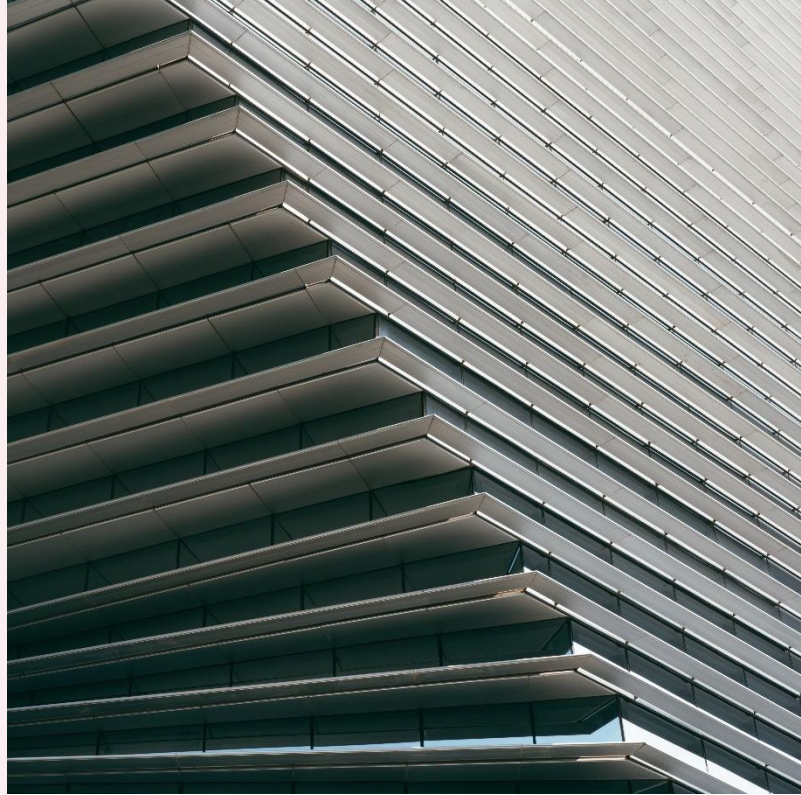


Bridging the accessibility gap: The strategic imperative of the European Accessibility Act

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This paper focuses specifically on the experiences and needs of people with a visual impairment. This emphasis reflects the paper's collaboration with 'Be My Eyes', a platform dedicated to supporting people with a visual impairment through remote visual assistance and highlights the critical role such services play in achieving accessibility under the EAA.

This paper should not be considered as a legal advice.

Executive summary

The European Accessibility Act (EAA) is a transformative legal instrument that redefines how technology must serve persons with disabilities across the EU, with global ramifications for companies. By 28 June 2025, a wide spectrum of products and services – from consumer electronics and banking platforms to e-commerce and ticketing systems – became subject to harmonised accessibility standards (including second-hand products imported from third countries). These standards are not optional enhancements; they are enforceable obligations designed to ensure equal access to services and products to persons with disabilities (subject to limited statutory exemptions and transitional arrangements).

Prior to the Act, there were divergences in EU Member States' legal and regulatory frameworks that govern the accessibility of products and services for people with disabilities. This resulted in the free movement of goods and services being impeded. Further, disabled consumers requiring accessible products and services faced inflated costs due to constrained supplier competition. Harmonising accessibility standards across the digital single market was therefore necessary to guarantee that all EU citizens, regardless of their physical abilities, can equitably access and benefit from the market's offering.

Scope and objectives

The EAA is sweeping in scope and ambition. It establishes common accessibility requirements for a wide array of everyday products and services placed on the EU market, capturing not only products manufactured and sold within EU Member States, but also those manufactured outside, and later made available within the EU market. This means the EAA has global ramifications, affecting, for example, a company in the US seeking to place products on the EU market.

The objectives of the Act are twofold: (i) to improve the free movement of accessible products/services across the EU for businesses by harmonising accessibility standards; and (ii) to remove barriers for persons with disabilities to ensure they can participate fully in society.

From 28 June 2025, physical and digital products such as computers (including hardware and operating systems), smartphones (including mobile applications), e-readers, payment terminals and operating systems, as well as key services such as ticketing, banking, emergency communications, identification mechanisms, electronic signatures and payment services across the EU must meet the accessibility requirements outlined in Annex I of the EAA.

The obligations of compliance could extend to manufacturers, importers, distributors and service providers (in both public and private sectors) on a global basis.

It should be noted that the scope of the Act extends to second-hand products as well as new products.

The essence of the Annex I requirements is to ensure that products and services are usable by people with a spectrum of disabilities without additional adaptation. Key examples include:

- **Multi-sensorial information:** Important information (i.e., instructions, warnings and labels) must be available in more than one form so as to ensure their accessibility. If something is shown visually, it may also need to be available as audio or as text that a screen reader can read. For instance, a device with a screen menu should have a speech output option.
- **User interface flexibility:** Interfaces should not rely solely on vision, hearing or fine motor skills. Organisations should provide keyboard, voice-controlled alternatives to touchscreens, as well as allow sufficient time for responses (e.g., no rapid timeouts), avoid using colour alone to convey meaning and ensure text is high contrast and resizable. Websites and software should follow the "POUR" principles: Perceivable, Operable, Understandable and Robust.
- **Support for assistive tech:** Products must work with common assistive technologies, such as screen readers.
- **Accessible customer support:** Customer support services must be accessible to persons with disabilities. For example, if troubleshooting steps are provided on a website, then that website must be navigable via assistive tech.

Exemptions from the Act

The EAA provides the following narrowly defined exemptions:

- Products that have already been in use before 28 June 2025 can continue to be used until 28 June 2030, unless they are replaced earlier.
- Existing self-service terminals, such as ATMs, may remain in operation until the end of their functional lifespan, capped at 15 years.
- Microenterprises – defined as businesses with fewer than ten employees and an annual turnover not exceeding €2 million or an annual balance sheet total not exceeding €2 million are exempt from certain obligations under the Act if certain conditions are met.
- A provider may invoke a "disproportionate burden" exemption if compliance would fundamentally alter the nature of the product or

service or impose an unreasonable cost. However, this exemption is tightly constrained and must be substantiated with documentation.

Timeline and the consequences of non-compliance

The critical date was 28 June 2025; after this date, any new product or updated service falling under the EAA must be compliant. If a business fails to comply, the consequences might include:

- Product or service can be banned from the market. For example, if a new model of a payment terminal doesn't meet the accessibility requirements (e.g., no audio output or tactile input), regulators can stop its sale in the EU until it becomes compliant.
- Companies may face fines or sanctions proportional to the breach. While each member state sets its fines, under EU law they must be high enough to be dissuasive. This could be considered analogous to data protection fines under EU General Data Protection Regulation, which are potentially significant enough to ensure attention at the highest corporate levels.
- There is also the risk of legal action by consumers or advocacy groups. The EAA requires that consumers be given avenues to enforce their rights, meaning a disabled person could bring a complaint or lawsuit if they are denied access to a product or service due to inaccessibility. The reputational impact of enforcement action or public complaints may, in some cases, exceed the financial penalties themselves.
- Public procurers, like governments, in the EU will likely insist on EAA-compliant products, so non-compliance might also mean losing out on contracts or market opportunities.

UK stance

In the UK, because the Act came after Brexit, the UK is not obliged to implement it. However, UK firms should not dismiss it. Firstly, any UK company selling into Europe, or offering apps to EU consumers, must meet EAA standards in those markets; the same is true of any other company wishing to sell on the EU market. Secondly, the UK's own laws (i.e., Equality Act 2010 and associated regulations) already require reasonable adjustments for persons with disabilities. Equally, public sector websites have accessibility regulations mirroring earlier EU rules. There is substantial overlap in spirit, in providing services that do not discriminate against disabled users. So, aligning with the EAA is an effective way of achieving current compliance, and futureproofing any potential UK initiatives on the horizon.

In practice, many global companies treat the EAA as a baseline, to be adopted across all products, UK included, to simplify operations and present themselves as universally accessible.

Accessibility as innovation: a messaging opportunity

The EAA is an opportunity, not just an obligation. It is a regulation with teeth, but it is also a catalyst for positive change that can yield competitive advantages. Historically, some firms have seen accessibility requirements as costly additions. Whilst the EAA will certainly require efforts (e.g. redesigning

interfaces, adding features, testing with assistive tech and training staff), such efforts can be leveraged to improve products for all users. Many accessibility features are solutions to widespread interaction problems. For example:

- **Advancing human-computer interaction:** The growing demand for more intuitive and flexible interaction methods – such as text-to-speech and voice control – has significantly advanced voice assistant technology and speech recognition. Today, voice interfaces like Alexa, Siri and Google Assistant are widely adopted and have become integral to the mainstream digital experience. By ensuring voice operability in line with the EAA, companies can enhance usability for a broad range of users, including people with a visual impairment, and in doing so, may unlock new, inclusive ways for all customers to engage with their services.
- **Better user experience for all:** Designing for visual accessibility often leads to cleaner, more intuitive interfaces. Whilst clear layouts and language, good contrast and larger clickable elements help someone with low vision, they also make the app a more user-friendly experience. Many companies report that fixing accessibility bugs improved their overall app ratings and reduced drop-off rates; issues that annoy disabled users often annoy others too. In short, good design is inclusive design.
- **Customer service as a differentiator:** Customer service channels, as the only route via which most customers directly interact with companies, are critical differentiators for shaping brand reputation. An inclusive customer experience not only allows companies to serve a broader customer base, but also further differentiate themselves from competitors at this important touchpoint. Having fully accessible customer support channels, including helplines, live-chat and troubleshooting guides, can enable companies to deliver immediate wins in customer satisfaction and trust from first contact, building a unique and attractive proposition as an approachable, caring and customer-centric brand.

To summarise, accessibility is not a burden; it is a catalyst. It pushes companies to be innovative, inclusive and introspective about their product design. The EAA forces a mindset shift for designers – instead of designing for the "average" user and then trying to accommodate others, design should be aimed at all users from the start. This would ensure that disabled users are not an afterthought, but a central consideration in every product and service lifecycle.

Impact of the EAA on tech firms

To ensure tech firms meet the requirements of the EAA, they are advised to take the following steps:

- **Audit and assess current products/services:** Companies should begin with a thorough accessibility audit of their offerings. This means evaluating websites, mobile apps, software, devices and customer support channels against the EAA's requirements. In this phase, if possible, involve actual users with disabilities, as their feedback is invaluable. Cataloguing issues across all products and regions will help prioritise fixes.

- **Integrate accessibility into design and development:** Bake accessibility into the product development lifecycle. The first step is building a diverse team, including disabled designers and testers who sit within the product design process, to ensure you are building 'with', not just 'for'. Create or update design guidelines to include accessibility checkpoints, empowering disabled designers and testers to leverage their lived experience to provide design insights that deliver value. Also, ensure that all designers use components that support assistive tech and that all developers follow best practices. Embedding accessibility in this way means that future products will be compliant from launch on day one, thus preventing constant retrofitting.
- **Fix or phase out non-compliant legacy elements:** For existing products that have accessibility issues, firms must either remediate them, replace them or withdraw them from the EU market. The EAA does provide an exemption if compliance is proven to be an "undue burden" or if the product would be fundamentally altered by the changes, but this is a high bar to meet. In some cases, creative solutions can help legacy systems; for example, if a device has a screen that can't be changed, an app could be provided that connects to the device and offers an accessible interface on a user's smartphone or free add-ons (e.g., tactile stickers or an external audio module) to improve accessibility could be offered.
- **Enhance customer support for accessibility:** A product is not fully accessible if users cannot get help equally. The EAA recognises this, highlighting the importance not only of accessible products, but also of the services that surround and support their use. While these services are often viewed as ancillary, they are just as critical to achieving truly accessible inclusive design. Tech firms should not only ensure their products meet disabled users' needs, but also their services, such as their customer service channels.
- **Procurement processes:** Companies should review their supply chains and update their procurement policies to ensure any third-party software, or component they use in their product or service, aids accessibility.

It is worth noting that if a service, or any component thereof, is subcontracted to a third party, the obligation to ensure accessibility would remain with the primary service provider. Compliance with the Act's accessibility requirements must be maintained throughout the delivery chain.

- **Train and cultivate awareness:** People drive accessibility, and it is vital you have a diverse and inclusive design team. Conduct training sessions for engineers, designers, product managers and customer-facing staff on what the EAA requires and how they can do their part. Some companies do empathy workshops (e.g. trying to navigate their app blindfolded or using only a keyboard) to help see where issues lie; this is a powerful eye-opener for developers who lack that lived experience. Building an inclusive culture means encouraging employees to speak up when they spot an accessibility issues, empowering people to leverage their lived experience and rewarding teams that come up with especially accessible solutions. Leadership should vocalise support; when top executives talk about accessibility as a core value, not just as a legal risk, it sets the tone for everyone to prioritise it.

The Act and 'Be My Eyes'

Who is 'Be My Eyes'?

Founded in Denmark in 2015, 'Be My Eyes' is a unique platform that connects people with a visual impairment with sighted volunteers through live video and artificial intelligence, to assist with everyday visual tasks. It operates via an app on smartphones or desktops by using the device's camera to stream videos of what the person with a visual impairment faces. The volunteer on the other end sees the video and provides guidance or description in real time. This simple idea, essentially borrowing someone's eyes for a few minutes, has blossomed into a global community. As of 2025, nearly 10 million volunteers, speaking over 180 languages, have signed up to help over 900,000 blind and low-vision users worldwide 24/7.

'Be My Eyes' also partners with companies to provide dedicated customer support via the app. Microsoft was an early proponent, integrating their Disability Answer Desk with 'Be My Eyes'. Users can now get real-time assistance via an artificial intelligence agent or place a call directly with Microsoft's support team via the 'Be My Eyes' app, allowing the support agent to see the user's screen, or whatever the user shows, and provide technical support visually. This replicates what a sighted user could do by describing what's on their screen. Google, Procter & Gamble, Hilton, BT/EE, Tesco, Sony and numerous others have joined this specialised help platform.

What does the Act mean for organisations such as 'Be My Eyes'?

No matter how many guidelines you impose and technology adaptation you make, a blind user might still meet a dead-end or broken code on a website that a sighted user can troubleshoot visually in seconds. Without accessible support, like visual assistance, the user is stuck and effectively denied the service. Thus, to ensure accessibility, companies must not only design products to be accessible but also provide a means for users with disabilities to get support. The Americans with Disabilities Act in the United States frames this as a requirement for auxiliary aids and services to achieve equal communication. The EAA is similar in spirit, even if language differs, requiring that communication with customers be as effective for disabled users as for others.

For companies required to comply with the EAA, remote assistance services such as 'Be My Eyes' can help meet EAA customer support obligations and plug compliance gaps for products and services that are difficult to change and for when things go wrong.

In practice, fixing core accessibility issues in products can take months or even years, during these periods remote assistance services offer a critical lifeline to ensure all customers can continue to use products and services. However, it is critical that these services remain a safety net for when delays to product fixes are unavoidable, not a substitute for proper, inclusive design.

Conclusion: accessibility as a strategic imperative

The EAA pushes society towards a simple goal: equal access to products and service, without undue difficulty or exclusion for people who have disabilities. It is about independence, dignity and equal opportunity. For a

person with a visual impairment, that might mean being able to bank online without needing sighted help; travel independently without being accompanied by a sighted companion and enjoy entertainment programmes on television without seeking help from others to navigate or choose the best channels on their behalf. Achieving this goal requires work from many stakeholders – companies, governments, tech innovators and advocates – and the EAA represents a major coordinated push to make this happen.

For corporations and government entities, the mandate is clear, and so is the opportunity. By leading on accessibility, you lead on quality and innovation. By doing what is right for inclusion, you also do what is smart for your business. This is an alignment of ethical duty and strategic interest. Those who recognise this alignment and act on it will thrive in the new landscape; those who drag their feet will fall behind, not just in compliance but in customer satisfaction and brand image.

As we stand at this inflection point, the advice is to go beyond minimum compliance and embrace the spirit of the law. Engage creatively with it, talk to users with disabilities, learn from their experiences and iterate your solutions. Use the tools at your disposal, from advanced artificial intelligence to volunteer communities like 'Be My Eyes'. Technology has always been about solving problems and accessibility is just a problem that, once solved, unlocks a better experience for everyone. From 2025 and beyond, an accessible product should simply be seen as a quality and standard product.

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