprints."



Yann Goupil, Digital Accessibility Lead at the **Caisse des Dépôts** Public Institution

Délia Garbarini, Digital Accessibility Lead, **CDC IT**

Digital accessibility is a genuine **user-centred** approach (primarily focused on UX) involving user participation at the early stages of the project, alongside user testing that places people with disabilities at the heart of the process. All these practices ensure the genuine **usability** of digital sites and applications, going beyond mere compliance. Indeed, it is worth noting that a website that is 100 per cent compliant is not necessarily 100 per cent accessible: issues such as dyslexia or mental health conditions, for example, are not taken into account in the RGAA. Furthermore, some websites that are 100 per cent accessible may not necessarily be very practical for users with disabilities to use, sometimes due to usability issues. Digital accessibility criteria, in terms of compliance, are technical and 'objective'. However, during a user test, the results will always be subjective and dependent on the type of user and their disability.

3.2 TOOLS AND TECHNICAL LEVERS

The success of a digital accessibility roll-out initiative across a large organisation cannot be limited to the mere technical application of standards, such as the RGAA (France's General Framework for Improving Accessibility). It is intrinsically based on a **profound cultural transformation** and on the **provision of tools and methodologies** enabling each professional group to integrate digital accessibility as a fundamental quality criterion, rather than as an additional constraint or an afterthought.

3.2.1 METHODS AND TOOLS FOR FOSTERING A CULTURE OF ACCESSIBILITY

Digital accessibility must involve all stakeholders, from business teams (responsible for requirements and content) to suppliers (through strict accessibility clauses in public and private procurement contracts). To achieve this, it is necessary to:

- **Formalise digital accessibility within internal processes by embedding it in the organisation's culture**: include in every employee's onboarding programme an "accessibility starter" session lasting at least one hour, covering the activities and projects of the digital accessibility unit, and incorporating a final assessment questionnaire.
- **Provide the procurement department with resources** such as standard digital accessibility clauses and specifications, as described in detail in section 2.3.
- **Raise awareness across the organisation**:
    - Implement initiatives to raise awareness amongst all staff, not just technical teams;
    - Offer specific training courses, tailored to the employee's profile and career path, such as modules on writing and creating accessible materials, or on communicating via social media[29] , demonstrating that it is possible to reconcile editorial quality with compliance (making PDFs accessible, ensuring the accessibility of editorial content, etc.);
    - For developers in particular, ensure rigorous training in testing tools and the interpretation of results.
- **Provide training in stages**: offer a range of training courses tailored to different roles (developers, designers, project managers, copywriters) and spread these courses out over the long term.
- **Foster synergy between departments**: seek to optimise the multidisciplinary synergies of product teams using agile methods. This point is crucial in the context of digital accessibility, and it is possible to capitalise on common ground between design and accessibility, accessibility and eco-design, or even eco-design and security, through joint workshops or sessions led by people trained in these various areas.
- **Organise the continuous collection of feedback** to promote digital accessibility projects and identify their challenges and successes.

[29] Valentin Haüy – Recommendations for making content published on social media accessible, which is also subject to regulatory requirements

- **Create operational guides incorporating practical case studies tailored to the organisation**. It is worth drawing inspiration from existing resources, such as the factsheets provided by the RGAA[30] , WCAG[31] , Orange[32] , or Déque University[33]. Orange, for example, has developed an immersive escape game called "Tota11ylos" [34] , which aims to raise awareness of the challenges faced by people with digital disabilities[35] .

The following case studies from Crédit Agricole S.A. and CACD2 outline their approaches to fostering a culture of inclusion and providing support through a number of practical tools and initiatives.

[30] RGAA, Criteria and tests

[31] Web Content Accessibility Guidelines (WCAG) 2.0

[32] Orange, Digital Accessibility at Orange

[33] Deque University, Web Accessibility Checklist

[34] Orange, 'Tota11y Lost' Escape Game

[35] Orange, Article on the 'Tota11y Lost' escape game

Case Study: Crédit Agricole S.A.

Operational roll-out and support measures for staff

➢ **Tools to raise awareness amongst all staff**

"As awareness-raising is considered central to the roll-out of digital accessibility, Crédit Agricole has put in place a number of tools and resources to embed these practices into staff members' daily routines:

- A **video** aimed at all staff, designed to raise their awareness of digital accessibility (presenting the different types of disability, key statistics, a reminder of the regulations, the link to the Social Project and the Group's DNA, as well as the approaches envisaged for the future).
- Four **short videos**, each focusing on a specific type of disability (visual, hearing, cognitive, motor), and sharing findings, needs and proposed solutions with staff.
- **A booklet raising awareness of digital accessibility**:
  - Outlining the key principles for a more inclusive digital environment;
  - Designed for Crédit Agricole Group staff;
  - Helping to understand digital accessibility;
  - Including real-life scenarios, within a corporate context, for four types of disability (motor, hearing, visual and cognitive);
  - Available on a dedicated intranet page;
  - And fully accessible.
- In addition, **a guide** to Office 365 tools, detailing features dedicated to digital accessibility, has been published, and practical guides on applying best practice in digital accessibility have been made available to staff.

➢ **Best practice guides for communication**

These practical guides are designed to assist communications officers in producing accessible communications materials. They provide recommendations, illustrated with examples of best and worst practices, for the distribution of content by Crédit Agricole (newsletters, LinkedIn posts, video transcripts, etc.)

Example of a guide on newsletter accessibility:

- The content of the newsletter must meet the following criteria: simple wording and structure using paragraphs and headings, etc.; use of a single language; and a "sans-serif" font.

- When using images, a distinction must be made between decorative and informative images.
- Contrast and colour schemes must comply with accessibility criteria.
- The guide concludes with a checklist to assess compliance with digital accessibility requirements: “Is my newsletter accessible?”

➢ **The digital accessibility implementation guide for digital accessibility lead** complements the framework and includes:

- An introduction to digital accessibility (definition, principles, link to the wider societal project, challenges, business opportunities, risk management – images, regulations, etc.)
- The application of digital accessibility within the Group (objectives, scope of application, collective responsibilities with a focus on user journeys requiring collaborative work with the Group’s various entities)
- The roll-out of the initiative within each entity (priority actions, available resources, governance at entity and Group level, external support).”

Élodie Tesson, IT Business Line Communications

Fabien Métivet, Senior Digital Project Manager,

Crédit Agricole Group SA

Case Study: CACD2 (Crédit Agricole Digital Consulting and Development)

Resources for support and training

- A ninety-minute presentation on the "CACD2 checklists" is offered to developers, Product Owners, UX/UI designers and project managers, followed by a quiz, which adds a fun element that is very well received. This presentation can also be delivered to other entities within the Group.

The documentation tools, which are updated regularly, serve as reference resources for teams:

- Checklist for developers;
- Checklist for designers;
- Recommendations to be included in user stories.

- At the same time, a hub has been set up to bring together all information on digital accessibility, providing access to checklists, industry updates, an overview of the accessibility team, and details of compliance rates achieved.
- CACD2 **actively** monitors **developments** by attending specialist events and conferences, and runs a **dedicated Slack channel**, fostering a genuine community of mutual support around accessible development.

Elodie Vuarchex, Digital Accessibility Lead and Product Owner at **CACD2**

3.2.2 FOCUS ON ACCESSIBLE DESIGN SYSTEMS

The majority of organisations in the working group are seeking to develop a framework for an accessible design system. A design system is a portal or platform that brings together a set of resources (component libraries, code, documentation) and rules for harmonising user interfaces. More and more design systems are incorporating digital accessibility criteria to facilitate and standardise their implementation by designers and developers. They generally include:

- Essential information on digital accessibility, along with all relevant media and content (web, mobile and conversational interfaces, videos, etc.);
- Technical frameworks and specific guidelines concerning the choice of colours, typefaces, iconography, etc.;
- A section on eco-design;
- Examples of accessible pages or applications.

Some design systems also incorporate an inspection mode or a checklist to assess the compliance of the services or products developed.

For some organisations, the design system has helped to secure strong buy-in from teams regarding digital accessibility, particularly when the system itself is well designed.

The design system thus acts as an essential technical and methodological tool that structures production and pools resources. It centralises communication between designers and developers, enabling them to collaborate more effectively and avoid any loss of information.

Case Study: iMSA

Scaling up digital accessibility through governance, the design system and training

"For iMSA, an economic interest group (GIE) of the MSA (France's second-largest social protection organisation), which manages 400 digital products for 5 million beneficiaries and 16,000 staff, accessibility is not merely a legal requirement but a societal challenge stemming from the demands of public service. The issue has been addressed for several years (the Accessiweb label for msa.fr in 2008) but has recently gained momentum with the creation of the in-house UX/UI Studio, which drives initiatives on quality issues such as user experience, eco-design and accessibility.

- The approach is now natively integrated into our governance framework through:
  - **Integration into Lean Portfolio Management**: accessibility is incorporated as a fully-fledged budget line and approved by the business units during budget votes.
  - **An institutional partnership (DINUM)**: DINUM supports iMSA, on the one hand through its funding scheme to overhaul its online services by improving accessibility and user experience, and on the other hand through the Digital Intervention Brigade (DIB), which offers training courses to raise awareness of digital accessibility.
  - **A joint leadership approach**: the initiative is being led, alongside Julie Parra (Project Manager at the MSA), to ensure strategy development, regulatory compliance and training.
- Scaling up across an application portfolio as extensive as iMSA's relies on rigorous standardisation – particularly when updating the application portfolio – and on gradual compliance based on:
  - **Two Design Systems as a foundation for consistency and standardisation**
    - **MSA Design**, for the public/members' scope (online services, mobile apps, white-label websites)
    - **Orion**, for the internal MSA (16,000 staff) and iMSA (1,000 staff) domains.

    These tools are essential for maintaining and updating the application portfolio.
  - **A pragmatic approach to compliance**: management focuses on resolving critical and major issues, followed by validation through pre-audit cycles (once 80 per cent of development is complete, aimed at developers and focused on productivity), final audits and counter-audits by service providers. Project integration is carried out agilely and throughout the value chain (in sprints), seeking to forge partnerships within the business teams.

- Recognising that accessibility requires specialist expertise, iMSA has implemented a strategy for managing and continuously improving skills to combat the "Dunning-Kruger effect" (i.e. the overestimation of one's own abilities) and technical obsolescence, in addition to the individual monitoring carried out by accessibility leads:
  - **Promoting front-end expertise**: challenging the myth of the full-stack developer by reaffirming the need for specific skills (semantics, W3C standards) distinct from those required for back-end development.
  - **A differentiated, long-term training programme**: a segmented approach distinguishing between awareness-raising (general knowledge and fostering a mindset), operational training (for day-to-day internal or external activities), expert training ("training the trainer", for identified roles, to be maintained in the long term) and technical monitoring (constantly evolving topics) to ensure the long-term retention of knowledge within the organisation.
  - **Operational support ("Accessibility Expert Helpline")**: provision of expert resources during development phases to respond to requests from project teams in real time."

Benoît Klein, Digital Accessibility Lead at **iMSA**

3.2.3 MONITORING KPIS AND DEMONSTRATING ROI

Steering the evolution of practices through the definition of key performance indicators (KPIs) is essential to demonstrate the value of investments made in this area and to embed digital accessibility within a strategic and measurable approach.

Including digital accessibility KPIs in dedicated dashboards will therefore enable:

- Monitor performance across the entire digital portfolio (rather than on a site-by-site basis);
- Measure the impact of the actions taken (training, redesign, integration of the Design System);
- Track progress (compliance rates, number of people trained) and demonstrate ROI (reduction in support tickets, reduction in costs associated with late fixes, improvement in completion rates, etc.);
- Report to governance bodies (CIO, Senior Management, CSR).

Here is an example of how KPIs have been categorised, based on feedback from working group participants, into four main categories: **compliance KPIs**, **governance KPIs**, **operational KPIs** and, finally, **KPIs relating to training and cultural adoption**.

1 – Compliance KPIs		
Indicator (KPI)	**Measure**	**Strategic Objective**
Total number of blockages	Counting instances of non-compliance, by application, by service and by site.	Identify the faults that prevent users from accessing services.
Overall compliance rate	Average percentage of RGAA criteria met across the entire system (at group level and by subsidiary).	Provide a summary and aggregated view of regulatory performance to decision-making and monitoring bodies.
Critical non-compliance ratio	Proportion of critical non-compliance cases relative to the total number of non-compliance cases. Criticality is determined based on the number of users, the significance of the activities involved and the number of corrective actions required.	Weigh up non-compliance to prioritise actions to be taken on the most critical services.
Publication rate of accessibility statements	Percentage of digital services with a valid and up-to-date accessibility statement.	Ensure transparency and compliance with legal publication obligations.

2 – Governance KPIs		
Indicator (KPI)	**Measure**	**Strategic Objective**
Allocation of human resources	Number of FTEs (Full-Time Equivalents) specifically dedicated to managing and providing expertise on accessibility (accessibility officers, internal auditors, etc.).	To measure the actual human resources investment at the appropriate level within the organisation to support the initiative in the long term.
Positioning of the digital accessibility lead within the organisation	The level at which the digital accessibility lead is positioned and to which they report within the organisation. The measurement scale could be as follows: Level 1 (Low): Reports to an operational team (development unit, communications, etc.). Little cross-functional influence. Level 2 (Medium): Reports to operational committees or departments. Strong technical decision-making power, but limited influence over business and budgetary decisions. Level 3 (Optimal – Target): Reports to a high-level strategic department and, ideally, has direct access to the Executive Committee. Strong capacity for transformation, with management authority over the business units.	Measuring the Digital Accessibility Lead's capacity for influence and task execution.
Dedicated project budget	Multi-year trend in the budget allocated to accessibility (costs of training, tools and project integration, conducting external audits, planning website redesigns).	Quantify the resources allocated to integration, development and scaling-up projects.

3 - Operational KPIs		
Indicator (KPI)	**Measure**	**Strategic Objective**
Remediation rate	The ratio of the number of "tickets" relating to major digital accessibility non-conformities to the percentage resolved.	To reduce "accessibility debt" and ensure the responsiveness of development teams.
Frequency of use of an accessible design system	The frequency with which the design system and its certified accessible components are used by the design/development team, compared to the use of non-standard or unaudited components.	Measuring adoption of and reliance on the design system, ensuring consistency in accessibility across the entire IT infrastructure.
Test coverage rate (automated or manual)	Percentage of features covered by automated and manual audit tools (comprehensive audits).	Ensure that validation tools and processes are applied comprehensively and continuously.
Total number of real-world tests conducted by *Personae*	Number of user tests conducted specifically with people with disabilities, per product and per year, achieving a high level of satisfaction amongst these users.	Measure the effort devoted to usability accessibility and not just theoretical compliance.
Accessibility regression index	Number of new accessibility defects introduced following an update or the release of a new feature.	Measuring the effectiveness of training and quality checklists integrated into the development cycle (DevOps).

4 – Training and onboarding KPIs		
Indicator (KPI)	**Measure**	**Strategic Objective**
Training rate for target teams	Percentage of staff (developers, designers, product managers, others, etc.) who have completed a certified accessibility training course.	To ensure that the required skills are present at every stage of the digital design, production and maintenance process.
Rate of content validation by digital accessibility leads within business units	Percentage of published content (text, PDF documents, videos) that has been validated by digital accessibility leads within business departments (Communications, HR, Legal, etc.).	Decentralise responsibility for accessibility and integrate it into the day-to-day practices of business and IT projects.
Rate of inclusion in contractual documents	Percentage of new tenders or supplier contracts incorporating clear accessibility clauses and requirements.	Formalise and systematise accessibility requirements with external partners.

Key takeaway

Ensuring digital accessibility cannot be improvised: it must be planned for, structured and maintained throughout the project lifecycle, combining appropriate methods, tools and governance. To achieve this, several best practices should be implemented:

- Take digital accessibility into account by design from the project scoping stage onwards, and at every phase throughout the project lifecycle;
- Include *personas* representing people with disabilities;
- Design user journeys taking into account real-world usage constraints;
- Measure the quality of experience, not just compliance;
- For existing systems, weigh up the options between corrective maintenance (patches) and a complete overhaul, the latter often proving more cost-effective and robust in the long term;
- Involve users with disabilities throughout the testing phases and during pre-audits;
- Develop design standards within design systems that incorporate digital accessibility requirements by default;
- Include, within the design system for projects, rules for blocking or approving based on compliance or non-compliance with digital accessibility criteria;
- Equip the organisation with the necessary resources (training, external support, audits, automated test monitoring, etc.) and ensure that developers receive training, particularly regarding testing tools and the interpretation of results;
- Regularly update the digital accessibility statement – a task reserved exclusively for designated leads;
- Monitor progress and areas for improvement using a “digital accessibility” KPI dashboard.

4 KEY POINTS FROM THE ACTION PRINCIPLES TO SUPPORT SCALING UP

Having examined the requirements of the regulatory framework, defined the principles of structured governance and detailed the steering mechanisms essential for the large-scale roll-out of digital accessibility, this fourth part aims to provide a **summary of the key principles** that must not be overlooked in order to successfully implement digital accessibility initiatives.

Designed as a practical summary of the working group's deliberations, this section aims to address the requirements for scaling up digital accessibility and proposes two operational tools:

- **An operational action framework (4.1)**: in response to recurring bottlenecks (siloed working, a lack of standardised skills, and the need to demonstrate profitability), this section identifies all the strategic levers that can be utilised and provides a framework of actions that organisations can implement directly to embark on their transformation.
- **A methodology for addressing the three areas** identified as priorities by the group's participants **(4.2)**:
    - Investing in awareness-raising and tailored training;
    - Establishing structured governance that is monitored over time, with dedicated bodies and committees;
    - Ensure iterative monitoring throughout the entire project lifecycle.

4.1 BARRIERS AND SOLUTIONS IDENTIFIED BY THE WORKING GROUP

Identified bottlenecks	Strategic solutions
Siloed organisation, lack of support and coordination Difficulty in identifying stakeholders and mobilising the entire chain of action.	**Structured, cross-functional governance** • Establish a Design Authority or a dedicated steering committee. • Appoint digital accessibility leads within each business unit to champion the initiative and support teams, alongside a central lead responsible for ensuring consistency and making decisions. • Support the initiative through high-level sponsorship. • Clearly identify the stakeholders (management, lead officers) and work in a product-oriented manner. • Ensure ongoing monitoring through dedicated bodies.
Varied levels of accessibility expertise The paradox faced by business units (Communications/Marketing), which may fear a decline in creativity or the quality of their work.	**Contextualised training** • Create operational guides tailored to each role (e.g. InDesign, editorial guidelines). • Highlight the benefits of accessibility (improved SEO, dedicated scorecard for the Finance or Legal departments). • Systematically raise staff awareness of accessibility issues.
Demonstrating ROI Direct profitability is difficult to isolate, costs are hard to justify, and there are obstacles linked to the rigidity of supplier contracts.	**Management based on reputational risks** • Promoting accessibility as a safeguard against damage to brand reputation (often feared more than penalties). • Action on procurement and contract clauses (weighting in RFPs and built-in provisions).
“Short-termist” approach Accessibility treated as a last-minute fix rather than an intrinsic quality.	**Native integration into the product lifecycle** • Thinking long-term (the product’s entire lifecycle) and integrating digital accessibility natively (before, during and after). • Carry out regular **pre-audits** and testing with **staff with disabilities**.

Lack of cultural awareness and skills A theoretical understanding of disability and a lack of in-house expertise.	**Investment in human resources and community engagement** • Bring together staff with disabilities and 'able-bodied' teams to confront the latter with the reality of disability. • Develop practical tools and guides, using real-life examples. • Capitalise on in-house training and the recruitment of staff with expertise in accessibility. • Highlight internal "success stories" to maintain commitment.

Isolated technical approach
 	
Complexity in maintaining accessibility throughout the product's lifecycle.
	Standardisation of the approach
	
	• Move beyond a simple "compliance project" approach to ensure accessibility is built in natively and on an ongoing basis.
	• Use of a Design System that natively integrates accessible components to harmonise and facilitate:
	  ○ adherence,
	  ○ maintenance operations,
	  ○ the long-term retention of in-house expertise.

Managing existing systems Difficulty in managing the compliance of a vast digital legacy portfolio.	**Operational Management** • Define a multi-year plan with a financial breakdown (a clear roadmap covering 1, 3 and 5 years). • Deploy a website monitoring tool to track their level of accessibility over time. • Prioritise accessibility in business decision-making and ensure the maintenance of legacy systems (technical debt management).

4.2 PRIORITY INITIATIVES IDENTIFIED BY THE WORKING GROUP

Whilst this document does not claim to be an exhaustive list of accessibility measures, the working group has identified the following priority areas due to their foundational nature. They can serve as a starting point, providing a concise and practical overview of the essential actions required to effectively launch a digital accessibility initiative.

4.2.1 INVESTING IN TAILORED TRAINING AND AWARENESS-RAISING

Awareness-raising and training on digital accessibility must be extended to all staff. The challenge is to create a chain of responsibility for digital accessibility, from initial training in education through to the ongoing maintenance of accessible digital solutions, by involving cross-functional expertise.

Training and awareness-raising therefore take place at several levels: technical teams (developers, designers, etc.), office software users, and decision-makers. Digital departments may take the lead in organising such training, but other departments must also be closely involved, such as the legal department or HR.

- **The first step is to raise awareness amongst decision-makers** (IT project managers, senior executives, etc.). The scale of the risks (fines, reputational risk) and the opportunities (market expansion, CSR) associated with digital accessibility must be specifically presented to senior management in the most realistic way possible. The challenge is to secure high-level support and a budget allocation commensurate with the work to be undertaken. It is also essential to emphasise that "ignorance of the law is no excuse" and that the legal and financial implications concern every management role (Legal, Finance, IT, etc.) and corporate officers.

- **The second stage involves engaging the teams** through the roll-out of two training programmes:
  - **Training for technical teams directly involved in the initiative** (front-end developers, business analysts, testers, etc.). They must receive accredited and ongoing training comprising specific modules:
    - Accessible front-end development (RGAA),
    - Inclusive UX/UI design,
    - Proficiency in automated testing tools.

  - **Training, within each business function, for everyday users** who produce digital content (office documents, PDFs, emails, videos) or validate procedures (specific training on writing and creating accessible materials, demonstrating how to balance editorial quality with compliance; checklists tailored to each business function; practical examples such as creating a newsletter or drafting a PDF, etc.).

NB: It is also worth supporting the integration of digital accessibility modules into the initial training programmes of engineering, IT and design schools, following the example of initiatives taken for eco-design (REEN Act – 2021).

- **The third stage involves building in-house expertise to ensure the sustainability of the approach**, even though audits and user testing may continue to be outsourced (with support) to qualified service providers. In practical terms, this can be achieved in several ways:

  - **Identifying internal liaisons and ambassadors** within each department who contribute, or are likely to contribute, to the dissemination of best practice.

  - **Involving people with disabilities**: this is one of the best ways to raise awareness amongst staff and ensure usability accessibility. Furthermore, their presence and participation in user

testing is the most practical and human way of fostering lasting awareness amongst product teams.

- **The inclusion, as standard, of digital accessibility skills requirements in job advertisements** for technical roles (Developers, UX/UI, QA). Mandatory awareness-raising modules can also be included in the **onboarding process** for all new recruits to the organisation.

4.2.2 ESTABLISHING STRUCTURED GOVERNANCE THAT IS MAINTAINED OVER TIME

Positioning digital accessibility as a key driver of business transformation involves various concrete actions, divided into three stages.

- **The first step is** to **ensure high-level sponsorship for the initiative**, enabling strategic alignment and the dissemination of best practice across the organisation. The sustainability and credibility required for this support can be achieved through:
  - Financial incentives through the inclusion of a dedicated accessibility metric in the bonus schemes of the initiative's sponsors.
  - A reminder of legal obligations and the associated penalties for non-compliance with these obligations.
  - A rigorous governance framework based on the legal requirement for private companies to have a multi-year digital accessibility plan. This strategic document could serve as a means of allocating roles, implementing formal monitoring and establishing a robust and clear multi-year roadmap.
  - Addressing the issue of digital accessibility within CSR initiatives.
- **The second step is to define the areas of responsibility and remit of the stakeholders.** The organisational implementation of accessibility depends on several factors:
  - Identifying the organisation's accessibility lead, who must champion the initiative, steer its progress and report annually to a dedicated body on the progress of the initiative.
  - Decentralising implementation outside the strategic committee (COMEX) through the establishment of an operational committee (COPIL) and, where appropriate, a third intermediate committee – the decision-making committee (CODIR) – to approve strategic directions and manage the project portfolio.
  - The regular presentation of results to the various decision-making bodies.
- **The third step is to ensure cross-functional coordination around digital accessibility**. The issue of digital accessibility must not remain the sole preserve of digital departments. Governance of digital accessibility must be integrated into the remit of communications, HR and CSR departments.

  It is therefore necessary to define a starting point for engaging the various stakeholders and ensuring a cross-functional approach within monitoring and decision-making bodies, taking into account the organisation, its structure, sector, culture, etc.

Digital accessibility can be structured using a general approach to ESG risk mapping, incorporating various impacts:

1. Reputational and communication impacts;
2. Operational impacts (customer/user/employee relations);
3. Regulatory and financial impacts, going beyond simply setting aside a budget to pay fines;
4. Social justice impacts (people's rights to greater autonomy through digital tools and services).

It can also serve as a bridge to scale up the Responsible Digital label (via a broadened 'eco-design' index). This approach allows for alignment with existing processes and achievements.

4.2.3 ENSURING ITERATIVE MONITORING THROUGHOUT THE ENTIRE PROJECT LIFECYCLE

To be sustainable, digital accessibility must not be a final step but a guiding principle integrated into every phase of the project. To meet the need **for iterative monitoring throughout the lifecycle of digital projects**, several best practices, tools and methods can be deployed:

➢ **Project methodologies**

- Incorporate digital accessibility criteria into **project methodologies** and functional specifications right from the start of the planning phase. This helps **to avoid massive additional costs associated with subsequent corrective redesigns.** Furthermore, through training, continuous learning and accessibility by design, design times are significantly reduced;
- Ensure that digital accessibility is **understood and endorsed by project leaders and decision-makers** so that it is **factored into estimates** (project management time, UX/UI design time, front-end development time, etc.).
- Have **an in-house expert in digital accessibility available to teams from the early stages**. This helps to demystify the subject, without reducing it to merely flagging non-compliance. It is indeed important to distinguish between operational accessibility (usability rates) and a 100% compliance rate;
- Using a **design system** enables accessibility to be standardised by utilising components that are already compliant by default;
- **In design, testing and development processes**, it is recommended to define *personas* (or "typical users") with one or more types of disability:
    - Initially, creating *personas* can be an effective way of building a user interface during the UX development phase. However, the range of disability scenarios represented must be sufficiently broad and detailed for the approach to be worthwhile, at least in terms of compliance.
    - Secondly, simulating real-life scenarios through user testing can be highly valuable for best meeting actual needs, whilst avoiding the pitfall of "imagining the disability". It also helps to motivate teams by offering a more qualitative and human perspective on

their work. These considerations go beyond the purely "quantitative" lens that emerges from audits.

➢ **Process**

Iterative monitoring of digital accessibility relies on the implementation of a rigorous process centred on holding stakeholders accountable, checking compliance and dedicated monitoring during the project phase:

- Extend responsibility for accessibility to all levels of project management (Product Owner, Product Manager, Scrum Master, etc.);
- Ensure strict monitoring of the rectification of non-compliance issues in the audited applications. To guarantee objectivity, those responsible for the assessment must not be the same people who produce the applications;
- Establish a regulatory body with the authority to request revisions to developed or purchased services;
- Conduct regular internal self-audits and external audits to ensure the development, maintenance, improvement, evaluation, rectification and compliance of digital assets (websites and applications) in order to update the accessibility map at group level.

➢ **Support**

The presence of **digital accessibility leads** (internal or external) is crucial to support teams (Product Owners, UX, Dev) from project launch through to go-live, through a range of measures:

- Providing **operational guides specific to each role** (checklists for content managers, designers, buyers, accessibility leads, etc.);
- Incorporating a **quiz** or **questions** specifically on digital accessibility into every presentation of a new project, ensuring that teams have fully understood the requirements;
- Identifying a **"flagship" project** to serve as a case study and be promoted as an example to as many people as possible;
- Produce an **internal video showing real-life testing** and share it with project managers, operational committees and even senior management;
- Demonstrate the **opportunities offered by digital accessibility** in digital projects (as ease of use is synonymous with ease of adoption). To do this, it is best to use resources that are already available and adapt them to specific use cases (customer applications, email campaigns, etc.);
- Ensure **effective cross-functional communication**: provide forums for discussion amongst staff, and even amongst customers themselves.

CONCLUSION

Digital accessibility is now a key issue at the heart of digital transformation for both public and private organisations. It is no longer merely a regulatory obligation but directly impacts organisations' ability to guarantee equitable access to their digital services for all users.

Against a backdrop of increasingly digitised user journeys, the inaccessibility of a digital service is not merely a deterioration in the user experience: it can lead to the effective exclusion of certain groups, particularly people with disabilities. As such, digital accessibility must be viewed as a fundamental right, on a par with access to essential services.

For large organisations, the challenge is no longer to address accessibility on an *ad hoc* or remedial basis, but to integrate it as a fundamental aspect of their digital transformation. This is why digital accessibility is a collective challenge that extends far beyond the remit of the IT department. It involves all business units and stakeholders.

The experience of the members of the Cigref working group is unequivocal: organisations that have succeeded in improving their digital accessibility are those that began by establishing a governance structure led by a clearly identified "digital accessibility" lead, with a clear mandate and dedicated resources. To carry out their duties fully, the lead's position within the organisational hierarchy is crucial: the working group recommends a position at Executive Committee level or one reporting directly to the Executive Committee, as this is the only level that guarantees genuine decision-making authority. In addition to these arrangements, the lead officer can help provide procurement teams with standard digital accessibility clauses and pre-filled tender specifications (including indicators such as the obligation to provide a recent RGAA audit report, a contractual commitment to a remediation plan in the event of non-compliance, or a requirement for minimum training for service provider teams).

At the same time, the effectiveness of the approach depends on re-engineering production cycles. The shift from a reactive corrective approach to a proactive, "by design" approach is essential for controlling costs and safeguarding budgets. By mainstreaming accessibility within development workflows and equipping each department with shared standards, what was once perceived as a constraint becomes a driver of software quality.

For digital accessibility to be truly effective, it must be based on real-world usage rather than technical constraints alone. This means placing the user at the heart of the process by involving, from the design stage onwards, representative profiles of people with disabilities, by creating user journeys tailored to their actual constraints, and by evaluating the quality of the user experience. Accessibility then becomes a driver for the overall improvement of the user experience, benefiting all audiences.

This report has demonstrated this through feedback from members of the Cigref working group: scaling up is possible. It relies neither on extraordinary resources nor on a complete organisational overhaul. It rests on a single decision: to make accessibility the norm, not the exception.

Looking to the future, digital accessibility is currently at a turning point, offering both great promise in terms of its potential and significant uncertainty regarding its long-term viability:

- On the one hand, AI opens up an unprecedented range of possibilities: the ultra-personalisation enabled by technical and behavioural data streams, the streamlining of conversational interfaces via generative AI, and the emergence of agent-based AI capable of supporting and empowering users, are creating new conditions for adapting services to the specific needs of each disability — and, beyond that, for offering everyone digital experiences that are genuinely tailored to their uses and ways of functioning.

- On the other hand, the widespread adoption of generative or agent-based AI for navigating the internet or intranets could fundamentally alter the very purpose of digital accessibility. For web pages, Generative Engine Optimisation (GEO) is posing serious competition to Search Engine Optimisation (SEO) in improving the visibility of websites on search engines that are increasingly AI-driven. In this context, AI systems are becoming interfaces, filters, transactional engines and even active agents, serving users or acting in their stead. The issue of UX/UI is thus being significantly called into question by the algorithmic ranking standards specific to these AI systems. The same issue arises when searching for internal organisational data using AI solutions. In conclusion, if new AI technologies are not designed from the outset to be inclusive and to promote accessibility, they risk creating a new digital divide, one that is deeper and more opaque.

Cigref is a network of major French companies and public administrations whose mission is to develop its members' ability to integrate and master digital technologies. Through the quality of its thinking and the representativeness of its members, Cigref is a unifying force in the digital society. Cigref was founded in 1970 under the French law of 1901, and does not engage in any profit-making activities.
To achieve its mission, Cigref relies on three core businesses that make it unique.

Membership
Cigref embodies the collective voice of France's leading companies and government agencies on digital issues. Its members share their experience of technology use within working groups, to help identify best practices.

Intelligence
Cigref participates in collective reflection on the economic and societal challenges of information technologies. Founded nearly 50 years ago, Cigref is one of the oldest digital associations in France, and draws its legitimacy from both its history and its mastery of technical subjects, the foundation of skills and know-how that underpin the digital world.

Influence
Cigref promotes and respects the legitimate interests of its member companies. As an independent forum for exchange and production between practitioners and players, it is a benchmark recognized by its entire ecosystem.

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