

European Accessibility Act (whole Part)

Audit Checklist

80 audit questions across 18 sections.

HOW TO USE THIS CHECKLIST

Each question has three boxes the auditor fills in during the audit:

1. **Compliance** — the binary headline: Compliant / Non-compliant.
2. **Classification** — where the gap is, four-state grid: Documented / Implemented matrix.
3. **Finding level** — severity: Maj / Min / Obs (Major nonconformity / Minor nonconformity / Observation).

Severity is the auditor's call on the day, against the real finding — no severity is pre-suggested per question.



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Product: European Accessibility Act (whole Part) (80 questions)
Regulation:
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Accessibility requirements for products and services

Q1 ANNEX

EAA Annex I §I.1(a)

For the information provided on the product itself (labelling, instructions, warnings), is it made available via more than one sensory channel, presented understandably, presented in ways users can perceive, and presented in adequately-sized, suitably-shaped fonts with sufficient contrast and adjustable spacing?

SOURCE VERBATIM

1. Requirements on the provision of information:

(a) the information on the use of the product provided on the product itself (labelling, instructions and warning) shall be: (i) made available via more than one sensory channel; (ii) presented in an understandable way; (iii) presented to users in ways they can perceive; (iv) presented in fonts of adequate size and suitable shape, taking into account foreseeable conditions of use, and using sufficient contrast, as well as adjustable spacing between letters, lines and paragraphs;

— Directive (EU) 2019/882, Annex I, Section I, point 1(a)

COMPLIANCE

Compliant Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

FINDING LEVEL

Maj Min Obs
 Maj = Major nonconformity · Min = Minor nonconformity · Obs = Observation

SUGGESTED EVIDENCE TO REQUEST

- Sample product labelling/instructions demonstrating multi-sensory, perceivable, legible presentation

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES:

Where instructions for use are not on the product but provided through other means (e.g. a website), are they publicly available when the product is placed on the market and do they meet the full set of §I.1(b) requirements – multi-sensory, understandable, perceivable, legible; available in text formats usable for alternative assistive formats; alternative presentation of non-textual content; and descriptions of the user interface, the functionality, and the software/hardware interfacing with assistive devices?

SOURCE VERBATIM

(b) the instructions for use of a product, where not provided on the product itself but made available through the use of the product or through other means such as a website, including the accessibility functions of the product, how to activate them and their interoperability with assistive solutions shall be publicly available when the product is placed on the market and shall: (i) be made available via more than one sensory channel; (ii) be presented in an understandable way; (iii) be presented to users in ways they can perceive; (iv) be presented in fonts of adequate size and suitable shape ... using sufficient contrast, as well as adjustable spacing ...; (v) ... be made available in text formats that can be used for generating alternative assistive formats ...; (vi) be accompanied by an alternative presentation of any non-textual content; (vii) include a description of the user interface of the product ...; (viii) include a description of the functionality of the product ... aiming to address the needs of persons with disabilities ...; (ix) include a description of the software and hardware interfacing of the product with assistive devices ... a list of those assistive devices which have been tested together with the product.

– Directive (EU) 2019/882, Annex I, Section I, point 1(b)

COMPLIANCE

Compliant Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

FINDING LEVEL

Maj Min Obs
 Maj = Major nonconformity · Min = Minor nonconformity · Obs = Observation

SUGGESTED EVIDENCE TO REQUEST

- Off-product instructions (e.g. website) demonstrating the §I.1(b)(i)–(ix) elements
- Descriptions of UI, functionality and assistive-device interfacing; list of tested assistive devices

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES:

Does the product (including its user interface) contain features, elements and functions allowing persons with disabilities to access, perceive, operate, understand and control it – covering the §I.2 design requirements: multi-sensory operation; alternatives to speech; flexible magnification/brightness/contrast; alternatives to colour and to audible signals; flexible vision/audio control; sequential control and alternatives to fine motor control; avoiding extensive reach/strength; avoiding photosensitive-seizure triggers; protecting privacy of accessibility features; alternatives to biometrics; consistent functionality with adequate interaction time; and interfacing with assistive technologies?

SOURCE VERBATIM

1. User interface and functionality design:

The product, including its user interface, shall contain features, elements and functions, that allow persons with disabilities to access, perceive, operate, understand and control the product by ensuring that: (a) ... communication ... via more than one sensory channel ...; (b) ... alternatives to speech ...; (c) ... flexible magnification, brightness and contrast ...; (d) ... an alternative to colour ...; (e) ... an alternative to audible signals ...; (f) ... flexible ways of improving vision clarity; (g) ... user control of volume and speed, and enhanced audio features ...; (h) ... sequential control and alternatives to fine motor control ...; (i) ... avoid modes of operation requiring extensive reach and great strength; (j) ... avoid triggering photosensitive seizures; (k) ... protect the user's privacy ...; (l) ... an alternative to biometrics identification and control; (m) ... consistency of the functionality and ... flexible amounts of time for interaction; (n) ... software and hardware for interfacing with the assistive technologies;

– Directive (EU) 2019/882, Annex I, Section I, point 2(a)–(n)

COMPLIANCE

Compliant Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

FINDING LEVEL

Maj Min Obs
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SUGGESTED EVIDENCE TO REQUEST

- UI/functionality accessibility specification mapped to §I.2(a)–(n)
- Test evidence (e.g. assistive-technology compatibility, contrast, motor-alternative operation)

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES: