Integrating AI Tools into

Accessible Product Design

Aligned with the European Accessibility Act

by John Walker

Definition of Disability

"People with disabilities include those who have long-term physical, mental, intellectual, or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis..."

CATEGORIES OF DISABILITIES







Auditory

Cognitive

Neurological







Physical

Speech

Visual





253 million

3.2% of people globally are affected by blindness and visual impairment

466 million

6% of people globally are affected by deafness and hearing loss

80%

Of disabilities are acquired between the ages of 18 and 64

LEVEL THE PLAYING FIELD

For 135 Million people in the EU with disabilities

HARMONIZE ACCESSIBITY LAWS

Across all EU member states

The Aim of the

European

Accessibility Act

APPLIES TO MOST BUSINESSES

E-books, e-readers, e-commerce, websites and mobile apps are all explicitly included

BASED ON WCAG 2.2

Minimum compliance of Web Content Accessibility Guidelines

84% CURRENT WEBSITES FAIL

Estimate of current compliance failure

ENFORCEMENT BEGINS 2025

Enacted in 2019

EAA 25 Business Objectives

The European Accessibility Act (EAA) 2025 aims to improve accessibility for a range of digital services and products, and has several objectives for businesses



Product
Accessibility &
Compliance



Service Accessibility



Cross Border
Compliance



Staff Training



Regular Audits



Reporting & Review



Personalized learning paths

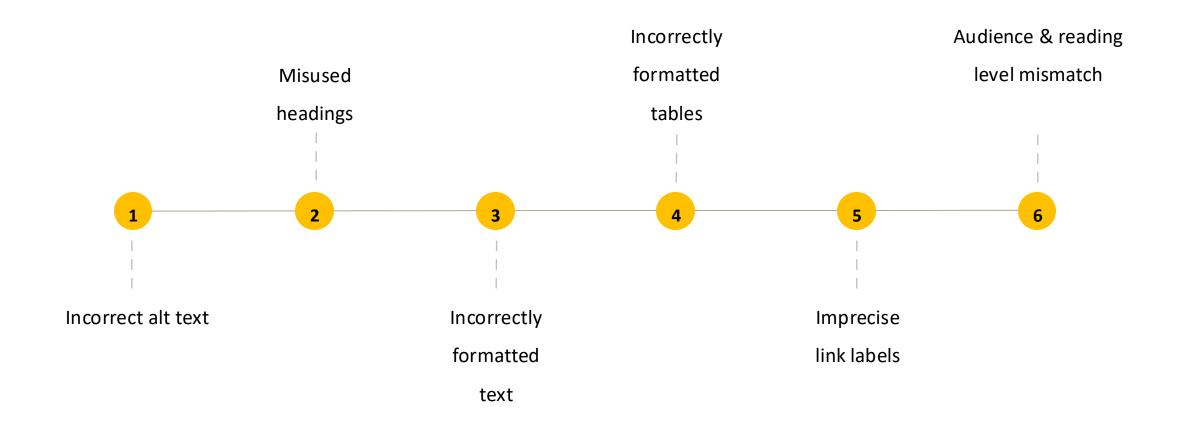


Empowers teachers

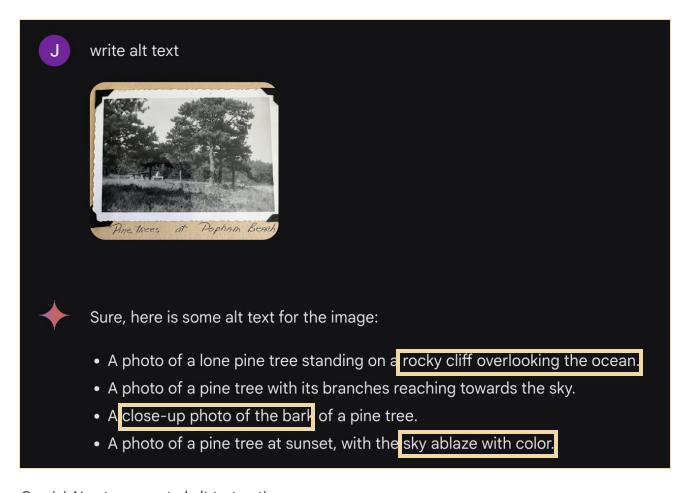
Al and
Accessibility



Al tools can sometimes identify textual issues



Al tools can generate alt text/captions



Al tools can generate alt text—but there can be problems

- But may refuse to caption images with people
- Their content can be incorrect
- Al's inability to understand context

Video captioning services also exist

But accuracy can vary from 17% to 48%

Gemini AI auto-generated alt text options

Al Scans

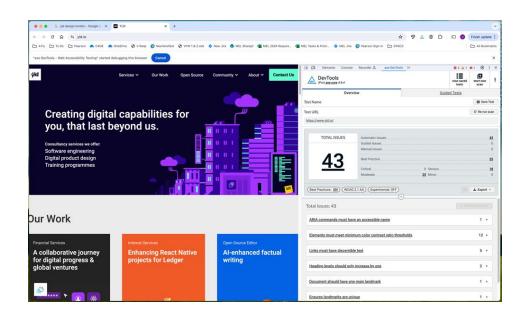
vs Human

Surveys

Al provides a baseline for assessing compliance, while manual human surveys are needed to find contextual issues

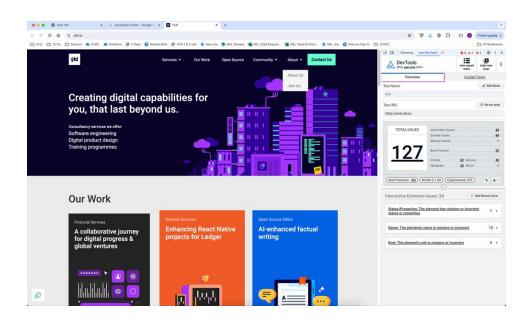
	Al	Humans
Evaluate	Quickly scan large sites	Evaluate content structure, presentation and comprehensibility
Identify	Identify basic, technical issues such as missing alt text	Log functional limitations via screen reader testing
Code	Document simple code violations	Identify misapplied (but technically correct) code
Plan		Parse WCAG guidelines and create prioritized remediation plan

Human surveys must supplement AI scans



AI Scan

Identified 43 issues



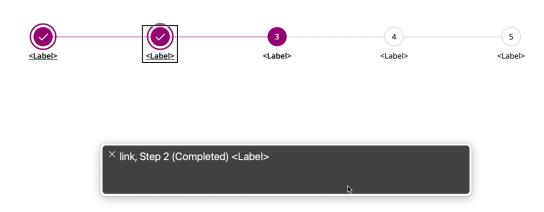
Human Survey + Al Scan

Identified 100+ issues

AccessibleInterfaces



Start with accessibility



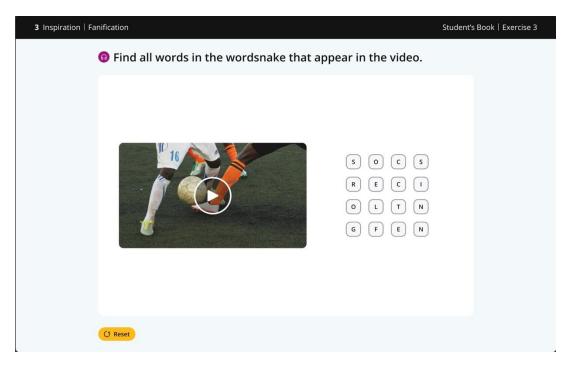
Embedding accessibility considerations into the product development lifecycle ultimately saves teams time, effort and money

All the components in Nemo, our new design system, are accessible and ready to use

Stepper Component

- Each step announced
- Additional screen reader-only content helps screen readers understand where they are in the process

Screens must be responsive

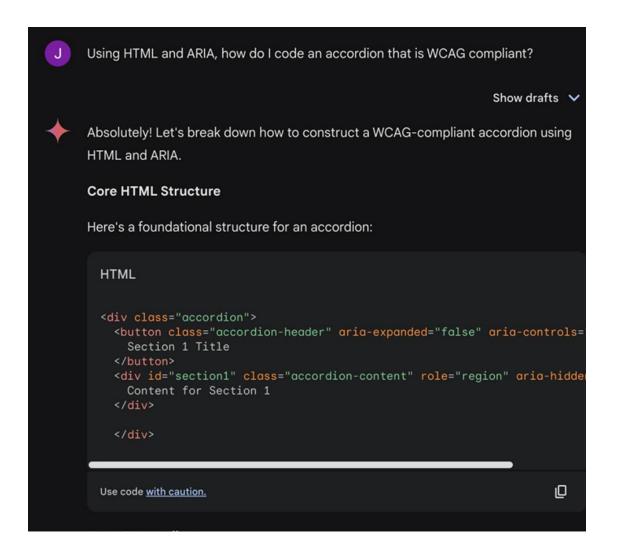




Create components that can be presented on any screen without reformatting

- This design stacks for mobile, but the game itself doesn't reformat
- Use a grid no bigger than 8x8 to ensure cognitive load isn't overwhelming

Al can *help* code components



Query: how to code a WCAG-compliant accordion

Gemini generated:

- **HTML tips** to create accessible components
- ARIA tips to make HTML components available to Javascript
- Javascript tips to dynamically transform and update the components in real time

Keep in mind

- Al tools can "hallucinate" and provide seemingly realistic made-up nonsense
- In our experience, Al's responses are partially or completely wrong about 30% of the time