

Joint statement European Disability Forum, European Union of the Deaf, European Emergency Number Association, European Deafblind Union, European Federation of Hard of Hearing People, European Association of Cochlear Implant users, European Federation of Parents of Hearing Impaired Children, European Deafblind Network

## **EMERGENCY CALL TO THE COUNCIL**

### **Accessible emergency communication for persons with disabilities: a requirement to save lives**

**The Council's proposal to exclude Public Safety Answering Points (centres answering emergency calls) from the upcoming European Accessibility Act will keep millions of persons with disabilities at risk. The above organisations call on the Council of the EU to accept mandatory and common accessibility requirements for services handling emergency calls. We have the right to call for help!**

The European Commission published its [proposal for the European Accessibility Act](#) (EAA) at the end of 2015. Once adopted, the Act will set accessibility requirements for several products and services, **including emergency services.**

Currently, emergency services remain largely inaccessible for many people with disabilities. Several countries have developed ad hoc solutions, such as specific mobile applications that users need to download or to register in beforehand. Nonetheless, **many persons with disabilities cannot yet rely on an accessible way to contact emergency services that works across the EU**, unlike their non-disabled peers, who can dial 112 with a regular voice call everywhere and around-the-clock. The Accessibility Act can finally address and fix this discriminatory situation that endangers millions of lives.

Both the European Commission proposal and especially the [European Parliament report](#) ensure end-to-end accessibility of telephony and emergency services by applying the same accessibility requirements. These requirements are **voice communication, text, including Real-Time Text and video communication, alone or in combination as Total Conversation services.** By making these services available and interoperable across Europe, persons that cannot communicate orally, as well as deaf, hard of hearing and deafblind persons, including those who use sign language, will be able to communicate with anybody, including with emergency services, on an equal basis with others.

These accessible means of communication are required for all economic operators involved. Indeed, both the Commission and the Parliament argue that smartphone manufacturers must ensure that their devices support Real-Time Text and Total Conversation services and that electronic communication network operators must carry them through their networks.

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Consequently, to make emergency services accessible, somebody will need to respond using Real-Time Text or Total Conversation services. Thus, the so-called Public Safety Answering Points (**PSAPs**), the centres that answer emergency calls, **must be able to appropriately receive, answer and handle such accessible communications, as they do with voice calls**. This is technically feasible and there are even [industry standards](#) available.

Unfortunately, the Council decided to exclude all requirements for PSAPs in its [position](#) regarding the Accessibility Act. **We are therefore urging Member States to reconsider their position**. It makes no sense to require smartphone manufacturers and network operators to support these accessible ways of communication in emergency services, if PSAPs are not required to be equipped to handle and respond to them. Excluding them would simply break this vital communication chain.

We advocate for a strong Accessibility Act and for Member States to ensure that all emergency services are accessible, as stipulated by amendments 187, 292 and 300 of the European Parliament report on the Act. However, if this is not possible, we would instead support a solution similar to the one put forward under the Maltese presidency of the EU: a proposal to establish **a requirement for Member States to designate one or several PSAPs to receive, answer and handle these communications in an accessible manner**. This solution would enable each Member State to choose their preferred PSAP or PSAPs to handle these accessible communications, based on national circumstances, such as the size of the country, its population, average number of accessible calls, political system, and so on.

### **We therefore suggest the following requirements:**

“Specific accessibility requirements related to services answering and handling emergency calls, including to the single European emergency number 112:

Ensuring that emergency communication using voice, text, including real time text and video (Total Conversation) are appropriately received, answered and handled, by one or several PSAPs that have been previously designated to be responsible for, and capable of responding using the same communication means.”

As State Parties to the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD), the EU and all its Member States must implement its provisions, including [Article 9](#) which requires States Parties to ensure accessibility of information and communications, including with regards to emergency services.

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As a matter of fact, the **inaccessibility of emergency services in the EU was highlighted by the UN CRPD Committee** in its 2015 [concluding observations to the EU](#). The Committee specifically asked the EU to ensure that the emergency number 112 is fully accessible to all persons with disabilities across the EU. This requirement can only be met by ensuring end-to-end accessibility of emergency services in the European Accessibility Act that is **available to all and interoperable everywhere** as regular voice calls.

**If Member States fail to deliver, the lives of those that cannot communicate orally, and of more than 52 million deaf, hard of hearing and deafblind European citizens as well as the people that surround them will continue to be put at risk.** Countless other persons will also be affected as everyone can find themselves in a situation where they are unable to call emergency services using oral communication, e.g. being unable to speak or hear after an accident or to speak because it would put their safety at risk, such as during a burglary. In short, all Europeans will immensely benefit from enhanced accessible ways to contact emergency services.

**We therefore call on the EU institutions, and especially the Council, to adopt our proposed amendment in the European Accessibility Act to ensure end-to-end accessibility of emergency services. This will literally save lives.**

This call is endorsed by the following organisations;

- [European Emergency Number Association](#)
- [European Disability Forum](#)
- [European Union of the Deaf](#)
- [European Deafblind Union](#)
- [European Federation of Hard of Hearing People](#)
- [European Association of Cochlear Implant users](#)
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