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2025.54 BRIDGING THE DIGITAL DIVIDE – CHALLENGES AND OPPORTUNITIES IN THE USE OF DIGITAL SERVICES IN LEGAL MIGRATION PROCEDURES

**European Migration Network
Ad-hoc query**

December, 2025

AD-HOC QUERY ON 2025.54 BRIDGING THE DIGITAL DIVIDE – CHALLENGES AND OPPORTUNITIES IN THE USE OF DIGITAL SERVICES IN LEGAL MIGRATION PROCEDURES

REQUESTED BY EUROPEAN COMMISSION ON 30 SEPTEMBER 2025

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Exported for: Unrestricted Dissemination

Responses from: EMN NCP Austria, EMN NCP Belgium, EMN NCP Bulgaria, EMN NCP Croatia, EMN NCP Cyprus, EMN NCP Czech Republic, EMN NCP Estonia, EMN NCP Finland, EMN NCP France, EMN NCP Germany, EMN NCP Greece, EMN NCP Hungary, EMN NCP Ireland, EMN NCP Italy, EMN NCP Latvia, EMN NCP Lithuania, EMN NCP Luxembourg, EMN NCP Netherlands, EMN NCP Norway, EMN NCP Poland, EMN NCP Slovakia, EMN NCP Slovenia, EMN NCP Spain, EMN NCP Sweden, EMN NCP Ukraine **(25 in total)**

Disclaimer: The following responses have been provided primarily for the purpose of information exchange among EMN National Contact Points (NCPs) in the framework of the EMN. The contributing EMN NCPs have provided, to the best of their knowledge, information that is up-to-date, objective and reliable. Note, however, that the information provided does not necessarily represent the official policy of an EMN Country.

BACKGROUND INFORMATION

This inform focuses on accessibility for disabled applicants[1] and the inclusion of digitally disadvantaged applicants[2] in their use of digital services[3] in legal migration procedures[4] in EMN Member and Observer Countries. It complements previous EMN informs and studies on digitalisation in migration management and aims to collect information on the current state of play – if and

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how digital services provided in legal migration procedures are developed and designed for the target groups to promote digital accessibility and inclusion, what considerations are made with regard to any legal requirements in the provision of these digital services and which challenges and good practices have been identified. Ultimately, it aims to collect information that facilitates and promotes the accessibility for disabled applicants and the inclusion of digitally disadvantaged applicants in using digital services in legal migration procedures.

The aims of the inform are:

To gain a better understanding of how EMN Member and Observer Countries adapt their digital services in legal migration procedures including, where applicable, according to the EU Directive on the accessibility of websites and mobile applications (Directive (EU) 2016/2102), the UN Convention on the rights of persons with disabilities (CRPD) (2006), and any national legislation in order to enable disabled and digitally disadvantaged applicants to access these services. To gather more knowledge on the application of the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), which migration authorities in EU Member States have to comply with when providing digital services in legal migration procedures. To identify challenges in EMN Member and Observer Countries with regard to the provision of digital services to disabled and digitally disadvantaged applicants in legal migration procedures, and including any present common legal challenges in EU Member States. To identify any good practices on digital inclusion and digital accessibility in EMN Member and Observer Countries' provision of digital services in legal migration procedures.

[1] See Definitions of terms in section 5.

[2] See Definitions of terms in section 5.

[3] See Definitions of terms in section 5.

[4] Visa application procedures, international protection procedures (including resettlement) and temporary protection procedures fall out of the scope of the inform.

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WE WOULD LIKE TO ASK THE FOLLOWING QUESTIONS:

We would very much appreciate your responses by **14 November 2025**.


1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.
2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.
3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.
4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant's disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.
5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.
6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.

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7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.
8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.
9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.
10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.
11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.
12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.

RESPONSES

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		Unrestricted Dissemination ?	
	EMN NCP Austria	Yes	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Support for persons with disabilities in submitting applications is the responsibility of the federal provinces. --- Source: Ministry of the Interior</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>See response to Q1. --- Source: Ministry of the Interior</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign</p>

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			<p>language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>See response to Q1. ---</p> <p>Source: Ministry of the Interior</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>See response to Q1. ---</p> <p>Source: Ministry of the Interior</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>See response to Q1. ---</p> <p>Source: Ministry of the Interior</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack</p>
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			<p>of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>See response to Q1. ---</p> <p>Source: Ministry of the Interior</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes. The Federal Disability Equality Act applies, among other things, to the federal administration and aims to eliminate or prevent discrimination against people with disabilities, thereby ensuring the equal participation of people with disabilities in society and enabling them to lead self-determined lives (Art. 1 and 2 of the Federal Disability Equality Act). ---</p> <p>Source: Ministry of the Interior</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No. ---</p> <p>Source: Ministry of the Interior</p>
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			<p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>n/a ---</p> <p>Source: Ministry of the Interior</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes. Equal treatment is already ensured by the fact that in Austria applications for residence permits must be submitted in person to the competent authority. Residence permits that are subsequently issued may only be handed over in person to foreign nationals who have reached the age of 14 (Art. 19 para. 1 and para. 7 Settlement and Residence Act). This means that personal interaction is required at the beginning and end of the procedure. The possible (non-)use of digital services during the procedure has no effect on the fees or the maximum duration of the procedure as stipulated by law.</p> <p>---</p> <p>Source: Ministry of the Interior</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p>
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			<p>See response to Q1. --- Source: Ministry of the Interior</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>See response to Q1. --- Source: Ministry of the Interior</p>
	<p>EMN NCP Belgium</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. The Act of 19 July 2018 on the accessibility of websites and mobile applications of public organisations is a Belgian federal law that aims to ensure the digital accessibility of government websites and mobile applications so that people with disabilities can also use them. This law implements the European legal obligation set out in Directive (EU) 2016/2102. The websites of the Belgian Immigration Office, the Federal Public Service Foreign Affairs, Working In Belgium (applications for single permits must be submitted via this website), the Brussels Capital Region, Flemish Region, Walloon Region and the German Community (in Belgium the regions are competent for examining single permit applications) comply (partially or completely) with accessibility requirements that are stipulated in European standard EN 301</p>

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			<p>549.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>No</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>No</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>Not applicable</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with</p>
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			<p>a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>No</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Applications for family reunification or student migration are submitted at a Belgian diplomatic post or at a municipality. This is done during an in-person appointment. At the in-person appointment, disabled or digitally disadvantaged applicants are helped by staff. They can also bring someone (friend, family member, ...) to assist them.</p> <p>Applications for a single permit must be submitted via the Working in Belgium website, which serves as a one-stop shop. For fixed-term work permits, the applicant is the employer or their representative, and for permanent work permits, the applicant is the migrant worker. The one-stop shop sends the applications to the competent region (Brussels Capital Region, Flemish Region, Walloon Region or the German Community), which examines them. Those regions can be reached by telephone every day. The Brussels Capital Region and the German Community also offer the possibility to make an appointment, and if necessary, assistance with the digitalization of the application can be provided.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p>
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			<p>Yes. In 2021, the Brussels Region approved the Digital Accessibility Plan (PDT). This plan aims to strengthen the digital skills of Brussels residents through four pillars, 17 areas of action and 66 action points. The PDT's actions are aimed at making digital technology accessible to all residents of Brussels. Based on studies on digital inclusion, the PDT focused on six particularly vulnerable target groups: job seekers, young people, senior citizens, people with disabilities, people in precarious situations and women. The Digital Accessibility Plan is therefore not specifically aimed at third-country nationals who have started a legal migration procedure.</p> <p>Additionally, in the Brussels Region, this issue is regulated by the decree and ordinance of the French Community Commission, the Brussels-Capital Region, and the Joint Community Commission of 25 January 2024 on the digital transition of public authorities. This legislation is also not specifically aimed at third-country nationals who have started a legal migration procedure.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No. When applying for a D-visa (long-stay visa) an appointment needs to be made at a Belgian diplomatic post or a Visa Application Centre (managed by an external service provider). Very often this appointment is made online. When making an online appointment, an online visa application form must be completed. But the appointment at the diplomatic post or the Visa Application Centre, during which the visa application can be lodged, is always in person.</p> <p>When applying, for example, for family reunification at the municipality, an in-person</p>
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			<p>appointment must be made to submit the application.</p> <p>Applications for a single permit must be submitted via the Working in Belgium website, which serves as a one-stop shop. For fixed-term work permits, the applicant is the employer or their representative, and for permanent work permits, the applicant is the migrant worker. The one-stop shop sends the applications to the competent region (Brussels Capital Region, Flemish Region, Walloon Region or the German Community), which examines them. Those regions can be reached by telephone every day.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>Not applicable</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p>
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			<p>Yes. According to the Federal Public Service for Foreign Affairs, digitally disadvantaged applicants are more common in applications for family reunification than in other forms of legal migration, such as international student applications.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>When applying for a D-visa (long-stay visa) an appointment needs to be made at a Belgian diplomatic post or with an external service provider. Very often, this appointment is made online. But the appointment at the diplomatic post or with the external service provider, during which the visa application can be lodged, is always in person. At the in-person appointment, staff assist disabled or digitally disadvantaged applicants. They can bring someone (friend, family member, ...) to help them.</p> <p>In most third countries, the Belgian Federal Public Service for Foreign Affairs collaborates with an external service provider that operates a Visa Application Centre. Those external service providers are selected via a public tender. During the tendering procedure, they are assessed in particular on the quality of the centre, including access for people with reduced mobility, with at least one toilet provided for such persons.</p>
	<p>EMN NCP Bulgaria</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p>

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		No
		2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.
		No
		3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.
		N/A
		4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.
		N/A
		5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with


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			<p>a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>N/A</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>N/A</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>N/A</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>N/A</p>
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			<p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>N/A</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>N/A</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>N/A</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>N/A</p>
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	<p>EMN NCP Croatia</p>	<p>Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>YES. In order to ensure the effective implementation of the provisions of Directive (EU) 2016/2102 and the UN Convention on the Rights of Persons with Disabilities, a series of measures have been implemented to ensure that third-country nationals who are persons with disabilities and have a regulated residence in the Republic of Croatia have access to information and communication technologies and systems on an equal basis, in order to enable them to live independently of other people's assistance and to have unhindered access to all services and facilities intended for the public.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>NO.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>YES. A person with a disability has the opportunity to inform the competent police</p>
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			<p>department/station about the need for specific forms of support measures when regulating their residence status in the Republic of Croatia and can be provided with contact with legal migration officers in their own home with prior arrangement. Specific support measures such as the use of Braille or sign language are the responsibility of the third-country national who is a person with a disability.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>In order to ensure the protection of third-country nationals who are persons with disabilities in terms of the processing of their personal data, entities participating in the procedure for regulating their residence are obliged to act in accordance with the provisions of the Act on the Implementation of the General Data Protection Regulation (Official Gazette, No. 42/18), which entered into force on 25 May 2018, and which ensures the implementation of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>NO.</p>
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			<p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Persons with limited digital literacy or a lack of it can regulate their residence status by personally visiting the premises of the competent police department or station, where they can do so with the assistance of an official. In exceptional cases, it is possible to arrange for an officer to come to the address of the person with a disability, in accordance with a prior agreement.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>No.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>YES. Submission of applications for short-term and temporary residence in the Republic of Croatia can be fully regulated electronically, i.e. via digital platforms, e.g. documentation for issuing a residence and work permit can be submitted via www.burzarada.hzz.hr, documentation for granting temporary residence for the purpose of digital nomads residence via www.digitalnomadscroatia.mup.hr, application for short-term residence can be made via</p>
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			<p>the E-visitor system, etc.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>YES. Detailed information on the procedures for regulating short-term residence, temporary residence, permanent residence or long-term residence in the Republic of Croatia is available on the website of the Ministry of the Interior www.mup.gov.hr, and specific questions can also be sent to the competent police departments/stations electronically to the email addresses available on the Ministry's website.</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>YES.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>NO.</p>
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			<p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>NO.</p>
	<p> EMN NCP Cyprus</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>YES. Cyprus has harmonised national legislation with Directive (EU) 2016/2102 on the accessibility of websites and mobile applications of public sector bodies. The relevant Law No. 50(I)/2019 was approved and published in the Official Gazette on 5 April 2019. This legislative framework ensures compliance with the European standard EN 301 549 and the UN Convention on the Rights of Persons with Disabilities (CRPD).</p> <p>The Digital Services Factory (DSF), a key initiative under the Cyprus Digital Strategy, promotes uniformity, security, and accessibility across public digital services through the implementation of the Service Standard (SS). This framework ensures that accessibility requirements are systematically integrated into new digital public services developed with the use of Service Standard.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please</p>

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			<p>explain your answer.</p> <p>YES. In addition to legislative compliance, Cyprus has made significant efforts in enhancing User Experience/User Interface (UX/UI). An important step in enhancing digital public services is the ongoing refinement of the Design System—a standardised framework adopted across government services. Developed as part of the Service Standard under the Digital Services Factory, the Design System ensures consistency, accessibility, and ease of use across digital interfaces. It acts as a cornerstone for user interface and experience design, unifying visual and interactive elements. This approach supports a seamless and user-friendly experience for all citizens, including those with diverse needs and varying levels of digital literacy.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Applicants with disabilities can inform authorities for their support needs. The Department for Social Inclusion of Persons with Disabilities and the Migration Department, provide channels for requesting accommodations, such as accessible formats or assistance during application processes. Support in communication is available in Cyprus by different agencies, for example:</p> <p>Sign language interpretation is provided by the Cyprus Association of Sign language and the services are subsidized by the State through the Pancyprian Confederation of the Organisations of Persons with Disabilities (CCOD). Any person in need for such services in Cyprus can have access through the CCOD. Translation of text into braille language is provided also by CCOD and in addition by the School for the Blind, under the Ministry of Education. Again there is no exclusion according to citizenship.</p>
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			<p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>Cyprus ensures GDPR compliance through law 121(I)/2018, which aligns with the EU GDPR. The principle of data minimisation is upheld by collecting only necessary information. Applicants with disabilities can inform authorities about their support needs, as described in Q3, through the available channels in Cyprus (e.g., CCOD, School for the Blind, Migration Department). The processing of such personal data is carried out in full compliance with the EU GDPR 2016/679 and the national Law 125(i)/2018.</p> <p>Data minimization is ensured by collecting only information strictly necessary to provide the requested support. Access to personal data is restricted to authorized personnel, and technical and organizational measures are applied to guarantee confidentiality, integrity, and security. Purpose and storage limitations are strictly followed, and, where feasible, data are anonymized or pseudonymized. Applicants are informed about the processing of their data through clear privacy notices, ensuring transparency and compliance with GDPR and national requirements.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>Cyprus applies a user-centric design approach in digital service development. The Digital Services Factory includes accessibility testing and user research, including feedback from disabled users, as part of its service standard.</p>
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			<p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Cyprus addresses digital disadvantage through national initiatives like the Digital Skills Promotion Project, offering free training to older adults and vulnerable groups, including migrants, to improve digital literacy and access to e-services.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>There is a series of legislation on equal access in various sectors. Specifically on digital services there is a law regulating that all public services websites must be accessible to persons with disabilities. This is a law under the responsibility of the Deputy Ministry of Research, Innovation and Digital Policy.</p> <p>National legislation promoting accessibility and inclusion, includes: Law 50(I)/2019 (transposing Directive 2016/2102) Law 57(I)/2024 (Accessibility of Products and Services Law) This law mandates equal access to digital services for persons with disabilities</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p>
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			<p>Among its efforts to increase efficiency and enhance accessibility to its services, the Migration Department is in the process of developing an online service which will allow the public to submit the following applications online: Renewal of a temporary residence permit for the purposes of domestic employment Renewal of a temporary residence permit for the purposes of Remunerated employment Renewal of a temporary residence and employment permit for employees in companies of foreign interests Renewal of a temporary residence permit for family members of employees at companies of foreign interests (family reunification) Renewal of a long-term residence permit Users of this service will be able to process the payment of the application’s fees online, and upon completion they will be sent a receipt and instructions directing them to refer to a designated office in person in order to provide their biometric data, which is necessary for the issuance of their residence permit. The said service is expected to operate by mid-2026. In addition to the above residence permits, it is foreseen that additional residence permits will be gradually included in the service.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>NA: there were no in-person services that were entirely replaced by digital services. The digital services outlined in Q8, will be offered complimentary to the existing services.</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p>
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			<p>Fees and processing times are standardised to all applicants in legal migration procedures, in line with principles of equal treatment. All applications are reviewed in order of priority according to their submission date.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>Challenges include: low digital literacy among older and migrant populations, Limited awareness of assistive technologies.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>A notable good practice is the Design System, developed and maintained by the DSF. It serves as a framework ensuring accessibility and usability across government services. The most recent version (3.2, released in May 2025) incorporates updated accessibility guidelines, and best practices in inclusive design.</p> <p>Another good practice launched is the digital Skills Promotion Project for vulnerable groups and the Digital Service Standard, ensuring accessibility by design.</p>
	<p>EMN NCP Czech Republic</p>	<p>Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to</p>

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			<p>disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes.</p> <p>The Czech Republic transposed Directive (EU) 2016/2102 through Act No. 99/2019 Coll., on the accessibility of websites and mobile applications (the Accessibility Act). Section 1(1) states that this law “implements the relevant Union act” and regulates the accessibility of websites and mobile apps managed by obliged public entities. Under Section 8 of Act No. 99/2019, these entities must publish an accessibility statement on compliance, identifying areas of non-compliance and plans to remedy them. In practice, not all components of migration-related digital services fully meet all accessibility requirements yet (for example, some PDF documents may lack a machine-readable text layer), but the legal obligation exists and is being progressively implemented.</p> <p>The Ministry of the Interior (which oversees migration and asylum matters) publishes an accessibility declaration for its website, acknowledging partial compliance and ongoing improvements. The design system for Czech government web pages explicitly states that public websites must meet the basic requirements established by Act No. 99/2019, including reference to standard EN 301 549 v2.1.2 as the technical benchmark.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>No, not specifically.</p> <p>Given that not all migration services are fully digital and many still rely on personal interaction, the need for embedding such advanced assistive technologies has not yet been</p>
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			<p>systematically addressed.</p> <p>However, several digital solutions have been developed to improve accessibility and user experience more broadly within migration-related services.</p> <p>Through the Information Portal for Foreigners, applicants can book in-person appointments online, use notification functions (e.g. reminders of upcoming document expiry), and receive targeted e-mail notifications. The portal also offers a payment data generator, which simplifies fee payments, and includes online registration systems for residence permit extensions.</p> <p>Digitalisation on a larger scale is planned within the development of the Integrated Foreigners' Agenda System, which aims to create a more unified, user-friendly, and accessible digital environment for applicants. While these features are not assistive technologies in the narrow sense, they represent ongoing progress toward greater accessibility and inclusion in migration services.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Yes.</p> <p>In the asylum context, the Czech Act on Asylum (No. 325/1999 Coll.) includes provisions for vulnerable persons whose specific needs must be identified and accommodated in the asylum procedure (e.g., medical or psychological support, alternative communication). While the act does not explicitly specify digital service adjustments, the general legal framework allows for individualized accommodations.</p>
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			<p>More broadly, the Information Portal for Foreigners and migration authorities provide channels (such as web forms, contact lines, and in-person offices) through which applicants may communicate their special needs or request assistance (e.g., translation, help with filling out forms). In practice, for face-to-face processes (e.g., interviews, biometric collection), applicants routinely request sign language interpreters, accessible formats (large print, Braille), or other support, and authorities strive to make accommodations.</p> <p>Thus, while a fully formalized digital “disability-needs” field may not exist in all migration e-systems, the procedural framework allows and supports applicants in informing the authorities about such needs.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>The processing of such data is subject to the GDPR and Act No. 110/2019 Coll., on Personal Data Processing, with safeguards for special-category data, limited to what is strictly necessary. Health and disability information constitutes a special category of personal data under Article 9 of the GDPR. Such data may only be processed if certain conditions are met (e.g. explicit consent, necessity for reasons of substantial public interest, or to protect vital interests).</p> <p>Under Czech law, Act No. 110/2019 Coll. (the implementing act of the GDPR) regulates data protection, including obligations concerning data minimisation, purpose limitation, security, transparency, storage limitation, and accountability.</p>
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			<p>In migration and asylum procedures, authorities process certain health or disability data only to the extent necessary to ensure that the applicant receives the required support (e.g. interpreting, accessible formats), they do not collect broader medical histories than required. Applicants are informed through privacy notices (often in procedural documentation or via digital services) about how their data are used, retention periods, and their rights.</p> <p>Internal guidelines and Data Protection Impact Assessments (DPIAs), as well as internal protocols within the Ministry of the Interior and the Information Portal for Foreigners (IPC), govern how such data are handled, securely stored, shared among relevant units, and disposed of once no longer needed.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>No. Accessibility declarations usually provide contact e-mails or feedback forms, allowing users to report accessibility issues. However, disabled applicants are not systematically involved in the development or testing of digital services.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Yes.</p>
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			<p>The legal obligation under Act 99/2019 focuses on accessibility for persons with disabilities; however, digitally disadvantaged users (those with low digital literacy, or without a device or connectivity) are not explicitly protected by that law. In practice, the Czech system maintains hybrid modes of service (digital + in-person or paper options), ensuring that individuals who cannot or prefer not to use digital channels are not excluded.</p> <p>The Information Portal for Foreigners offers detailed instructions, explanations, contact support, and the possibility to make appointments or submit documents in person. Migration authorities retain traditional in-person interfaces (offices, face-to-face interviews) and support channels (phone, help desks, staff assistance) to bridge the gap for those unable to use digital tools.</p> <p>Some integration or AMIF projects support the education of migrants in digital skills or provide assistance in using online tools, which helps mitigate the disadvantage.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes.</p> <p>Act No. 99/2019 Coll. is the primary national law implementing accessibility obligations for public sector websites and mobile applications. It applies directly to digital services operated by public bodies, including migration authorities.</p> <p>Additionally, Act No. 198/2009 Coll. on equal treatment and on legal means of protection against discrimination prohibits discrimination based on disability (among other grounds) in access to goods, services, and public administration and this conceptually covers public digital</p>
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			<p>services as services provided by the state. Also, Czech data protection law (Act No. 110/2019 Coll.) also ensures individuals' rights and procedural fairness in digital systems.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No.</p> <p>While some parts of the migration procedure have been digitized (e.g. information provision, payments, appointment booking, or partial submission of documents via the Information Portal for Foreigners), key processes remain in person, particularly biometric enrolment, identity verification, issuance and collection of residence cards, and interviews in asylum procedures.</p> <p>Czech legislation and ministry guidelines still require personal presence for certain steps due to the need for identity control and biometric verification.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>Yes.</p> <p>For the digital components of migration services that are available (e.g. the Information Portal for Foreigners, online booking systems, and information pages), support is provided through explanatory guides, FAQs, contact emails, helplines, and user instructions. Since no complete</p>
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			<p>replacement of in-person interactions has been introduced, there is no documented national scheme specifically established in connection with such replacement; however, general support channels exist for digital components. Users encountering difficulties with digital services can usually contact the relevant department or use an in-person alternative.</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes.</p> <p>The administrative fees applicable to migration or residence proceedings are set uniformly under national law and regulations and are not dependent on whether the application is submitted digitally or in person. For example, the Information Portal for Foreigners publishes a schedule of fees for third-country nationals that applies to the service regardless of the mode of submission. However, the method of payment may differ when submitting online, for instance an applicant may use a generated bank transfer or a payment gateway, while in person, payment by card or cash may be accepted. These procedural differences do not amount to a difference in fees. Regarding processing times (statutory time limits), the legal deadlines are tied to the procedure itself, not to the mode of submission, so digital and non-digital modes are treated equally.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>Yes.</p>
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			<p>Digital divide / risk of exclusion - Rapid digitalization can leave behind persons who lack access to devices, connectivity, or digital literacy (i.e., those who are digitally disadvantaged). Technical and usability gap vs. declared compliance - Even when digital services declare compliance with accessibility standards, actual usability (especially when using assistive technologies, navigating complex forms, or completing multi-step processes) can lag particularly in migration procedures with many legal complexities and document requirements. Balancing data protection and personalization - To provide individual accommodation (e.g. disability-specific support), systems must collect sensitive personal data. Ensuring GDPR compliance, data minimization, secure storage, transparency, and consent is both legally and technically challenging.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>Yes.</p> <p>Hybrid approach (digital + in-person fallback): maintaining the possibility of in-person submissions and services ensures that those unable to use digital channels are not excluded. Public accessibility declarations with improvement plans: obligated entities are required to publish accessibility statements under Act No. 99/2019 Coll., outlining their current level of compliance and steps to address non-compliant areas, which promote transparency and accountability.</p> <p>Support and educational projects for migrants: through integration programs (often funded by the Asylum, Migration and Integration Fund – AMIF), various initiatives aim to improve digital literacy among migrants and assist them in accessing and using digital tools. At the offices, intercultural workers are available to assist foreigners with anything they need, which may also include explaining certain digital services.</p>
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			<p>Contact and feedback mechanisms in digital services: even if user testing is not systematically documented, services often include feedback forms, helpdesks, or contact email addresses for reporting accessibility issues, thereby enabling continuous improvement.</p>
	<p>EMN NCP Estonia</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. Estonia has established a legal basis for ensuring the accessibility of digital public services, including those related to migration. The requirements of Directive (EU) 2016/2102 and EN 301 549 have been transposed into national law via the Public Information Act (§ 32), which obliges public sector websites and applications to meet accessibility standards (including WCAG 2.1 AA). In addition, the Accessibility of Products and Services Act, which entered into full effect in June 2025, further strengthens this framework.</p> <p>Several migration-related services — such as applications for residence permits or temporary protection — are available online and are gradually being updated to meet accessibility standards. Public sector websites are expected to follow WCAG 2.1 AA guidelines, and many have published accessibility statements.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p>

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			<p>No, Estonia has not introduced any additional digital service adaptations.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Yes. In Estonia, applicants with disabilities can inform the Police and Border Guard Board (PBGB) about their need for support when using legal migration services. However, the PBGB generally does not provide direct support services such as interpretation or translation (e.g. sign language) but applicants may bring their own support persons or interpreters when attending appointments. While in international protection procedures support services and funding are available, such arrangements are not foreseen for legal migration cases.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>PBGB ensures compliance with the GDPR and Estonian data protection legislation by processing disability-related data only with the applicant’s knowledge and consent, for a clearly defined purpose, and with appropriate technical and organisational safeguards in place. The principle of data minimisation is strictly applied — only the minimum necessary data is used, and only for as long as required to provide the requested support.</p>
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			<p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>No.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Yes. Estonia takes into account the challenges faced by digitally disadvantaged applicants when developing digital public services, including those related to legal migration. Various national measures aim to improve digital inclusion, such as training programmes, adaptation support, and broader policies to enhance digital literacy and connectivity. Within the national integration programme, the Ministry of Culture is launching a new digital skills module with three levels. The first and second levels include in-person training hours to build basic and intermediate digital competences, while the third level provides an e-learning format introducing Estonia’s digital services and tools.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Estonia has a comprehensive legal framework that promotes accessibility, inclusion, and equal access to public services, including digital services used in legal migration procedures. This</p>
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			<p>framework includes anti-discrimination laws, accessibility requirements for public digital services, and data protection regulations, all aimed at ensuring that all applicants—regardless of disability, language proficiency, or migration status—can access services on an equal footing.</p> <p>The Equal Treatment Act is a cornerstone of Estonia’s anti-discrimination legislation. It prohibits discrimination on various grounds, including disability, ethnic origin, and age, and explicitly applies to all individuals within Estonia’s jurisdiction, including migrants and asylum seekers. This Act requires public authorities and service providers to ensure that all individuals receive equal treatment, which covers the right to access services without discrimination. Digital services related to legal migration procedures fall under this legislation, obliging authorities to take steps to remove barriers and provide reasonable accommodations for disadvantaged groups.</p> <p>The Public Information Act mandates accessibility requirements for all public sector websites and mobile applications. This law aligns with the EU Directive 2016/2102 on the accessibility of websites and mobile applications of public sector bodies. Under this Act, digital services—including those managed by the Police and Border Guard Board (PPA) or the eesti.ee portal—must comply with recognized accessibility standards such as WCAG 2.1. This means the digital platforms used for visa applications, residence permits, and other migration-related procedures are required to be usable by people with disabilities.</p> <p>Estonia has also transposed the EU Accessibility Act (Directive 2019/882) into national legislation through the Accessibility of Products and Services Act, which came into force in 2022 and was fully applied from June 2025. This Act strengthens the obligations of public and private service providers to ensure that their services, including digital services, are accessible to persons with disabilities and older persons. This legislation further consolidates Estonia’s commitment to digital inclusion in public services, including migration procedures, and</p>
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			<p>introduces legal consequences for non-compliance.</p> <p>In addition, Estonia enforces the Personal Data Protection Act, which implements the EU General Data Protection Regulation (GDPR) at the national level. Since information related to disability status is considered sensitive personal data, its collection and processing in migration services are subject to strict safeguards. This protects applicants' privacy while enabling authorities to provide necessary accommodations.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No. In Estonia, certain interactions between applicants and authorities in legal migration procedures have been digitalised, but full replacement of in-person contact has not occurred. For example, some documents can be submitted electronically (e.g. by email or through online platforms), and communication with the Police and Border Guard Board (PBGB) can take place digitally, however if necessary, it is still possible to also submit documents in person to the PBGB. Whilst for certain processes digital application is promoted (f.ex. for short-term employment registration of a foreigner, the employer can submit and manage the application entirely electronically), it is also possible to submit the application in person to the PBGB, if needed.</p> <p>Applicants must still appear in person for the first application to verify their identity and provide biometric data (fingerprints), which are valid for six years. Similarly, residence permits and other documents must always be collected in person. Future developments aim to expand digital solutions further, but in-person attendance remains necessary for certain steps.</p>
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			<p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>n/a.</p> <p>Remarque: In Estonia, the Police and Border Guard Board (PBGB) provides general guidance and support to applicants in legal migration procedures, including those using digital channels. The PBGB's Migration Advice service assists individuals in understanding migration rules and procedures and provides instructions on how to submit applications. Support is available in Estonian, English, and Russian via phone, email, and video calls. However, this service is not specifically designed to support the use of digital systems or accessibility tools. Guidance related to specific digital application environments is provided separately by the responsible authorities managing those systems.</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes. In Estonia, applicants in legal migration procedures are treated equally. The standard processing times published by the Police and Border Guard Board apply uniformly, with no preferential treatment given to digital or paper-based submissions. While individual cases may vary depending on factors such as completeness of the application or the need for additional checks, these differences are not related to the choice of service channel.</p> <p>Regarding the state fees, these are regulated by law and, and to promote the use of electronic channels, the law provides more favourable state fees. For example, a state fee of 140 euros</p>
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			<p>must be paid for consideration of applications for short-term employment registration and if the application is submitted via the PBGB self-service portal the state fee is 130 euros. The same principle applies when applying for identity documents.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>No, as Estonia has not developed specific digital services tailored to applicants with disabilities in the field of legal migration. All users, including those with special needs, can rely on the general accessibility features provided on the Police and Border Guard Board’s website</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>n/a</p>
+	EMN NCP Finland	Yes	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>YES/NO. Finnish Immigration Service has two separate digital services, a website (Migri.fi) and online service (Enter Finland). The website meets the accessibility requirements described in national legislation (Act on the Provision of Digital Services 306/2019). The Act on the</p>

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			<p>Provision of Digital Services is implementing the requirements of Directive 2016/2102 and is setting more precise regulation to the accessibility of digital services in Finland. The online service Enter Finland has some known accessibility issues, which are due to be fixed as part of developing the system in the future. You can find the list of accessibility issues here: https://enterfinland.fi/eServices/info/accessibilitystatement.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>NO</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>YES</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant's disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>If the website is not accessible enough, the user can inform the authorities and they will</p>
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			<p>provide the content for them in accessible way within 14 days. The requests or personal information related to them are not being registered or stored. However, no such requests have been received so far.</p> <p>If an applicant is able to use the digital service Enter Finland, but needs support measures during in-person interactions, they can inform the authorities using the digital service. The information is stored and processed the same way with other additional information given by the applicant during their application process. Depending on the situation, the applicant may be responsible to pay or find an interpreter by themselves.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>NO</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>YES. The Finnish Immigration Service aims to write online texts as clear and understandable for everyone. When designing the service or its functionalities, different user groups are taken into account, in both technical and content's point of view. If a user group is unable to use digital service, the Finnish Immigration Service provides them a possibility to use some other kind of service, for example paper application.</p>
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			<p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>YES, Act on the Provision of Digital Services (see Swedish version here: https://www.finlex.fi/fi/lainsaadanto/2019/306?language=swe).</p> <p>The Act on the Provision of Digital Services obliges the public sector and some private and third sector organisations to comply with accessibility requirements. The act entered into force in Finland on 1 April 2019 and the amendments to Chapter 3a on 1 February 2023. The Act is based on EU’s accessibility directives. In addition, the Act is impacted by the UN Convention on the Rights of Persons with Disabilities, which emphasises the inclusion of persons with disabilities and the possibility of using services independently also in the digital environment. Accessibility is one of the key principles of the Convention.</p> <p>The aim of the Act is to improve everyone’s possibilities to use digital services on an equal basis. Accessibility should be understood as a key operating principle that should be taken into account in all planning, implementation and maintenance of online content and services.</p> <p>Finnish Transport and Communications Agency Traficom’s Digital Accessibility Supervision Unit is the authority supervising compliance with the the Act on the Provision of Digital Services.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p>
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			<p>NO, the applicant always has a possibility to use a paper application instead of using digital services.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>N/A</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>The processing fees are lower for online applications compared to paper applications. In many cases, the processing time is longer when applying on paper than when applying online. In some cases, it may be possible to skip in-person interaction, when applying online. When applying on paper, in-person interaction is always part of application process.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>YES. The online service Enter Finland has some accessibility issues which need to be fixed as part of developing the service in the future. It would be either very expensive or almost</p>
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			<p>impossible to fix them separately before a bigger renewal of the service.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>In the future, the Finnish Immigration Service sees its development process as more modular, so that it's easier to develop, change and replace certain parts or functionalities of the system. It will make accessibility improvements easier. Moreover, current development practices take accessibility into account when designing development work, so the accessibility is natural part of the new parts and functionalities of the system.</p>
	<p>EMN NCP France</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. To ensure the highest possible level of compliance with the European and international standards for digital accessibility to public services, particularly those relating to administrative procedures for third-country nationals residing in France, such as the Digital Administration for Foreigners in France (ANEF), the French Government created, by Decree No. 2009-546 of 14 May 2009, a reference framework for improving accessibility (RGAA), stemming from the obligation to make digital public services accessible to persons with disabilities, as defined in Article 47 of the Disability Act No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship for persons with disabilities. Since its creation, this framework has been subject to new versions and updates.</p>

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			<p>The RGAA is currently governed by the provisions of Article 5 of Decree No. 2019-768 of 24 July 2019 on accessibility for persons with disabilities to online communication services, which stipulates that an RGAA, jointly issued by the Minister for Persons with Disabilities and the Minister for Digital Affairs, specifies the technical modalities for implementing accessibility for persons with disabilities to online public communication services, in particular :</p> <ul style="list-style-type: none">- The format and information to be included in the accessibility statement and the multi-annual accessibility plan ;- The procedures for implementing the criteria for a disproportionate burden ;- The technical methodology for verifying compliance of services with the harmonised standards published in the Official Journal of the European Union under the conditions set out in Article 6 of Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies. <p>Currently, the version 4.1.2 of the RGAA, published on 16 February 2021, applies and includes corrections made to the version 4.0 of September 2019. The version is structured in two parts. The first part of version 4.1 of the RGAA sets out the rules for implementing accessibility requirements, defining :</p> <ul style="list-style-type: none">- Online public services : « online communication services are defined as any provision to the public or categories of the public, by means of electronic communication, of signs, signals, writing, images, sounds or messages of any nature that are not private correspondence » ;- The reference standard : « Online communication services that comply with the European standard EN 301 549 (2018-08) are considered to meet legal accessibility requirements » ;- The principle that legal accessibility requirements are implemented to the extent that they do not impose a disproportionate burden on the organisation concerned : Disproportionate burden is a derogation that may be invoked on a case-by-case basis for a feature or content.- The accessibility statement : the accessibility statement is the result of an effective assessment of the compliance of the online public communication service with the reference
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			<p>standard.</p> <p>The second part focuses on the technical method for verifying compliance with the reference standard, which makes it possible to verify that a web page complies with the 50 success criteria of levels A and AA of the international WCAG 2.1 standard that have been adopted in the European reference standard to establish the legal requirement for digital accessibility. In this regard, the RGGGA 4.1 contains a French translation of the list of parts of the reference standard EN 301 549 V.2.1.2 (2018-08).</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. In order to improve accessibility for disabled applicants, France has launched a digital initiative promoting artificial intelligence. In particular, with regard to the digital procedures for granting residence rights to third-country nationals within the framework of the Digital Administration for Foreigners in France (ANEF), the digital mission (MINUM) of the Directorate-General for Foreigners in France (DGEF), within the ministry of the Interior, which is responsible for managing the ANEF platform, has planned to create a chatbot for ANEF users to better guide and help them to find the right procedure/form to complete.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p>
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			<p>Yes. Pursuant to Article 6 of Decree No. 2019-768 of 24 July 2019 on accessibility to online communication services for persons with disabilities, users of an online communication service must be able to report any difficulties encountered with regard to accessibility of that service to the person responsible for it, in order to be directed to an alternative or obtain the content in another form. In this regard, the version 4.1 of the RGAA specifies that « online communication services must include a section entitled « Feedback and content ». For example, when an applicant with a disability uses the public service dedicated to administrative procedures relating to residence in France, the ANEF, they can report any need for assistance on this platform under the heading « Need help » and « Contact us ».</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>The Directorate-General for Foreigners in France (DGEF) within the ministry of the Interior and the French Office for Immigration and Integration (OFII), which manage public digital services relating to procedures for third-country nationals residing in France due to their competence in dealing with general rules on residence, have implemented a platform called HIPE as part of their public interest missions in order to ensure compliance with the regulations in force applicable to the processing of personal data, in particular, Regulation (EU) 2016-679 of the European Parliament and of the Council of 27 April 2016 (the « GDPR » Regulation), as well as the Law No. 2018-493 of 20 June 2018 on the protection of personal data.</p> <p>When using this platform, the data collected is not used for any purpose other than to facilitate the management of administrative procedures for foreign nationals. Thus, the</p>
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			<p>personal data collected by the DGEF, the OFII and Prefecture officials only includes data relating to the civil status and personal situation of the foreigner user.</p> <p>Furthermore, this regulation allows users to benefit from a set of rights regarding the personal data being processed, such as the right of access, the right of rectification, the right to restriction of processing and, in applicable situations, the right to erasure.</p> <p>Finally, the OFII and the DGEF use all necessary technical and organisational measures to ensure the confidentiality and security of the personal data processed. These organisational measures include : organising privacy policy; managing privacy policy; risk management; integrating privacy policy into projects; managing security incidents and data breaches; personnel management; privacy oversight and project management.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>Yes. The development of a multi-year accessibility plan by an entity responsible for a communication service, introduced in Article 47 of Law No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship of persons with disabilities, takes into account persons with disabilities in user testing, particularly in the context of work to bring a service into compliance.</p> <p>In this regard, the 2024-2026 multi-year accessibility plan of the Directorate-General for Foreigners in France for the ANEF platform specifies that « when designing, validating or developing a website or application, if user tests are carried out, the user panel will endeavour as far as possible to include people with disabilities ».</p>
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			<p>Furthermore, any user, including disabled users, can become a test user as part of the programme to improve the quality of service provided by the French administrations to users, « Services publics + », which was officially launched in January 2021.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>The digital transition, currently being rolled out in administrative procedures, including those relating to the residence of third-country nationals in France, requires national digital inclusion strategies in order to address the challenges faced by digitally disadvantaged applicants. Thus, based on the expectations and recommendations formulated by the National Council for Digital Refoundation, the State has proposed to all partners, whether local authorities or civil society actors, a draft strategic roadmap for the period 2023-2027 entitled « France Numérique Ensemble » (Digital France together), focusing on four areas :</p> <ul style="list-style-type: none">- Territorializing inclusion policy and support local actors by mobilizing a dedicated engineering fund ;- Deploying a range of digital tools accessible to all mediators to ensure lifelong skills development ;- Supporting the structuring of the professional digital assistance and mediation sector to guarantee users high-quality reception and support ;- Collecting data according to the « tell us once » principle and sharing structured data to better adapt public policy as it evolves. <p>Furthermore, digital inclusion is also the objective pursued by the strategy to combat the digital divide launched in July 2020 by the Interministerial Delegation for the Reception and Integration of Refugees (DIAIR). Three challenges have been identified by the DIAIR and its</p>
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			<p>public innovation laboratory, the Lab'R : computer equipment, internet connectivity and training in digital tools. To address these challenges, several proposals have been put forward :</p> <ul style="list-style-type: none">- Launching a national study on the digital use of newly arrived migrants ;- Launching a flash survey on the digital use of refugees ;- Offering refurbished smartphones or tablets at affordable prices ;- Offering refurbished laptops at affordable prices ;- Tolling out a mobile service for all refugees who need it ;- Equipping temporary accommodation centers with internet boxes ;- Offering a service tailored to the needs of refugees to provide digital training to as many people as possible ;- Making digital mediation accessible to refugees ;- Offering training tailored to expectations and needs of caregivers. <p>In addition, the fight against the digital divide and digital illiteracy is one of the integration policy measures that can be funded through calls for projects at the level of the decentralized state, departmental or regional services, as part of the Program 104 (Integration and access to nationality) of the French budget / Action 12), as well as through the European Union's AMIF (Asylum, Migration and Integration Fund). In addition, national credits made it possible in 2024 to cover :</p> <ul style="list-style-type: none">- Nearly 20 projects specifically dedicated to this theme ;- 121 comprehensive support initiatives (covering several aspects of the integration process for newly arrived immigrants) including measures to combat the digital divide and digital illiteracy. <p>In both cases, projects funded by national appropriations include training hours to strengthen beneficiaries digital skills, as well as the provision of the IT and/or digital equipment necessary to complete their procedures and follow the integration programs dedicated to</p>
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			<p>them.</p> <p>To view examples of calls for projects funded by the Program 104, click here : Regional call for projects : Auvergne-Rhône Alpes Region (AURA) : https://www.prefectures-regions.gouv.fr/irecontenu/telechargement/126155/932436/file/Politique_d_integration_des_etrangers_primo-arrivants_en_Auvergne-Rhone-Alpes_BOP_104_Appel_a_projets_regional_2025_V2.pdf.pdf Call for projects at the departmental level : Department of Ain. https://www.ain.gouv.fr/contenu/telechargement/25987/180600/file/Appel%20%C3%A0%20projet%202024%20sur%20le%20BOP%20104.pdf</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes. The Law on Equal rights and Opportunities, Participation and Citizenship for persons with disabilities of 11 February 2005 established the principle of legal obligation of accessibility to all digital public services, including those set up as part of legal migration procedures, requiring, in Article 47, public bodies to ensure that everyone can benefit from the same level of information and communication, regardless of the means of access, the type of content or the mode of consultation.</p> <p>The obligations relating to this accessibility are defined by Decree No. 2019-768 of 24 July 2019 relating to the accessibility for persons with disabilities to online communication services, currently in force, which repealed and replaced the Decree implementing the 2005 Disability Act, published on 16 May 2009. These obligations include the publication of an accessibility</p>
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			<p>statement, an indication on the home page of whether or not the site complies, a technical method for verifying compliance, a technical method for verifying compliance with the reference standard set by an accessibility framework and penalties for non-compliance with accessibility requirements.</p> <p>The obligations of the Law of 11 February 2005 concerning digital accessibility were reaffirmed by the Order of 6 September 2023, issued pursuant to the Law of 9 March 2023 containing various provisions adapting to European Union law in the areas of the economy, health, labor, transport and agriculture.</p> <p>This order notably strengthened penalties for breaches of accessibility requirements for online communication services, as set out in the Act of 11 February 2005 on equal rights and opportunities, participation and citizenship for persons with disabilities. The government’s challenge is to monitor compliance by all websites starting in 2024.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No. Although the Administration uses digital procedures, particularly for administrative procedures relating to the residence of third-country nationals, in addition to or instead of paper or physical procedures (e.g., counter procedures), this dematerialization is accompanied by alternative solutions, including physical reception. This principle was established by the Council of State in its decision of 3 June 2022 concerning the deployment of digital administration for foreigners in France. Indeed, the Council of State considered that « with regard specifically to the case of foreign nationals, given the characteristics of the public concerned, the diversity of applicants’ situation and the consequences for a foreign national’s</p>
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			<p>situation, particularly their right to remain in France and, in some cases, to work there, of the registration of their application, it is incumbent upon the regulatory authority, when it requires the use of an online service to obtain certain residence permits, to make the necessary provisions to ensure that persons who do not have access to digital tools or who encounter difficulties, either in their use or in completing administrative procedures, receive assistance. It is also responsible, for the same reasons, for ensuring that an alternative solution is available in cases where, despite this support, certain applicants are unable to use the teleservice for reasons related to the design of the tool or the way it operates.</p> <p>These alternative solutions are codified in Article R. 431-2 of the French Code for stay and residence of foreign nationals and right of asylum (CESEDA), which states that « persons who are unable to submit their application online themselves shall be provided with assistance and support to enable them to complete this formality, and that an alternative solution, in the form of a physical facility for the registration of applications, shall be put in place for foreign nationals who, having completed all the necessary formalities, in particular by making use of the reception and support system, are unable to submit their application online », in particular by using the reception and support system, finds it impossible to use the teleservice for reasons related to its design or mode of operation ».</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>Yes. In order to comply with the decision of the Council of State of 3 June 2022 mentioned above (Q. 8), procedures for receiving and assisting persons with digital difficulties have been implemented, particularly in the context of the digitization of procedures relating to the right</p>
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			<p>of residence. Indeed, the Decree of 1 August 2023, issued for the application of Article R. 431-2 of the French Code for stay and residence of foreign nationals and right of asylum (CESEDA), established these reception and support procedures based on:</p> <ul style="list-style-type: none">- The set up of a telephone helpline and contact form by the « Citizen Contact Center » of the French National Agency for Secure Documents (ANTS). This citizen contact center can be reached via a dedicated toll free telephone number. Its call center agents assist users in submitting their applications, provide them with information on the status of their cases, identify any anomalies and forward them to the Directorate-General for Foreigners in France. They also act as a liaison for users who are stuck in the system and for whom a solution has been found following the report ;- An in-person assistance : In-person assistance is provided by digital reception points set up in prefectures and sub-prefectures with a department responsible for foreign nationals. These digital reception points provide support for submitting residence permit applications ;- An alternative solution is reserved for users who have been unable to submit their application via the online service despite using the reception and support system. The application is only admissible if the user is invited by the local prefecture to use the alternative solution and if they provide, in support of their application, a document from the citizen contact center certifying that it is impossible to submit their application online. The application for a residence permit is then made at the prefecture or sub-prefecture of the department of residence, or, in Paris, at Prefecture of Police. A physical appointment is systematically offered to foreign nationals authorized to submit their application for a residence permit under this procedure. The Prefect may also provide, if the foreign national so requests, for the use of a postal address or an email address designated for receiving correspondence from the public. <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p>
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			<p>N/A. In accordance with article L. 112-9 of the Code of Relations between the Public and the Administration, the Administration determines the implementation of digital or non-digital services whose terms of use apply to everyone, not allowing a user to use either a digital or non-digital service.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>Yes. In his report published on 11 December 2021 entitled “the Digital Administration for Foreigners in France (ANEF): a digitization leading to massive violations of users’s rights”, the Human Rights Defender identified two major difficulties affecting certain vulnerable groups in particular when using the ANEF, namely :</p> <ul style="list-style-type: none">- Limitations and malfunctions affecting the submission and processing of residence permit applications: For example, those responsible for supporting vulnerable groups complain that the same person cannot manage procedures on the ANEF platform on behalf of several foreign nationals from the same email address, even though many people do not have an email address and would not be able to check it anyway;- Support and alternative measures are highly inadequate given the mandatory nature of the service: With regard to the Citizen Contact Center, the Defender of Rights has noted, through the complaints he handles, that the follow-up given by the Citizen Contact Center to users’submissions via the contact form is often unsatisfactory. With regard to Digital Access Points (PANs), the findings of a survey conducted in spring 2024 by the Federation of Solidarity Actors (FAS) among social workers confirm the low profile of the system, since 47 % of the 485 respondents did not know whether the prefecture with which they worked had a PAN competent in matters of foreign nationals’ residence, thus revealing a lack of visibility of this system. Furthermore, the fact that the PANs are very often run exclusively by volunteers
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			<p>in civic service means that these services are unable to satisfactorily fulfill their mission of helping to assess applications or even providing support in putting together the necessary documentation, as these volunteers, despite their knowledge and commitment, do not individually have sufficient legal expertise. In this regard, the memo dated 20 August 2021 stipulated that this part of the missions would be carried out by agents from the services responsible for foreign nationals.</p> <p>In addition, other difficulties specifically affecting digitally disadvantaged applicants have been identified in the guide to best practices for the digital inclusion of refugees, produced in collaboration with the Directorate for Integration and Access to Nationality (DIAN) of the Ministry of the Interior and the MedNum, a national cooperative of digital mediation actors, in conjunction with the French National Agency for the Cohesion of Territories (ANCT) including :</p> <ul style="list-style-type: none">- A connection dependent on the access to a checking account and housing: Financial resources, access to a checking account, and housing circumstances appear to have an impact on the type and frequency of connection. Access to a checking account is only possible after the recognition of the Beneficiary of International Protection (BIP) status, which determines access to less expensive offers, available only by direct debit. And only about a quarter of the refugees surveyed who live in temporary accommodation centers say they connect via private wif-fi, as few accommodation centers have a wi-fi network, whether in hotels or scattered housing. <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>Yes. Several best practices have been implemented to overcome the challenges mentioned above, including:</p> <ul style="list-style-type: none">- The development, as part of the 2021 call for projects to combat the digital divide, of an
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			<p>information kit entitled « A best practice guide for the digital inclusion of refugees », written in collaboration with the MedNum and the French National Agency for the Cohesion of Territories (ANCT), intended for all digital mediation advisors and assistants who work with refugees, in order to improve their knowledge of the refugee population and expand their resources in the area of digital inclusion;</p> <ul style="list-style-type: none">- The deployment of specific tools, such as digital mediators, digital assistants, local digital inclusion policy pilots, support for the development of digital hubs;- The creation of a digital unit within the daily ANEF in April 2025 to strengthen support for prefectures undergoing change : this unit is accompanied, during its visits to prefectures, by a technical team that deals with anomalies on site ;- The implementation of a national communication plan aimed at users and prefectural services since 2023 : Each rollout of new online procedures or features is accompanied by enhanced support for users and prefectures at different stages of their implementation : presentation tools dedicated to prefectures, including an user guide, an « agent » guide, frequently asked questions (FAQ, job descriptions, and a communication kit for prefectural services.- Réfugiés.info is a public information service that is translated and accessible, aimed at facilitating the integration of persons benefiting from international protection in France. It offeres « actions » and « procedures » fact sheets written in simple French and translated into seven languages (English, Arabic, Pashto, Persian-Dari, Russian, Tigrinya, Ukrainian), available on a website and a mobile app. The flagship initiative for accessibility at Réfugiés.info focuses on bringing its website, which accounts for 95 % of the service’s usage, into compliance with the RGAA. The objective is to achieve full compliance. To do this, the project has been adjusted to focus on the nine most visited page types (profiles, home page, search, etc.), covering 94 % of the site’s users. The redesign of these pages incorporates the use of DSFR, ensuring compliance with accessibility and usability standards. The roadmap calls for an initial audit early next year to update the compliance score, followed by the
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			<p>implementation of corrective measures and a final audit to validate that the objective has been achieved. In parallel with the RGAA compliance, work is planned to improve the experience of users with reading difficulties, specific visual needs, or low digital literacy, thereby contributing to accessibility in the broadest sense. This includes extending multilingual speech synthesis to the entire service (application, mobile website, and search/navigation features), a feature that is currently essential for 60 % of users but not available on the mobile web.</p>
	<p>EMN NCP Germany</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. Digital services follow Directive (EU) 2016/2102, EN 301 549, the UN CRPD and national law, such as the Accessibility Strengthening Act – BFGS, the Act on Equal Opportunities for Persons with Disabilities and the Accessibility in Information Technology Ordinance – BITV 2.0.</p> <p>However, self-assessments and tests have identified that some of these provided digital services are only partially compliant or do not fully meet all requirements. Noteworthy remaining barriers include inaccessible PDF documents, insufficient colour contrast, pop ups that cannot be closed by keyboard and loading processes that fail to signal completion to the screen readers.</p>

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			<p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. Additional tools such as text-to-speech and vice versa, translation and contrast functions are available e.g. as part of integration and professional language courses.</p> <p>These are accessible, for instance, as an integrated component of integration courses and professional language training programs. They serve the purpose of accessibility, enhance comprehension, and facilitate interaction with the course materials for all participants.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Yes. Applicants can indicate special needs (e.g. sign language, Braille) via the responsible authorities or embassies. This ensures accessibility during digital service use in legal migration procedures.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>Yes, In line with GDPR. Data on disabilities are processed only as genuinely needed and in</p>
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			<p>strict compliance with data minimisation rules.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>Yes. Users and disability organisations are consulted when designing or testing digital services.</p> <p>Furthermore, German public authorities are required to provide a feedback mechanism on their websites and mobile apps, according to the Accessibility in Information Technology Ordinance – BITV 2.0. This allows users, including those with disabilities, to report accessibility barriers.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Yes. Support is provided through personal assistance, helpdesks and online tutors as part of German language courses, multilingual information, web-based transcription services and offline options.</p> <p>Additionally, there are initiatives by local foreigner authorities, organizations and cities to provide digital education, such as programming courses and computer literacy training, to help migrants improve their digital skills for employment.</p>
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			<p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes. The BFGG (online available: https://www.gesetze-im-internet.de/bfsg/), the BITV 2.0 (online available: https://www.gesetze-im-internet.de/bitv_2_0/BJNR184300011.html) and the General Equal Treatment Act (online available: https://www.gesetze-im-internet.de/bgg/) ensure equal access to digital public services.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No. In-person interactions (e.g. identity verification, submission of biometric data, finalizing residence permits) remain part of migration procedures.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>n/a</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use</p>
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			<p>digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes, Germany applies the principle of equal treatment to applicants in legal migration procedures regardless of whether they use digital or non-digital services. The core legal framework and administrative rules ensure fairness and non-discrimination in terms of fees and the general legal processing period.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>Yes. Challenges include harmonising federal IT systems, upgrading legacy software and supporting digitally less skilled users.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>Yes. Good practice includes accessibility standards promoted by the new Federal Ministry for Digital and State Modernisation and the ongoing “digital but inclusive” approach across public services.</p> <p>Germany addresses digital challenges through a comprehensive approach that combines a legal obligation for accessibility with the provision of analogue alternatives. Digital services are designed to be multilingual and mobile-friendly to increase accessibility. Simultaneously, local authorities and non-profit organizations ensure physical points of contact and personal support. This hybrid approach aims to bridge the digital divide and ensure inclusion for all</p>
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			applicants.
	EMN NCP Greece	Yes	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>According to migration legislation (Migration Code, articles 11-12 of I.5038/2023), the submission of applications for the granting of an initial residence permit and supporting documents, as well as the receipt of any rejection decision or other documents from the relevant file, are made through the electronic services (https://migration.gov.gr/applications/) of the Ministry of Migration and Asylum of article 173 (Integrated Information System/IIS "Migration") by the third-country national or by his attorney-at-law or by his spouse, ascendants and adult descendants. The authorisation of attorney is proven in writing by certification of the authenticity of the signature of the authorizing person by any public authority.</p> <p>If the application is submitted by an authorized lawyer, the procedure is carried out through the interoperability of the electronic services of the Ministry of Migration and Asylum with the electronic platform of the Plenary of the Bar Associations of Greece (portal.olomeleia.gr) and the relevant authorization to the lawyer is uploaded electronically to the application of the third-country national.</p> <p>The applicant's communication on issues related to his application for the granting of a residence permit is made exclusively through the Integrated Information System (IIS) "Migration".</p>

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			<p>For the submission of the electronic application, it is mandatory to complete all the fields relating to the applicant's personal and demographic information, his travel document (except in the case of those deprived of a passport) and his place of residence. The applicant shall attach the necessary supporting documents and submit the required proof of payment of the electronic fee. Persons who have more than one nationality, not including Greek, are obliged to choose a nationality, provided that they are in possession of a passport or other travel document of the relevant state.</p> <p>The electronic application shall constitute a solemn declaration as to the content and accuracy of the submitted data. In case of doubt as to the authenticity or correctness of the content of the submitted supporting documents, the competent service may request the sending of supporting documents in physical form, in derogation of the electronic procedure. The above supporting documents are submitted by post (registered letter) or by courier service with proof of delivery.</p> <p>The accuracy and authenticity of the information in the certificate are verified electronically by the competent public services, either through the interoperability service of public bodies with the IIS or through a search in the Electronic Third Country Citizen File System of the Ministry of Migration and Asylum.</p> <p>After submitting the application, the applicant receives at the email address indicated in his application:</p> <ul style="list-style-type: none">-a receipt for submitting the application, which includes all the information and documents registered in the application for issuance and-a confirmation of submission of the application, which is valid until the issuance of the decision to grant the residence permit or the decision to reject the application. The confirmation of submission of an electronic application for the issuance of a residence permit
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			<p>receives a unique serial number and carries precise data and information, according to which it is possible to ascertain, in real time (OnLine), the authenticity and accuracy of its content. It also certifies that its holder resides legally in the country and temporarily enjoys the rights deriving from the residence permit for which he is applying. The application submission certificate ceases to be valid automatically when the decision to grant the residence permit or the decision to reject the request is issued.</p> <p>Finally, in the webpage of the Ministry of Migration and Asylum, where there is the link for its electronic services, functions an accessibility menu for the disabled persons.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Please see answer in question 1.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Please see answer in question 1.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure</p>
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			<p>compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>-</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>N/A</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>N/A</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>N/A</p>
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			<p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>Please see answer in question 1.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>-</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Please see answer in question 1.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>N/A</p>
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			<p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>-</p>
	<p>EMN NCP Hungary</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes Section 2 of Article XV of the Fundamental Law of Hungary states that Hungary shall guarantee fundamental rights to everyone without discrimination and in particular without discrimination on the grounds of race, colour, sex, disability, language, religion, political or other opinion, national or social origin, property, birth or any other status.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>No</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign</p>


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			<p>language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>No</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>Not applicable</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>No</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>No</p>
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			<p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>No</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No</p> <p>Personal contact has not been fully replaced by digital services. The client is entitled to opt for personal presence which can still be implemented during procedures (e.g. personal interview, personal submission of documents).</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>Not applicable</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p>
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			<p>Yes The same conditions are applicable for persons using digital and persons using non-digital services.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>No</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>Not applicable</p>
	<p>EMN NCP Ireland</p>	<p>Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>*Please note the following for the synthesis report: a member of the access team in the Department of Justice, Home Affairs and Migration has suggested that the UN Convention on the rights of persons with disabilities be abbreviated to UNCRPD. The abbreviation CRPD is more directly associated with the UN Directive and when this abbreviation is searched online, the results direct to websites relating to the Committee on the Rights of Persons with</p>

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			<p>Disabilities.</p> <p>Yes and no. The level of compliance depends on the legal migration procedure in question. Overall, Ireland is partially compliant. Accessibility statements are in place across services, however none are fully compliant. Beyond the statements, the accessibility of websites and apps themselves varies. An overview is provided here, with responses to other questions, in particular question 8 and 9, describing in more detail how compliant specific legal migration processes are.[1]</p> <p>A non-exhaustive list of legal migration procedures in Ireland that are within the scope of this inform include:[2]</p> <p>Residence permits Family reunification through EU Treaty Rights Start-up Entrepreneur Programme (STEP) Atypical Working Scheme Employment permits Hosting agreements</p> <p>Immigration Service Delivery sits in the Department of Justice, Home Affairs and Migration and its website contains information on residence permissions and permits, EU Treaty Rights, the Start-up Entrepreneur Programme and coming to work in Ireland from third countries. The Atypical Working Scheme (AWS) is applied for on the Immigration Service Delivery (ISD) portal.[3]</p> <p>Separately, employment permits are the responsibility of the Department of Enterprise, Tourism and Employment.</p> <p>The Hosting Agreement Scheme (where researchers from third countries can be employed by Higher Education Institutions or businesses) is under the remit of the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS). However, EURAXESS Ireland supervises and coordinates the Hosting Agreements system on behalf of DFHERIS.[4]</p> <p>1 – 4 The Department of Justice, Home Affairs and Migration (DJHAM)</p> <p>Under the directive, the Accessibility Statement must contain accurate information on the website’s compliance, commitment to compliance, a feedback mechanism, a complaints mechanism and a description of any content on the website or app that is not accessible and</p>
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			<p>the reasons for that inaccessibility, among other requirements.[5] In accordance with the directive and the corresponding regulations, the Immigration Service Delivery website (irishimmigration.ie) has an accessibility statement on their website. This statement does not state the level of compliance with the directive, but does list their committal to making the website accessible in accordance with S.I. 358/2020 and the National Disability Authority IT Accessibility Guidelines. They state they are committed to achieving AA standard under WCAG 2.1 Guidelines and that the website currently has alternative text for images, captions for videos, and clear, simple language throughout its' content. They note that their platforms support keyboard navigation and screen readers. There is no description of any content on the website or app that is not accessible and the reasons for that inaccessibility.[6] The statement itself appears to be accessible, which is also a requirement.[7]</p> <p>Under 'feedback and complaints', the Department of Justice, Home Affairs and Migration's website (irishimmigration.ie/accessibility) states that if a user wishes to make a complaint, they can contact the access officer and this works as both a feedback mechanism and the complaints procedure. The access officer is also the person to contact for assistance, however this is not stated on the accessibility statement. [8]</p> <p>The monitoring body, the National Disability Authority[9], undertook a simplified review of the Immigration Service Delivery website in 2021 and gave the website a 38.6% rating after testing 999 pages. 1684 critical errors were found. The main issues were inaccessible PDFs, name role value[10], colour contrast, parsing[11], accessible rich internet applications[12], forms and not being able to use the website with a keyboard alone.[13] Adobe PDFs can be made accessible; however this is not standard protocol in the Department of Justice, Home Affairs and Migration.[14] Unless otherwise specified, it is not known whether the PDFs referred to throughout this response, with regards to any legal migration process, are accessible or not.</p>
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			<p>Separate provisions under national legislation, often referred to as the Public Sector Duty, is explained further in question 7. DJHAM undertook a Public Sector Duty assessment for the Department in 2018. However, the only mention of accessibility was in relation to the Information, Communications and Technology Division (now known as Change, Technology and Innovation). The measure in place to ensure their public sector duty was met, was to develop any business applications in accordance with the accessibility standards outlined in the question.[15]</p> <p>Business applications refer to apps for both staff and the public. A project’s business case is reviewed by the DJHAM Project Management Office who can question how an IT project will serve the intended users, and request changes should they feel changes are needed to comply with various Department or EU policies or legislation. Ultimately the project board, set up to oversee the project, sign off on the IT solution being developed. When the system is live, the service owners should make their service as accessible as possible for its internal or external users, given what is practicable with the technology on which the service is built.[16]</p> <p>The DJHAM assessment did not identify any gaps in coverage at the time.[17] The DJHAM Equality Diversity Inclusion (EDI) & Public Sector Duty Committee, which was established in 2020, is currently undertaking an updated Public Sector Duty assessment.[18]</p> <p>In November 2025, the DJHAM Test Strategy 2024 - 2027 was launched. It states that there is a dedicated Test Team, under the Information Management Technology Strategy and Architecture Team which is responsible for and provides guidance on non-functional testing including accessibility testing to ensure compliance with the EU directive specifically.[19] Axe DevTools is the toolset currently used for accessibility testing. This tool’s AI engine is based on the Web Content Accessibility Guidelines (WCAG), this means the tool finds up to 60% of accessibility issues by itself. This tool is currently in use by the dev and test teams. The test team carry out accessibility testing of the websites and power apps.[20]</p>
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			<p>The Department of Justice, Home Affairs and Migration has two online portals, which are both active: A. Digital Contact Centre (DCC) and B. 'Immigration Service Online' portal.</p> <p>The Digital Contact Centre Immigration Service Delivery launched an online self-service portal called the Digital Contact Centre (DCC) in October 2024, with plans to expand the legal migration processes it covers. The relevant areas it currently covers include first registration appointments, notifying immigration services that your circumstances have changed, general queries for all immigration divisions, some interactive EU treaty rights applications and other applications that require a scanned copy of an application form to be uploaded.[21]</p> <p>The DCC is a read only portal where registered customers can view the status of in flight applications. Customers who authenticate their identity on the DCC can navigate to the Case Management System (CMS) where they can create a limited number of applications, such as EU Treaty Rights applications[22]. Although the DCC and CMS are separate systems managed by different teams, to the user they present as a single system. The CMS will often be referred to as the DCC during the course of these responses to avoid confusion. There is an offline process on the CMS where customers can download application forms as part of an offline application process.[23]</p> <p>The majority of third country nationals in Ireland just need to register with immigration when they arrive.[24] However, others need to apply for their permission once they are in the country and then subsequently register their immigration permission.[25] The majority of applications under the Domestic Residence and Permissions unit are made using PDF application forms uploaded through the Digital Contact Centre. These PDFs are not designed to be accessible.[26]The Digital Contact Centre has an accessibility statement on the website listing their committal to making the website accessible in accordance with S.I. 358/2020 and the National Disability Authority IT Accessibility Guidelines. They state they are committed to achieving AA standard under WCAG 2.1 Guidelines.[27] The statement notes that they design and develop the website and digital content to be accessible to users with a</p>
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Ad-Hoc Query on 2025.54 BRIDGING THE DIGITAL DIVIDE – CHALLENGES AND OPPORTUNITIES IN THE USE OF DIGITAL SERVICES IN LEGAL MIGRATION PROCEDURES

			<p>wide range of disabilities, including visual, auditory, motor, and cognitive impairments, they regularly audit their digital platform to ensure compliance, provide alternative text for images, captions for videos, use clear, simple language throughout, and that their platforms support keyboard navigation and screen readers.[28] Users can also translate the statement to 13 different languages. However, it also does not mention that the access officer can be contacted for assistance as well as complaints, does not contain the required statement on the level of current compliance with the directive and there is no description of any content on the website or app that is not accessible and the reasons for that inaccessibility.[29]</p> <p>In line with best practices, the Department of Justice, Home Affairs and Migration carry out different steps to validate customer registrations. Their technology partner ID-Pal carries out an identity verification check, and for applicants that pass this check, they carry out a multi-factor authentication process to validate customer details. ID-Pal have provided the Department with an Accessibility Statement stating: "Our website is partially conformant with the Web Content Accessibility Guidelines (WCAG) 2.1 level AA." ID-Pal also stated "ID-Pal Mobile Applications comply with Google and Apple's strict accessibility guidelines and the ID-Pal Mobile and Web Applications are responsive to screen readers". The ID-Pal app has a choice of 12 languages available for selection inside the app settings. The ID-Pal accessibility statement outlines the measures it takes to ensure accessibility and explains how they assessed the level of compliance. They also provided the date of their statement and the next date of review. While the statement acknowledges that not all aspects are accessible, it does not state which elements are not and why, as per the requirements. It provides a phone number and postal address, as well as an email, for support.[30] To access the statement while on the app, service users need to click on a terms and conditions link, or a Data Protection link, to open the website, scroll to the end of the page and click on Accessibility.[31]</p> <p>A small-scale survey evaluated Chinese speaking migrants' user experiences of Immigration</p>
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			<p>Service Delivery's Digital Contact Centre in 2025.[32] The data revealed a range of challenges users encountered while using the ID-Pal identity verification system and nearly half of the respondents (47.6%)[33] reported the absence of human support to resolve technical or procedural issues. Additionally, 36.5% said they did not know where to ask questions or access services. The disability status of the respondents was not captured, however overall, 58.1% of the 62 users needed assistance from others to complete their tasks on the DCC platform.[34]</p> <p>The Department of Justice, Home Affairs and Migration report that the DCC has been an incredibly popular service since launch in October 2024 with a user base far beyond expectations. As a result, the service has experienced a number of growing pains during 2025 which, at times, impacted the delivery of the DCC to certain countries or the provision of the SMS service. The Department commit to working on the reliability and effectiveness of the system for staff and applicants. [35]</p> <p>The Other Immigration Service Delivery PortalThe other portal at https://inisonline.jahs.ie/user/login is referred to as the 'Immigration Service Online' portal or ISD Online Forms. Users can apply for the atypical working scheme or renew their residence permits on this portal,[36] as well as apply for other permissions.[37] The login page has an 'accessibility' link at the bottom which redirects to their accessibility statement. It includes the statement of commitment and the feedback/complaints mechanism, but not the level of compliance or a description of any content that is not accessible, and the reasons for that inaccessibility.[38]</p> <p>The ISD Online Forms team state that they are currently in the process of bringing all services up to WCAG 2.2 standards. They have completed initial accessibility works and will go out to tender for an external audit soon.[39]</p> <p>5. Employment Permits</p>
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			<p>The Department of Enterprise, Tourism and Employment’s website has an accessibility statement on their website, including details about how to contact the access officer and how to make a formal complaint. It states that their website is partially compliant with the Web Content Accessibility Guidelines 2.1 level AA and that some content does not fully comply, for example, some documents in PDF may not be fully accessible.[40] The aforementioned aspects are requirements that the Department are compliant with, and the statement itself appears to be accessible, which is also a requirement.[41] However, a description of any content that is not accessible, the reasons for that inaccessibility and, where appropriate any accessible alternatives provided, are also required and are absent. The Department of Enterprise, Tourism and Employment include a feedback mechanism separate to the complaints procedure and actively states that they welcome feedback, which can be emailed to the access officer, but also to the Webmaster.[42] The Department's accessibility statement was written in 2022, however, it is still accurate in 2025.[43]</p> <p>All actions relating to employment permits are on the new 'Employment Permits Online' portal since April 2025[44], except the application for the Reactivation Employment Permit Scheme.</p> <p>6. Hosting Agreements:</p> <p>TCN researchers would be eligible for this scheme after being successful at applying for a position in the university or business via the general application process and interview(s). If the TCN needed permission to work in Ireland, and the role was eligible for the Hosting Agreement Scheme, then human resources (HR) staff from the hosting institution, for example the University of Galway, would apply for the scheme on behalf of the applicant.[45] Third country nationals (TCNs) who are resident in Ireland on a different permission can apply from within the state. However, researchers arriving on Hosting Agreements from abroad, must have their original Hosting Agreement issued before coming to Ireland, whether they require a visa or not.[46] Eligible dependents may also join the TCN. Staff apply via an online portal which is run by Euraxess Ireland.[47] There is a section of the</p>
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			<p>online application on the applicant’s details, which the applicant can fill out. However, HR staff can also fill this out on their behalf. If the applicant has a disability or is digitally disadvantaged, the staff can fill this in for them. As a result, this scheme is accessible for the applicant.</p> <p>However, the portal itself has not been assessed by Euraxess for accessibility and was not designed with any knowledge of the accessibility requirements under the law.[48] The application is then submitted to Euraxess for approval and when the agreement is issued, the applicant will receive a pdf via email. The pdf has not specifically been made accessible in line with the NDA’s guidelines. It is only 4 pages long and can be printed if desired, however this is not required. [49]</p> <p>[1] None of the online digital services outlined here involve online interviews. [2] There are additional schemes that third country nationals can apply for listed in footnotes 32 and 47. [3] The AWS facilitates specialised, highly-skilled employment of a short term nature that is not supported by current Employment Permit legislation. [4] Correspondence with Euraxess Ireland, October 2025; Euraxess Ireland (2025), 'Fast track work permit non-EU R&D hosting agreement scheme', available at: https://www.euraxess.ie/ireland/fast-track-work-permit-non-eu-rd-hosting-agreement-scheme, accessed 10 November 2025 [5] National Disability Authority, 'What are the EU web accessibility requirements?', Available at https://nda.ie/monitoring/eu-web-accessibility-directive/what-are-the-eu-web-accessibility-requirements ; National Disability Authority, 'Development of Accessibility Statements', Available at https://nda.ie/monitoring/eu-web-accessibility-directive/accessibility-statements [6] Department of Justice, Home Affairs and Migration, 'Accessibility', available at:</p>
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			<p>https://www.irishimmigration.ie/accessibility/, accessed 10 November 2025</p> <p>[7] As observed by EMN Ireland without the use of assistive technology.; National Disability Authority, 'Development of Accessibility Statements', Available at https://nda.ie/monitoring/eu-web-accessibility-directive/accessibility-statements</p> <p>[8] Department of Justice, Home Affairs and Migration, 'Accessibility', available at: https://www.irishimmigration.ie/accessibility/ , accessed 10 November 2025</p> <p>[9] The National Disability Authority were contacted to provide input for this inform, but did not respond.</p> <p>[10] The error "Name Role Value" is frequently associated with how interactive elements are coded on pages such as search forms, application forms, cookie banners and other interactive widgets. The "Name, role value" WCAG 2.1 Success Criteria (SC) is an indicator of how accessible these elements may be. A search form is an interface, typically a text box and a button, on a website or within an application where users enter keywords to find specific information or items within a database or collection.</p> <p>[11] Parsing content means that browsers and assistive tech can read and understand the interface. In order to be understandable, the code must be clean, modern, and have no major errors.</p> <p>[12] ARIA, or Accessible Rich Internet Applications, refers to a set of HTML attributes and roles designed to make dynamic web content and advanced user interface elements accessible to people with disabilities. These attributes provide information about an element's role (e.g., a button), its state (e.g., disabled or checked), and its properties (e.g., name or relationship to other elements) to assistive technologies (AT), such as screen readers, that cannot inherently understand complex, JavaScript-driven web applications.</p> <p>[13] National Disability Authority (2022) 'Ireland's Monitoring Report for the EU Web Accessibility Directive - 2021 supplemental', available at: https://nda.ie/uploads/publications/Irelands-Monitoring-Report-for-the-EU-Web-Accessibility-Directive-2021-supplemental-accessible-PDF.pdf accessed 10 November 2025</p>
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			<p>[14] Correspondence with a member of the access team, the Department of Justice, Home Affairs and Migration, October 2025</p> <p>[15] Department of Justice, Home Affairs and Migration (called the Department of Justice and Equality at the time) (2018) 'Public Sector Duty: Equality and Human Rights Assessment', available at: https://assets.gov.ie/static/documents/public-sector-duty-equality-and-human-rights-assessments.pdf accessed 10 November 2025</p> <p>[16] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[17] Department of Justice, Home Affairs and Migration (called the Department of Justice and Equality at the time) (2018) 'Public Sector Duty: Equality and Human Rights Assessment', available at: https://assets.gov.ie/static/documents/public-sector-duty-equality-and-human-rights-assessments.pdf accessed 10 November 2025</p> <p>[18] Correspondence with EDI & PSD Committee, the Department of Justice, Home Affairs and Migration, October 2025</p> <p>[19] Department of Justice, Home Affairs and Migration (2025), 'Test Strategy 2024 – 2027' [Internal Document]</p> <p>[20] Department of Justice, Home Affairs and Migration (2025), 'As-is Test Process Review' [Internal Document]</p> <p>[21] The following applications can also be made on the digital contact centre: Extension of Visitor, Reactivation Employment Permit Scheme, *Temporary Permission to Remain Stamp 0 Renewal (these are all PDFs that are scanned and uploaded to the DCC), *Spouse of Irish National, *Parent of Irish citizen child (these 2 are editable PDF forms on the DCC), *Postal applications are accepted for these. However, this information is not available on the Department of Justice, Home Affairs and Migration's website and is not provided to applicants generally.</p> <p>Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025;</p>
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			<p>Correspondence with MRCI, November 2025; Department of Justice, Home Affairs and Migration (2025) 'Submitting Registration or Renewal Queries', available at https://www.irishimmigration.ie/registering-your-immigration-permission/submitting-registration-or-renewal-queries/ accessed 10 November 2025; [22] Only 1 and 1A. EUTR 2 – 5 are still via posting physical forms. Department of Justice, Home Affairs and Migration, 'EU Treaty Rights', available at: https://www.irishimmigration.ie/coming-to-join-family-in-ireland/joining-an-eea-or-swiss-national/eu-treaty-rights/#application-forms , accessed 10 November 2025; Correspondence with MRCI, October 2025 [23] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025 [24] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025 [25] Such as EU Treaty Rights. See footnote 32 and 47 for additional permissions that must be applied for, before registering the permission. [26] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025 [27] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025; Department of Justice, Home Affairs and Migration, 'Accessibility', available at: https://portal.irishimmigration.ie/en/accessibility/ , accessed 10 November 2025 [28] Department of Justice, Home Affairs and Migration, 'Accessibility [of the Digital Contact Centre]', available at: https://portal.irishimmigration.ie/en/accessibility/ , accessed 10 November 2025 [29] Department of Justice, Home Affairs and Migration, 'Accessibility', available at: https://portal.irishimmigration.ie/en/accessibility/ , accessed 10 November 2025; National Disability Authority, 'Development of Accessibility Statements', Available at</p>
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			<p>https://nda.ie/monitoring/eu-web-accessibility-directive/accessibility-statements</p> <p>[30] ID pal (2025) 'ID-Pal Accessibility Statement', https://www.ID-Pal.com/accessibility-statement/, Accessed 13 November 2025</p> <p>[31] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[32] Zhang, M (2025), 'A User Experience Evaluation of Ireland's Digital Contact Centre (DCC) Immigration Platform among Chinese-Speaking Migrants', a Maynooth University & Crosscare Migrant Project.;</p> <p>[33] Out of 63 respondents.</p> <p>[34] While disability status was not captured, participants were asked to rate their digital skills.</p> <p>[35] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[36] Department of Justice, Home Affairs and Migration, 'Transfer of all nationwide Renewals to the ISD online portal', available at: https://www.irishimmigration.ie/transfer-of-all-nationwide-renewals-to-the-isd-online-portal/ accessed 10 November 2025;</p> <p>Department of Justice, Home Affairs and Migration , 'Atypical Working Scheme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-work-visa-options/applying-for-a-long-stay-employment-visa/atypical-working-scheme/ , last accessed 10 November 2025</p> <p>[37] The following applications can also be made on ISD Online Forms: Spouse of an Irish National*, Parent of an Irish Citizen Child*, De Facto Partner of an Irish or Non-EEA National*, Turkish Association Agreement and Extension of Student Conditions. Applications are made on an interface that looks the same as the Immigration Service Online portal but it is actually an interactive form on SharePoint. *Postal applications are accepted for these. However, this information is not available on the Department of Justice, Home Affairs and Migration's website and is not provided to applicants generally.;</p>
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			<p>Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025; Correspondence with MRCI, November 2025.</p> <p>[38] Department of Justice, Home Affairs and Migration, 'Please login to your ISD account', available at: https://inisonline.jahs.ie/user/login , accessed 10 November 2025</p> <p>[39] Correspondence with ISD Online Forms (Development and Production Support Teams), the Department of Justice, Home Affairs and Migration, October 2025</p> <p>[40] Department of Enterprise, Tourism and Employment, 'Accessibility', https://enterprise.gov.ie/en/accessibility/</p> <p>[41] As observed by EMN Ireland without the use of assistive technology.; https://nda.ie/monitoring/eu-web-accessibility-directive/accessibility-statements</p> <p>[42] Department of Enterprise, Tourism and Employment, 'Accessibility', https://enterprise.gov.ie/en/accessibility/</p> <p>[43] Correspondence with the Department of Enterprise, Tourism and Employment, November 2025</p> <p>[44] Only applicants or Department of Enterprise, Tourism and Employment staff can access this portal so its content was not reviewed first-hand; Department of Enterprise, Tourism and Employment, 'Welcome to Employment Permits Online', https://employmentpermits.enterprise.gov.ie/</p> <p>[45] Correspondence with Euraxess Ireland, October 2025</p> <p>[46] Euraxess Ireland (2025), 'What to Know As Researchers', available at: https://www.euraxess.ie/ireland/fast-track-work-permit-non-eu-rd-hosting-agreement-scheme/researchers, accessed 10 November 2025</p> <p>[47] Euraxess Ireland is under the Irish Universities Association.</p> <p>[48] As only HR, Euraxess and applicants can login to the portal, we could not review specific aspects; Correspondence with Euraxess Ireland, October 2025</p>
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			<p>[49] Correspondence with Euraxess Ireland, October 2025</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Text-to-speech (TTS) services: No, the Department of Justice, Home Affairs and Migration reports that neither the Digital Contact Centre or the CMS have inbuilt text-to-speech (TTS) services or video relay services (VRS), but provides alternative text for images, captions for videos, and uses clear, simple language throughout their content.[1]</p> <p>Video relay services: Video relay services are not needed as none of the online digital services outlined here involve online interviews.</p> <p>Closed captions: YouTube has automated closed captions in whatever language is used in the video and you can also press "show transcript" in the description of any YouTube video to show the transcript to the right-hand side of the video. As explained in question 9, there is an information video explaining how to renew your residence permission on Youtube. The video is available in English, Portuguese, Arabic, Hindi, Mandarin Chinese, Russian and Spanish.[2] This video directs you to another English-only video on immigration terms and phrases.[3] The series of 'how to' video guides and the recorded webinar for employment permits online</p>
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			<p>(mentioned in Q9) are also on YouTube.[4]</p> <p>Other: 1-4. The Department of Justice, Home Affairs and Migration Other adaptations to the Immigration Service Delivery website in the Department of Justice, Home Affairs and Migration include[5].</p> <p>An accessibility widget (a stick figure image in the top left-hand corner that you click on) has been added to the website. This helps with increasing or decreasing font size, navigating keyboard links, underlining links on the web page, highlighting links on the web page and inverting the website colours. A breadcrumb link is available at the top each page to help you navigate.[6] The home page and all internal pages include a search box. You can use the Tab key on your keyboard to jump from one link to the next. All navigation bars in the site provide a logical order for this. All images on this site itself include descriptive ALT attributes. ALT titles are provided to explain the purpose of the image in question. These adaptations apply to the website, but not to PDFs on the website.</p> <p>Except for the ability to use the tab key and ALT text, none of these features are available on the Digital Contact Centre[7] or the Immigration Service Online portal. [8] It may appear as if images on the DCC portal do not have ALT text, however, when a screen reader inspects the page, there is a tag for ALT text on each image. Icons for YouTube, X and LinkedIn also have aria-labels. [9]</p> <p>The Department of Justice, Home Affairs and Migration report that the Digital Contact Centre portal was set up with all the correct attributes that work with assisted technology (AT). This allows the AT dialog box to find the attribute elements and can be navigated easier.[10] Enable Ireland (an Irish disability NGO) advised the Department of Justice, Home Affairs and Migration that accessibility widgets are not best practice and accessibility features should be</p>
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			<p>built directly into a website rather relying on an accessibility widget or toolbar, which can interfere with other accessibility tools.[11]Information Management Technology is reportedly developing a plan to integrate recommended accessibility features directly into the Digital Contact Centre.[12]</p> <p>Communications from the DCC are by text message or email only, the DCC does not issue PDFs. The CMS however (which appears as the DCC for users) communicates by email and does issue PDFs of decisions. These PDFs are accessible and therefore, for example, have text to speech and are suitable for braille printers.[13]</p> <p>5. The Department of Enterprise, Tourism and Employment The Department of Enterprise, Tourism and Employment report that it is standard to include alt text for non-decorative images.[14] Their website also has the breadcrumb link, a search box, and the tab key can be used to navigate the website.[15]</p> <p>[1] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025 [2] The video says this is only for those in Dublin. However, this has since changed and what is outlined in the video applies to everyone in Ireland; Department of Justice, Home Affairs and Migration (Called Department of Justice at the time) (2021) 'Renewing your Permit to remain in Ireland online (For those in Dublin ONLY)', extension://hdppkjifljbdpckfajcmblbchhledln/bcr.html?bcr=https://www.youtube.com/watch?v=04kc40RULEk [3] Department of Justice, Home Affairs and Migration (Called Department of Justice at the time) (2021) 'Guide to Irish Immigration Terms and Phrases', https://www.youtube.com/watch?v=gQaXJX_8xCY [4] Department of Enterprise, Tourism and Employment (2025) 'Launch of 'Employment Permits Online' ', https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-</p>
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			<p>permits/latest-updates/new-eps/ Last accessed 10 November 2025</p> <p>[5] Department of Justice, Home Affairs and Migration, 'Accessibility', available at: https://www.irishimmigration.ie/accessibility/ , accessed 10 November 2025</p> <p>[6] For example, on the Department of Justice, Home Affairs and Migration’s accessibility statement webpage (https://www.irishimmigration.ie/accessibility/), the breadcrumb link is Home / Accessibility under accessibility. You can click on home to bring you back.</p> <p>[7] Department of Justice, Home Affairs and Migration, 'Log In / Register for an Account', available at: https://portal.irishimmigration.ie/en/ , accessed 10 November 2025</p> <p>[8] The widget is not available on the login page, but the European Migration Network staff did not have a login to the Immigration Service Online portal itself. No Department of Justice, Home Affairs and Migration staff working with the portal indicated that the widget was available on the portal.;</p> <p>Department of Justice, Home Affairs and Migration, 'Please login to your ISD account', available at: https://inisonline.jahs.ie/user/login , accessed 10 November 2025</p> <p>[9] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[10] Correspondence with a member of the access team, the Department of Justice, Home Affairs and Migration, October 2025</p> <p>[11] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[12] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[13] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[14] Correspondence with the Department of Enterprise, Tourism and Employment, November 2025</p>
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Ad-Hoc Query on 2025.54 BRIDGING THE DIGITAL DIVIDE – CHALLENGES AND OPPORTUNITIES IN THE USE OF DIGITAL SERVICES IN LEGAL MIGRATION PROCEDURES

			<p>[15] Department of Enterprise, Tourism and Employment (2025) 'Launch of 'Employment Permits Online' ', https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/latest-updates/new-eps/ Last accessed 10 November 2025</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Yes and no. It depends on their impairment and their knowledge of where/how to find assistance.</p> <p>1 – 4 The Department of Justice, Home Affairs and Migration’s Digital Services[1] Access Officer The Department of Justice, Home Affairs and Migration has an appointed access officer. This role is required by, and defined under, the Disability Act 2005 as being `to provide or arrange for and co-ordinate the provision of assistance and guidance to persons with disabilities in accessing its services’.[2]</p> <p>People may contact the access officer directly or be put in contact with the access officer after contacting other staff, although assistance may be facilitated by other staff on occasion. This means the office is available to assist members of the public who wish to flag that they need assistance to access Department buildings, information, or processes. If someone notes that they have encountered a particular barrier to access, then the access officer can raise this with the relevant area to work towards remediating the situation.</p> <p>With reference to immigration issues, the access officer contact allows people to flag that they might need extra assistance when attending an appointment, that they are not able to access</p>
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			<p>the immigration portal, or that they might require a paper-based application or some other form of individual specific accommodation.</p> <p>In some other instances, it can involve social workers, or healthcare professionals acting with the consent of an applicant, making contact to seek 'reasonable accommodation' on behalf of clients or patients in their care.</p> <p>Telephone calls to the Department's main telephone line seeking accessibility assistance, as well as emails or written correspondence noting such issues, will be referred to the access officer, as appropriate.[3]</p> <p>The contact for the access officer is noted on the 'Contact us' page of the ISD website, under press and freedom of information.[4] It is also noted in the 'Accessibility' section at the bottom of every ISD webpage under 'Feedback and Contact Information'.[5] On the Department's own website, the Access Officer details are noted on the main landing page under the 'Contacts' heading[6] and both the accessibility statement on the main website, and on the Digital Contact Centre, have a link to the contact details.[7]</p> <p>If you are able to create an account and login to the digital contact centre, there is a support section in the bottom right of the screen, but it does not include information on how to contact the access officer or support. There is an "accessibility" link under "security" at the bottom of the page. This brings you to the accessibility statement and that brings you to the details of the access officer.</p> <p>There is an AI chatbot available on the DCC. If you ask the chat-bot for the details of the access officer, it ignores your request and again prompts you to choose from the preselected options. If you are able to click on "something else" and ask for the access officer's details again, the response states that this information is not available. See the footnote for full</p>
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			<p>details.[8] If you are able to select that the chatbot did not answer your question, it does give you the option to submit a query for an agent to process and get back to you later. However, it does not submit the query on your behalf, it tells you that you “must first create an account with Immigration Service Delivery” and redirects you to the same home page you are logged into to use the query function.</p> <p>Some TCNs may not be aware of access officers. The Migrant Rights Centre Ireland[9]reported that their staff did not know about the role of access officers and have not naturally come across them or their contact details when assisting service users with disabilities. However, it should be noted that they are not a disability-specific organisation.[10]</p> <p>All new members of staff in the Department are required to attend a mandatory day long induction programme. As part of this, they complete a module on EDI, where they learn about the EDI Strategy, the EDI & Public Sector Duty Committee, EDI initiatives, where to access EDI training and the courses available and the role of the Access Officer and Access Team. As this is a general induction, it does not cover role- or function-specific information such as the accessibility requirements for websites and apps.[11]</p> <p>The Digital Contact Centre: Yes, if a user is able to set up an account and login, the Digital Contact Centre and the CMS has a customer portal where service users can submit a query, regardless of the method required to apply for their respective Department of Justice, Home Affairs and Migration scheme. Users can use this query function to inform the authorities about any need for support measures and can upload supporting information if they choose to do so.[12] Legal representatives or advocates are also able to provide information about support measures directly to ISD via a third party account on the DCC.[13]</p> <p>3. STEP Programme</p>
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			<p>Yes, at the bottom of the page, you can press 'contact us' which will automatically open a new email with the email address filled.[14] There is no phone number, however applicants can email regarding any accessibility issues.[15]</p> <p>5. Employment permits On the Department of Enterprise, Tourism and Employment's homepage for the Employment Permits Online portal, there is a link for accessibility at the bottom that brings you to the details of the access officer.[16] There are two access officers mentioned on the Department of Enterprise, Tourism and Employment's website, one for physical access to buildings and the other for publications and information leaflets. The employment permit portal falls under the latter.[17] Additionally, any applicant including those with a disability can engage with the Employment Permits Unit directly via the dedicated Employment Permits Online ticketing system, or through the use of their general Employment Permits mailbox, including in cases where they may require direct support in the application process. The employment permit application process does not involve in person engagement. When an employment permit is issued, it is emailed in a PDF, which may be printed if desired.[18]</p> <p>6. Hosting agreement An applicant could inform HR in the university or business that they will be employed by. The mechanism for this will be different depending on the organisation.</p> <p>[1] Correspondence with the Access Officer, Department of Justice, Home Affairs and Migration, October 2025 [2] Correspondence with the Access Officer, Department of Justice, Home Affairs and Migration, October 2025 [3] Correspondence with the Access Officer, Department of Justice, Home Affairs and</p>
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			<p>Migration, October 2025</p> <p>[4] Department of Justice, Home Affairs and Migration, 'Contact Immigration Service Delivery', available at: https://www.irishimmigration.ie/contact-immigration-service-delivery/ , accessed 10 November 2025</p> <p>[5] For example, Department of Justice, Home Affairs and Migration , 'Start-Up Entrepreneur Programme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-options-for-working-in-ireland/coming-to-work-for-more-than-90-days/start-up-entrepreneur-programme-step/ , last accessed 10 November 2025</p> <p>[6] Department of Justice, Home Affairs and Migration, 'Homepage', available at: https://www.gov.ie/en/department-of-justice-home-affairs-and-migration/?alb&referrer=https://www.justice.ie/ , accessed 10 November 2025</p> <p>[7] Department of Justice, Home Affairs and Migration, 'Accessibility', available at: https://www.irishimmigration.ie/accessibility/, accessed 10 November 2025 ; Department of Justice, Home Affairs and Migration, 'Accessibility', available at: https://portal.irishimmigration.ie/en/accessibility/ , accessed 10 November 2025</p> <p>[8] "There is no specific information provided about an access officer or their contact details in the available sources. However, for immigration and labour market access-related queries, you may be directed to contact relevant departments such as the Immigration Service Delivery. For certain application queries, you can contact preclearance@justice.ie and include your Application Reference Number for a quicker response. For full contact details for overseas visa offices and online applications, you are advised to check the Visa Offices page as referenced in the information provided [1]. [1]: https://www.irishimmigration.ie/contact-immigration-service-delivery/ "Contact Immigration Service Delivery"</p> <p>[9] A non-governmental organisation who works with TCNs who are in Ireland.</p> <p>[10] Correspondence with MRCI, October 2025.</p> <p>[11] Communication with the EDI & PSD committee, Department of Justice, Home Affairs and Migration, October 2025</p>
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			<p>[12] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025; Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[13] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[14] Department of Justice, Home Affairs and Migration , 'Start-Up Entrepreneur Programme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-options-for-working-in-ireland/coming-to-work-for-more-than-90-days/start-up-entrepreneur-programme-step/ , last accessed 10 November 2025</p> <p>[15] Correspondence with the Start-Up Entrepreneur Programme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[16] Department of Enterprise, Tourism and Employment, 'Welcome to Employment Permits Online', https://employmentpermits.enterprise.gov.ie/ , accessed 10 November 2025</p> <p>[17] Department of Enterprise, Tourism and Employment, 'Do you require any special assistance?', https://enterprise.gov.ie/en/contact-us/do-you-require-special-assistance/, accessed 10 November</p> <p>[18] Correspondence with the Department of Enterprise, Tourism and Employment, November 2025</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant's disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>1-2 Residence Permits and Family Reunification (EU treaty rights only) The Digital Contact Centre:</p>
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			<p>The Digital Contact Centre includes a privacy and cookies policy[1] on the website where applicants can see the legislative provisions under which a person’s data can be processed. This privacy policy applies to the CMS. [2]</p> <p>The DCC records the minimum amount of personal information necessary to validate the person’s identity in order to create an account. Once the person is validated on the DCC, the user can create an application without the need to re-enter identity validation details. The CMS also requests only the minimum amount of information. Both the DCC and the CMS created Data Protection Impact Assessments (DPIA) that were signed off by the data controller.[3]</p> <p>1-4 Department of Justice, Home Affairs and Migration digital services* *Where an Access Officer is involved[4]</p> <p>The access officer role is a requirement under the Disability Act 2005. The legislation states that the officer acts to: “provide or arrange for and co-ordinate the provision of assistance and guidance to persons with disabilities in accessing its services”.</p> <p>Aligning with article 6 of the GDPR, [5] the personal data processing is carried out for the performance of the role. The personal data is also not used in a way that the data subject would not expect.</p> <p>The access officer shares information on requests for reasonable accommodation, or other disability related queries, on a limited basis and only to the appropriate team. In all instances, this sharing is internal.</p> <p>Where a query might relate to an outside agency or require interaction with another body on behalf of a customer, then express consent to the sharing is sought.</p>
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			<p>The Department is committed to protecting the rights and privacy of all individuals in accordance with the EU General Data Protection Regulation, 2016/679 (GDPR) and the Data Protection Act 2018.</p> <p>Securing and managing personal data in accordance with the GDPR principles is a priority and is governed by a comprehensive set of policies, procedures and systems. For example, a Department Data Protection and Records Management Steering Group operates with membership of senior personnel from across the Department to assist the Management Board and the Data Protection Officer in fulfilling their Data Protection responsibilities. The Department also has put in place a network of data stewards to champion data protection awareness in each business unit.</p> <p>Further, all staff must complete compulsory data protection training to ensure that the Department is compliant with obligations to protect all personal data processed. This includes data protection training provided as part of staff induction and an online Introduction to Data Protection e-learning course.</p> <p>The Department has implemented appropriate measures to ensure that all data including any special category data, held under its control, is secure and is not at risk from unauthorised access. Measures for the protection of personal data are reviewed and upgraded where appropriate, on an ongoing basis.[6]</p> <p>The Domestic Residence and Permissions Unit state that all of their application forms and the website have privacy notices with information regarding the use of applicant’s data, such as the legal basis for processing of data and data retention, as well as applicant rights in relation to data and information on how to register a complaint.[7]</p> <p>5. Employment permits</p>
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			<p>The Employment Permits Online Portal provides details of the Department’s Privacy, Website Cookies and the General Data Protection Regulation compliance, including the collection and use of personal information. [8] A user cannot create an account without accepting the GDPR message.[9]</p> <p>6. Hosting agreement This will depend on the specific university or business that the applicant will be employed by. Neither Euraxess who coordinate the overall scheme, nor DHFERIS, would receive an applicant's disability status. HR staff may contact Euraxess for advice on an anonymous case though. [10]</p> <p>[1] Department of Justice, Home Affairs and Migration, 'Privacy and Cookies Policy', available at: https://portal.irishimmigration.ie/en/privacyandcookiespolicy/ , accessed 10 November 2025</p> <p>[2] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[3] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[4] Correspondence with the Access Officer, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[5] 'processing is necessary for compliance with a legal obligation processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.</p> <p>[6] Correspondence with the Access Officer, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[7] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p>
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			<p>[8] Department of Enterprise, Tourism and Employment (2025) 'Privacy, Website Cookies and the General Data Protection Regulation (GDPR)', https://enterprise.gov.ie/en/privacy-statement/ , Last accessed 10 November 2025</p> <p>[9] Department of Enterprise, Tourism and Employment (2025) 'Launch of 'Employment Permits Online' ', https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/latest-updates/new-eps/ Last accessed 10 November 2025</p> <p>[10] Correspondence with Euraxess Ireland, October 2025</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>1-4 Department of Justice, Home Affairs and Migration Digital Services</p> <p>Members of the access team in the Department of Justice, Home Affairs and Migration, are occasionally asked to review if websites or outputs such as PDFs are accessible to people with disabilities. The Access Team is an informal team comprised of DJHAM volunteers with a professional or personal interest in accessibility issues. It was established to help both staff and service users with accessibility issues. The team, which draws on staff from various functions within the Department, is chaired by the Department's Access Officer. According to the Department's 2022 Equality, Diversity and Inclusion Strategy, the concept of an Access Team is seen as best practice in the area of accessibility as it provides a practical forum for the resolution of practical issues. It also provides a resource for staff to raise any access related queries or issues.[1]</p> <p>At present, the access team has members from Information Technology (IT), Facilities, ISD and HR. Some of the team also have lived experience. At its core are the Access Officer, who works with members of the public, and the Disability Liaison Officer (DLO). The team is</p>
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			<p>primarily focussed on raising awareness, but they also continue to try and promote a better general understanding of accessibility issues. Some team members have contributed to reviewing of documents or software, using either their personal or professional expertise. There are no members of the access team who work full time on the area, with the exception of the DLO who works with staff only. Efforts are being made to create a firmer structure with a more direct reporting line and specific responsibilities for the access team.[2]</p> <p>The Digital Contact Centre</p> <p>No, the Department did not involve disabled applicants when developing the DCC. However, in 2024 the Department invited staff that use assistive technologies to participate in the testing process of the Digital Contact Centre and their feedback was noted.[3] The objective was to check if testers found any issues, not to check if it met the requirements of the directive specifically.[4] It is unknown the full extent of testing that was carried out, what the exhaustive list of assistive technologies were tested and the range of impairments that were considered.[5]</p> <p>One access team member tested the following screen readers on a computer: NVDA, ZoomText, JAWS. Apple’s iOS screen reader was tested on an iPad and an old iPhone, and Android's version was tested on a Samsung S23. Accessibility features for colour blindness, such as colour contrast, were reviewed.[6] A keyboard was used to undertake all of the testing. Colour contrast issues were observed, for example, the focal box for screen readers which shows you where you are, was too close to the colours from the background. Some suggestions such as using yellow instead of gold were recommended. An access team member who did not have any visual impairment and who was using an Irish network reported having issues with ID Pal.[7]</p> <p>While the testing was undertaken on the English website, it was noted that when selecting a different language, the HTML/ARIA was incorrect and not accessible, unlike the English</p>
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			<p>version. Observations were then passed back to the team designing the Digital Contact Centre. The staff member noted that when asked to re-review the portal, some changes had been implemented to make it more accessible.[8]</p> <p>Additionally, the Department commissioned Vially, who then engaged Vision Ireland, to carry out an accessibility audit on the DCC and the CMS, to determine compliance with Web Content Accessibility Guidelines 2.2. The Department state they are committed to ensuring the DCC and CMS comply with these guidelines at the earliest opportunity.[9] Vially and Vision Ireland’s accessibility audit of the Portal content in September 2025 comprised of a full website audit. The Web Content Accessibility Guidelines 2.2 were applied. The purpose of the audit was to determine how the content can be altered to ensure accessibility to all people, including those with disabilities.</p> <p>The report included the audit methodologies, consisting of the guidelines which were checked, the software which was used, and the devices that were used for testing. The report provides a pass or fail mark for every WCAG 2.2 guideline and its A level.[10]</p> <p>In other areas, members of the access team, have made presentations on how to ensure the correct colour contrast and on how to use the S.C.U.L.P.T[11] model for accessibility testing, have written scripts/walk-through guides for people using assistive technology to troubleshoot, have provided guidance documents on how to make PDFs accessible and have written standard operating procedures. However, the extent to which these resources are used is unclear.[12]</p> <p>3. STEP programme No.[13]</p> <p>5. Employment Permits No, the Department of Enterprise, Tourism and Employment did not directly involve disabled</p>
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			<p>applicants when developing Employment Permits Online. However, Employment Permits Online was developed to be a fully operational system, including a public facing portal, meeting EN 301549:2015 (Accessibility requirements suitable for public procurement of ICT products and services in Europe. ETSI EN 301 549 - V1.1.2 - Accessibility requirements suitable for public procurement of ICT products and services in Europe). [14]</p> <p>6. Hosting agreement No.[15]</p> <p>[1] Department of Justice, Home Affairs and Migration (2022) (called the Department of Justice at the time), 'Equality, Diversity and Inclusion Strategy', available at: https://assets.gov.ie/static/documents/department-of-justice-equality-diversity-and-inclusion-strategy.pdf, accessed 10 November 2025, pp.16</p> <p>[2] Correspondence with the Access Officer, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[3] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[4] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[5] This question was asked to stakeholders.</p> <p>[6] By an access team member without colourblindness.</p> <p>[7] Correspondence with a member of the access team, the Department of Justice, Home Affairs and Migration, October 2025</p> <p>[8] Correspondence with a member of the access team, the Department of Justice, Home Affairs and Migration, October 2025</p> <p>[9] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p>
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			<p>[10] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[11] University of Reading, 'S.C.U.L.P.T for Accessibility', available at: https://sites.reading.ac.uk/tel/s-c-u-l-p-t-for-accessibility/ , accessed 11 November 2025</p> <p>[12] Correspondence with a member of the access team, the Department of Justice, Home Affairs and Migration, October 2025</p> <p>[13] Correspondence with the Start-Up Entrepreneur Programme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[14] Correspondence with the Department of Enterprise, Tourism and Employment, November 2025</p> <p>[15] Correspondence with Euraxess Ireland, October 2025.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>1-2 Residence Permits and Family Reunification (EU treaty rights only) The Digital Contact Centre: Yes, the Department takes the challenges faced by digitally disadvantaged applicants into consideration when developing digital services, alongside other factors. The Digital Contact Centre is available world-wide, bringing the services to a global audience. The Digital Contact Centre portal is available in fourteen different languages to make the services more inclusive to a wider market. Ease of access and ease of use of the system is a key driver of the design and implementation of the system and multiple angles were considered when launching the system. After validating their ID on the DCC, service users can navigate to the CMS and start a process to apply for EU Treaty rights applications. This application process was built with a</p>
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			<p>“digital first, not digital only” philosophy, and application forms are available for download on the CMS.[1]</p> <p>Another consideration made for the DCC is the choice of customer authentication methods. Examples of authentication methods are the use of email, SMS and Authenticator apps when logging in to the system. The DCC currently uses email and SMS as these technologies are more widespread and more readily understood. Authenticator apps, which are available from Google and Microsoft, while regarded as a stronger security method, can only be installed on modern devices. This can be problematic for applicants where modern devices are expensive.[2]</p> <p>There have been some relevant developments since launching. Approval for developing an extension for the Digital Contact Centre to give proxy access to trusted partners was recently received. This could support applicants with access issues to access the services available via the DCC. It is the Department's intention to extend an invite to NGOs (including those that work with disabilities) and other government bodies for comments on the design approach for the proxy portal to ensure it meets user needs. They are currently in the discovery and scoping phase for this.[3] A ‘proxy’ refers to someone that can assist a person engaging in a legal migration process. The Department have reviewed a similar approach in the UK [4]</p> <p>There was no consultation when developing the digital contact centre or the case management system. However after the DCC was first launched, there was a meeting between the Department of Justice, Home Affairs and Migration and members of the Migrant Rights Forum including MRCI and Crosscare. There have been two more meetings since then. The objective of the most recent meeting was for the Department to demonstrate the new CMS, with the addition of the interactive EU treaty rights application.[5] The Department received feedback on the general functionality of the CMS.[6]</p>
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			<p>One commitment outlined in the Department of Justice’s Customer Service Action Plan 2025-2028 is that as part of the Immigration Service Delivery Modernisation Programme, customer and staff feedback is to be used to develop and enhance the Digital Contact Centre in 2025.[7]</p> <p>The Department of Justice, Home Affairs and Migration stated that accessibility issues with the DCC are constantly being reviewed and they are making incremental changes to the platform to reduce them.[8]</p> <p>After an application is made on the digital contact centre, applicants can indicate whether they want correspondence to be digital or postal.[9]</p> <p>1-4 Department of Justice, Home Affairs and Migration Digital Services Yes, the challenges faced by digitally disadvantaged applicants will be taken into consideration in developing future digital services[10] as other elements of the action plan were; the commitment to standardise processes, tools and templates for conducting design research for digitisation and modernisation programmes,[11] to create high-level Department guidelines on user research which outlines the benefits, the context in which it is needed, risks, who to contact and what level of approval is needed,[12] and to host Department wide events and seminars on how to make services more customer-centred.[13]</p> <p>Many legal migration decisions are issued either via registered post, or via registered post and digitally.[14]</p> <p>3. STEP programme No.[15]</p> <p>5. Employment Permits No specific information on how challenges faced by digitally disadvantaged applicants are</p>
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			<p>taken into consideration was provided. The Department of Enterprise, Tourism and Employment state that Employment Permits Online is designed to deliver an improved customer experience and a more efficient and responsive service. The new system introduces a portal space with separate and individual accounts for both employers, employees and agents, making it easier to get up-to-date information on the status of applications. According to the Department, the new employment permits system makes the application process easier, more secure and more intuitive.</p> <p>In addition to computer/laptop applications, Employment Permit Online is fully compatible to receive applications submitted via mobile (cell) phone.[16]</p> <p>6. Hosting agreement No.[17]</p> <p>[1] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[2] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[3] Correspondence with Immigration Service Delivery - Modernisation & Coordination Division, Department of Justice, Home Affairs and Migration, October 2025; Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[4] UK Visas and Immigration (2024) 'UKVI account: terms and conditions'. https://www.gov.uk/government/publications/ukvi-account-terms-and-conditions/ukvi-account-terms-and-conditions , Last accessed 18 November 2025</p> <p>[5] This did not include any disability organisations or disabled service users specifically, hence its lack of inclusion in question 5.</p> <p>[6] Correspondence with Immigration Service Delivery - Modernisation & Coordination</p>
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			<p>Division, Department of Justice, Home Affairs and Migration, October 2025; Correspondence with Crosscare, October 2025; Correspondence with MRCI, October 2025</p> <p>[7] Department of Justice, Home Affairs and Migration (2025) (called the Department of Justice at the time), 'Customer Service Action Plan 2025 – 2028', available at: https://assets.gov.ie/static/documents/Department_of_Justice_Customer_Service_Action_Plan_2025-2028_-_Desktop_Version.pdf , accessed 10 November 2025</p> <p>[8] Correspondence with Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[9] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[10] Correspondence with Immigration Service Delivery - Modernisation & Coordination Division, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[11] By the end of 2027; Department of Justice, Home Affairs and Migration (2025) (called the Department of Justice at the time), 'Customer Service Action Plan 2025 – 2028', available at: https://assets.gov.ie/static/documents/Department_of_Justice_Customer_Service_Action_Plan_2025-2028_-_Desktop_Version.pdf , accessed 10 November 2025</p> <p>[12] By the end of 2026.</p> <p>[13] By the end of 2028.</p> <p>[14] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[15] Correspondence with the Start-Up Entrepreneur Programme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[16] Correspondence with the Employment Permits Unit, Department of Enterprise, Tourism and Employment, October 2025</p> <p>[17] Correspondence with Euraxess Ireland, October 2025.</p>
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			<p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes, the European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020 came into force on 23 September 2020 giving effect to the Directive in Ireland.[1] The National Disability Authority Act 1999 provided the founding legislation for the National Disability Authority, which is the body with responsibility for monitoring Ireland's adherence to the directive.[2]</p> <p>Prior to this, the Irish Human Rights and Equality Act 2014 had already established a positive duty on public sector bodies to eliminate discrimination, promote equality of opportunity and treatment and protect human rights. This means that all public bodies in Ireland have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation, called the Public Sector Equality and Human Rights Duty.[3] Under equality legislation, discrimination based on specific distinct grounds is unlawful including disability and age (does not apply to a person under 18). Discrimination here is the treatment of a person in a less favourable way than another person is, has been or would be treated in a comparable situation on any of the nine equality grounds. Discrimination can be direct, indirect, by association or imputation.</p> <p>The Disability Act 2005 obligates public bodies to make their services and information accessible to people with disabilities, ensuring equal treatment and integrated access to mainstream services where practicable. It establishes Access Officers to provide guidance and appoints Complaints Officers and an Appeals Officer to handle complaints and appeals regarding failures to comply with the Act.[4]</p>
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The Disability Act 2005 (Code of Practice) (Declaration) Order 2006^[5] provides for the use of plain English and other accessible formats like Easy-to-Read summaries for information from public bodies. One of the first steps in making digital content accessible is that it is written in "Plain English".^[6] Plain English is written to be easily understood. Using plain English ensures that documents are written clearly and concisely, there is no confusion about meaning and jargon is kept to a minimum. All documents produced to provide information to the public should be written in plain English.^[7] Plain English supports the right to accessible information as outlined in Article 21 of the UNCRPD.^[8]

The Irish Human Rights and Equality Commission Act 2014 provided for the establishment of the Irish Human Rights and Equality Commission.^[9] This Act provides for the establishment of the Irish Human Rights and Equality Commission. Its' mandate is to promote and protect human rights and equality for everyone in Ireland, including those who are not from European Economic Area countries. IHREC also has a specific role in promoting and monitoring Ireland's obligations under the UN Convention on the Rights of Persons with Disabilities (UNCRPD). IHREC works to ensure that people with disabilities have the same rights and dignity as everyone else and can challenge discrimination in areas like access to services. Ireland's general disability legislation applies to all third country nationals residing in Ireland.

[1] European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020, S.I. No. 358/2020,
<https://www.irishstatutebook.ie/eli/2020/si/358/made/en/print>

[2] National Disability Authority Act, 1999, S.I. No. 14/1999, <https://www.irishstatutebook.ie/eli/1999/act/14/enacted/en/html>

[3] The Public Sector Equality and Human Rights Duty (the Duty) is contained in Section 42 of the Irish Human Rights and Equality Commission Act 2014. Irish Human Rights and Equality Commission Act 2014, S.I. No. 25/2022 available at:
<https://www.irishstatutebook.ie/eli/2014/act/25/enacted/en/html>

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			<p>[4] Disability Act 2005, S.I. No. 14/2005 https://www.irishstatutebook.ie/eli/2005/act/14/enacted/en/html</p> <p>[5] Disability Act 2005 (Code of Practice) (Declaration) Order 2006, S.I. No. 163/2005 https://www.irishstatutebook.ie/eli/2006/si/163/made/en/print</p> <p>[6] National Adult Literacy Agency, (2008) 'Plain English Guidelines at a Glance' available at: https://www.nala.ie/publications/plain-english-guidelines-at-a-glance/ , accessed 10 November 2025</p> <p>[7] Citizens Information Board, (2009) 'Accessible Information for All', Research Series, https://www.citizensinformationboard.ie/downloads/accessibility/Accessible_Information_For_All.pdf</p> <p>[8] The National Platform of Self Advocates, 'Why Plain English Makes Reports Better for Everyone', available at: https://thenationalplatform.ie/why-plain-english-makes-reports-better-for-everyone/ accessed 10 November 2025</p> <p>[9] Irish Human Rights and Equality Commission Act 2014, S.I. No. 25/2022 available at: https://www.irishstatutebook.ie/eli/2014/act/25/enacted/en/html</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>Yes.</p> <p>1. Residence permits: After a third-country national enters the state, or receives an immigration permission they must register with Immigration Service Delivery, if they wish to stay for more than 90 days. When they are registered, they will receive their Irish Residence Permit.[1] Service users must still present themselves to complete an in-person registration process.[2]</p>
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			<p>However, some processes relating to this are digital.</p> <p>In October 2024, Immigration Service Delivery launched a self-service portal called the Digital Contact Centre (DCC)[3] where service users can create an account and book a first-time registration appointment, with plans to expand the legal migration processes it covers. The other relevant areas it currently covers include applying for various residence permissions, viewing the status of existing applications, notifying immigration services that your circumstances have changed, general queries, solicitor or third-party advocate queries. [4]Service users wishing to renew existing permissions can do this online via a different portal; the preexisting 'Irish Immigration Service Online' platform. [5]</p> <p>2. Family reunification – EU treaty rights The process for EUTR 1 and 1A is now on the DCC, whereas previously people had to fill out physical forms.[6] EUTR1 is to be used by TCNs applying for a residence card as a qualifying family member of an EEA national, who is not Irish. Whereas, 1A is to be used by permitted family members.[7]</p> <p>3. Start-Up Entrepreneur Programme The Start-up Entrepreneur Programme (STEP) was introduced to allow for innovative entrepreneurs who are third country nationals to apply for permission to establish their business and reside in Ireland on a full-time basis.[8] They can also apply for their direct, dependent family members to join them. Applications must be made via email from outside of Ireland. The application form is on the website in PDF format.[9] This form plus any necessary documents must be scanned and emailed. The applicant will receive an acknowledgement letter via email and if successful, a preapproval letter. Once the necessary funding requirements are met, they will receive a stamp 4 immigration letter, via email. There are also guidelines about the programme in PDF format.[10]</p>
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			<p>STEP applications were via physical post up until 2019. Postal applications are no longer available in any circumstances.[11]</p> <p>There is a plus sign button to press for details about how to apply online, which is where the email address for submission is. However, there is no alternative text so it is unclear if someone using a screen reader would know that there is a button to press.[12] This is a common error found by the National Disability Authority.[13]</p> <p>4. The Atypical Working Scheme Applicants must make an application on an online application portal from outside the state on the 'Irish Immigration Service Online' portal.[14] Postal applications are not allowed in any circumstance, and all applicants must apply through the portal.[15] However, if someone on the Atypical Working Scheme needs to change their status or raise a query, they must do so through the newer digital contact centre.[16]</p> <p>1-4 Department of Justice, Home Affairs and Migration Digital Services While application methods vary, many legal migration decisions are issued either via registered post alone, or alongside a digital notification.[17]</p> <p>5. Employment permits: Applicants must apply for a permit, renew or cancel their permit and change their employer online on the Department of Enterprise, Tourism and Employment's website portal – Employment Permits Online since April 2025.[18] The only exception is detailed in reactivating a permit.[19] Users can also track their application, update details, appeal a refused application and get assistance online. This was previously done by post or email. The Department of Enterprise, Tourism and Employment does not require in-person appointments. Registering your immigration permission with the Department of Justice, Home Affairs and Migration is still</p>
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			<p>required and this falls under 1. residence permits. There is no public office and the Employment Permit Section cannot facilitate in person callers to the office. When an employment permit is issued, it is emailed in a PDF, which may be printed if desired. In order to create an account, users must undertake two-step verification via email and SMS.[20]</p> <p>6. Hosting agreements The process for hosting agreements is detailed in question 1. Before the online portal, applications were by post. Post is not permitted under any circumstances now.[21]</p> <p>[1] Department of Justice, Home Affairs and Migration, 'Immigration Permission/Stamps', available at: https://www.irishimmigration.ie/registering-your-immigration-permission/information-on-registering/immigration-permission-stamps/ , accessed 10 November 2025</p> <p>[2] Department of Justice, Home Affairs and Migration (2025) 'Submitting Registration or Renewal Queries', available at https://www.irishimmigration.ie/registering-your-immigration-permission/submitting-registration-or-renewal-queries/ accessed 10 November 2025</p> <p>[3] Department of Justice, Home Affairs and Migration, 'Log In / Register for an Account', available at: https://portal.irishimmigration.ie/en/ , accessed 10 November 2025</p> <p>[4] For some of these functions, users are actually being directed towards the CMS, for example, when they are making an EU Treaty Rights application, but it appears the same to the user; Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[5] Department of Justice, Home Affairs and Migration, 'Transfer of all nationwide Renewals to the ISD online portal', available at: https://www.irishimmigration.ie/transfer-of-all-nationwide-renewals-to-the-isd-online-portal/ accessed 10 November 2025</p>
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			<p>[6] EUTR 2 – 5 are still via posting physical forms. Department of Justice, Home Affairs and Migration, 'EU Treaty Rights', available at: https://www.irishimmigration.ie/coming-to-join-family-in-ireland/joining-an-eea-or-swiss-national/eu-treaty-rights/#application-forms , accessed 10 November 2025 ; Correspondence with MRCI, October 2025</p> <p>[7] The definitions are explained here: Department of Justice, Home Affairs and Migration, 'Explanatory Leaflet for EUTR 1 and EUTR 1A', available at: https://www.irishimmigration.ie/wp-content/uploads/2025/09/EUTR-1and-EURT-1A-combined-explanatory-leaflet-1.pdf , accessed 10 November 2025</p> <p>[8] The Start-up Entrepreneur Programme is a small programme with 25 new applications in 2024.</p> <p>[9] It is not known whether this PDF is accessible or not.</p> <p>[10] Department of Justice, Home Affairs and Migration , 'Start-Up Entrepreneur Programme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-options-for-working-in-ireland/coming-to-work-for-more-than-90-days/start-up-entrepreneur-programme-step/ , last accessed 10 November 2025 ; Correspondence with the Start-Up Entrepreneur Programme, Department of Justice, Home Affairs and Migration, October 2025.; It is not known whether this PDF is accessible or not.</p> <p>[11] Correspondence with the Start-Up Entrepreneur Programme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[12] Department of Justice, Home Affairs and Migration , 'Start-Up Entrepreneur Programme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-options-for-working-in-ireland/coming-to-work-for-more-than-90-days/start-up-entrepreneur-programme-step/ , last accessed 10 November 2025</p> <p>[13] National Disability Authority (2022) 'Ireland's Monitoring Report for the EU Web Accessibility Directive - 2021 supplemental', available at:</p>
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			<p>https://nda.ie/uploads/publications/Irelands-Monitoring-Report-for-the-EU-Web-Accessibility-Directive-2021-supplemental-accessible-PDF.pdf accessed 10 November 2025</p> <p>[14] Department of Justice, Home Affairs and Migration , 'Atypical Working Scheme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-work-visa-options/applying-for-a-long-stay-employment-visa/atypical-working-scheme/ , last accessed 10 November 2025</p> <p>[15] Correspondence with the Atypical Working Scheme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[16] Correspondence with Migrants Rights Centre Ireland, October 2025</p> <p>[17] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[18] Department of Enterprise, Tourism and Employment, 'Welcome to Employment Permits Online', https://employmentpermits.enterprise.gov.ie/ , last accessed 10 November 2025</p> <p>[19] https://www.irishimmigration.ie/my-situation-has-changed-since-i-arrived-in-ireland/reactivation-employment-permit-scheme/</p> <p>[20] Department of Enterprise, Tourism and Employment (2025) 'Launch of 'Employment Permits Online' ', https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/latest-updates/new-eps/ Last accessed 10 November 2025</p> <p>[21] Correspondence with Euraxess Ireland, October 2025</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>1. Residence permits: The Digital Contact Centre</p>
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			<p>There is a step-by-step guide on how to set up an online account on the DCC.[1] Each step has accessible text, describing what is in screenshots of the customer service portal, meaning a screen reader could read it. This step-by-step guide is provided directly on the webpage and not in a PDF, following the recommendations of the National Disability Authority.[2]</p> <p>When setting up an account for the DCC, after many steps and pages, registrants see a support email when the page reads "If you have any issues with receiving the confirmation email, please email ImmigrationPortalSupport@Justice.ie". This is only provided when you are sent the link for the identity verification application ID-Pal and it is after registrants are required to verify their email using a code. This email address is also on the step-by-step guide webpage but registrants are only directed to email this if they do not have an identity document.[3] When you finish submitting everything on ID-Pal, you are presented with "if you have any queries, please contact ImmigrationPortalSupport@Justice.ie".[4]</p> <p>This message in a grey on a white background, except for the email address itself. This poor colour contrast was visible on parts of the ID-Pal, for example, for "align your document within the frame until it is captured automatically". This light grey text on a white background is repeated on the website when you start an application for first-time registration, although the grey is not as light.[5]</p> <p>The app asks you to make sure all text can be clearly read but the image is quite small so depending on the level of visual impairment, this may be difficult.[6]</p> <p>If you proceed to make an EU treaty rights application on the CMS, you are prompted to give data privacy consent and agree to the digital/electronic communications terms and conditions. Underneath this reads "Want to proceed with an application without agreeing to ISD Digital/Electronic Communications conditions?" This link will advise you that you can request physical paper applications be posted to you via the digital contact centre or by writing to the</p>
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			<p>Department of Justice, Home Affairs and Migration via post.[7]There is an opportunity in 2026 that the proxy portal (mentioned in question 6) can allow proxies help gain access to services.[8]</p> <p>The 'Immigration Service Online' Portal There is a step-by-step guide on how to renew your registration permission online.[9] It directs an applicant to register for the online customer service portal and ask any questions there, if they require assistance. There are information videos to explain how you renew your registration which focus on the general process and documents you need, but not how to use the portal itself. The video is available in the following languages in English, Portuguese, Arabic, Hindi, Mandarin Chinese, Russian and Spanish. This video also directs you to another video on immigration terms and phrases.[10] It states that applicants are emailed when their Irish Residence Permit is approved, if their application is rejected or if they need to take further action.</p> <p>3. Start-Up Entrepreneur Programme The physical form that needs to be emailed may be easier for some people to use than an online portal. However, it still requires good internet access, and as the PDF cannot be edited, it requires access to a printer and a scanner or sufficient knowledge and technology to use a smart phone to scan the application.</p> <p>At the bottom of the page, you can press 'contact us' which will automatically open a new email with the email address filled.[11] There is no phone number, however applicants can email regarding any accessibility issues. Applicants to this programme often have a legal representative assisting them, although applications can be made independently. Due to the nature of the programme, applicants are generally not digitally disadvantaged.[12]</p> <p>4. The Atypical Working Scheme</p>
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			<p>The Atypical Working Scheme Unit has developed a range of training materials to assist in making applications for permission under the Scheme which are provided in PDF format. They do show step-by-step images of the portal, however the PDFs are out of date and show a previous version of the portal.[13] A link at the bottom of the page titled 'online application overview' directs you to a page with another PDF that also appears to show a previous iteration of the portal.[14]</p> <p>5. Employment permits: The employment permits webpage provides useful information across the scope of the employment permit system.[15] A contact details page sets out relevant points of contact across various email addresses and phone numbers.[16] Most webpages related to permits are not in PDF format, following the recommendation of the NDA. Employment permits online information webpage also publishes a series of 'how to' video guides, including how to set up an account and how to submit an application, a recorded webinar, user guide and an FAQ document,[17] in accessibility format in line with the technical requirements.[18] All these are in accessibility format in line with the technical requirements, according to the Employment Permit Unit.[19] In addition, there are a series of Employment Permit Checklists PDF format. There is also an email address for technical queries. [20]</p> <p>If needed, service users can email the Department of Enterprise, Tourism and Employment to request the forms to print and post instead. This alternative option is listed on a different page to the supports above and is not in Plain English. [21]</p> <p>The Department also has a dedicated 'Ticketing' system for any user queries related to Employment Permits Online.[22]</p> <p>6. Hosting agreements Applicants are advised to contact the HR staff member they are dealing with in the</p>
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			<p>organisation that has hired them in the first instance. However, an applicant can also contact Euraxess directly, via their contact details on their own website. HR staff may also contact Euraxess for advice. [23]</p> <p>1-4 Department of Justice, Home Affairs and Migration Digital Services If a third country national writes to the Minister for Justice, Home Affairs and Migration requesting a postal application form, the request must be considered. Additionally, if a third country national writes to the Minister providing information and supporting documentation that would make them eligible for the scheme they wish to apply for, this application must be considered, even where the form itself has not been filled out.[24]</p> <p>Supports not provided by the state Guidance and support in navigating the digital services outlined above is often provided external to civil or public bodies on an ad hoc basis. Crosscare is an Irish a non-governmental organisation that works with migrants who are in the country and they have found that a number of digitally disadvantaged migrants come to them for support regarding residence permits. Crosscare have found that it is a very small minority of their service users that have no smartphone and that the general issue is digital literacy and confidence, particularly in regard to two-factor authentication, scanning and uploading documents. File limits on potentially large documents is also a common issue. Crosscare emphasise that obtaining residence permission is an important and serious legal migration process and that if digital systems present barriers, then they risk illegal residence.[25]</p> <p>Crosscare stated that the 'Irish Immigration Service Online' portal, which has been in existence for longer, is easier for digitally disadvantaged applicants to use because: some changes have been made to it over the years based on feedback; authentication is email</p>
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			<p>based; there are question mark boxes beside questions with explanations/instructions; each section has a one-page information flow. Crosscare is planning clinics to support use of the online portal to renew residence permits.</p> <p>Crosscare have found the new Digital Contact Centre to be more difficult for digitally disadvantaged people to navigate, including the two-factor authentication by text during set-up and the inability to change the email address that you sign up with.[26] This is a problem if a user becomes locked out, which is more likely with poor digital literacy. Some older mobile phones have also been unable to download the ID Pal app Required to set up a DCC account. The Department of Justice, Home Affairs and Migration has stated that Ireland has an obligation to secure its online services according to NIS 2 regulations, with Article 21 referencing the use of Multi-Factor authentication. [27] They also note that older phones can be used by attackers to exploit apps and potentially be used to attack the DCC.[28] Migrants have reported to Crosscare that if they go to the ISD office, in-person support is not available. In comparison to the other immigration-related portal, Crosscare noted a lack of information icons giving instructions and too many free text boxes.[29]</p> <p>Crosscare are hopeful that if the accessibility issues are resolved, the online process may be easier for TCNs than paper forms as it will only display what is relevant for the user.</p> <p>The Migrant Rights Centre Ireland (MRCI) is another Irish non-governmental organisation that works with TCNs. Generally, service users are on employment permits in low-paid jobs. They report regularly working with people who are digitally disadvantaged. MRCI do not specifically work with disabled people, however they noted that many disabilities are hidden and they do not ask service users about their disability status.[30]</p> <p>MRCI reported that some service users have struggled with the new digital contact centre as it requires a smart phone and digital literacy. They welcome the fact that there is an email for</p>
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			<p>support, however they report that email reply times can be poor and that sometimes the solutions can be difficult to follow.</p> <p>They reported improvements over time, especially with ID-Pal. MRCI found that being able to make a third-party advocate account on the digital contact centre was a useful feature for assisting people who were digitally disadvantaged or disabled because staff were able to see how the portal worked for themselves. The employment permit portal does not allow this.</p> <p>MRCI also found a benefit of the digital contact centre is having a centralised point of contact for many units across legal migration, as previously it may have been difficult for people to find the correct email address for their query.[31]</p> <p>On the 'Irish Immigration Service Online' portal, MRCI reported that if you use your phone to renew your Irish residence permit rather than a PC/laptop, there are instances where the payment option does not work. Many service users do not have laptops. There is also no notice that you must use a laptop.</p> <p>MRCI believe that as there are people who are digitally disadvantaged, there should be alternative options to the digital contact centre. They also argue that it is very important that there be easily accessible and easy to find information on those alternative options. MRCI also state that when online is the only option, if the digital service is not working, people may have no other channel other than to ask an NGO. MRCI have had an increase in people attending, for these reasons only, since the launch of the DCC, causing capacity constraints.[32]</p> <p>In international protection (which is outside the scope of this inform), applicants go to the building in person and are assisted by staff to make applications on iPads where required. MRCI identified this as a good practice.[33]</p>
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			<p>MRCI also felt that the ability to create a third party or advocate profile on the DCC was a positive. This is not available on the Employment Permits Online portal.</p> <p>On the employment permits portal, the employer and employee must fill out their sections of an application separately. MRCI noted that this means is no longer possible for one party to fill out the full form for another digitally disadvantaged party. However, they highlighted this as a positive in terms of safeguarding against potential challenges to workers' rights. [34]</p> <p>[1] Department of Justice, Home Affairs and Migration, 'Customer Service Portal – A guide to using the online self-service portal', available at: https://www.irishimmigration.ie/customer-service-portal-a-guide-to-using-the-online-self-service-portal/ , accessed 10 November 2025</p> <p>[2] National Disability Authority (2022) 'Ireland's Monitoring Report for the EU Web Accessibility Directive - 2021 supplemental', available at: https://nda.ie/uploads/publications/Irelands-Monitoring-Report-for-the-EU-Web-Accessibility-Directive-2021-supplemental-accessible-PDF.pdf accessed 10 November 2025, pp.6</p> <p>[3] Department of Justice, Home Affairs and Migration, 'Customer Service Portal – A guide to using the online self-service portal', available at: https://www.irishimmigration.ie/customer-service-portal-a-guide-to-using-the-online-self-service-portal/ , accessed 10 November 2025</p> <p>[4] The European Migration Network Ireland National Contact Point set up a digital contact centre account to review the accessibility of the process.</p> <p>[5] The European Migration Network Ireland National Contact Point set up a digital contact centre account to review the accessibility of the process.</p> <p>[6] The European Migration Network Ireland National Contact Point set up a digital contact centre account to review the accessibility of the process.</p> <p>[7] The first page after you press "start application process" for EU treaty rights on the Digital Contact Centre. https://apply.irishimmigration.ie/Digital-Consent/</p> <p>[8] Correspondence with Immigration Service Delivery - Modernisation & Coordination</p>
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			<p>Division, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[9] Department of Justice, Home Affairs and Migration, 'Renewing your registration permission if you live in the Republic of Ireland, available at: https://www.irishimmigration.ie/registering-your-immigration-permission/how-to-renew-your-current-permission/renewing-your-registration-permission-if-you-live-in-the-republic-of-ireland/ , accessed 10 November 2025</p> <p>[10] Department of Justice, Home Affairs and Migration (Called Department of Justice at the time) (2021) 'Guide to Irish Immigration Terms and Phrases', https://www.youtube.com/watch?v=gQaXJX_8xCY , accessed 10 November 2025</p> <p>[11] Department of Justice, Home Affairs and Migration , 'Start-Up Entrepreneur Programme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-options-for-working-in-ireland/coming-to-work-for-more-than-90-days/start-up-entrepreneur-programme-step/ , last accessed 10 November 2025</p> <p>[12] Correspondence with the Start-Up Entrepreneur Programme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[13] Department of Justice, Home Affairs and Migration , 'Atypical Working Scheme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-work-visa-options/applying-for-a-long-stay-employment-visa/atypical-working-scheme/ , last accessed 10 November 2025</p> <p>[14] Department of Justice, Home Affairs and Migration , 'Atypical Working Scheme', available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-work-visa-options/applying-for-a-long-stay-employment-visa/atypical-working-scheme/ , last accessed 10 November 2025</p> <p>[15] Department of Enterprise, Tourism and Employment, 'Employment Permits', https://employmentpermits.enterprise.gov.ie/ , last accessed 10 November 2025 https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/</p> <p>[16] Department of Enterprise, Tourism and Employment (2025) 'Employment permit contact details', https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-</p>
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			<p>permits/contact/ accessed 10 November 2025</p> <p>[17] Department of Enterprise, Tourism and Employment (2025) 'Launch of 'Employment Permits Online' ', https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/latest-updates/new-eps/ accessed 10 November 2025</p> <p>[18] Correspondence with the Employment Permits Unit, Department of Enterprise, Tourism and Employment, October 2025</p> <p>[19] Correspondence with the Employment Permits Unit, Department of Enterprise, Tourism and Employment, October 2025</p> <p>[20] Department of Enterprise, Tourism and Employment, 'Employment permits contact details', https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/contact/, last accessed 10 November 2025</p> <p>[21] Department of Enterprise, Tourism and Employment, 'Employment permits application forms', https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/application-forms/ last accessed 10 November 2025</p> <p>[22] Correspondence with the Employment Permits Unit, Department of Enterprise, Tourism and Employment, October 2025</p> <p>[23] Correspondence with Euraxess Ireland, October 2025; Euraxess Ireland (2025), 'What to Know As Researchers', available at: https://www.euraxess.ie/ireland/fast-track-work-permit-non-eu-rd-hosting-agreement-scheme/researchers, accessed 10 November 2025</p> <p>[24] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[25] Correspondence with Crosscare, October 2025</p> <p>[26] Correspondence with Crosscare, October 2025</p> <p>[27] Department of The Environment, Climate and Communications and the National Cyber Security Centre, 'NIS 2: A Quick Reference Guide', https://www.ncsc.gov.ie/pdfs/NCSC_NIS2_Guide.pdf , Accessed 18 November 2025</p>
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			<p>[28] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[29] Correspondence with Crosscare, October 2025</p> <p>[30] Correspondence with Migrants Rights Centre Ireland, October 2025</p> <p>[31] Correspondence with Migrants Rights Centre Ireland, October 2025</p> <p>[32] Correspondence with Migrants Rights Centre Ireland, October 2025</p> <p>[33] Correspondence with Migrants Rights Centre Ireland, October 2025</p> <p>[34] Correspondence with Migrants Rights Centre Ireland, October 2025</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Equal treatment in this way, is mandated in Irish legislation by the Public Sector Equality and Human Rights Duty.[1]</p> <p>1. Residence permits Yes, equal treatment is applied in all cases. Students applying for extension of student conditions are obligated to apply using the digital form in order to ensure efficient processing.[2]</p> <p>2. Family reunification through EU treaty rights only No, the case management system states that if you submit a paper application by post, it is at your own expense, the application will be processed manually, which may take longer, you will not receive status updates and all communication will be by post.[3] An Irish NGO, MRCI also reports that applicants can be delayed in applying because of the difficulty in finding out that they can send postal applications and how to do so.[4]</p>
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			<p>3. Start-up Entrepreneur Programme (STEP) N/A. There is no non-digital option regardless of the circumstances.[5]</p> <p>4. Atypical Working Scheme N/A. There is no non-digital option regardless of the circumstances.[6]</p> <p>5. Employment permits Yes, the Department of Enterprise, Tourism and Employment report that Employment Permit applications are processed in date order. Employment permit fees are standardised across digital and non-digital applications.[7] The non-digital application requires the completion and submission of a hardcopy application form and additional documentation (based on the permit type).[8]</p> <p>6. Hosting agreements Yes. The non-digital service option is a staff member applying on their behalf.[9]</p> <p>[1] The Public Sector Equality and Human Rights Duty (the Duty) is contained in Section 42 of the Irish Human Rights and Equality Commission Act 2014. Irish Human Rights and Equality Commission Act 2014 S.I. No. 25/2022 available at: https://www.irishstatutebook.ie/eli/2014/act/25/enacted/en/html</p> <p>[2] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[3] The first page after you press "start application process" for EU treaty rights on the Digital Contact Centre portal. Department of Justice, Home Affairs and Migration, 'Digital Consent', available at: https://apply.irishimmigration.ie/Digital-Consent/ , accessed 10 November 2025</p> <p>[4] Correspondence with Migrants Rights Centre Ireland, October 2025</p>
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			<p>[5] Correspondence with the Start-Up Entrepreneur Programme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[6] Correspondence with the Atypical Working Scheme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[7] Department of Enterprise, Tourism and Employment, 'Fees for employment permits' , https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/fees/ last accessed 10 November 2025</p> <p>[8] Correspondence with the Employment Permits Unit, Department of Enterprise, Tourism and Employment, October 2025</p> <p>[9] Correspondence with Euraxess Ireland, October 2025.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>1. A lack of awareness of the legal requirements and whose responsibility it is Not all staff consulted as part of this inform were aware of their legal duty to make websites and apps accessible under the EU directive and what the technical requirements are. Staff consulted often did not know where to find out information about, and get support with, making their websites and apps, and the content on them, accessible.[1] There may also be an assumption amongst staff members that ensuring the website is accessible is the role of other staff members. In particular, business owners (individual units) may assume information technology (IT) staff will ensure a website is accessible and IT staff may not do this unless business owners specify that this is an element they are requesting. A number of staff members reported that legal practitioners and/or migrant advocacy organisations support users to access legal migration services where there are accessibility</p>
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			<p>issues. The directive and Irish legislation requires public legal migration services to be made accessible for all users to access services independently.[2]</p> <p>2. The Duplication of Applications The development of online digital systems has lead to duplication of applications. For example, when a new digital system is created, applicants who had previously applied using postal systems often create new applications on the digital system. This has been seen on Domestic Residence and Permissions, and EU treaty Rights applications systems when new online digital application systems have been created[3]</p> <p>3. Cyber security inhibiting access to services When there are cyber security concerns or attacks, some features of digital services may need to be disabled temporarily, for example SMS verification from certain countries.[4] This is necessary, but can prevent users from being able to engage in the legal migration process.</p> <p>[1] This was the experience of the European Migration Network Ireland National Contact Point during consultation for this inform.</p> <p>[2] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025; Correspondence with the Start-Up Entrepreneur Programme, Department of Justice, Home Affairs and Migration, October 2025.</p> <p>[3] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[4] Correspondence with Information Management Technology - Enterprise Digital Delivery, Department of Justice, Home Affairs and Migration, October 2025</p>
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			<p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>Yes and no. The Department of Justice, Home Affairs and Migration has made commitments and efforts to improve accessibility for all, some elements of which should improve accessibility for digitally disadvantaged people, as well as disabled service users. However, it is difficult to say whether these are good practices and whether their objectives will be met. The Domestic Residence and Permissions Unit found that is beneficial to provide clear instructions to applicants regarding the fairness and accuracy of digital application systems in comparison to paper-based systems.[1]</p> <p>The purpose of the EDI & PSD committee is to oversee the Public Sector Equality and Human Rights Duty and to devise, oversee and promote equality, diversity and inclusion for the Department, as outlined in the Terms of Reference.[2] The first objective of the committee is to improve the accessibility of all services for all service users as outlined in The Equality, Diversity and Inclusion Strategy from 2022.[3] Alongside the Access Team, they continually create awareness and promote EDI via communications and events.</p> <p>In line with the Department’s EDI strategy, the Department, via Organisation Design & Development unit embed EDI related training into ongoing training programmes at all stages of an employee’s career - from new starters to senior levels.[4] This includes self-guided training course developed by the Irish Human Rights & Equality Commission (IHREC) to support and enable staff within public bodies to understand and meet their obligations to fulfil their Public Sector Equality and Human Rights Duty, and an eLearning module on how to use plain language to communicate clearly and effectively.[5] Beyond these there are no trainings on how to be compliant with the directive specifically and staff’s legal obligation to do. The IHREC training does not include any information on the directive or the accessibility requirements of digital services. It names the UNCRPD, but does not go into any detail. The</p>
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			<p>IHREC and Plain Language training are mandatory.[6]</p> <p>The Access Team also hold annual hybrid accessibility events for staff which raise awareness around disability. The last one was in April 2025, where there was one slide on the accessibility of websites. The event also demonstrated how assistive technology can be used on these websites. All staff are emailed a link after the events, providing staff who were not able to attend with an opportunity to watch the event back.[7] These events are voluntary. The EDI & PSD committee secretariat attend the EDI Interdepartmental network as a means of understanding best practice in EDI across different Government Departments and identifying areas of improvement within the Department of Justice, Home Affairs and Migration.[8]</p> <p>The first desired outcome area of the Department of Justice, Home Affairs and Migration's 2022 EDI Strategy focused on improving the accessibility and quality of services.[9] One of the envisaged actions was a Service Design Playbook, which was created in 2023 to guide the development of services. It is a practical resource that supports teams through every phase of the design lifecycle from discovery to delivery. The principle of sequencing is reflected in the handbook's modular structure, which mirrors the user journey and provides clear guidance for each phase of the design process. The playbook is currently being updated, with accessibility embedded throughout the new iteration. The new playbook will include accessibility checklists that help teams build services everyone can use with dignity. [10]</p> <p>Another action, was the publication of a Customer Service Action Plan. The first of three themes in the Department of Justice's Customer Service Action Plan 2025-2028 looks exclusively at accessibility. Making all websites, application forms and letters accessible in line with the directive is the first commitment of the plan. IMT Strategy, Architecture, and Development are tasked with making websites accessible and it is to be completed by May 2028.[11]</p>
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			<p>The Department of Justice's Transparency Unit and Immigration Service Delivery Unit were also tasked with ensuring all website content regarding legal migration services is written in Plain English by May 2027. [12]</p> <p>[1] Correspondence with Domestic Residence and Permissions, Immigration Service Delivery, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[2] Department of Justice, Home Affairs and Migration (2025) EDI & PSD committee Terms of reference [internal document].</p> <p>[3] Department of Justice, Home Affairs and Migration (2022) (called the Department of Justice at the time), 'Equality, Diversity and Inclusion Strategy', available at: https://assets.gov.ie/static/documents/department-of-justice-equality-diversity-and-inclusion-strategy.pdf, accessed 10 November 2025</p> <p>[4] The EDI committee is developing a EDI Screening /Impact Assessment Tool to ensure equality, diversity and inclusion principles are embedded in the process of DJHAM policy/programme design. It has not covered web accessibility as yet.</p> <p>[5] Communication with the EDI & PSD committee, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[6] Communication with the EDI & PSD committee, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[7] Communication with the EDI & PSD committee, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[8] Communication with the EDI & PSD committee, Department of Justice, Home Affairs and Migration, October 2025</p> <p>[9] Department of Justice, Home Affairs and Migration (2022) (called the Department of Justice at the time), 'Equality, Diversity and Inclusion Strategy', available at: https://assets.gov.ie/static/documents/department-of-justice-equality-diversity-and-inclusion-strategy.pdf, accessed 10 November 2025</p>
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			<p>[10] Correspondence with the Service Design and Customer Insight Team, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[11] The lifespan of the Customer Service Action Plan is May 2025 - May 2028. Y1 = May 25-26, Y2 = May 26-27, Y3 = May 27-28;</p> <p>Correspondence with the Service Design and Customer Insight Team, Department of Justice, Home Affairs and Migration, November 2025</p> <p>[12] Department of Justice, Home Affairs and Migration (2025) (called the Department of Justice at the time), 'Customer Service Action Plan 2025 – 2028', available at: https://assets.gov.ie/static/documents/Department_of_Justice_Customer_Service_Action_Plan_2025-2028_-_Desktop_Version.pdf , accessed 10 November 2025</p>
	<p>EMN NCP Italy</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>NO. Italy has transposed Directive (EU) 2016/2102 through Legislative Decree No. 106/2018, updating Law 4/2004 on digital accessibility and adopting the technical requirements of the European standard EN 301 549, in line with the United Nations Convention on the Rights of Persons with Disabilities (CRPD). However, no specific digital services for this category have been implemented to date.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please</p>


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			<p>explain your answer.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>YES. The competent authorities are required to comply with Law No. 104/1992 and Law No. 4/2004, which provide for the adoption of individual support measures for persons with disabilities.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p>
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			<p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>YES. Law No. 4/2004, as amended by Legislative Decree No. 106/2018, sets out general principles of digital accessibility and inclusion applicable to public services, including those in the field of migration.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p>
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			<p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p>
 <p>EMN NCP Latvia</p>		<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes, Latvia has initiated and significantly adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation. However, full and comprehensive implementation has not yet been achieved – the process is still in a transitional phase.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes, Latvia has made several adaptations of digital services – for instance, text-to-speech (TTS) services, videos relay services (VRS), videos with sign language interpretation or subtitles and easy-to-read (presenting digital content in plain language). These also include the ability to navigate a page using only the keyboard, adjust the font size, change contrast settings, use a text magnifier, and apply a page mask.</p>

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			<p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Yes. Individuals with disabilities are not offered the opportunity to pre-apply for support measures through the online services. Other channels are available – submit documents by post, embassies. Individuals with disabilities can inform the institution about this in order to find an individual solution or approach. It is possible to apply for a home visit to issue/receive an eID if the person is immobile.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>In accordance with the General Data Protection Regulation, the institution ensures the protection of applicants’ personal data.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>Yes. In accordance with the Cabinet Regulation No. 445, “Procedures for Institutions to Place Information on the Internet” the Ministry of Environmental Protection and Regional</p>
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			<p>Development shall consult non-governmental organizations which represent the interests of a person with disability and that of older persons on the composition of a sample frame of websites and mobile applications.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Yes. In the field of legal migration, in exceptional cases, services are also available in person, or through customer service centers available in municipalities.</p> <p>Latvia also provides support to digitally disadvantaged people, for example, training is offered to seniors to improve digital skills, and various other training courses within the framework of the adult lifelong learning program. All municipalities should also provide freely accessible computers to reduce digital inequality. In addition, eID includes a free electronic signature.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes. The Cabinet Regulation No. 445 regulates the accessibility of websites and digital services provided by state and local government institutions. The Law on the Structure of Public Administration stipulates that state administration services must be provided electronically</p>
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			<p>“where possible and appropriate”, and that the procedure for ensuring the accessibility of e-services is determined by the Cabinet Regulation No. 402, Regulations Regarding the Public Administration E-services.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No, only the partial submission of documents is possible digitally – either to the institution's official electronic address or by e-mail (and in the near future also using online platforms), signed with a secure electronic signature. However, issuing and receiving an eID is only possible in person. Future developments aim to expand digital solutions further, but in-person attendance will remain necessary for certain steps.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>N/a</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p>
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			<p>No. There is no different state fee or processing time depending on the method of submission.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>Yes, especially in providing digital services in legal migration procedures.</p> <ul style="list-style-type: none">- Lack of digital skills, limited access and individuals' reluctance to use digital services and tools;- High costs of implementing the WCAG (Web Content Accessibility Guidelines);- Insufficient user engagement and feedback from participants with disabilities or special needs in migration procedures to ensure effective accessibility solutions. <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>Yes.</p> <p>There is an option to access services in person, which provides access to the service for individuals who do not have internet access or sufficient digital skills. Introduced on the institution's website text-to-speech (TTS) services, video relay services (VRS), videos with sign language interpretation or subtitles and easy-to-read (presenting digital content in plain language). Users can also navigate pages using only the keyboard, adjust font size and contrast, a text magnifier, and a page mask. Free or co-funded training in digital tools provided in the country. However, it should be noted that as long as a person has the opportunity to receive services in a non-digital way, they are likely to show little interest in integrating into the use of digital</p>
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			tools and digital services.
	EMN NCP Lithuania	Yes	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Partially yes. MIGRIS (the electronic migration services portal) includes built-in accessibility controls at the top of the interface (text size adjustment, a high-contrast/black background mode, and the ability to hide illustrations). These features align with the core requirements of Directive (EU) 2016/2102 and the technical expectations of EN 301 549 (i.e., making content perceivable and operable, including support for low-vision and cognitive needs). They are also consistent with the CRPD’s Article 9 on accessibility and universal design.</p> <p>However, the available information does not show that the full package of measures required under Directive (EU) 2016/2102 and EN 301 549 has been implemented.</p> <p>In addition to the digital services available through MIGRIS, Lithuania maintains a mobile service for applicants who, due to disability, health condition or advanced age, are unable to visit a Migration Department office in person. In such cases, authorised Migration Department officers travel to the applicant’s place of residence to collect biometric data, verify identity, and perform other necessary procedural actions. This measure ensures that persons with disabilities are not excluded from legal migration procedures and represents an additional accessibility accommodation beyond the requirements set out in legislation on digital public services.</p>

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			<p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>No</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>No</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>N/A</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>No</p>
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			<p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>No</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes. Lithuania has national legislation on equality, non-discrimination and disability rights that applies horizontally to all public services, including digital services used in legal migration procedures. Two key acts are relevant: the Law on Equal Opportunities, which prohibits discrimination on grounds including disability and requires public authorities to ensure equal access to services; and the Law on the Social Integration of Persons with Disabilities, which establishes the right of persons with disabilities to accessible public services, reasonable accommodation and support measures. Although these laws do not expressly mention MIGRIS or digital migration services, they apply to all public-sector service delivery, including online systems.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p>
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			<p>No. In-person interactions have not been entirely replaced by digital services in Lithuania’s legal migration procedures. Even though applications are submitted electronically through MIGRIS, applicants must still appear in person to present the original documents, provide biometric data and sign, unless they are eligible for the separate mobile service due to disability, health condition or old age.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>N/A</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes. The applicable procedures, deadlines and fees are set in legislation and do not differ based on the method of submission.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>No.</p>
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			<p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>N/A</p>
	<p>EMN NCP Luxembourg</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes, the Directive has been transposed to national legislation. In Luxembourg the Directive (EU) 2016/2102 has been adopted through « Loi du 28 mai 2019 relative à l’accessibilité des sites internet et des applications mobiles des organismes du secteur public » https://legilux.public.lu/eli/etat/leg/loi/2019/05/28/a373/joThe Web Accessibility Assessment Framework “RAWeb 1” has been defined as the accessibility framework for all public sector bodies in the scope of the above mentioned law - https://accessibilite.public.lu/en/raweb1/ The Web Accessibility Framework complies with the success criteria of the Harmonised European standard EN 301 549 (.pdf) to establish the level of legal requirements in terms of digital accessibility.</p> <p>Mobile App Accessibility Assessment Framework RAAM 1.1 is the framework for assessing the accessibility of mobile applications, has been drawn up to serve as a basis for assessment and implementation for all public sector bodies in the scope of the above mentioned law - https://accessibilite.public.lu/en/raam1.1/index.html The RAAM provides an operational framework for checking compliance with accessibility</p>

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			<p>requirements. It can be used to check that a mobile application complies with the criteria described in the European standard EN 301 549 v.3.2.1</p> <p>The same for PDF the RAPDF 1 -https://accessibilite.public.lu/en/rapdf1/index.html. The RAPDF1 provides an operational framework for checking compliance with accessibility requirements. It can therefore be used to check that a PDF document complies with the criteria described in the European standard EN 301 549 v.3.2.1 for Section 10 Non-web documents.</p> <p>The Information and Press Service (SIP) of the Luxembourg Government is responsible for assessing the accessibility of websites and mobile applications of Luxembourg public sector bodies.</p> <p>As required by law, all Luxembourg state websites related to immigration or used by migration applicants include an accessibility statement. https://maint.gouvernement.lu/en/support/accessibilite.html https://guichet.public.lu/en/citoyens/support/accessibilite.html https://guichet.public.lu/fr/citoyens/support/accessibilite/accessibilite-myguichet.html https://guichet.public.lu/en/citoyens/support/accessibilite/accessibilite-app-myguichet.html https://info-dpi.public.lu/fr/support/accessibilite.html https://gouvernement.lu/en/support/accessibilite.html</p> <p>Declaration of the accessibility for Ministry of Home Affairs website https://maint.gouvernement.lu/en/support/accessibilite.html It has been indicated that the website is partially compliant with the European Standard EN 301 549 and the Framework for Assessing Web-Accessibility (RAWeb) version 1 . Reasons why the website is only partially compliant are also listed in the Declaration :</p> <p>Non-accessible content</p>
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			<p>The content listed below is non-accessible for the following reason(s):</p> <p>Non-compliance Please refer to the French version for this section.</p> <p>Disproportionate burden Not all documents available on the site comply with standard EN 301 549 V3.2.1; the volume of documents to be processed to achieve compliance is very large and requires too many resources. However, we undertake to provide an accessible version of content on request on a case-by-case basis (please refer to the 'Feedback and contact information' section)Editorial content, particularly older content (unchanged after 23 September 2023), may be non-compliant:Poorly formatted lists and headings;Non-relevant link titles and image alternatives;Language changes are not programmatically identified;Empty paragraph tags have been inserted to improve readability.Improperly structured tablesSome videos published after 23 September 2020 do not have accurate text transcripts. We will endeavour to provide the information conveyed in the video in the surrounding textThe volume of pages to be checked and content to be reworked represents an excessive workload. With respect to these pages, we have ascertained that, although this content has structural weaknesses, the non-conformities affecting it do not block access to the information. Should any content nevertheless prove not to be accessible, we undertake to provide an accessible version on request (please refer to the 'Feedback and contact information' section). Particular attention will be paid to the copywriting of future editorial content.</p> <p>Content not within the scope of the law of 28 May 2019 Downloadable documents provided by third-party administrations and not under our control.Social feed images provided by third-party content aggregators and not under our control.Documents published before 23 September 2018.All videos published on the website prior to 23 September 2020.Interactive map modules are exempt as long as the page contains an alternative way of retrieving the information provided by the map (e.g. the address is spelled out in full). We endeavour to keep them identifiable and to ensure that they do not</p>
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			<p>constitute a keyboard trap. Editorial content considered archived (unchanged after 23 September 2019). Preparation of this accessibility statement</p> <p>This statement was prepared on 3 January 2025. The declarations contained in this statement are accurate and based on an actual evaluation of this website compliance with the requirements defined in RAWeb 1, such as an assessment carried out by a third-party: Idéance.</p> <p>Control procedure</p> <p>Websites created under the Renow standardisation reference system are developed within a generic and centralised framework and architecture in accordance with project management processes and the Renow checklist. To guarantee neutrality, we regularly call on accessibility experts to check the compliance of sites or new features.</p> <p>Each site is evaluated at several stages:</p> <p>During the design of the content structure. During the creation of graphic and functional models. Immediately prior to going live. Once the site is online, checks are carried out as follows:</p> <p>the editors check access to all new content before it is published. each new functionality of the site is evaluated before it is published. During evaluations, the site is tested with the most common screen readers, tablets, mobile phones and PCs. They are also tested with different web browsers (compatibility up to 2 versions below the current version).</p> <p>Contributor competencies</p> <p>The work procedures include the application of internet guidelines at the various stages of the site's development (writing, management, development).</p> <p>Our employees have the knowledge and skills required to correctly apply the Internet guidelines.</p> <p>Feedback and contact information</p> <p>If you notice a lack of accessibility, send us an email to sipinternet@sip.etat.lu: describe your problem and specify the page on which it occurred. We commit to replying to you within 1</p>
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			<p>month. Within reasonable limits, the correction of the accessibility issue will preferably be carried out online such as to remedy the problem in a sustainable way. Should this not be possible, the information you requested can be made available to you in an accessible format of your choice:</p> <p>in writing in a document or email;orally in an interview or by phone.Enforcement procedure</p> <p>Should the reply be unsatisfactory, you also have the possibility of informing the Information and Press Service, the body responsible for supervising accessibility, via its online complaint form or the Ombudsperson, the mediator of the Grand Duchy of Luxembourg.</p> <p>This statement is based on the model set out in the Implementing Decision (EU) 2018/1523. This model is owned by the European Union and licensed under a Creative Commons Attribution 4.0 International license.</p> <p>Declaration of accessibility on the Government website guichet.luThe body making the statement "Government IT Centre (CTIE)" is committed to making its website accessible, in accordance with the law of 28 May 2019 on the accessibility of websites and mobile applications of public sector bodies. This accessibility statement applies to:</p> <p>https://guichet.public.lu/</p> <p>Compliance status</p> <p>This website is partially compliant with the European Standard EN 301 549 and the Framework for Assessing Web-Accessibility (RAWeb) version 1 , due to the reasons listed below.</p> <p>Non-accessible content</p> <p>The content listed below is non-accessible for the following reason(s):</p> <p>Non-compliance</p> <p>Please refer to the French version for this section.</p> <p>Disproportionate burden</p> <p>Not all documents available on the site comply with standard EN 301 549 V3.2.1; the volume</p>
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			<p>of documents to be processed to achieve compliance is very large and requires too many resources. However, we undertake to provide an accessible version of content on request on a case-by-case basis (please refer to the 'Feedback and contact information' section) Editorial content, particularly older content (unchanged after 23 September 2023), may be non-compliant:</p> <p>Poorly formatted lists and headings; Non-relevant link titles and image alternatives; Language changes are not programmatically identified; Empty paragraph tags have been inserted to improve readability. The volume of pages to be checked and content to be reworked represents an excessive workload. With respect to these pages, we have ascertained that, although this content has structural weaknesses, the non-conformities affecting it do not block access to the information. Should any content nevertheless prove not to be accessible, we undertake to provide an accessible version on request (please refer to the 'Feedback and contact information' section). Particular attention will be paid to the copywriting of future editorial content.</p> <p>Some videos published after 23 September 2020 do not have accurate text transcripts. We will endeavour to provide the information conveyed in the video in the surrounding text Content not within the scope of the law of 28 May 2019</p> <p>Downloadable documents provided by third-party administrations are not under our control. Documents published before 23 September 2018 All videos published on the website prior to 23 September 2020. Interactive map modules are exempt as long as the page contains an alternative way of retrieving the information provided by the map (e.g. the address is spelled out in full). We endeavour to keep them identifiable and to ensure that they do not constitute a keyboard trap. Editorial content considered archived (unchanged after 23 September 2019). Preparation of this accessibility statement</p> <p>This statement was prepared on 31 January 2024. The declarations contained in this statement are accurate and based on an actual evaluation of this website compliance with the</p>
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			<p>requirements defined in RAWeb 1 , such as an assessment carried out by a third-party: Access42. The statement was last reviewed on 6 December 2024.</p> <p>Control procedure Websites created under the Renow standardisation reference system are developed within a generic and centralised framework and architecture in accordance with project management processes and the Renow checklist. To guarantee neutrality, we regularly call on accessibility experts to check the compliance of sites or new features. Each site is evaluated at several stages: During the design of the content structure. During the creation of graphic and functional models. Immediately prior to going live. Once the site is online, checks are carried out as follows: the editors check access to all new content before it is published. each new functionality of the site is evaluated before it is published. During evaluations, the site is tested with the most common screen readers, tablets, mobile phones and PCs. They are also tested with different web browsers (compatibility up to 2 versions below the current version).</p> <p>Contributor competencies The work procedures include the application of internet guidelines at the various stages of the site's development (writing, management, development). Our employees have the knowledge and skills required to correctly apply the Internet guidelines.</p> <p>Feedback and contact information If you notice a lack of accessibility, send us an email to accessibilite@guichet.public.lu: describe your problem and specify the page on which it occurred. We commit to replying to you within 1 month. Within reasonable limits, the correction of the accessibility issue will preferably be carried out online such as to remedy the problem in a sustainable way. Should this not be possible, the information you requested can be made available to you in an</p>
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			<p>accessible format of your choice: in writing in a document or email; orally in an interview or by phone. Enforcement procedure</p> <p>Should the reply be unsatisfactory, you also have the possibility of informing the Information and Press Service, the body responsible for supervising accessibility, via its online complaint form or the Ombudsperson, the mediator of the Grand Duchy of Luxembourg.</p> <p>This statement is based on the model set out in the Implementing Decision (EU) 2018/1523. This model is owned by the European Union and licensed under a Creative Commons Attribution 4.0 International license.</p> <p>Declaration of accessibility on the Government website MyGuichet.lu</p> <p>https://guichet.public.lu/fr/citoyens/support/accessibilite/accessibilite-myguichet.html https://guichet.public.lu/en/citoyens/support/accessibilite/accessibilite-app-myguichet.html</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes, we have added the Readspeaker function to the Guichet.lu website (which describe the migration procedure). This tool makes reading easier for people with reading difficulties (illiteracy or visually impaired people). Readspeaker is also available on the Portal for applicants for international protection. We also translate all Guichet.lu in English and german. In especially, the Portal for applicants for international protection is available in 6 languages.</p>
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			<p>No, seeing that the website of the Ministry and the guichet.lu is only partly accessible in accordance with their declarations. There are some additional accessibility features available on guichet.lu website, but those are in accordance with the “minimum” requirements.</p> <p>Declaration of the accessibility for Ministry of Home Affairs website https://maint.gouvernement.lu/en/support/accessibilite.htmlAs indicated in the accessibility declaration the website is partially compliant with the accessibility requirements. The reasons why the website is only partially compliant are also listed in the Declaration (see answer to question 1).</p> <p>Accessibility statement for the Guichet.lu website https://guichet.public.lu/en/citoyens/support/accessibilite.html</p> <p>The Guichet.lu website has multiple accessibility features :</p> <p>easy-to-read content (alternative version of pages whose content has been written in very clear and simple language)accessibility settings (different contrast settings; line spacing to improve legibility; replacement of images that carry information with text; increase or decrease text size) (https://guichet.public.lu/en/citoyens/support/accessibilite/accessibilite-guichet.html)</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Yes, the applicant can inform the holder of the website, but the waiting time to receive the answer should be taken into consideration.</p> <p>Both the website of the Ministry of Home Affairs and the government website encourages users to provide feedback and flag the challenges that are related to the accessibility of the services and the information.</p>
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			<p>If a user notices a lack of accessibility, they are invited to send an email to sipinternet@sip.etat.lu: to describe their problem and specify the page on which it occurred. The holder of the website commits to replying to the user within 1 month. Within reasonable limits, the correction of the accessibility issue will preferably be carried out online such as to remedy the problem in a sustainable way. Should this not be possible, the information you requested can be made available to the user in an accessible format of your choice:</p> <p>in writing in a document or email;orally in an interview or by phone.In the accessibility statement of all Guichet.lu it is stated:</p> <p>“If you notice a lack of accessibility, send us an email to accessibilite@guichet.public.lu: please describe your problem and the page on which it occurred. We commit to replying to you by email within 1 month at the latest. Within reasonable limits, the correction of the accessibility issue will preferably be carried out online such as to remedy the problem in a sustainable way. Should this not be possible, the information you requested can be made available to you in an accessible format of your choice:</p> <p>in writing in a document or email;orally in an interview or by phone.” https://guichet.public.lu/en/citoyens/support/accessibilite/accessibilite-app-myguichet.html)It’s the same in dpi website and most Luxembourg state websites : https://info-dpi.public.lu/fr/support/accessibilite.html</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>In case of a support request on Guichet.lu, regardless of the input channel or accessibility needs, all investigations are anonymised.</p>
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			<p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>We have not implemented this approach for these procedures. For other procedures, we have already tested with groups including people with special needs, ensuring improvements that benefit all procedures.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>On Guichet.lu, we apply the principle of administrative simplification to make services more accessible.</p> <ul style="list-style-type: none">• User-friendly design: We streamline steps, ensure consistent terminology, and avoid collecting unnecessary information.• Inclusive UX approach: Our design process follows UX principles to guide and support users throughout their journey, with clear instructions and intuitive navigation. <p>These measures aim to reduce complexity and improve inclusion for all applicants, including those with limited digital skills or access.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p>
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			<p>The amended law of 28 November 2006 on equal treatment[1] concerning</p> <ol style="list-style-type: none">1. transposition of Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin;2. transposing Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation, ... prohibits any direct or indirect discrimination based on religion or belief, disability, age, sexual orientation or actual or assumed membership or non-membership of a particular nationality, race or ethnic group. Direct discrimination occurs when a person is treated in a less favourable manner than another is being, has been or would be treated in a comparable situation, on the basis of one of the above reasons. <p>Indirect discrimination occurs when an apparently neutral provision, criterion or practice is likely to result in a particular disadvantage for people of a nationality, who belong (or not), whether in reality or supposedly, to a given race or ethnic group, or on the basis of sex, sexual orientation, religion or beliefs, a handicap or age, relative to other people, unless this provision, criterion or practice can be objectively justified and that the means to carry out this objective are appropriate and necessary.</p> <p>Even if there is no mentioning of digital services in legal migration procedure, the scope of the Law on equal treatment Act is broad, as it applies to all persons, public and private, natural or legal, including public bodies, in the following areas : work, social protection, education and access to and supply of goods and services.</p> <p>The different accessibility referentials (as mentioned in the answer to question 1) are applied to digital services in legal migration procedures. Based on these referentials, internal and external audits are carried out, and corrective actions are implemented as part of a continuous improvement process, ensuring that digital services remain inclusive and aligned with evolving standards.</p>
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			<p>[1] Loi du 28 novembre 2006 portant</p> <ol style="list-style-type: none">1. transposition de la directive 2000/43/CE du Conseil du 29 juin 2000 relative à la mise en oeuvre du principe de l'égalité de traitement entre les personnes sans distinction de race ou d'origine ethnique;2. transposition de la directive 2000/78/CE du Conseil du 27 novembre 2000 portant création d'un cadre général en faveur de l'égalité de traitement en matière d'emploi et de travail;3. modification du Code du travail et portant introduction dans le Livre II d'un nouveau titre V relatif à l'égalité de traitement en matière d'emploi et de travail;4. modification des articles 454 et 455 du Code pénal;5. modification de la loi du 12 septembre 2003 relative aux personnes handicapées. <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>NO.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>N/A.</p>
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			<p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>N/A.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>N/A.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>N/A.</p>
	<p>EMN NCP Netherlands</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Partially, the Netherlands has adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD) and national legislation to make</p>

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			<p>them accessible to disabled applicants.</p> <p>In the Netherlands, applications for legal migration are processed by the Immigration and Naturalisation Service (Immigratie- en Naturalisatiedienst, IND). The digital services of the IND are accessible through the IND-website.[1] The IND-website must be accessible to everyone. That means easy to use and understand. This includes visitors who have difficulty reading, who do not see well, or have another disability.[2]</p> <p>All digitally accessible websites must meet the digital accessibility requirements of the Dutch government. Since May 2018 these requirements are laid down in the Temporary decree digital accessibility government (Tijdelijk besluit digitale toegankelijkheid overheid)[3] and as of July 2023 this (no longer temporary) Decree became a part of the Digital government act (Wet digitale overheid, Wdo)[4] [5]. Article 3.1 of the Decree states that government agencies have to make their websites and mobile applications accessible by applying standard EN 301 549, which refers to the criteria in the Web Content Accessibility Guidelines (WCAG)[6].</p> <p>Furthermore, this article states that any amendment to or replacement of this standard made in accordance with the procedure laid down in the first, second or fourth paragraph of Article 6 of Directive (EU) 2016/2102 shall apply for the purposes of this Decision from the date on which the amendment in question must be implemented.</p> <p>As required on the basis of Article 4 of the Decree digital accessibility government, the IND publishes an accessibility label regarding the compliance of their website with this decree.[7] The accessibility label that applies to the IND-website is label B, partially satisfies.[8] The IND-website does not yet meet all the accessibility requirements. This is stated in the most recent research report on digital accessibility from October 2024.[9]</p> <p>To improve accessibility, among other things, the IND is working on technical updates,</p>
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			<p>rewriting texts and adding subtitles, transcripts, or audio descriptions to videos. Besides that, the IND employees involved learn more about digital accessibility by taking courses.</p> <p>[1] Immigration and Naturalisation Service, https://ind.nl/en [2] Immigration and Naturalisation Service, https://ind.nl/en/accessibility [3] Government of the Netherlands, wettenbank, Tijdelijk besluit digitale toegankelijkheid overheid, https://wetten.overheid.nl/BWBR0040936/2018-07-01 [4] Government of the Netherlands, wettenbank, Wet digitale overheid, https://wetten.overheid.nl/BWBR0048156/2023-07-01 [5] Government of the Netherlands, Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, https://www.digitoegankelijk.nl/wetgeving/wat-is-verplicht#besluit [6] World Wide Web Consortium, https://www.w3.org/TR/WCAG21/ [7] Immigration and Naturalisation Service, https://ind.nl/en/accessibility [8] Ministry of the Interior and Kingdom Relations, https://www.toegankelijkheidsverklaring.nl/register/25299 [9] Immigration and Naturalisation Service, https://puc.overheid.nl/ind/doc/PUC_1348495_1/</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>No, at this moment the Netherlands has not yet made any other adaptations of digital services in legal migration procedures, besides those required by legislation. The aim of the Netherlands is to first make the IND-website as accessible as possible by means of design, coding (clean, standard and correct) and text (plain, short and clear). This is an ongoing process in which accessibility research provides us with suggestions for improvement. New insights in the future may possibly lead to providing the IND-website with extra functionalities</p>
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			<p>to support applicants with special needs. Apart from that, applicants with special needs can benefit from growing, supportive browser possibilities.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Yes, while using digital services in legal migration procedures in the Netherlands, an applicant with a disability can inform the authorities about any need for support measure due to their special needs. Applicants who have had a problem with accessibility of the IND-website or who have a question or comment about accessibility can use a contact form to inform the IND about any need for support measures due to their special needs.[1] Through this contact form they have the possibility to ask a question or post a comment.[2]</p> <p>Furthermore, disabled applicants in the Netherlands with multiple challenges or problems with functional capacity are eligible for IND’s customised service that is provided at the information desk. For example, a blind person can make an appointment to have his application form completed at the information desk. Or, deaf applicants who can't make an appointment at the information desk through the IND customer service. They report to the reception desk without an appointment, and they are helped immediately or a longer appointment is scheduled. They then bring a sign language interpreter with them, or communication takes place through messaging. However, most applicants with vision and hearing problems seem to manage well with all kinds of adapted digital tools or have a good support network.</p> <p>Apart from that, when submitting a digital application, all applicants can request assistance via the IND chatbot Sofia. If necessary, the chatbot can direct the applicant to assistance via live chat.</p>
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			<p>When it comes to developing digital services for regular migration procedures, the Netherlands strive to meet the requirements of the WCAG. In the future, the Netherlands also envisions offering more support for updated digital applications, either within the application itself or through a different helpline.</p> <p>[1] Immigration and Naturalisation Service, https://ind.nl/en/accessibility</p> <p>[2] Immigration and Naturalisation Service, https://ind.nl/en/service-and-contact/contact-with-ind/e-mail</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>The IND handles all personal information, including information about an applicant’s disability and related special needs, in accordance with the Privacy Statement of the IND. The Data Protection Officer of the Ministry of Justice and Security checks whether the IND applies and complies with the General Data Protection Regulation (Algemene Verordening Gegevensbescherming, AVG), including its data minimisation principle.[1]</p> <p>The IND has introduced the Government Information Management Baseline (Baseline Informatiebeveiliging Overheid, BIO)[2] for the protection of data in the systems. The technical measures that the IND has introduced to protect personal data, are in accordance with the BIO. The IND actively implements the BIO.[3]</p> <p>[1] Immigration and Naturalisation Service, https://ind.nl/en/documents/05-2022/privacystatement-ind.pdf</p> <p>[2] Government of the Netherlands, https://www.nldigitalgovernment.nl/overview/government-information-security-</p>
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			<p>baseline/ [3] Immigration and Naturalisation Service, https://ind.nl/en/documents/05-2022/privacystatement-ind.pdf</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>No, the Netherlands does not yet actively involve disabled applicants with a view to improving accessibility for this group. However, disabled or non-disabled applicants have the opportunity to make use of a feedback button on the IND website in case of any issues with digital services. Furthermore, the IND is currently validating new digital service designs with users, through a customer panel. The IND is not yet including individuals with disabilities in these designs because it is unknown if the IND customer panel includes any individuals with disabilities. Privacy regulations prevent the IND from asking about this. So far, the IND hasn't included individuals with disabilities in the outsourcing of the search for test subjects for customer research, customer journey research and UX research. The IND intends to involve test subjects with disabilities in future research through organisations and advocacy groups. However, it is not possible to indicate when this will be implemented.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Digital accessibility is playing an increasingly important role in the development of digital</p>
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			<p>services. More and more the IND takes into account the applicant's ability to act and think by using short and simple texts and by actively contacting applicants sooner if they don't yet meet all the application requirements. The IND is also increasingly trying to provide explanations in other ways, such as videos or live chat. If desired, applicants can use written application forms.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes, the Netherlands has national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures. This national legislation is laid down in the Digital Government Act (Wet digitale overheid, Wdo)[1] which encloses the Decree digital accessibility government (Besluit digitale toegankelijkheid overheid).[2]</p> <p>According to this legislation, government organisations have to make and keep their websites and apps, and all content on these websites and apps, accessible. This includes digital services in legal migration procedures.</p> <p>The following parts of the Decree digital accessibility government form the core of the legislation:[3]</p> <p>Article 3, paragraph 1: Government organisations shall make their websites and mobile applications accessible by applying standard EN 301 549 (this standard includes the requirements of WCAG 2.1, level A and AA)Article 4: Government organisations shall publish an up-to-date accessibility statement for their websites and apps in accordance with a fixed modelThere are some exceptions to this obligation (article 2, paragraph 2)In some cases,</p>
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			<p>government organisations may temporarily not apply individual requirements from the accessibility standard if this would place a disproportionate burden on them (article 3, paragraphs 2, 3 and 4)In order to comply to the legislation, the IND has drawn up an accessibility statement for websites and apps.[4] This accessibility statement is published in the register of accessibility statements.[5] A summary of the accessibility statement, the so called accessibility label[6], is published on the IND website[7], as prescribed by the legislation. The status of the accessibility label can range from A to E. The status of the accessibility label of the IND website is B (see also question 1).</p> <p>With status A, B, and C, a government organisation complies with the legislation, if the following conditions are met:[8]</p> <p>The accessibility statement has to be updated at least once a yearIf anything changes in the meantime, this has to be included in the statement immediatelyImprovement has to be noticeable. This should be reflected in the updates to the accessibility statement</p> <p>[1] Government of the Netherlands, wettenbank, Wet digitale overheid, https://wetten.overheid.nl/BWBR0048156/2023-07-01</p> <p>[2] Government of the Netherlands, wettenbank, Tijdelijk besluit digitale toegankelijkheid overheid, https://wetten.overheid.nl/BWBR0040936/2018-07-01</p> <p>[3] Ministry of the Interior and Kingdom Relations, https://www.digitoegankelijk.nl/wetgeving/wat-is-verplicht</p> <p>[4] Ministry of the Interior and Kingdom Relations, https://www.digitoegankelijk.nl/toegankelijkheidsverklaring</p> <p>[5] Ministry of the Interior and Kingdom Relations, https://www.toegankelijkheidsverklaring.nl/register</p> <p>[6] Ministry of the Interior and Kingdom Relations, https://www.digitoegankelijk.nl/toegankelijkheidsverklaring/naar-een-verklaring-verwijzen-vanaf-je-website-app</p>
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			<p>[7] Immigration and Naturalisation Service, https://ind.nl/en/accessibility</p> <p>[8] Ministry of the Interior and Kingdom Relations, https://www.digitoegankelijk.nl/wetgeving/wat-is-verplicht</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No, in the Netherlands in-person interactions in legal migration procedures are never entirely replaced by digital services. Although many procedures have been increasingly digitalised, these procedures can always be done by (paper) post or in-person. Furthermore, new legislation will come into effect on 1 January 2026 (the IND has been granted an extension until 1 January 2027) which obligates government organisations to digitalise all formal communications.[1] This means that citizens can decide for themselves whether or not to interact through digital communication, via mail or in-person.</p> <p>[1] Government of the Netherlands, Wet modernisering elektronisch bestuurlijk verkeer, https://www.digitaleoverheid.nl/overzicht-van-alle-onderwerpen/wetgeving/wet-modernisering-elektronisch-bestuurlijk-verkeer/</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>Not applicable.</p>
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			<p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes, the Netherlands applies equal treatment to applicants in legal migration procedures regardless of whether they use digital services or non-digital services.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>Yes, making digital services fully digitally accessible is a challenge: a recent digital accessibility study shows that the digital residence permit applications of the IND are 70% digitally accessible.</p> <p>The IND encounters a challenge in the organisation of user research for people with disabilities, i.e. involving people with disabilities in the research and development of the accessibility of legal migration procedures. Currently, the IND uses a test panel for user research, but does not have information on potential disabilities of the panel members, partly because of privacy legislation. However, the IND does intend to validate new digital service designs with them in the future.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>Frequent research into digital accessibility increases insight into this and makes clear the</p>
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			<p>importance of including digital accessibility as a requirement when developing (or further developing) digital services.</p>
	<p>EMN NCP Norway</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes.</p> <p>Norway applies the Regulation on Universal Design of Information and Communication Technology (ICT) Solutions, which entered into force on 1 July 2013.</p> <p>Purpose (§1): The regulation aims to guarantee universal design of ICT solutions to promote equal participation in society, reduce and prevent digital barriers, and avoid discrimination, without imposing a disproportionate burden on service providers.</p> <p>This regulation covers all digital services provided by state or local government. The Norwegian framework aligns with and supports several European and International standards:</p> <p>EU Web Accessibility Directive (Directive (EU) 2016/2102): Norway implements this directive through its EEA obligations, ensuring accessibility requirements for public sector websites and mobile applications. European standard EN 301 549: The regulation incorporates principles consistent with EN 301 549 for ICT accessibility. EU Accessibility Act (EAA): Norway follows harmonized accessibility requirements for products and services under its EEA commitments. UN Convention on the Rights of Persons with Disabilities (CRPD): The regulation supports Norway’s international obligations to ensure accessibility and equal</p>

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			<p>participation for persons with disabilities.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>No. Please explain your answer: There are some explanatory videos produced in 2017 that outline the application process in simple steps; however, these materials are outdated and do not reflect the current procedures.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>No. There is no integrated functionality within the digital application system to request accessibility support measures.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>N/A</p>
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			<p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>No.</p> <p>There has been no specific focus on this area. The requirements for universal design are intended to reduce the need for testing with different user groups. Universal design is considered the main mechanism for ensuring accessibility, rather than targeted adaptations for specific user groups.</p> <p>UDI acknowledges that the universal design requirements are intended to reduce the need for user testing, but that this may leave gaps for applicants with specific needs.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Norway considers some challenges faced by digitally disadvantaged applicants when developing digital services for legal migration procedures, but measures are limited. For applications where a fully digital process has been introduced, the previous application flow remains available. This allows applicants to submit their application in person at the police and physically deliver documents, recognizing that some applicants prefer or require this option. Note that the application form and payment must be completed online for these applicants either way.</p> <p>Additionally, the size of the application forms is optimized to accommodate users with poor</p>
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			<p>internet connectivity, in an attempt to make it easier to fill out regardless of where you are in the world.</p> <p>However, Norway does not provide specific support for illiterate applicants. The system relies on these applicants having helpers, as all application forms and information are text-based. There is currently no focus on adaptations for illiteracy. This approach is consistent with general practices in Norwegian public administration and is not unique to migration procedures.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Yes, please see question 1.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>Yes.</p> <p>For certain types of applications for renewal of residence permits, Norway has introduced a fully digital process (as mentioned under question 6). Applicants log in using a verified e-ID, complete the application form, upload supporting documents, and have their application processed without any in-person interaction.</p> <p>However, applicants are free to choose the old application process, which includes an in-</p>
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			<p>person appointment with the immigration authorities for submission of supporting documents, if they so wish.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>Yes. Norway provides general guidance and support for applicants but not specifically targeted at disabled or digitally disadvantaged applicants.</p> <p>There is a general Q&A page explaining how to apply, and our phone service is available to all applicants. Additionally, the digital application form includes some guidance of the new process and how it differs from the old application process.</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes. It was noted in the UDI's equality assessment of 2023 that the automation of certain applications for Norwegian citizenship may create a perception of unequal treatment between automated cases and those processed manually. But the automation of application processing is based on the quality of the data on the applicants, and not the way they submitted the application.</p>
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			<p>Using a fully digital process does not necessarily result in faster processing times; it only ensures that the application is registered in the system more quickly.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>Yes.</p> <p>Norway has identified some challenges: Lack of integrated solutions for helpers or representatives to act on behalf of applicants due to strict e-ID requirements. Limited knowledge about the actual barriers faced by digitally disadvantaged applicants. Reliance on written forms and instructions, with no dedicated measures for illiterate users.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>Norway is aware of many of the issues and will work to address them in the Modernization program of our systems. One good practice is that our application forms are optimized for mobile devices, allowing applicants to complete them using mobile data without requiring a PC or a high-speed internet connection. This ensures that applicants are not dependent on strong connectivity to submit their applications.</p>
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	<p>EMN NCP Poland</p>	<p>Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>YES.</p> <p>Since April 2024, the Office for Foreigners has been offering the Refugeebook mobile application, available in five languages (Polish, English, Russian, Ukrainian, and Belarusian). The application provides information on social assistance, the international protection procedure, and basic information about Poland (without possibility to submit any application). It also allows for adding up-to-date information and notifications relevant to foreigners.</p> <p>The application complies with the Web Content Accessibility Guidelines (WCAG) and with the Polish Act on the Digital Accessibility of Websites and Mobile Applications of Public Sector Bodies, thus meeting the accessibility requirements under Directive (EU) 2016/2102.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>NO / Not applicable within the scope of social assistance for applicants seeking international protection.</p> <p>The Department for Social Assistance (in Office for Foreigners) does not develop digital tools used in social assistance procedures. However, within its remit, it ensures that social assistance services for foreigners requiring special treatment are provided in an accessible</p>
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			<p>manner, including individual support adapted to their needs.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>YES.</p> <p>In the area of social assistance, foreigners may inform the Office for Foreigners about their special needs or disabilities that may affect the scope or form of support. Such information can be provided during personal contact with staff members, in writing, or via representatives of reception facilities.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant's disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>Upon receiving information about a disability or special needs, personal data are processed solely for the purpose of ensuring appropriate assistance and shared on the need to know base. The processing complies with the EU General Data Protection Regulation (GDPR), in particular the principles of data minimisation and purpose limitation, and with the Polish legislation on data protection. Only data necessary to provide the required form of assistance are collected and stored in accordance with internal data protection procedures.</p>
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			<p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>NO</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>YES.</p> <p>In social assistance practice, staff are instructed to identify and respond to difficulties faced by foreigners with limited digital skills or access to the Internet. Where needed, assistance is provided in person, and information is available in several languages in both printed and electronic form.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>YES.</p> <p>Digital accessibility in Poland is regulated by the Act of 4 April 2019 on the Digital Accessibility of Websites and Mobile Applications of Public Sector Bodies. Additionally, the Act on Equal Treatment and anti-discrimination provisions ensure equal access to public services, including those offered digitally, for persons with disabilities.</p>
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			<p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>NO.</p> <p>In social assistance procedures for applicants seeking international protection, in-person interactions have not been replaced by digital tools. Applicants still submit documents or provide information in person at the Office for Foreigners or at reception facilities</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>NO</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>NO / Not applicable within the scope of social assistance for applicants seeking international protection.</p> <p>The Department for Social Assistance does not develop digital tools used in social assistance procedures.</p>
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			<p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>YES. Identified challenges include: Limited digital literacy or Internet access among some applicants. Language barriers for persons not covered by the available language versions.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>YES. Offering information and updates via the Refugeebook application in multiple languages.</p>
	<p>EMN NCP Slovakia</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. Directive (EU) 2016/2102, which regulates that websites and mobile applications of public administration entities, including the Ministry of the Interior of the Slovak Republic, are in accordance with the European standard EN 301 549 has been transposed into Act No. 95/2019 Coll. on Information Technologies in Public Administration. The implementing regulation to the Act is Decree No. 78/2020 Coll. on Standards for Public Administration Information</p>

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			<p>Technologies. According to Article 14 of the Decree on Standards, the standard for website accessibility is to ensure the perceptiveness, controllability, comprehensibility and robustness of websites, by complying with the rules according to the Slovak technical standard (STN EN 301 549), in particular the rules of levels A and AA of the special specification of the World Wide Web Consortium (W3C) for the accessibility of web content in version 2.1 (WCAG 2.1).</p> <p>The website of the Ministry of the Interior of the Slovak Republic is created in accordance with the above-mentioned Decree 78/2020 Coll. on standards for public administration information technology.</p> <p>The Act on the Residence of Foreigners regulates procedures in the case of a foreigner with a disability, such as submitting an application for residence by proxy or possible scanning of biometric data by a mobile workplace.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>NA</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>No. In the case of a foreigner with some of the above-mentioned health disabilities, the</p>
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			<p>Bureau of Border and Foreign Police does not provide services such as sign language interpretation or braille as part of the proceedings.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>NA</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>NA</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>NA</p>
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			<p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>NA</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>NA</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>The applicant can apply electronically for the renewal of temporary residence and the renewal of the residence document. If acts and procedures are carried out on the basis of an</p>
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			<p>application submitted by electronic means or through a postal service carrying out the activity of a certifying person and unless this Act provides otherwise for individual items of the list of fees, the rate of the fee shall be 50% of the fee determined in accordance with the list of fees; In these cases, however, the fee is reduced by a maximum of 50 euros.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>NA</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>NA</p>
	<p>EMN NCP Slovenia</p>	<p>Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Slovenia does not provide digital services in legal migration procedures and only offers informing via websites as a digital service in legal migration procedures: https://www.gov.si/podrocja/drzava-in-druzba/priseljevanje-v-slovenijo/ https://infotujci.si/ The first website is fully compliant in accordance with Directive 2016/2102</p>

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			<p>which has been transposed into national legislation with the Accessibility Of Websites And Mobile Applications Act (ZDSMA). The second website is only semi-compliant with the Directive, however a complete website redesign is planned, which will ensure the website is fully accessible.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>No.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>No, however an applicant can inform the authorities via the contact email provided on both websites.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>N/A</p>
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			<p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>N/A</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>N/A</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>No.</p> <p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No.</p>
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			<p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>N/A</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes. The fees and the processing times are the same.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>N/A</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>N/A</p>
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	<p>EMN NCP Spain</p>	<p>Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. Directive (EU) 2016/2102 was transposed into Spanish law by Royal Decree 1112/2018 of 7 September 2018 on the accessibility of public sector websites and mobile applications.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. According to Royal Decree 1155/2024, which entered into force on May 20, 2025, digital services in the field of legal migration have been significantly enhanced. In addition to the legally required adaptations, the Royal Decree 1155/2024 promotes broader accessibility by enabling text-based communication services and fully electronic processing of applications. This regulatory framework facilitates online procedures for migrants, including those with disabilities, ensuring more inclusive and accessible digital interactions with the administration. Also, on the portal of the Ministry of Inclusion, Social Security and Migration, there is a menu of Accessibility Tools (inSuit Tools).</p>
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			<p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>Article 12 of Law 39/2015, of 1 October, on the Common Administrative Procedure of Public Administrations establishes that Public Administrations must guarantee that interested parties can interact with the Administration through electronic means, and will assist in the use of electronic means to interested parties.</p> <p>With regard to the electronic headquarters of Public Administrations, communications can be made on accessibility requirements (Article 10.2.a) of Royal Decree 1112/2018), such as:</p> <ul style="list-style-type: none">• Report any possible non-compliance by this website• Convey other difficulties in accessing content• Make any other queries or suggestions for improvement regarding the accessibility of the website <p>Communications will be received and processed by the Information Technology Division of the Ministries of Territorial Policy and Democratic Memory and of Finance and Public Function, only if they relate to aspects related to Accessibility (https://sede.administracionespublicas.gob.es/pagina/index/directorio/accesibilidad).</p> <p>With regard to the webpage of the Ministry of Inclusion, Social Security and Migrations, there are channels for any citizen to contact the Ministry either in person or electronically (https://www.inclusion.gob.es/web/guest/el-ministerio/atencion-al-ciudadano).</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p>
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			<p>In the case of the webpage of the Ministry of Inclusion, Social Security and Migration, the following url of the headquarters of the Ministry of Inclusion, Social Security and Migrations (https://sede.inclusion.gob.es/proteccion-de-datos) the data protection policy. Within this policy, a Register of Personal Data Processing Activities is managed. In addition, periodic audits of compliance with the National Security Scheme are carried out.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>Currently no. Future developments include usability testing by users with disabilities.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>Yes. Challenges faced by digitally disadvantaged applicants –such as limited internet access, low digital literacy, or illiteracy– are addressed through dedicated in-person support services. Spain has an extensive network of Oficinas de Atención al Ciudadano (Citizen Service Offices), which assist individuals in navigating digital procedures related to legal migration. These offices provide personalized guidance, help applicants complete online processes, and ensure that no one is excluded due to technological barriers.</p> <p>On the other hand, as a challenge it is worth mentioning that, according to the Annual Report of the Ombudsman 2024, there have been complaints to the Ombudsman about the difficulties</p>
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			<p>in ensuring in-person attention in immigration offices, for people over 65, people with disabilities and for those affected by the digital divide, which is also the reason for the formulation of a Recommendation to the State Secretariat for Territorial Policy.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>First, Article 49.2 of the Spanish Constitution establishes that public authorities shall promote policies that guarantee the full personal autonomy and social inclusion of persons with disabilities, in universally accessible environments.</p> <p>Also worth mentioning is Royal Legislative Decree 1/2013 of 29 November 2013 approving the Consolidated Text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion. This regulation establishes that people with disabilities have the right to carry out their procedures with the Public Administrations in conditions of accessibility and with the reasonable adjustments that are necessary. If the system is not accessible, the person can request face-to-face care or personalized assistance.</p> <p>Also, in 2018, Royal Decree 1112/2018 of 7 September 2018 on the accessibility of websites and applications for mobile devices in the public sector was approved; and in 2023 Royal Decree 193/2023 of 21 March 2023 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for the access and use of goods and services available to the public (the latter extending the regulation on accessibility).</p>
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			<p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No.</p> <p>As previously mentioned, in-person support services remain available in Spain. Applicants who require assistance or prefer face-to-face interaction can still attend offices to carry out their legal migration procedures. These services ensure that individuals who may face barriers to digital access are not excluded from the process.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>N/A.</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>YES.</p> <p>Article 2 ter of Organic Law 4/2000, of 11 January, on the rights and freedoms of foreigners in Spain and their social integration, provides that the Public Administrations shall incorporate the objective of integration between immigrants and the receiving society, with a transversal character to all public policies and services, promoting the economic, social, cultural and</p>
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			<p>political participation of immigrants, in the terms provided for in the Constitution, in the Statutes of Autonomy and in other laws, under conditions of equal treatment. Equal treatment is guaranteed for applicants in legal migration procedures, regardless of whether they use digital or in-person services. Both channels are maintained to ensure accessibility, streamline procedures, and uphold an inclusive approach that takes into account the diverse needs and circumstances of all individuals.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>No.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>No.</p>
	<p>EMN NCP Sweden</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>YES. The Swedish Migration Agency [Migrationsverket] has adapted its digital services so that they essentially meet the requirements of the EU’s Web Accessibility Directive. Among the</p>

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			<p>remaining shortcomings are old documents that have not yet been made accessible. Making old PDF documents accessible is a time-consuming task, especially if they contain tables and images. Other shortcomings which remain to be addressed can sometimes be due to third-party products that are part of a digital service. It often takes a long time to address these. The Migration Agency's new website, launched in 2025, meets accessibility requirements to a much greater extent than the previous one. To improve accessibility has been of great importance in designing and developing the new website. Only a few shortcomings remain, one of which is linked to guideline 11.7 in EN 301 549, "respect user preferences." The Swedish supervisory authority for the EU's Web Accessibility Directive, the Agency for Digital Government [Myndigheten för digital förvaltning, DIGG], considers that compliance with this guideline involves that digital services must offer an interface setting that provides a dark mode. Resolving this is a major undertaking. The shortcomings identified will be addressed in accordance with action plans that have been drawn up by the Migration Agency.</p> <p>Ordinance (2001:526) on the responsibility of government agencies for implementing disability policy [Förordningen (2001:526) om de statliga myndigheternas ansvar för genomförande av funktionshinderspolitiken] refers to the UN Convention on the rights of persons with disabilities (CRPD). It states that government agencies are to carry out inventories and draw up action plans with a view to make their premises, activities, and information more accessible to persons with disabilities. This ordinance also applies to the Migration Agency.</p> <p>An accessibility statement, as required by the EU's Web Accessibility Directive, is on the Migration Agency's website. The statement is only available in Swedish, but can be read in other languages with a translation tool (Tillgänglighetsredogörelse – Migrationsverket, last accessed 14 November 2025). The feedback mechanism is available on the same webpage as a form where users (applicants) can report digital accessibility problems they have experienced on the Migration Agency's website. The form has questions on e.g. in which</p>
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			<p>digital service the user experienced challenges, what challenges were experienced and how they affected the user, and whether the digital service is compatible with the user’s adaptive equipment. This information and the form is only available in Swedish, but can be read in other languages with a translation tool (Rapportera brister i tillgänglighet – Migrationsverket, last accessed 12 November 2025).</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>YES. Digital services are available in Swedish and in English. The Migration Agency's website offers a text-to-speech feature (listening function), which reads written content aloud to improve accessibility. This feature is available in both Swedish and in English.</p> <p>The Migration Agency’s website has a form that visitors (applicants) can use to request specific information from the Migration Agency in a format other than the standard format, e.g. in braille. Such requests can be made also concerning information that the Migration Agency has published in other channels than on its website, including in the digital services (e-applications) provided. The Migration Agency will then try to assist the visitor (applicant) by producing the information in an alternative format. Information about this functionality is available on the Migration Agency’s website in English (About the website (About the Swedish Migration Agency) – Swedish Migration Agency, under the heading “Accessibility”, last accessed 18 November 2025). The form is available in Swedish only, but can be translated into other languages with a translation tool (Förfrågan om att få information från Migrationsverket i alternativa format – Migrationsverket, last accessed 5 November 2025).</p>
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			<p>For some time now, the Migration Agency has been offering digital passport checks as an alternative to personal passport checks for a large number of applicants. This can be advantageous for applicants with disabilities who may find it difficult to travel to the Swedish embassy or consulate they have been referred to in their region, as distances can be considerable (Digital passport check – Swedish Migration Agency, last accessed 11 November 2025).</p> <p>The Migration Agency’s website, from which the e-application is made, contains information on various contact channels to the Migration Agency. Applicants can contact the Migration Agency by several different channels, including text-to-speech relay service [Textttelefoni], video relay service [Bildtelefoni], and “Teletalk” [Teletal].</p> <p>The national text-to-speech relay service enables persons with hearing loss, deafness, deaf blindness or speech difficulties to make or receive calls. The service can be used to call private individuals, organisations, and companies. It works both for those who are talking and want to call someone who needs the service to communicate. It conveys conversations in both Swedish and in English and can be used for international calls. This service is free of charge and open 24 hrs. It works via mobile phone, tablet, computer, a special text phone or a stationary phone. The service also works for braille users (Short information in English – Textttelefoni.se, last accessed 6 November 2025).</p> <p>The other two services are of more limited use for non-Swedish speakers and / or those calling from abroad.</p> <p>The national video relay service also offers limited video remote interpreting. The service is for persons in Sweden with deaf blindness, deafness, hearing loss or speech impairment and uses Swedish sign language in their communication. The service is also for Swedish speakers that do not know sign language and are in contact with persons using Swedish sign language.</p>
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			<p>However, translation to or from English is not available. The service is free of charge (Short information in English - Bildtelefoni.net, last accessed 6 November 2025).</p> <p>“Teletalk” is a telephone service for anyone who needs support during telephone calls. An interpreter / mediator joins the call and provides assistance in Swedish. They act as an intermediary by rephrasing, summarising, or translating information to bridge gaps and ensure messages are understood correctly. This is what the interpreter does: interprets unclear speech and difficult words, provides memory support, takes notes of what is said during the call and sends them to the client, and assists with telephone exchanges and supports the client. “Teletalk” is available in Sweden, while calls from abroad are limited to 3 minutes (Free telephone support service Teletalk, last accessed 6 November 2025).</p> <p>These contact channels are primarily intended for disabled people (applicants) to reach the Migration Agency, and not for the purpose of administrative measures (e.g. decisions relating to an application). To the best of our knowledge, we do not have any information as to how frequently they are used to perform e.g. a personal interview with a disabled applicant.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>YES. The Migration Agency's e-application forms contain a concluding section with a free text field where applicants can enter any information they wish. In this field, disabled applicants can indicate if they have a need for special support. However, there are no instructions or information about special needs, as this section is intended for any information that applicants may wish to provide regarding their application.</p>
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			<p>It should be added that case officers only can find information about any special needs which the applicant may have stated in the free text field in the specific application submitted. Since the information entered by the applicant in this field is in free text format and does not have a fixed structure or follow a predetermined format, it cannot be stored in the Migration Agency's computer system so that it can be searched via a search field in the case management system or used for statistical purposes. It is therefore not possible to automatically signal to the case officer in the case management system that the person has special needs.</p> <p>The Migration Agency's website, from which the e-application is made, contains information on various contact channels to the Migration Agency. Applicants can contact the Migration Agency by several different channels, including text-to-speech relay service [Texttelefoni], video relay service [Bildtelefoni], and "Teletalk" [Teletal] (please see reply to Q2, where these services are explained in detail).</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant's disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>The Migration Agency does not initiate any collection of this data, i.e. there are no specific questions about an applicant's disability or special needs in e.g. the online application forms. If the applicant wishes to provide this information, they do so entirely on their own initiative (please see reply to Q3 where the free text field in the online application form is explained). If an applicant does provide this information, it will not be stored in a structured form / as structured data in order to be in compliance with the EU GDPR and national legislation such as the Act on the Personal Data of Aliens (2016:27) [Utlänningsdatalagen (2016:27)] and the Personal Data of Aliens Ordinance (2016:30) [Utlänningsdataförordningen (2016:30)] as per</p>
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			<p>the Migration Agency’s policy (please see reply to Q11 where challenges with regard to the EU GDPR are discussed).</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>YES. The Migration Agency has occasionally collected feedback from or involved people with disabilities in developing its digital services. Last year, experts at the Migration Agency contacted a group of people with disabilities organised by the Swedish Agency for Participation [Myndigheten för delaktighet, MFD] in order to get in touch with informants for a survey on how accessibility to its digital services is perceived by the target group. However, there were too few people in the target group of migrants with disabilities for the results to be considered significant and to draw any broad conclusions from. The Migration Agency’s experience is that it is difficult to find people from this narrow target group segment for active involvement in the development of its services. However, initial discussions are underway within the Migration Agency to try to evaluate its new website with the target group in question.</p> <p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>YES. The Migration Agency places great emphasis on the language content of its services, ensuring that it is easy to understand and that difficult and bureaucratic words are not used. The Migration Agency’s website also has a glossary that explains some of the terms used on</p>
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			<p>the website that may be perceived as difficult by some users (applicants). The glossary is available in Swedish and English (Word explanations – Swedish Migration Agency, last accessed 5 November 2025). The main languages of the Migration Agency’s website are Swedish and English. A small number of pages / information is only available in Swedish. However, there is a translation tool which users (applicants) can take advantage of to make this information accessible in other languages. In addition to the translation tool there is a text-to-speech tool and a dictionary tool, both of the latter are available in English. There is also a webpage with links to information available in languages other than Swedish and English (Information in other languages – Swedish Migration Agency, last accessed 14 November 2025).</p> <p>The Migration Agency develops its digital services so that they work well for use on mobile phones and is keen to keep them streamlined so that they are not weighed down by too much data. This also means that they can be used in contexts / areas where bandwidth is low. Moreover, it is always possible to submit a digital application e.g. via a representative, in cases where the applicant is unable to apply digitally themselves. All e-applications include the option of applying via a representative, and in such cases, a power of attorney is always required. A representative can be e.g. a family member, a friend, or a lawyer. There are no formal requirements as to who can act as representative, other than that a power of attorney must be attached to the digital application.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>YES. A number of laws and ordinances have a bearing on accessibility and inclusion in this regard. Some are of a more general nature such as the Instrument of Government</p>
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			<p>[Regeringsformen] (1974:152), Chapter 1, Section 2, which stipulates that public power shall be exercised with respect for the equality of all people and for the freedom and dignity of the individual. The Instrument of Government is part of Sweden’s constitution. Furthermore, the Administrative Procedure Act [Förvaltningslagen] (2017:900), Section 6, stipulates that a public authority shall ensure that contacts with individuals are smooth and simple. Both of these statutes promote accessibility.</p> <p>Moreover, there are other acts which more specifically address accessibility for persons with disabilities, including web accessibility. The Public Procurement Act [Lagen om offentlig upphandling] (2016:1145), Chapter 9, Section 2, promotes accessibility by stipulating that technical specifications shall be determined taking into account the needs of all users, including accessibility requirements for persons with disabilities.</p> <p>The Act (2018:1937) on Accessibility to Digital Public Services [lagen (2018:1937) om tillgänglighet till digital offentlig service], Sections 10 and 11, which is Sweden's way of complying with the EU’s Web Accessibility Directive, contains accessibility requirements. Finally, the Ordinance (2001:526) on the responsibility of government agencies for implementing disability policy [Förordningen (2001:526) om de statliga myndigheternas ansvar för genomförande av funktionshinderspolitiken] states that government agencies shall design and conduct their activities with regard to disability policy objectives. The authorities shall make a special effort to ensure that their premises, activities and information are accessible to persons with disabilities. The UN Convention on the rights of persons with disabilities (CRPD) shall serve as a guide in this work. Websites and e-services fall within the scope of the information requirements in this ordinance, which means that they must be accessible to persons with disabilities.</p>
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			<p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>YES. The Migration Agency is striving towards as fully digitalised process, with digital applications, digital communication / submission of supplementary information and digital passport checks. In many cases, attendance in person for applicants is not necessary at all, except to provide biometric data. In several places around the world (especially in South America), personal interviews via video have been introduced and are increasingly used for cases (particularly family reunification cases) where personal interviews are required. However, for the time being, interviews are held in person at a Swedish embassy, with the interviewing case officer in another location. Personal interviews with a family member (sponsor) in Sweden are often conducted via Skype / Zoom.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>YES. There is, however, no guidance or support specifically aimed at applicants with disabilities and / or digitally disadvantaged applicants in this regard (but please see replies to Q2, Q3, and Q6). The support and guidance available are aimed at all users (applicants) and is largely limited to technical issues. The information is collected under the heading 'technical support for problems with e-services' under a separate tab on the Migration Agency's website. Applicants will find self-guidance (basic troubleshooting), contact details for telephone support, a form for reporting technical problems to the Migration Agency's technical support team, information on how to log in and use the e-services, and a series of frequently asked</p>
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			<p>questions (FAQs). In addition to support for technical issues connected to the e-services, the latter includes information about challenges with credit card payments and how these can be resolved. The information is available in English and in Swedish and also has a text-to-speech feature (listening function) in both languages (Technical support when using the e-services – Swedish Migration Agency, last accessed 12 November 2025). Finally, case officers are expected to be familiar with the digital services provided and to be able to reply to questions from applicants by phone or email.</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>YES. However, there is a significant difference in waiting times between online applications (e-applications) and paper applications, as paper processing (registration, request for payment of the application fee, scanning of application documents, requests to submit additional supporting documents, transfer of the paper file between the Swedish embassy abroad and various units at the Migration Agency) takes longer. In communication with applicants and on the Migration Agency’s website, e-application is always highlighted as the main channel for submitting an application.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>YES. When the EU’s Web Accessibility Directive entered into force, the Migration Agency identified a significant need for increased knowledge within its system development operations</p>
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			<p>in order to successfully develop digital services that would meet the requirements. The Migration Agency made a major investment in staff training in this area. In general, knowledge and awareness of accessibility in digital services have increased among staff. However, there is still a need to spread and increase this knowledge to more staff, in order to avoid relying on a few key staff members.</p> <p>The Migration Agency has experienced recurring challenges in procurement and purchasing where staff sometimes find it difficult to set certain strict requirements for accessibility due to the risk that no company will be able to provide a sufficiently accessible product. If the Migration Agency sets overly high requirements in procurement that no one can meet, it will not be able to purchase the products / services as they do not meet the requirements. Potentially, this could mean that the Migration Agency would be left without a provider of a service critical to its operations.</p> <p>The Migration Agency considers that systematically storing information about disabilities and special needs of applicants would not be in compliance with the EU GDPR (please see replies to Q3 and Q4). This reduces the Migration Agency’s possibility to perform the structured follow-ups needed for further developing its digital services for users (applicants) with disabilities than is currently the case. The Migration Agency e.g. cannot extract data from its database in order to search for applicants with disabilities in a targeted manner.</p> <p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>YES. Trainings have been held at the Migration Agency to meet the need for knowledge about how digital services can be made accessible to people (applicants) with disabilities. Knowledge has also been strengthened through training in the area of procurement and purchasing. The</p>
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			<p>procurement process has also been supplemented with accessibility-related information in guidelines for the procurement process, which means that this perspective is now better taken into account than before. Finally, checklists for legal statements made at different stages of a development project or assignment include accessibility-related matters. This procedure helps the Migration Agency to ensure that questions regarding accessibility are addressed in the project / assignment.</p>
	<p>EMN NCP Ukraine</p>	<p align="center">Yes</p>	<p>1. Has your country adapted its digital services in legal migration procedures in accordance with Directive (EU) 2016/2102, the European standard EN 301 549, the UN Convention on the rights of persons with disabilities (CRPD), and national legislation to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>No.</p> <p>2. Has your country made any other adaptations of digital services (e.g. text-to-speech (TTS) services, video relay services (VRS) in legal migration procedures, besides those required by legislation, with a view to make them accessible to disabled applicants? YES/NO. Please explain your answer.</p> <p>Yes. When issuing a permit for immigration to Ukraine, a permanent and temporary residence permit, a stateless person's certificate for traveling abroad to foreigners and stateless persons, in the event of the need to accept documents from a person who cannot move independently due to a long-term health disorder, confirmed by a medical opinion from the relevant healthcare institution, upon the written request of such a person or his or her legal representative, an employee of the territorial body/territorial unit of the State Migration</p>

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			<p>Service at the person's place of residence or treatment is carried out. In this case, the application is prepared (including the collection of biometric data) by an employee of the territorial body/territorial division of the State Migration Service at the place of residence or treatment of the person.</p> <p>In the event that it is technically impossible to complete the application form (including obtaining biometric data), an employee of the territorial division of the State Migration Service, during a personal visit to a person who is unable to move independently due to a long-term health disorder, verifies and confirms the identity of the person and the person depicted in the photograph, and draws up a report. The report is drawn up in the presence of the person who is unable to move independently due to a long-term health disorder/their legal representative, and if the person is in a healthcare facility, also the attending physician. The report shall contain information about the place, date, and time of the visit, details about the employee of the territorial body/territorial division of the State Migration Service and the persons present, the reasons for the visit, and confirmation/non-confirmation of the person's health status and identity.</p> <p>The act is signed by an employee of the territorial division of the State Migration Service, the person/their legal representative, and, if the person is in a healthcare facility, also by the attending physician. The employee of the territorial division of the State Migration Service also obtains the information necessary for the application and other documents required by law by interviewing the person.</p> <p>In the absence of physical disabilities, a person who is unable to move independently due to a long-term health disorder shall sign a separate sheet for subsequent scanning using the means of the Unified State Demographic Register, which is filled in and maintained in accordance with the requirements of the Law of Ukraine "On the Unified State Demographic Register and Documents Confirming Citizenship of Ukraine, Certifying Identity or Special</p>
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			<p>Status.”</p> <p>Based on the results of a personal visit by an employee of the territorial division of the State Migration Service at the place of residence or treatment of the person, an application form is drawn up, to which the documents received and the acts drawn up are scanned using the means of the departmental information system of the State Migration Service.</p> <p>3. While using digital services in legal migration procedures in your country, can an applicant with a disability inform the authorities about any need for support measures (e.g. braille, sign language interpretation) due to their special needs? YES/NO. If yes, please elaborate.</p> <p>The issue will be resolved individually.</p> <p>4. If you answered YES to Q3, in cases where authorities in your country have received such information about an applicant’s disability and related special needs, how do you ensure compliance with the EU GDPR, including its data minimisation principle, and any national legislation that regulates the collection and processing of personal data)? Please elaborate.</p> <p>The issue will be resolved individually.</p> <p>5. When developing digital services in legal migration procedures, does your country involve disabled applicants (e.g. by collecting their feedback via questionnaire, or by test group) with a view to improving accessibility for this group? YES/NO. Please explain your answer.</p> <p>No.</p>
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			<p>6. When developing digital services in legal migration procedures in your country, how are challenges faced by digitally disadvantaged applicants (such as lack of access to internet, lack of digital skills, illiteracy of the users) taken into consideration with a view to improving inclusion? YES/NO Please explain your answer.</p> <p>The issue will be resolved individually.</p> <p>7. Does your country have national legislation on accessibility and inclusion promoting equal access (e.g. anti-discrimination legislation), that applies to digital services in legal migration procedures? YES/NO. If yes, please describe.</p> <p>Ukrainian legislation on combating discrimination is based on the Constitution of Ukraine (Article 24), which prohibits any form of discrimination, and the Law of Ukraine “On the Principles of Preventing and Combating Discrimination”. This law obliges all institutions to adhere to the principle of equality and contains mechanisms for protecting rights, including appeals to the Commissioner for Human Rights of the Verkhovna Rada of Ukraine or to the court. Violations are subject to civil and criminal liability, as well as the right to compensation for material and moral damage. In addition, Ukrainian legislation on accessibility and inclusion is based on international standards, national standards (DSTU), building codes, and strategies that cover physical, informational, social, economic, digital, and educational accessibility to ensure equal access. The main documents are the new STU (State Standard of Ukraine) ISO 21542:2025, state building codes, and the National Strategy for Creating a Barrier-Free Environment in Ukraine for the Period until 2030, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 366-r of April 14, 2021 (as amended by Resolution of the CMU No. 294-r of March 25, 2025).</p>
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			<p>8. In your country, have any in-person interactions (e.g. personal interviews and in-person submission of supporting documents) between the applicant and authorities been entirely replaced in legal migration procedures by digital services? YES/NO. If yes, please elaborate.</p> <p>No.</p> <p>9. If you answered YES to Q8, has your country provided guidance and support (e.g. support office / helpdesk, Q and A section) in legal migration procedures where in-person interaction has been entirely replaced by digital services with a view to facilitate access for disabled and digitally disadvantaged applicants? YES/NO. If yes, please elaborate.</p> <p>-</p> <p>10. Does your country apply equal treatment to applicants in legal migration procedures (e.g. with regard to the level of fees and length of processing times) regardless of whether they use digital services or non-digital services? YES/NO. Please explain your answer.</p> <p>Yes.</p> <p>11. Has your country identified any challenges in developing and providing digital services in legal migration procedures for disabled or digitally disadvantaged applicants? YES/NO. If yes, please describe up to three challenges.</p> <p>No</p>
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			<p>12. If you answered YES to Q11, has your country developed any good practices to overcome these challenges? YES/NO. Please explain your answer.</p> <p>-</p>
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