



# Digital Accessibility Multi-year Plan 2024 – 2026

This plan might be updated without notice, the online version of this document is the only one that must be used:

- Date of the first release: 4/10/2024
- Date of the last update: 4/10/2024

## Introduction

This document describes Orange's commitment for the accessibility of all its digital services for its customers or employees which are used in France as required by the law n°2016 1321 from 10/7/2016 and known as the French Digital Republic Act and the decree n° 2019 768 from 7/24/2019.

As one of the main contributors of the digital transformation, Orange, with its strategic plan Lead the Future, keep on aiming to achieve a new enterprise model which enables the digital inclusion and empowerment of its users, employees, and the whole society.

The creation, the monitoring and the updates of this multi-year plan, and the yearly action plans that come with it, are under the responsibility of Ludivine De Lavison, Head of Sustainable Marketing and Accessibility of Orange Group.

Her goal is to ensure that the necessary actions for the digital accessibility are implemented, such as:

- The proper application of norms and good practices.
- The awareness raising and trainings of the employees.
- The monitoring of the application of the digital accessibility requirements
- Handling user requests

Broadly speaking, she is, together with her teams, the chief accessibility officer of Orange Group. She makes sure that the proper level of quality of service is provided to the end users with one or several disabilities.

# Organization of digital accessibility's consideration within the Orange Group

## Human and financial resources allocated to digital accessibility

The implementation of the digital accessibility policy by the entire Orange Group is carried out by the CSR (Corporate Social Responsibility) referents of each entity and executed with the contribution of an internal accessibility expertise center composed of a team of digital accessibility experts.

As part of new projects and upcoming redesigns, the consideration of digital accessibility will be part of the workload plans and of the purchase orders made to internal and external service providers.

## Training and awareness

The Orange Group offers its employees 25 training modules about digital accessibility, presented in person or remotely, to allow employees in various job roles (purchasers, developers, designers, marketing experts...etc.) who work with digital products or services to purchase, build, develop, design, or publish accessible contents. These modules are grouped as follows:

- General awareness during dedicated events (conferences or awareness weeks for instance) or communication to all Orange Group employees via email or accessible portals
- Training for ergonomists
- Training for web and mobile content designers or creators
- Training for web and mobile content developers
- Training for testers
- Training for all content writers depending on the tools used (mainly Microsoft Office tools and documents)
- Training to test accessibility using a screen reader

An online training course available in both French and English has also been developed with Atalan and 9 other partners. It deals with “The digital accessibility at all project's stages”.

These trainings are intended for everyone, especially for those involved in the creation, maintenance and use of digital contents: managers, purchasers, designers, developers, testers, editorial content writers, and communicators.

The content and the methods of these trainings are updated over time with the technology and tools used by the employees, but also with the legislation and accessibility standards.

Project teams also conduct testing campaigns to ensure a proper level of digital accessibility of the tools and services for all employees.

## Technical resources and internal expertise

To facilitate the consideration of accessibility requirements, Orange provides an open-source website « [a11y-guidelines.orange.com](https://a11y-guidelines.orange.com) » that details the international recommendations for the accessibility of digital contents. This website is constantly evolving and is opened to contributions and feedbacks from internet users.

Orange is an international company, present in 26 countries, and that explains why the technical reference used is the last version of the standard Web Content Accessibility Guidelines (WCAG, [www.w3.org/WAI/standards-guidelines/wcag/fr](https://www.w3.org/WAI/standards-guidelines/wcag/fr)).

However, the French standard “Référentiel Général d’Amélioration de l’Accessibilité” (RGAA, [accessibilite.numerique.gouv.fr/methode/introduction/](https://accessibilite.numerique.gouv.fr/methode/introduction/)) is also taken into account, as Orange provides a mapping table between those 2 standards here:

[Correspondance RGAA et WCAG - Recommandations accessibilité numérique Orange](#)

The Orange Group has also released a design reference base « [system.design.orange.com/](https://system.design.orange.com/) » for all types of digital content made within the company. One of the main goals of this tool is to ensure the accessibility of the common components of Orange’s websites and mobile applications.

The Orange Group has an internal dedicated competence center composed of digital accessibility auditors who supports the testing policy of the project teams and who helps the experts/auditors/ambassadors throughout the company.

The approach includes 3 types of tests:

- **Technical evaluation**, it involves inspecting codes and color contrasts using open-source tools (such as Axe, Wave, or Orange's va11ydette among others) in order to measure compliance with standards and best practices.
- **Functional evaluation**, it allows Orange to test the interface behavior with different assistive technologies. The tests are mainly conducted for 3 behaviors: screen reader usage, font enlargement and keyboard navigation.
- **User evaluation**, it checks the level of accessibility from an end user point of view. Users with disabilities, whose workstations (or mobile phones) are equipped with assistive technologies (screen magnifier, screen reader, alternative keyboard, braille display...etc.), perform tests based on a set of tasks to execute. These tests identify usability issues and provide their level of criticality. These tests are always done by accessibility experts. More detailed on the testing procedures are available on the website « <https://a11y-guidelines.orange.com/en/> » and are sorted according to the technology used (HTML, Android, iOS, Microsoft Office...etc.).

This team of experts also offers a dedicated support for each project (whether old or new) requesting it and provides an accessibility statement that can be consulted by the users of the services or products.

Each project must consider the necessary tasks needed to reach the maximum level of accessibility depending on its own constraints. However, it is required that each project improves its accessibility by solving the blocking points identified and by improving its compliancy rate before the next audit occurs, meaning after 3 years at the latest.

Finally, in France, Orange has created an autonomy program to ensure that digital technology is designed, provided and used in a more humane, inclusive and sustainable way: [Aide à l'autonomie avec Orange \(link available in French only\)](#)

## Ambitions of the Digital Accessibility Multi-Year Plan 2024-2026

The goals of Orange Group in France, at the end of the 3 years period of this plan, are as follows:

- 100% of the new websites or mobile applications will reach a compliance rate of 75% without any blocking point identified.
- 100% of the existing websites or mobile applications that will have been redesigned will reach a compliance rate of 75% without any blocking point identified. The projects will be prioritized according to the audience of the involved websites and mobile applications in order to impact as many users as possible.
- 100% of the websites and mobile applications will have an accessibility statement that will be less than 3 years old.

### Staffing

Every new employee follows digital accessibility trainings and has access to all the relevant trainings for their job.

### Consideration of accessibility in procurement and subcontracting procedures

Orange Group has established a standard model for including accessibility requirements in all requests for proposal, supplier selections processes and project specifications. These requirements are parts of the contracts made with Orange's suppliers.

### Management of user feedbacks

Users of Orange's websites and mobiles applications who want to report an issue can send an email to [accessibilite.france@orange.com](mailto:accessibilite.france@orange.com).

As the compliance work progresses, a contact method will be specified in each accessibility statement released for a website or mobile application in order to allow users with disabilities to report their difficulties.

Finally, there is a dedicated email address for Orange Group employees, which does not need to be specified here.

## Assessment of the previous action plans

They can be accessed on the same page as this multi-year plan on the orange.com website « [We promote digital inclusion and socio-economic development](#) » , here is the link to the previous document available in French only: [Plan d'actions de 2020 à Juin 2023](#).

A dedicated document for the 2023 action plan is currently being written and will be released by the end of the first semester of 2024.