

## **APACE survey for publishers**

*APACE project – Accelerating Publishing Accessibility Through Collaboration in Europe*

This survey aims to collect facts and figures on the current level of adoption of Born Accessible practices in Europe. The results are used to pinpoint the expertise and competencies necessary for professionals in the publishing sector in regard to accessibility, especially in anticipation of the European Accessibility Act.

"Born accessible" refers to the production of digital accessible books right from the beginning, and building the process into current ebook production workflows, instead of updating books post-production to make them accessible).

We encourage all publishers to participate in the survey, regardless of their involvement in accessibility initiatives. Your input will contribute to a better understanding of the European context and will help identify key areas where training is most essential.

Estimated time to complete the survey is 16 minutes.

This survey is carried out within the APACE project – Accelerating Publishing Accessibility Through Collaboration in Europe. APACE is a medium-scale cooperation project co-funded in the framework of the Creative Europe programme for a duration of 24 months (January 2024 – December 2025). All project activities will be in line with the European Accessibility Act which will have a strong impact on the publishing sector.

The partners of APACE are Fondazione LIA (Italy), Associazione Italiana Editori (Italy), Börsenverein des Deutschen Buchhandels e.V. (Germany), Asotziatia Bulgarska Kniga (Bulgaria), Stichting Dedicon (the Netherlands), Accessibility Library Celia (Finland), Lithuanian Audiosensory Library (Lithuania).

For more information about the project: [2024-25 APACE - Accelerating Publishing Accessibility through Collaboration in Europe - Fondazione LIA](#)

## Part 1 – Information about the publishing house

1. Please indicate the name of the publishing house/imprints you represent as you fill out this survey:

2. Country

3. Which market segments does your publishing house serve? (multiple choice)

- Trade
- Children
- Comics
- Educational (K-12)
- Academic
- Professional
- Other (please specify)

4. Please indicate how many employees are involved in your publishing house:

- 1-10
- 11-50
- 51-100
- > 100

5. Annual turnover reported in your last Financial Statement (2023) amounted to:

- Less than 2 million Euros (micro-enterprise)
- Between 2 and 10 million Euros
- More than 10 million Euros

## Part 2: Are you ready for the European Accessibility Act?

The European Accessibility Act (EAA) is an EU Directive that establishes binding accessibility targets that must be met by many different types of products and services. It strengthens the rights of people with disabilities to access goods and services, including e-books, dedicated reading software, e-reading devices, and e-commerce websites and apps.

For more information: [Directive \(EU\) 2019/882 on the accessibility requirements for products and services](#)

6. Do you think the European Accessibility Act will have an impact on your publishing house?

- Yes
- No
- Do not know

7. Have you already started to work to be compliant with the requirements of the European Accessibility Act?

- We do not need to be compliant
- We have not yet defined a plan for it
- We are defining our strategy
- We are in an early stage of implementation
- We have been working on the topic for at least 1 year
- We have almost achieved all the goals
- We are in line with all the requirements
- We are evaluating the impact on the publishing house
- Do not know

8. Has your organization allocated a specific budget to fulfil the requirements of the European Accessibility Act?

- Yes
- No
- We plan to allocate budget by 2025
- Do not know

\* 9. Is there an internal Accessibility Officer or someone responsible for accessibility at your organisation?

- Yes
- No
- We are planning to appoint one
- Do not know

**10. Which departments listed below are currently engaged in the accessibility-related initiatives? (multiple choice)**

Top management

Authors

Editorial

Production

Digital

Graphic

Sales

Communication

Do not know

None

## Part 3: E-books

**11. Does your publishing house currently publish e-books?**

Yes

No

**12. Who is responsible for e-books production?**

In-house personnel

External suppliers

Both

Do not know

**13. Which source file is the basis of your digital publications? (multiple choice)**

InDesign

QuarkXpress

LaTeX

Microsoft Word

XML

Other (please specify)

**14. In which formats are your new titles published? (multiple choice)**

EPUB 2

EPUB 3 reflowable

EPUB 3 Fixed layout

PDF

Other (please specify)

**15. How many e-books are part of your catalogue and are distributed to online retailers?**

EPUB 2

EPUB 3 reflowable

EPUB 3 Fixed layout

PDF

Other

## Part 4: Accessible E-books

16. Does your publishing house produce accessible e-books (i.e., in line with standards)?

- Yes
- No
- We plan to do so by the end of 2024

17. Which percentage of your e-books is accessible (in compliance with the European Accessibility Act requirements)? (enter a number within 0 and 100, where 0= none of them are accessible and 100=all of them are accessible)

EPUB 2	<input type="text"/>
EPUB 3 reflowable	<input type="text"/>
EPUB 3 Fixed layout	<input type="text"/>
PDF	<input type="text"/>
Other	<input type="text"/>

18. Which strategy is in place at your publishing house to be compliant with accessibility requirements?

- We are featuring accessibility within our internal workflows
- We delegate all the activities related to accessibility to external suppliers
- Our internal staff is collaborating with the external suppliers to adapt the workflows
- Do not know
- None
- Other (please specify)

**19. Which of the following tools do you use to create accessible e-books? (multiple choice)**

- Ace by DAISY
- EPUBCheck
- SMART by DAISY
- Sigil
- Oxygen
- Calibre
- Acrobat Pro
- PAC - PDF Accessibility Checker
- Thorium
- Other (please specify)

None

**20. Is the creation of image descriptions (alternative and/or extended descriptions) part of your production process?**

- Yes
- No
- Do not know

**21. If the answer is positive, who is made responsible for image descriptions? (multiple choice)**

- Authors
- Editorial department
- External suppliers
- Other (please specify)

**22. Do you have guidelines for the production of accessible e-books in line with standards (WCAG 2/EPUB Accessibility 1.1) for in-house personnel and/or external suppliers?**

- No
- Yes (please specify)



**23. Do you have in place a Quality Assurance programme to test the accessibility of your e- books?**

- No
- Yes (please specify)

**\* 24. Have you ever hired a third-party company to conduct an audit on the accessibility of your:**

	Yes	No	Don't know	We run audits internally	Not applicable
Production workflows					
Distribution workflows					
E-books					
Platforms					
Apps					
Websites					



## Part 5: Accessible e-book distribution (Metadata and DRM)

25. Which Digital Rights Management (DRM) do your distributors use for your e-books? (multiple choice)

Adobe DRM

Radium LCP

Watermark

Do not know

None

26. Do your e-books have the related accessibility metadata (information about the accessibility of e-book that are conveyed through different standards)?

Yes

No

Do not know

27. If yes, which standard formats? (multiple choice)

ONIX

EPUB Accessibility metadata (embedded in the publication)

Other (please specify)

## Part 6: Skills and training

### \* 28. Does the in-house staff have the skills required to...

	Yes	No	Not applicable	Don't know
Produce Born Accessible publications				
Verify the level of accessibility of publications				
Write alternative descriptions for images				
Create accessibility metadata				
Develop accessible websites, platforms, apps				

### \* 29. Do the external suppliers have the skills required to...

	Yes	No	Not applicable	Don't know
Produce Born Accessible publications				
Verify the level of accessibility of publications				
Write alternative descriptions for images				
Create accessibility metadata				
Develop accessible websites, platforms, apps				



**\* 30. Below you will find listed some tasks related to the topic of accessibility. How challenging do you think they are?**

	<b>Low</b>	<b>Moderate-low</b>	<b>Moderate-high</b>	<b>High</b>	<b>Don't know</b>
The understanding of the accessibility technical requirements					
The understanding of the accessibility legislative requirements					
Production of accessible e-books					
Distribution of accessible e-books					
Image description					
Metadata					
Math formulas					
STEM contents					
Quality Assurance					
The use of software to produce accessible publications					

Other (please specify)



**\* 31. Have you ever been trained in the topics mentioned?**

	Yes	No	Don't know
General overview of accessibility (what is Born Accessible, which tools are used to read by persons with print impairments)			
Accessibility legislation			
Alternative description of images			
Production of accessible e-books			
Accessibility metadata			
Accessibility standards			
The role of semantics			
Artificial intelligence for accessibility			
Accessibility remediation tools for the backlist			
Quality assurance for e-books			
Accessible audiobooks			

Other (please specify)

**\* 32. What would be your interest in receiving training on the following topics?**

	Low	Moderate-low	Moderate-high	High	Don't know
General overview of accessibility (what is Born Accessible, which tools are used to read by persons with print impairments)					
Accessibility legislation					
Alternative description of images					
Production of accessible e-books					
Accessibility metadata					
Accessibility standards					
The role of semantics					
Artificial intelligence for accessibility					
Accessibility remediation tools for the backlist					
Quality assurance for e-books					
Accessible audiobooks					

Other (please specify)

**\* 33. Have you accessed public funds to organize training programmes for accessibility?**

- No
- Yes, National funds
- Yes, European funds
- Other (please specify)



**\* 34. Are you aware of any national or international training programme, project or collaborative initiative for inclusive publishing?**

No

Yes (please specify)



## **Part 7: Compiler contacts and further comments**

The survey is over, thank you very much for your time. If you wish, please leave further comments and your email address here, so we can update you with the results of the survey and on the continuation of the APACE project

**35. Please include an email address to which to send project updates**

**36. Any further comment or reflections on the topic of accessibility is welcome**

## Privacy policy - 1/2

In accordance with the provisions of Article 13 of Regulation (EU) 2016/679 on the Protection of Personal Data (hereinafter also referred to as GDPR), the text below indicates how we respect the privacy of participants to this Survey, describing how we collect, use and design personal information, the rights granted to them and how you can contact us.

### Data Controller

The Data Controller is Fondazione LIA, with registered office in Corso di Porta Romana, 108, 20122 Milan (Italy) - <http://www.fondazionelia.org>

For any clarification, question or need related to privacy, you can contact us at any time by writing to the address indicated above or by sending a communication to [privacy@fondazionelia.org](mailto:privacy@fondazionelia.org).

Fondazione LIA acts as PROJECT COORDINATOR of APACE (Accelerating Publishing Accessibility through Collaboration in Europe) and, within the framework of the project, carries out, manages and coordinates the present survey.

The PARTNERS of APACE informed publishers about the survey and shared the information about the project in their own country, acting as independent Data Controllers in relation to the processing of personal data.

### Purposes of Data Processing

We collect through the survey personal information, which participants are free to provide, for the following purposes of processing: i) analyze the results and elaborate statistics about the adoption of Born Accessible practices in Europe and to pinpoint the expertise and competencies necessary for professionals in the publishing sector in regard to accessibility; ii) management of all activities concerning the survey; iii) sending updates and information about the survey and the results.

### Legal Basis

The processing of personal data will be based, pursuant to Art. 6 of the GDPR, on the consent expressed by the data subject participating actively to the survey. The provision of data for these purposes is optional, the refusal does not imply any consequence.

### Processing Methods

The processing of personal data means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

As far as security is concerned, we inform you that the database is accessible only by personnel formally authorised to do so by the Controller, as well as the related operations described above, and that your data will be processed using methods and instruments suitable to guarantee its confidentiality and may be carried out by electronic or automated and non-automated means (paper files), both of which are provided with adequate security measures, as provided for by the GDPR, in order to prevent the loss of data, unlawful or incorrect use and unauthorised access.



## Privacy policy - 2/2

### Communication to Third Parties

Without prejudice to any communications to comply with legal obligations, the Controller will communicate the personal data provided by users with attention only to third parties selected for the support of the service requested, or for the performance of the purposes listed above, appropriately designated data processors, such as:

- Associazione Italiana Editori (AIE) and Ediser s.r.l. (AIE services company), for the management of the survey;
- external companies for the information system, website or databases and telecommunications networks;

Data may be shared by Fondazione LIA in anonymized and aggregated form with APACE partners and external organizations collaborating with the project.

### Transfer of Extra EU Data

Transfer of data outside the EU could be made, for technical and maintenance reasons, by means of the following guarantees, assured by the survey provider:

- Transfer of data to countries considered adequate by the EU Commission.
- Subscription of standard contractual clauses for the transfer of data outside the EU, as defined by the European Commission, in order to ensure a safe and lawful transfer and subsequent processing of data outside the EU.

### Data retention

We retain the data provided voluntarily by the person concerned for a period of time necessary in relation to the duration of the APACE project.

### Rights of the data subject

In accordance with the GDPR, the Data Subject is entitled to: the right to ask the Data Controller for access to personal data (art. 15), rectification (art. 16), cancellation (art. 17), limitation of the processing of personal data concerning him/her (art. 18), the right to portability of data (art. 20) or to object their processing (art. 21), in addition to the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the subject or which significantly affects him/her in the same way (art. 22).

Where the processing of personal data is based on the express consent given by the person concerned, pursuant to art. 7 paragraph 3 of the Regulation, the possibility of revoking the consent is recognized.

There is also the right to lodge a complaint with the relevant Supervisory Authority (art. 77 of the Regulation) should the users consider that the processing carried out by the Controllers does not comply with the provisions of the law on the protection of personal data. In Italy, the complaint may be submitted to the local Data Protection Authority.



More information on how to submit complaints is available on the website of the DPA, at [www.garanteprivacy.it](http://www.garanteprivacy.it)

Requests may be made to the Data Controller in the following ways:

- by writing to the following e-mail addresses: [privacy@fondazionelia.org](mailto:privacy@fondazionelia.org)
- by registered mail to the addresses: Fondazione LIA - Corso di Porta Romana, 108 - 20122 Milan (Italy).