

Preparing for the European Accessibility Act: Leveraging AI for Enhanced Compliance

In brief

How to prepare for the EAA and how AI can help

The European Accessibility Act applies from 28 June, so it is important to ensure your business is ready. To mark this date, we spoke to Sebastian Kranz from Slalom about how you can ensure your digital assets are compliant, and how AI tools are really accelerating the accessibility assessment process.

Background

By way of refresher, the Act applies to certain in-scope products and services provided to consumers in the EU. This includes services such as e-commerce services (including online retail, subscriptions and in-app purchases), electronic communications services (except for M2M services), services providing access to audiovisual media services, and banking services. It also encompasses products like smartphones, desktops, notebooks, tablets, e-readers, routers, modems and smart TVs.

The steps required for compliance fall into four main workstreams:

1. Ensure the **features and functionality** of the products and services enable them to be used by people with disabilities. The EAA includes specific requirements in Annex I, supplemented with non-binding examples of possible solutions in Annex II, such as providing alt text descriptions of any images.
2. Provide **information** about how the products or services are accessible, in the instructions for products, and in the terms and conditions or accessibility statement for services.
3. Ensure **customer support** services - such as helpdesks, call centres or online chat - are equipped to provide users with information about the accessibility features that are available.
4. Have **procedures** in place to ensure that products and services remain compliant including when there is a change in the law or technical standards you're applying, and also ensuring that whenever product design, marketing or IT teams make changes, accessibility functionality is not lost or limited.

The potential sanctions for non-compliance vary across Member States and include various levels of fine, but also potentially mandatory non-compliance notices on your websites or even imprisonment. Reputational risk is also key, as accessibility is an important part of your organisation's approach to inclusion and diversity.

More background is available [here](#).

With this in mind, how can you ensure that your websites and apps are ready?

As a professional software quality engineer, I recognize the imperative of strategic preparation for this regulatory evolution, particularly emphasizing a robust and modern testing strategy. This guide aims to equip both technical and non-technical stakeholders with actionable insights for understanding and achieving EAA compliance.

POURing accessibility into software

To achieve EAA compliance, organizations must align their digital offerings with established accessibility principles. While the EAA does not mandate specific technical specifications, it consistently references **WCAG 2.1 Level AA** as the recommended baseline.

This recommendation is further reinforced by **EN 301 549**, the harmonized European Standard for Information and Communication Technology (ICT) accessibility, which defines precise requirements for ICT products and services to ensure usability by persons with disabilities. These standards are predicated on four foundational principles, collectively known by the acronym **POUR**:



Perceivable: Information and user interface components must be presented in a manner that users can perceive, irrespective of their sensory capabilities.



Operable: User interface components and navigation must be operable by all users, supporting diverse input methods beyond a conventional mouse.



Understandable: Information and the operation of the user interface must be clear and consistent.



Robust: Content must be sufficiently robust to be interpreted reliably by a wide array of user agents, including current and prospective assistive technologies (ATs).

Strategic technical compliance imperatives

For software quality engineering professionals, a profound comprehension and diligent application of WCAG 2.1 AA and EN 301 549 guidelines are indispensable for meeting legal requirements. Key technical areas demanding focused implementation include:



Inclusive Design Paradigms: Visual elements must be designed with inherent accessibility, ensuring high-contrast color schemes and scalable font sizes. Leveraging appropriate semantic HTML elements and judiciously applying Accessible Rich Internet Applications (ARIA) attributes are critical for conveying structure and functionality to assistive technologies.



Ensuring Operability: All application functionality must be fully accessible via keyboard or touch interface, mandating a logical tab order, clear visual focus indicators, and the complete absence of "keyboard traps." Support for alternative input methods and clear, descriptive text labels are also vital.



Content Accessibility: All non-text content, including images and multimedia, must feature descriptive alternative text and accurate captions or transcripts. Online documents must be structured for readability. Common deficiencies such as missing alt text, inadequate color contrast, and keyboard navigation issues are primary areas of non-compliance.

Integrating accessibility within the Software Development Lifecycle (SDLC)

Achieving and sustaining EAA compliance is most efficiently and cost-effectively realized when accessibility is systematically embedded throughout the entire Software Development Lifecycle (SDLC). This "accessibility-first" or "shift-left" methodology ensures that accessibility considerations are integrated from initial planning and requirements gathering through design, development, testing, and deployment. This proactive approach transforms accessibility from a potential burden into an integral component of quality assurance and product development, significantly reducing the higher costs associated with post-launch remediation.

Verification, testing, and modern testing strategies for EAA compliance

Robust verification and continuous monitoring are paramount for sustained EAA compliance. A comprehensive accessibility testing strategy should be multi-faceted and integrated into a modern quality engineering pipeline.

1 Shift-Left Accessibility Testing:

- **Requirements & Design Phase:** Integrate accessibility directly into user stories and design specifications. Conduct early design reviews with accessibility experts. Prototype evaluations should include accessibility considerations from the outset.
- **Development Phase:** Empower developers with accessible coding practices and integrate automated accessibility checks into their IDEs (Integrated Development Environments) and code reviews. This allows for immediate feedback on potential issues.

2 Multi-Layered Testing Approach:

- **Automated Accessibility Testing:** Utilize tools like Deque's axe DevTools or Google Lighthouse within CI/CD pipelines. These tools efficiently identify common, easily detectable issues (e.g., missing alt text, insufficient color contrast) during every build or deployment.
- **Manual & Expert Testing:** Automated tools alone are insufficient for comprehensive WCAG compliance. Expert manual testing, performed by certified accessibility specialists, is crucial for evaluating complex interactions, logical flow, contextual understanding, and adherence to nuanced guidelines. This often involves using assistive technologies to mimic real user experiences.
- **User Testing with Persons with Disabilities:** This is the gold standard. Involving individuals with diverse disabilities in usability testing provides invaluable real-world feedback, uncovers overlooked barriers, and validates that the solution is truly usable and inclusive.
- **Compatibility Testing:** Rigorously test products with a wide range of assistive technologies (e.g., various screen readers like JAWS, NVDA, VoiceOver; screen magnifiers; speech input software) across different browsers and operating systems to ensure robust performance.

3 AI-Accelerated Quality Engineering for Accessibility:

- **Intelligent Test Generation:** AI/ML can analyze design patterns, code changes, and previous defect data to suggest or automatically generate accessibility test cases, particularly for complex user flows or dynamic content.
- **Enhanced Automated Checks:** While traditional automated tools are rulebased, AI can potentially infer accessibility issues beyond explicit rules, by analyzing visual context, user behavior patterns, and semantic nuances, providing more intelligent insights into potential usability barriers.
- **Predictive Analytics for Accessibility:** AI can analyze vast datasets of accessibility issues, bug reports, and user feedback to predict where new accessibility defects are most likely to occur in upcoming releases, allowing teams to prioritize testing efforts proactively.
- **Facilitating User Testing Recruitment:** AI can help identify and connect with diverse user profiles for user testing panels, ensuring a representative sample of individuals with various disabilities, accelerating the feedback loop.
- **Automated Remediation Suggestions:** In the future, AI could even suggest code-level remediations for identified accessibility issues, further accelerating the development cycle.

4 Continuous Accessibility Testing (CAT):

- Integrate accessibility checks into the DevOps pipeline, ensuring that every code commit triggers automated accessibility scans. This ensures that accessibility is continuously monitored and maintained, preventing regressions and reducing the cost of fixing issues later.
- Establish dashboards and reporting mechanisms to track accessibility compliance over time, making it a visible metric of product quality.

Conclusion: Beyond compliance – A strategic business advantage

While EAA compliance is a legal obligation with significant consequences for nonadherence, it also presents a compelling strategic opportunity. Organizations that proactively prioritize accessibility can significantly expand their market reach, tapping into the considerable spending power of people with disabilities. Beyond merely mitigating risks, investing in accessibility profoundly enhances brand reputation and cultivates robust customer loyalty. By embracing modern testing strategies, including AI-accelerated engineering, organizations can not only ensure compliance but also deliver truly inclusive, high-quality digital experiences that benefit all users, turning a regulatory mandate into a competitive advantage.

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