

REPORT ON REGULATORY IMPACT ANALYSIS

Draft Royal Decree approving the basic conditions for cognitive accessibility.

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I. EXECUTIVE SUMMARY:

Ministry/proposing body	Ministry of Social Rights, Consumer Affairs and Agenda 2030	Date	18/09/2025
Title of the standard	DRAFT ROYAL DECREE GRANTING THE REGULATION OF THE BASIC CONDITIONS OF COGNITIVE ACCESIBILITY		
Type of report	<input checked="" type="checkbox"/> Normal abbreviated		
TIMELINESS OF THE PROPOSAL			
Situation being regulated	Establish and regulate basic cognitive accessibility conditions.		
Objectives pursued	<ul style="list-style-type: none"> - Complete the implementation of the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, as amended by Law 6/2022 of 31 March 2009 amending the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2015, in order to establish and regulate cognitive accessibility and its requirements and implementation conditions. Its second additional provision sets a deadline of three years from the entry into force of the law for the government to approve the specific regulation developing basic cognitive accessibility conditions. - Make effective the incorporation of cognitive accessibility into the concept of universal accessibility. This contributes to ensuring the right to equal opportunities and non-discrimination for persons with cognitive or mental disabilities as it facilitates understanding, communication and interaction for all. Cognitive accessibility is deployed through easy reading, alternative and augmentative communication systems, pictograms and other available human and technological means. 		
Main alternatives considered	There are no alternatives, as the legislator established a specific mandate to the government to enforce the law, which consists of the drafting of a regulation.		
CONTENT AND LEGAL ANALYSIS			

Type of regulation	Royal Decree. Basic standard.
Structure of the standard	<p>This Royal Decree consists of a single article, six additional provisions, one derogatory provision and six final provisions.</p> <p>The Sole Article adopts the basic cognitive accessibility conditions regulation.</p> <p>For its part, the first additional provision regulates the processing of information, the second additional provision concerns the tendering of public contracts, the third additional provision provides for an agreed catalogue of pictograms for signs, the fourth additional provision provides for the production of a report on the technical adaptation of airport and railway installations, the fifth additional provision updates the rules on the accreditation of the degree of disability in order to give effect to Article 4 (2) of the consolidated text of the General Law on the rights of persons with disabilities and their social inclusion, and the sixth additional provision refers to the financing of the measures envisaged.</p> <p>In direct relation to the fifth additional provision, the single repealing provision repeals Royal Decree 1414/2006 of 1 December 2014 determining the status of a person with disabilities for the purposes of Law 51/2003 of 2 December 2003 on equal opportunities, non-discrimination and universal accessibility for persons with disabilities.</p> <p>The first and second final provisions amend specific electoral rules. The first final provision amends Royal Decree 1612/2007 of 7 December 2007 regulating an accessible voting procedure that makes it easier for visually impaired persons to exercise the right to vote, with the aim of removing requirements for persons wishing to use this procedure. Furthermore, the second final provision amends Royal Decree 422/2011 of 25 March 2015 approving the Regulation on the basic conditions for the participation of persons with disabilities in political life and electoral processes, with the aim of expressly incorporating actions on cognitive accessibility, some of which have already been implemented by the Ministry of the Interior. The third final provision amends Order TMA/851/2021, of 23 July, implementing the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces, in order to bring it into line with the current rules and, more specifically, with Law 11/2023 of 8 May on the transposition of European Union Directives on the accessibility of certain products and services, migration of highly qualified persons, taxation and the digitalisation of notarial and registration activities; and amending Law 12/2011 of 27 May 2003 on civil liability for nuclear damage or damage caused by radioactive materials; the fourth final provision regulates the applicable title of competence, the fifth final provision contains the implementing</p>

	<p>and enforcement powers of this regulation and the sixth final provision the entry into force.</p> <p>The regulation consists of three chapters. Chapter I contains the general provisions, Chapter II regulates accessibility requirements in the different scopes and Chapter III concerns positive action measures and other complementary support. These chapters are rolled out over 21 articles.</p>
<p>Public consultation (Article 26 (2) of Law 50/1997)</p>	<p>In accordance with Article 133 of Law 39/2015 of 1 October on the Common Administrative Procedure of Public Administrations and Article 26 (2) of Government Law 50/1997 of 27 November, prior to the preparation of the draft Royal Decree in question, the mandatory public consultation was convened in order to obtain the opinion of citizens, organisations and associations.</p> <p>The previous public consultation was open from 15 to 29 February 2024, with a total of 17 contributions received.</p>
<p>Reports collected or to be collected (Article 26 (5) of Law 50/1997)</p>	<p>Report from the Technical Secretariat-General of the Ministry of Social Rights, Consumer Affairs and the 2030 Agenda, in accordance with the fourth paragraph of Article 26.5 of Law 50/1997 of 27 November (pending).</p> <p>— Prior approval by the Minister for Digital Transformation and the Civil Service, pursuant to the fifth paragraph of Article 26.5 of Law 50/1997 of 27 November (pending).</p> <p>Report from the Office for Coordination and Regulatory Quality, in accordance with Article 26 (9) of Law 50/1997 of 27 November (pending).</p> <p>— Report on the sixth paragraph of Article 26 (5) of Law 50/1997 of 27 November on the Ministry of Territorial Policy and Democratic Memory (signed on 11 December 2024).</p> <p>— Also, in accordance with the first paragraph of Article 26 (5) of Law 50/1997 of 27 November, the reports of the following ministries:</p> <ul style="list-style-type: none"> Ministry of the Presidency, Justice and Relations with Parliament (signed on 4 March 2025). Ministry of Defence (pending). Ministry of Finance (signed on 10 February 2025). Ministry of Interior (signed on 2 April 2025). Ministry of Transport and Sustainable Mobility (signed on 15 January 2025). Ministry of Education, Vocational Training and Sport (pending). Ministry of Labour and Social Economy (pending). Ministry of Industry and Tourism (signed on 12 December 2024). Ministry of Culture (pending). Ministry of Economy, Trade and Enterprise (received with signature on 17 January 2025).

	<p>Ministry of Health (signed on 28 November 2024).</p> <p>Ministry of Science, Innovation and Universities (signed on 5 December 2024).</p> <p>Ministry of Digital Transformation and the Civil Service (signed on 12 June 2025).</p> <p>Ministry of Housing and Urban Agenda (signed on 18 December 2024).</p> <p>Ministry of Youth and Children (received with signature on 14 January 2025).</p> <p>Report from the Autonomous Communities and Cities of Ceuta and Melilla via the Territorial Council for Social Services and the System for Autonomy and Care for Dependency (signed on 23 April 2025).</p> <p>— Report of the Spanish Federation of Municipalities and Provinces (FEMP) (received on 28 November 2024).</p> <p>— Report of the State Council of Non-Governmental Social Action Organisations (signed on 3 December 2024).</p> <p>Report of the National Disability Council (signed on 12 December 2024).</p> <p>Report of the Spanish Data Protection Agency (signed on 13 December 2024).</p> <p>Report of the Comisión Nacional del Mercado y la Competencia (National Commission for the Market and Competition) (signed on 20 December 2024).</p> <p>— Report of the Consumer and User Council (signed on 2 November 2024).</p> <p>— Opinion of the Economic and Social Council, in accordance with Article 7 (1.1) (a) of Law 21/1991 of 17 June establishing the Economic and Social Council (pending).</p> <p>Opinion of the Council of State, as provided for in Article 22 (3) of Organic Law 3/1980 of 22 April on the Council of State (pending).</p> <p>— The consultation of the State Council of Older Persons, the State Commission for Coordination and Monitoring of Disability Grading Assessment and the Advisory Committee of the System for Autonomy and Care for Dependency was initially raised. However, since its members were represented in other collegiate bodies which have already issued a report, that request was ultimately rejected.</p> <p>— In the opinion of the Technical Secretariat-General of the Ministry of Social Rights, Consumer Affairs and Agenda 2030, this standard is subject to the procedure laid down in Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services and to the provisions of Royal Decree 1337/1999 of 31 July regulating the provision of information in the field of technical standards and regulations and regulations on Information Society services.</p>
<p>Public hearing and public information procedures (Article 26 (6) of Law</p>	<p>The draft royal decree was submitted between 20 November and 12 December 2024 to a hearing and public information on the Ministry's internet portal, in order to obtain any additional input from other</p>

50/1997)	persons or organisations. The comments received and their assessments are set out in the annex to this report.	
IMPACT ANALYSIS		
Alignment with the order of competence	The draft Royal Decree is issued pursuant to Article 149 (1.1) (a) of the Spanish Constitution, which confers on the State exclusive competence to regulate the basic conditions guaranteeing equality for all Spaniards in the exercise of their rights and in the fulfilment of constitutional obligations.	
Economic and budgetary impact	Effects on the wider economy	<p>From the point of view of the economic impact, it should be noted that this rule will have positive effects for people with disabilities and also for businesses.</p> <p>The costs arising from the approval of this Royal Decree should be considered as an investment since it will also increase the public who can access the goods and services in question.</p>
	As regards competition	<p><input type="checkbox"/> The rule does not have significant effects on competition.</p> <p><input checked="" type="checkbox"/> The rule has positive effects on competition.</p> <p><input type="checkbox"/> The regulation has negative effects on competition.</p>
	In terms of the administrative burden	This regulation does not entail any additional administrative burden.

	<p>As regards budgets, the regulation</p>	<p>It <input type="checkbox"/> involves an expense.</p> <p><input checked="" type="checkbox"/> Implies income.</p> <p>Has <input type="checkbox"/> no effect on budgets</p> <p><input checked="" type="checkbox"/> Concerning the budget of the State Administration.</p> <p><input checked="" type="checkbox"/> Affecting the budgets of other territorial administrations.</p> <p>The general government shall be charged to the budget for the financial year in question. However, the revenue received from the application of the infringement and penalties regime provided for in the TRLGD and other resources provided for in the legislation may finance any improvements in accessibility to public services of a state nature.</p>
<p>Impact on gender issues</p>	<p>The impact of the regulation on gender issues is</p>	<p>Negative <input type="checkbox"/></p> <p>Null <input type="checkbox"/></p> <p>Positive <input checked="" type="checkbox"/></p>
<p>Other impacts considered</p>	<p>Positive impact on childhood, adolescence and family.</p> <p>Positive and relevant impact on equal opportunities, non-discrimination and universal accessibility for persons with disabilities.</p> <p>Positive social impact.</p> <p>No environmental impact.</p> <p>No climate change impact.</p>	

II. TIMELINESS OF THE PROPOSAL

1. Motivation

a) Reasons for the proposal

The reasons for this draft royal decree are regulatory in nature.

Firstly, the proposal derives directly from the requirement in the wording of Law 6/2022 of 31 March 2022 amending the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2015 (hereinafter 'TRLGD'), which, in its second additional provision, provides for a period of three years from the entry into force of the law for the Government to approve the specific regulation implementing the basic cognitive accessibility conditions. This regulatory text meets the basic conditions applicable throughout the national territory whose competition and enforcement are considered essential to guarantee the rights of persons with intellectual disabilities and mental health disorders, as well as other groups (people with cognitive impairment, foreign or elderly) and their families.

The above follows from the application, in our legal system, of the International Convention on the Rights of Persons with Disabilities, so this Royal Decree can be considered to consolidate the process of legislative adaptation of the Spanish legal system to the aforementioned Convention, which began with Law 26/2011 of 1 August 2011 adapting legislation to the International Convention on the Rights of Persons with Disabilities and Royal Decree 1276/2001 of 17 September 2001 adapting legislation to the International Convention on the Rights of Persons with Disabilities. Universal accessibility is presented in this international treaty as a general principle, in Article 3, as an obligation on States in Article 4 and as a right in Article 9 and interacts with each of the other rights recognised throughout its enacting terms.

b) Public interest and affected communities

In accordance with Article 1, the direct beneficiaries of this regulation shall be all persons and, in particular, persons with cognitive difficulties.

The Survey on Disability, Personal Autonomy and Dependency Situations (EDAD 2020) estimates that the number of people aged six and over with a disability was 4.32 million in 2020, an increase of 14.0 % compared to the previous survey carried out in 2008. Therefore, approximately 9.1 % of the population resident in Spain when the survey was carried out (47.4 million according to the municipal register review on 1 January 2020). Of these more than 4 million, around 950 thousand people express

communication constraints, around 700 thousand say they have a learning disability and just over 600 thousand experience difficulties in their interpersonal relationships. These groups of people could, a priori, benefit from the adoption of a regulation such as the present one, so its impact would be positive for more than 2.26 million people.

In addition, people with some functional limitations, such as foreigners – because they do not know about it – or older people will also benefit from the rule.

On the other hand, persons whose skills are temporarily impaired by different situations or circumstances (e.g. those who have suffered a disease or accident and are in the process of being recovered) should be added to the above numbers.

For businesses, improving the accessibility of publicly available products and services is an important business opportunity, and can generate net benefits for developers who know to realise the large potential demand.

c) Justification of the opportunity

There is a growing demand for accessible areas. The number of people with disabilities is expected to increase in the coming years, making it imperative to create an environment in which products and services are more accessible, so as to promote the inclusion and autonomy of those who make use of them.

2. Objectives

The aim of the draft royal decree is 'to establish and regulate cognitive accessibility and its requirements and implementation, in order to contribute to the exercise of the rights and duties of citizens, and to ensure equal opportunities and non-discrimination for all persons and, in particular, those with cognitive difficulties'.

According to Article 29a (1) of the TRLGD, '[t]he basic cognitive accessibility conditions are the systematic, comprehensive and consistent set of requirements, requirements, standards, parameters and guidelines that are deemed necessary to ensure the understanding, communication and interaction of all people with all environments, products, goods and services, as well as of processes and procedures'.

The conditions of cognitive accessibility must be applied, in the terms set out in the regulation, in the areas referred to in Article 5 TRLGD, in accordance with Article 29a(2) of the same recast, as they are necessary 'to promote human development and the maximum individual autonomy of all persons'. These concern the following areas:

- Telecommunications and the information society.
- Urbanised public spaces, infrastructure and buildings.

- Transport.
- Goods and services available to the public.
- Relations with public administrations, including access to public benefits and their administrative decisions.
- Administration of justice.
- Participation in public life and electoral processes.
- Cultural heritage, in accordance with historical heritage legislation, always with the aim of reconciling the values of heritage protection and access, enjoyment and enjoyment by persons with disabilities.
- Employment.

In short, this regulation complements, for years with the specific features of cognitive accessibility, those aspects of universal accessibility that are already provided for in the legal order for years.

3. Alignment with the principles of good regulation

The legislative text is in line with the principles of good regulation laid down in Article 129 of Law 39/2015 of 1 October 2015 on the Common Administrative Procedure of Public Administrations (BOE of 2 October), namely the principles of necessity, effectiveness, proportionality, legal certainty, transparency and efficiency.

The principle of necessity is thus met, since the legislation responds to the need to comply with a legal mandate given to the Government to approve a regulation, by means of a royal decree, which develops the basic conditions for cognitive accessibility, in accordance with Article 29a of the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2015, as amended by Law 6/2022 of 31 March 2003.

It is effective as regulating cognitive accessibility involves implementing policies and measures that promote understandable and accessible environments, products and services for all, regardless of their cognitive abilities.

The Royal Decree also complies with the principle of proportionality since it regulates the aspects that are essential and necessary to serve the aims pursued.

As regards the principle of legal certainty, the legislation clearly sets out the limits to be applied and the consistency of the draft legislation with the rest of the national legal order has been ensured, especially since it supplements other conditions of universal accessibility which, at the time, did not address cognitive accessibility, which was forgotten for years.

In addition, it complies with the principle of transparency since its preparation has involved a wide participation of the sectors concerned, clearly identifies its purpose and provides a full explanation of its content. In addition, prior public consultation has been carried out during its processing and both the hearing and the public information procedure will be carried out.

Finally, with regard to the principle of efficiency, since the savings made by the standard are significantly higher than the burdens imposed and rationalised in the management of public resources.

4. Alternatives

The Ministry of Social Rights, Consumer Affairs and the 2030 Agenda¹ is responsible for 'proposing and implementing the Government's policy on social rights and social welfare, family and diversity, social cohesion, care for people with disabilities or dependants, as well as the protection of animal rights and welfare'.

There are no alternatives to the proposal precisely because it responds to the mandate set out in the second additional provision of Law 6/2022 of 31 March 2003, which grants the Government a period of three years from its entry into force to establish and regulate cognitive accessibility and its requirements and implementation conditions.

5. Annual Regulatory Plan

This Royal Decree is provided for in the 2025 Annual Regulatory Plan.

III. CONTENT, LEGAL ANALYSIS AND DESCRIPTION OF THE PROCEDURE

1. Content

a) Structure

The draft royal decree is structured in an explanatory part, a single article, six additional provisions, one derogatory provision and six final provisions. The Sole Article

¹ Royal Decree 209/2024 of 27 February, implementing the basic organisational structure of the Ministry of Social Rights, Consumer Affairs and the 2030 Agenda.

approves the basic cognitive accessibility conditions regulation, quadrate of three chapters. Chapter I contains the general provisions, Chapter II regulates accessibility requirements in the different scopes and Chapter III concerns positive action measures and other complementary support. These chapters are rolled out over 21 articles.

The first additional provision regulates the processing of information, the second additional provision concerns the tendering of public contracts, the third additional provision provides for an agreed catalogue of pictograms and other visual supports, the fourth additional provision provides for the production of a report on the technical adaptation of airport and railway installations, the fifth additional provision updates the rules on the accreditation of the degree of disability, the specification of which, in accordance with Article 4 (2) of the consolidated text of the General Law on the rights of persons with disabilities and their social inclusion, and the sixth additional provision refers to the financing of the measures envisaged.

In direct relation to the fifth additional provision, the single repealing provision repeals Royal Decree 1414/2006 of 1 December 2014 determining the status of a person with disabilities for the purposes of Law 51/2003 of 2 December 2003 on equal opportunities, non-discrimination and universal accessibility for persons with disabilities.

The first and second final provisions amend specific electoral rules. The first final provision amends Royal Decree 1612/2007 of 7 December 2007 regulating an accessible voting procedure that makes it easier for visually impaired persons to exercise the right to vote, with the aim of removing requirements for persons wishing to use this procedure. Furthermore, the second final provision amends Royal Decree 422/2011 of 25 March 2015 approving the Regulation on the basic conditions for the participation of persons with disabilities in political life and electoral processes, with the aim of expressly incorporating actions on cognitive accessibility, some of which have already been implemented by the Ministry of the Interior. The third final provision amends Order TMA/851/2021, of 23 July, implementing the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces, in order to bring it into line with the current rules and, more specifically, with Law 11/2023 of 8 May on the transposition of European Union Directives on the accessibility of certain products and services, migration of highly qualified persons, taxation and the digitalisation of notarial and registration activities; and amending Law 12/2011 of 27 May 2003 on civil liability for nuclear damage or damage caused by radioactive materials; the fourth final provision regulates the

applicable title of competence, the fifth final provision contains the implementing and enforcement powers of this regulation and the sixth final provision the entry into force. The sole article of the regulation is divided into three chapters:

Chapter I, 'General provisions', defines in its six articles the scope in which the conditions set out throughout the text of the project will apply and sets out the general measures on information and communication on cognitive accessibility. It adds the penalty regime applicable as a guarantee of compliance with the content of the Royal Decree.

Chapter II, 'Specific rules applicable', regulates, over nine articles, the cognitive accessibility conditions in the areas referred to in Article 5 TRLGD, in accordance with Article 29a(2) of the TRLGD.

Chapter III, 'Promoting cognitive accessibility', sets out in six articles the positive action measures and other complementary support to help implement measures aimed at improving cognitive accessibility, such as the establishment of public aid, information campaigns and research in the field, among others.

The first additional provision, 'Processing of information', provides that the actions carried out under this Royal Decree must comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 96/46/EC (General Data Protection Regulation) and Organic Law 3/2018 of 5 December on the protection of personal data and the guarantee of digital rights, and its implementing legislation.

The second additional provision, 'Tender for public contracts', calls on public administrations to ensure the quality of cognitive accessibility in public procurement procedures.

The third additional provision, 'Catalogue of pictograms for cognitive accessibility signage and glossary', calls for the creation of a technical and specialised working group with the aim of analysing, within three years of publication of the regulation, a reference document containing existing pictograms for signs with the aim of establishing a reference document as preferential in accordance with the existing legislation, so that they can be used in the areas covered by this regulation.

The fourth additional provision, 'Adaptation of infrastructure and means of transport', gives a period of two years to draw up a report on the cognitive accessibility of airport

and railway facilities, paying particular attention to facilities in terms of physical, signalling and easy reading and guidance, and including concrete recommendations for improvement.

The fifth additional provision, 'Accreditation of the recognition of the degree of disability referred to in Article 4 (2) of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion', responds to the mandate introduced by the second paragraph of Article 4 (3) of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion. It provides that regulations shall determine how situations equivalent to degrees of disability equal to or greater than 33 per cent for the purposes recognised by the standard are to be demonstrated.

The sixth additional provision, 'Financing of the measures envisaged', provides that the regulation does not entail any increase in appropriations or salaries, staff costs or any other appropriations for the public sector. Their obligations shall be implemented in accordance with existing budgetary resources and the financing instruments for the accessibility measures provided for in the legislation.

The sole derogating provision, 'Repeal of Royal Decree 1414/2006 of 1 December 2015 determining the status of a person with disabilities for the purposes of Law 51/2003 of 2 December 2003 on equal opportunities, non-discrimination and universal accessibility for persons with disabilities', repeals the rule that, until now, regulating the accreditation referred to in the previous sixth additional provision, which had been disupdated and required simplified wording.

The first final provision, 'Amendment to Royal Decree 1612/2007 of 7 December 2007 regulating an accessible voting procedure that makes it easier for visually impaired persons to exercise the right to vote', brings its wording into line with the recent reform of Article 49 of the Constitution, extending the rights of visually impaired persons.

The second final provision, Amendment to Royal Decree 422/2011 of 25 March 2015 approving the Regulation on the basic conditions for the participation of persons with disabilities in political life and electoral processes, with the aim of expressly incorporating actions on cognitive accessibility, some of which have already been implemented by the Ministry of the Interior.

The third final provision amends Order TMA/851/2021, of 23 July, implementing the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces. It resolves a lack of consistency between the requirements laid down in the aforementioned Order and Law 11/2023, of

8 May, transposing European Union Directives on the accessibility of certain products and services, migration of highly qualified persons, taxation and the digitalisation of notarial and registration activities; and amending Law No 12/2011 of 27 May 2011 on civil liability for nuclear damage or damage caused by radioactive materials.

The fourth final provision 'Title of competency' regulates the title of competence of the draft Royal Decree, which is issued in accordance with Article 149 (1.1) (a) of the Spanish Constitution, which confers on the State exclusive competence to regulate the basic conditions guaranteeing equality for all Spaniards in the exercise of rights and the fulfilment of constitutional obligations.

The fifth final provision, 'Financing of the measures envisaged', empowers the head of the Ministry with powers in relation to disability to adopt the rules for implementing and implementing the provisions of this Royal Decree.

The sixth final provision, 'Entry into force', provides for the entry into force of the rule on 2 January 2027.

2. Legal analysis

a) Background

Following the explanatory memorandum to Law 6/2022 of 31 March, the International Convention on the Rights of Persons with Disabilities, adopted on 13 December 2006 by the General Assembly of the United Nations (UN), ratified by Spain on 3 December 2007 and which entered into force on 3 May 2008, states in Article 9 that it is 'the obligation of States Parties to take appropriate measures to ensure access for persons with disabilities on an equal basis with others... to information and communications, including information and communications technology and systems'. These measures shall apply, inter alia, to "equipping buildings and other facilities open to the public with signposting in easy-to-read and easily understandable formats". It also lays down 'an obligation to promote other appropriate forms of assistance and support to persons with disabilities in order to ensure their access to information'.

Furthermore, "information and communication should be available in easy-to-read formats and augmentative and alternative modes and methods for persons with disabilities [...]".

Furthermore, the UN Committee on the Rights of Persons with Disabilities, in its concluding observations on Spain's combined second and third periodic reports of 9

April 2019 on compliance with the International Convention on the Rights of Persons with Disabilities, draws attention to the need for 'the State Party to take all necessary legislative and budgetary measures to ensure accessibility in all areas and throughout the country, including private spaces open to the public and public buildings and services, such as transport, information and communication'. The Committee also recommends that spaces open to the public should be provided with signage and information in easy-to-read format and have the necessary services to facilitate the accessibility of buildings and public services, in particular for all persons with intellectual disabilities.

Spain has had legislation relating to universal accessibility since 2003, under Law 51/2003 of 2 December on equal opportunities, non-discrimination and universal accessibility for persons with disabilities (LIONDAU, hereinafter 'LIONDAU'), which is then subsumed and integrated together with other legal orders (Law 13/1982 of 7 April and Law 49/2007 of 26 December) into the TRLGD. However, despite the time that has elapsed since the adoption of LIONDAU, people with difficulties in understanding and communication still face cognitively inaccessible environments on a daily basis characterised by the presence of technical and environmental barriers, barriers in an environment under the full control of society.

Existing legislation is not sufficiently explicit as cognitive accessibility has not been considered in practice when developing and implementing actions related to universal accessibility. It is therefore clear that there is a regulatory deficit on cognitive accessibility that needs to be remedied by making legal amendments that give a legislative status to this unwaivable dimension of universal accessibility. This deficit was covered by Law 6/2022 of 31 March 2003, which is now supplemented by the establishment of basic cognitive accessibility conditions.

b) Constitutionality of the rule. Relationship with higher-ranking standards.

Article 14 of the Spanish Constitution recognises equality before the law for all Spaniards, without any discrimination on grounds of birth, race, sex, religion, opinion or any other personal or social condition or circumstance. It is for the public authorities to promote the conditions for real and effective freedom and equality of the individual and groups in which they are integrated, by removing obstacles that prevent or hinder their full enjoyment and by facilitating the participation of all citizens in political, economic, cultural and social life (Article 9 (2)). Persons with disabilities are a group of so-called vulnerable people, who have historically encountered many obstacles to exercising their basic rights, to participate in society and to develop personally. Among these, the

difficulties faced by people with diminished cognitive abilities are even greater, making it urgent to address regulation to ensure everyone's understanding, communication and interaction with environments, products, goods and services, processes and procedures.

This has also been the spirit of the recent reform of Article 49 of the Constitution, which requires public authorities to promote "policies ensuring full personal autonomy and social inclusion of persons with disabilities, in universally accessible environments".

Furthermore, Article 10 of the Constitution states that the foundations of political order and social peace, the dignity of the person, the inviolable rights attached to it, the free development of personality, respect for the law and the rights of others. It also recognises that the rules on fundamental rights and freedoms contained in the Magna Charter will be interpreted in accordance with the Universal Declaration of Human Rights and the international treaties and agreements on the same matters ratified by Spain. They will therefore also be interpreted in accordance with the provisions of the Convention on the Rights of Persons with Disabilities.

c) Consistency with the rest of the legal order.

This Royal Decree not only complies with the mandate imposed by the second additional provision of Law 6/2022 of 31 March 2003, but also supplements the legislative acquis on universal accessibility, expressly determining the conditions which, in addition to those relating to physical and sensory accessibility, allow persons with cognitive difficulties to make use of the services referred to in the scope of the TRLGD, on an equal basis with the others.

This regulation thus complements and makes the scenario already identified by, inter alia, the following rules truly accessible to all:

- Royal Decree 314/2006, of 17 March, approving the Technical Building Code, and Order TMA/851/2021 of 23 July 2014, implementing the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces.
- Royal Decree 366/2007 of 16 March 2015 establishing the conditions of accessibility and non-discrimination of persons with disabilities in their relations with the General State Administration.
- Royal Decree 505/2007 of 20 April 2007 approving the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of urbanised public spaces and buildings.

- Royal Decree 1494/2007 of 12 November 2015 approving the Regulation on the basic conditions for access of persons with disabilities to technologies, products and services related to the information society and social media.
- Royal Decree 1544/2007 of 23 November 2011 regulating the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities.
- Royal Decree 1112/2018 of 7 September 2018 on the accessibility of the websites and mobile applications of public sector bodies.
- Royal Decree 193/2023 of 21 March 2009 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public.

In short, this draft royal decree regulates the basic conditions of cognitive accessibility, but in turn ensures consistency and coherence between existing legislation in this area, without there being any need to expressly repeal any legislation.

d) Relationship with international and Community standards.

As stated above, the draft royal decree complies with the provisions and measures contained in the International Convention on the Rights of Persons with Disabilities, which has been part of our legal system since its entry into force on 3 May 2008. In particular, Article 9 requires States Parties to ‘take appropriate measures to ensure access to information and communications, including information and communication technologies and systems, for persons with disabilities on an equal basis with others’. These measures shall apply, inter alia, to “equipping buildings and other facilities open to the public with signposting in easy-to-read and easily understandable formats”. It also lays down ‘an obligation to promote other appropriate forms of assistance and support to persons with disabilities in order to ensure their access to information’. Furthermore, “information and communication should be available in easy-to-read formats and augmentative and alternative modes and methods for persons with disabilities [...]”.

As regards the compatibility of the project with European Union law, although the Royal Decree aims to ‘establish and regulate cognitive accessibility’, which is not the mobility of persons with a disability, certain circumstances may affect both cognitive accessibility and mobility, or may make mobility dependent on it (blind, deaf, age-related illnesses, etc.), since, in so far as a person has cognitive difficulties, he or she may have them to navigate and mobilise within a given environment.

Under the above consideration, some of the provisions of the draft royal decree might be incompatible with European Union law on denied boarding in air transport, in accordance with:

- Regulation (EC) No 261/2004 of the European Parliament and of the Council of 11 February 2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights, and repealing Regulation (EEC) No 295/91, and in particular the definition of 'denied boarding' in Article 2(j) thereof;
- Regulation (EC) No 1107/2006 of the European Parliament and of the Council of 5 July 2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air, in particular with the exceptions to the prohibition of denied boarding for persons with disabilities set out in Article 4 thereof.

The draft legislation would be incompatible with the aforementioned European Union legislation in so far as the draft legislation contains a regulation which, without excluding its application to air transport in the fields already covered by those regulations, did not correspond to the provisions of the aforementioned European Union rules and which govern the same situation.

Regulation (EC) No 261/2004 of the European Parliament and of the Council provides for the rights of air passengers in the event of denied boarding. Article 2 of that regulation defines denied boarding as follows:

“(j) denied boarding means a refusal to carry passengers on a flight, despite presenting themselves for boarding under the conditions laid down in Article 3(2), unless there are reasonable grounds to deny boarding, such as health or safety reasons or inadequate travel documents;”

In line with this provision, air carriers may deny boarding of disabled persons on the basis of access limitations established on the basis of operational needs, in particular taking into account the capacity of the means of transport and the safety of the operation.

Furthermore, Regulation (EC) No 1107/2006 of the European Parliament and of the Council provides for disabled persons and persons with reduced mobility (Article 2(a)), applying to persons using or intending to use commercial passenger flights departing from, arriving at or transiting through airports situated in the territory of a Member State to which the Treaty applies (Article 1(2)). This Regulation lays down a general

prohibition on denied boarding (Article 3), but air carriers may do so in the following cases:

“Article 4 derogations, special conditions and information

1. Notwithstanding the provisions of Article 3, an air carrier or its agent or a tour operator may refuse, on the grounds of disability or of reduced mobility, to accept a reservation from or to embark a disabled person or a person with reduced mobility:

(a) for the purpose of complying with safety requirements established by international, Community or national law, or in order to comply with safety requirements established by the authority that issued the air operator certificate to the air carrier concerned;

(b) if the dimensions of the aircraft or its doors make it physically impossible to embark or transport the disabled person or person with reduced mobility.

In the event of refusal to accept a reservation on the grounds referred to in points (a) or (b) of the first subparagraph, the air carrier, its agent or tour operator shall make reasonable efforts to propose an acceptable alternative to the person concerned (...).”

In addition, Regulation (EC) No 1107/2006 of the European Parliament and of the Council provides for the provision of assistance by air carriers without additional charge (Article 10), as set out in Annex II to that regulation.

The transport of persons with cognitive difficulties by air is therefore understood to be possible provided that it does not fall within one of the abovementioned exceptions in Article 4 which would justify denied boarding (security requirements, physical impossibility of boarding or transport).

Therefore, Article 9 (3) establishes the exceptional nature of this type of transport and the application of obligations where it is compatible with the relevant EU legislation.

e) Entry into force

With regard to the entry into force, this is delayed to 2027, thus giving reasonable time for the actors obliged by the standard to make the necessary adaptations to comply with it.

3. Description of the processing

The draft Royal Decree was drawn up by the Directorate-General for the Rights of Persons with Disabilities² of the Ministry of Social Rights, Consumer Affairs and Agenda 2030, which, by virtue of Royal Decree 209/2024 of 27 February, implementing the basic organisational structure of the Ministry of Social Rights, Consumer Affairs and Agenda 2030, is the department of the General State Administration responsible for proposing and implementing the Government's policy on care for people with disabilities.

To this end, work has been carried out jointly with the advisory centre on cognitive accessibility of the Royal Disability Trustee, an autonomous body also attached to the Ministry of Social Rights, Consumer Affairs and Agenda 2030.

a) Preliminary public consultation

In accordance with Articles 133 of Law 39/2015 of 1 October 26.2 and Article of Law 50/1997 of 27 November on the Government, a public consultation was held prior to the preparation of the draft royal decree in question in order to gather the views of the most representative bodies and organisations potentially affected by the future law.

The prior public consultation procedure³ took place between 15 and 29 February 2024. A total of 17 contributions were received from the organisations listed below:

1. PARTNERSHIP FOR EASY UNDERSTANDING OF ENVIRONMENTS AND BUILDINGS: To set out the basic principles of autonomous deambulation. Identify the key components of the architectural design and their relationships. This contribution has been taken into account in the article on urbanised public spaces.
2. NATIONAL DISABILITY COUNCIL. Through this body, the following contributions have been made:
 - The regulation itself must be accessible and will not lead to confusion. An attempt has been made to use simple, but legal, language. In any case, the text will have an easy-to-read version.
 - The Regulation should make clear the cross-cutting nature of cognitive accessibility. It must live together and complement the technical support and criteria already provided for and regulated in other aspects – relating to physical and sensory capabilities – in order to

² Royal Decree 209/2024 of 27 February, implementing the basic organisational structure of the Ministry of Social Rights, Consumer Affairs and the 2030 Agenda.

³ https://www.mdsocialesa2030.gob.es/servicio-a-la-ciudadania/proyectos-normativos/documentos/RD_Accesibilidad-cognitiva_Consulta-Publica-Previa.pdf

ensure universal accessibility. This perspective has been taken into account in the wording of the text.

— The regulation should incorporate mandatory compliance with existing legislation and technical standards and should take them into account in the solutions. It should also point out the need to promote the development of standards that are engaged in and agreed upon by groups directly involved in cognitive accessibility, in relation to issues that are not yet standardised. The standard refers to UNE standards and, as a development of the TRLGD, its principles include civil dialogue.

— The regulation should refer to the need for cognitive accessibility support to be developed and implemented by professional agents and involving persons with intellectual disabilities in the process of validation and evaluation of measures. To this end, the professionalisation of the different figures involved in the easy-to-read process and other cognitive accessibility tools will be advanced through the creation of specific and standardised training. The proposed wording includes training and promoting codes of conduct and good practice as a priority. Furthermore, as a development of the TRLGD, it has civil dialogue among its principles, as it cannot be otherwise.

— This regulation will apply in all areas in existing legislation on universal accessibility, as well as in sectors affecting people's daily lives: public services, transport, urban spaces, communications, employment, education, participation, information and communication technologies, etc. The draft royal decree complies with the legal mandate. Thus, Article 29a(2) provides that cognitive accessibility conditions are to be applied in the areas referred to in Article 5 TRLGD, as they are necessary 'to promote human development and the maximum individual autonomy of all persons'.

— Consider the incorporation of the easy-to-read alternative mandatory for all communications from public administrations. And there is no easy reading than the one that meets the existing standard, including validation by experts with cognitive disabilities. Clear language should always be used in such communications and should be obliged to incorporate easy reading. It is very important not to confuse the two terms: clear language and easy to read. This contribution has been taken into account.

— The regulation should indicate the type of pictograms to be used and the standards they must meet to ensure that they are understandable to the widest possible group of people. This contribution has been taken into account. In addition, an agreed catalogue of symbols, signs and pictograms is envisaged.

3. ASPACE: an inclusive opportunity not only for this million persons with disabilities, but also for older people or migrants who, due to different living circumstances, may be affected by any of the areas involved in the interactive process with the environment. And for which making a world understandable and communicable means a genuine democratic improvement.

In this regard, and in accordance with the objective scope of Law 15/2022 of 12 July, which is integral to equal treatment and non-discrimination, cognitive accessibility should be deployed in:

(a) Employment, employed and self-employed, including access, working conditions, including pay and dismissal, career advancement and training for employment.

(b) Access, promotion, working conditions and training in public employment.

(c) Parenthood and participation in political, trade union, business, professional and social or economic interest organisations.

(D) Education.

(e) Health.

(f) Transport.

(g) Culture.

(h) Citizen safety.

(I) Administration of Justice.

(j) Social protection, social benefits and social services.

(K) Access, supply and supply of goods and services available to the public, including housing, which are offered outside the scope of private and family life.

(L) Access to and stay in establishments or spaces open to the public, as well as the use of and stay on public roads.

(m) Advertising, media and information society services.

(N) Internet, social networks and mobile applications.

) Sports activities

(o) Artificial intelligence and mass data management, as well as other areas of similar significance.

In particular, it is necessary to safeguard the three pillars of the social and democratic rule of law. In other words, Education, Health and Justice.

In addition, in the emergency and citizen security services. In particular on 016, 112 and 091. To this end, these means must implement logistical adaptation systems that enable victims with CAAs to request assistance in the face of violence, discrimination or vital risk.

The logistical adaptation of emergency and citizen security services to the communication needs of more than 655.000 people with disabilities would inevitably lead to non-regulatory public development policies.

The comments have been taken into account. With regard to the scope, we would reiterate the previous point on Article 29a (2). It should not be forgotten that this regulation complements existing rules. However, cognitive accessibility is already present in the most recent legislation on universal accessibility and, in particular, in Law 11/2023 of 8 May on the transposition of European Union Directives on the accessibility of certain products and services, the migration of highly qualified persons, taxation and the digitalisation of notarial and registration procedures; and amending Law 12/2011 of 27 May 2003 on civil liability for nuclear damage or damage caused by radioactive materials; and Royal Decree 193/2023 of 21 March 2009 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public.

4. FEDERACIÓN AUTISMO CASTILLA-LA MANCHA. Objective of the standard: Develop basic cognitive accessibility conditions.

Adding: the regulation of their application, deadlines and penalties for non-compliance. Both comments have been taken into account.

5. AUTISM SPAIN. Although significant progress has been made in implementing measures that promote universal accessibility and overcome physical and sensory barriers to environments, knowledge and implementation of cognitive accessibility measures is still limited. It should be ensured that resources and support are accessible, contribute to the reduction of barriers to understanding and ensure access to services, goods and products for people in the autism spectrum.

They set out measures to promote cognitive accessibility, as well as requirements for the procedural facilitator and access to justice for persons with autism. The comments have been taken into account.

6. CEAPAT-IMSERSO. (1) text proposed for introductory section, e.g. in General provisions: The reference to cognitive accessibility in the relationship

between a person and his or her environment means not only taking into account aspects such as signposting in a space or the suitability of the design of technological products, but also making it essential to take account of relationships between people.

(2) text proposed for section on terms and definitions: the proposed definitions of: Cognitive skills and cognitive disability. It is important to include in the regulation a definition of augmentative and alternative communication in order to align its regulation with the definition laid down. The proposed definitions of: Augmentative and Alternative Communication, Code for Augmentative and Alternative Communication and Supporting Product for Augmentative and Alternative Communication. Incorporate basic accessibility conditions that make it easier for people to navigate in the different environments of participation and in all the stays and spaces within them. The proposed definitions of: Accessible Signalling and Design for Use and Guidance in Spaces

(3) text proposed for the section (s) setting out ways of applying cognitive accessibility tools in the areas covered by Law 6/2022. Again, they stress that attention should be paid to the Augmentative and Alternative Communication, the adaptation to the Facil Reading of the information presented on the websites of public administrations, including documents on services and resources offered.

(4) proposed text for section addressing awareness and training

It is considered essential to include in the Regulation references to awareness-raising and training measures in all areas covered by Law 6/2022.

Most of the comments submitted have been taken into account.

7. CEDD. There is no need for any comments.

8. GENERAL COUNCIL OF LOGOS COLLEGES. Consider that the implementing regulation on basic cognitive accessibility conditions should set out these conditions in detail, building on the amendment made to the concept of universal accessibility in its convergence with the principles of the Convention on the Rights of Persons with Disabilities (CRPD), with a view to an inclusive, inclusive, participatory and respectful approach to diversity of skills.

This means that it should cover all persons with disabilities, whether or not they have an administrative recognition thereof, and regardless of the type of disability and the difficulties they encounter.

In accordance with the definition of universal accessibility, the basic cognitive accessibility conditions should ensure that their objective of effectiveness and deployment through the Facil Reading, alternative and augmentative

communication systems, pictograms and other human and technological means available for that purpose is met, assuming universal design and without excluding reasonable accommodation.

The implementing regulation on basic cognitive accessibility conditions should aim to address, in different Titles, each of the instruments enabling cognitive accessibility to be deployed and effective.

Therefore, at least the following should be considered:

1. Minimum cognitive accessibility conditions in Facil Reading
2. Minimum cognitive accessibility conditions in augmentative communication – Alternative: websites and digital services should be accessible so that they can interact with their media.

The General Council of Colegios de Logopedas considers that minimum accessibility conditions should be included in all areas of application of Law 6/2022 in the above aspects.

The contributions made have been taken into account.

9. CERMI. The beneficiaries of cognitive accessibility are diverse and cover different groups. Some of the most prominent groups of beneficiaries include:

- (1) persons with disabilities Cognitiva
- 2) people with low level of literacy
- (3) older people
- 4) people in Estrés or Crisis Situations
- (5) families and caretakers
- (6) public professionals and servicers.

Most of the groups identified are included in the text of the draft.

10. EDACE. They propose a series of measures to ensure cognitive accessibility for people with acquired brain damage:

- Signalling measures
- Measures for the physical organisation of spaces
- Support measures for social communication
- Modification of environmental conditions
- Adaptation of written texts.
- Accessible design of Information and Communication Technologies

Consultation bodies. We would ask to include a section providing for the creation of a Commission as a body for support, advice and necessary interventions to include social reference bodies for people with disabilities, as has been done in other reference legislation, such as in Article 7 (3) of Law

7/2021 of 2 June, reforming civil and procedural legislation to support people with disabilities in exercising their legal capacity.

Have the validation of persons with cognitive alterations. The Cognitive Accessibility systems proposed in the standard must be tested and validated before they are implemented.

Most comments have been taken into account. The CEACOG, as a focal point, is considered to be more effective than setting up a Commission.

11. ICAM. 1. The report published together with the prior public consultation notice specifically states that all the basic conditions that are intended to be regulated in the draft regulation 'must be of a minimum character, with the Autonomous Communities and local authorities being able to establish additional or more demanding ones within their sphere of competence'. Although the empowerment of the Autonomous Communities and local authorities to raise the level of intensity of these basic conditions is a positive aspect, it is essential that this does not prevent the draft regulation from containing a regulation that is sufficiently detailed and which clearly reflects the basic conditions of accessibility and the way in which they must be guaranteed, so that the absence of specific action by the Autonomous Communities or local authorities does not create a risk of lack of protection, especially given the State competence assumed through Article 149.1.1 (a) of the Spanish Constitution.

2. In the light of the above, it might be appropriate to:

— That any legislative initiative drawn up in accordance with the draft regulation be informed in advance by the Spanish Cognitive Accessibility Centre.

— The draft regulation specifically provides for mechanisms for coordination, cooperation and consultation between all the competent territorial administrations.

3. Apart from the basic conditions that are generally laid down for each of the areas set out in Article 5 of the recast text, it is necessary for the draft Regulation to expressly provide for a regulation with special provisions for older persons, bearing in mind that their cognitive accessibility difficulties may result in specific circumstances different from those of other persons.

4. It is essential that the draft regulation specifically provides for the participation of associations representing older people in the adoption of decisions or in the preparation of regulatory initiatives under it.

5. Positive action and public support mechanisms should be put in place to contribute to the objectives of the draft Regulation. Also the obligation for public administrations to promote awareness-raising campaigns, training actions, etc.

6. The competent public administrations should promote the adoption of technical standards, certifications and attestations of compliance with the basic cognitive accessibility conditions in which the specialised association sector may be involved.

7. In addition to the Spanish Cognitive Accessibility Centre, the State Centre for Personal Autonomy and Technical Aid of the Institute of Elderly and Social Services should be designated as advisory centres within the General State Administration.

8. In line with other recently approved regulatory standards in the field of accessibility and non-discrimination, it would be advisable to specifically provide that public administrations will promote the inclusion of social considerations related to basic cognitive accessibility conditions in contract documents, thus also involving the private sector.

9. It should be expressly provided that, in the event of an apparent conflict between the rules contained in the draft regulation and other rules of the same rank, the most favourable to the rights and interests of individuals must prevail.

10. The draft Regulation should establish mechanisms for monitoring and monitoring compliance. In this respect, the government's obligation to draw up compliance reports (with the support of the advisory centres) could be envisaged as well as their periodicity, which should not exceed one year.

11. In compliance with the second final provision of Law 6/2022 and after the deadline laid down therein, the opportunity could be taken to incorporate the amendment to Royal Decree 946/2001 of 3 August approving the Statute of the Royal Disability Trustee, in order to regulate in that provision the powers, structure, tasks and functioning of the Spanish Cognitive Accessibility Centre.

It is noted that universal accessibility is accessible to all, regardless of whether or not their limitations are linked to an accredited disability. That is the philosophy of the text here that the elderly are also a group expressly referred to in the legislation. However, and without prejudice to the cooperation that may be provided by CEAPAT, CEACOG is established as an advisory centre since its activity targets all persons who have needs related to a potential loss of cognitive abilities, whatever the cause.

12. ELEVEN. He reiterated ICAM's comments and added that cognitive accessibility is closely linked to the use of the Braille literacy system, which is an essential means of communicating blind and deaf-blind people and for their access to information and knowledge. It is therefore a factor of utmost importance for inclusion from this perspective. It might therefore be appropriate

that the proper use of Braille and the functioning of the Spanish Braille Commission within the ONCE should also be regulated in the standard for the exercise of the functions of research, promotion, dissemination, protection and good use of the Braille system in its capacity as the highest technical authority in the matter. This could also include precise regulatory amendments. The text takes into account that the information should always be provided by several means. However, it has not been considered to include the proposal on Braille, which will be regulated in other rules (in particular the accessible labelling legislation in preparation).

13. Full Spanish INCLUSION a) Accessibility. The Regulation should be clear and accessible for everyone to comply with it. It will not lead to confusion and integrate a timetable with clear deadlines.

(b) Transversality. The Regulation should make clear the mainstreaming of Cognitive Accessibility. It should coexist and complement support for other types of access, in order to ensure universal accessibility.

(c) Terminology. The regulation should include a specific paragraph concerning the definitions of at least the following terms, which are important for the application of the standard: • Understandable• Evaluator/evaluator• Validator/validator• Adaptor/adaptor• Facil• Guidance• Deliverables• Secuence• Use• Validation. • Cognitive accessibility assessment. • Pictograms. • Universal design. • People with difficulties in understanding, including: people with intellectual and developmental disabilities, people with mental health problems, people with cognitive impairment, migrants who do not know the language, people with low levels of literacy, etc. This includes others already defined by other laws, for example: reasonable accommodation, usability, etc.

(D) Standard. The regulation should record existing standards and that solutions should take into account (easy to read, branding, signage, pictograms and universal accessibility) and identify the need to promote the development of standards that are engaged and agreed by the groups directly involved in cognitive accessibility, on issues that are not yet standardised.

(e) Professionalism in the process. It should refer to the need for Cognitive Accessibility Support to be developed and implemented by trained, experienced and employed professional actors. These teams, in addition to having cognitive accessibility professionals, should unquestionably include the participation of persons with intellectual disabilities in the process of validation and evaluation of measures. These persons must be employed. The administration will also advance the professionalisation of the different figures involved in the easy-to-

read process and other cognitive accessibility tools through the creation of specific and standardised training.

(f) Areas of application to be taken into account: This Regulation shall apply in all the areas set out in the aforementioned Law 6/2022 of 31 March 2003, as well as in sectors affecting people's daily life, including but not limited to public services, transport, urban spaces, communications, employment, education, participation, information and communication technologies, etc.

(g) Easy reading: all documents produced in easy reading are drawn up in accordance with the relevant standardised and existing rules, and the validation phase carried out by persons with intellectual and developmental disabilities or other difficulties in understanding and expertise in this field is essential.

(l) Maintaining cognitive accessibility is important to maintain cognitive accessibility over time, the regulation should include the maintenance of solutions and their updating.

(j) Pictograms. Where reference is made to the use of pictograms, it shall be clear which type of pictograms are to be used and the standards they have to comply with, ensure standardised use and are understandable by the widest possible group of persons.

(K) Training. Training on cognitive accessibility should be included in all areas. This training shall be carried out on a regular basis by professionals with knowledge and experience in the field.

(L) Time. Highlight the need for agility in processes, so that people with difficulties of understanding can see their rights fulfilled. Diagnosis, actions (depending on the most commonly used uses, most in demand, etc.), priority, control and maintenance measures and maximum review period.

(m) New Technologies: the patterns of Cognitive Accessibility in digital environments should be clear and adhered to.

(P) Criteria. The regulation should include quantitative and qualitative criteria. Because of cognitive accessibility characteristics, the criterion will often not be a measure or a number. The regulation should lay down criteria which cannot be waived and must be incorporated immediately. It shall also establish other criteria allowing for a longer period of time for their implementation.

(P) Financial resources. Public administrations must guarantee the financial resources necessary for the implementation of the cognitive accessibility measures laid down in the Regulation.

Most of the proposals moved have been taken into account.

14. FULL INCLUSION OF ARAGON. (1) set up public cognitive accessibility offices in the different Autonomous Communities that centralise improvements on cognitive accessibility, with professional management of persons with and without disabilities with prior experience in the field.

(2) standardise the criteria, skills and competences of cognitive accessibility experts with and without disabilities or other characteristics, in conjunction with public employment and training services.

3) comply, on the basis of the official definition of Cognitive Accessibility in Law 6/2022 of 31 March amending the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November, in order to establish and regulate cognitive accessibility and its requirements and application conditions (Definition: 'the characteristic of environments, processes, activities, goods, products, services, objects or instruments, tools and devices that enable easy to understand and communicate'), the different tools available to make environments, communities and societies more cognitively accessible, which are:

a. Facil reading: Adapting understandable public documentation, with more relevance being that addressed to groups that may have greater difficulties in reading in various cross-cutting areas such as health, participation, social services, etc.; Implement the premises developed by 'Standard UNE 153101: 2018, easy-to-read EX'. Guidelines and recommendations for the production of documents'; Create a repository of accessible documentation from each Autonomous Community administration available to the public (physical and web).

b. Communication support pictography: Encourage the use of communication support pictograms in public care spaces; Promote the work of the SAAC Aragonese portal (ARASAAC) to develop more materials in this regard.

c. Pictography and signage: Creation of a State bank of basic pictograms for the signposting of environments, services, spaces and uses common to the whole territory in order to improve spatial orientation in these areas, in accordance with the existing regulations and with the social and business fabric for their development.

D. Web spaces: Deepen the web browsing needs of groups with difficulties in understanding and cognitive that go beyond those referenced by the W3C; Implement systems such as text transcription buttons to LF, identical web iconography at state level in public spaces for similar tasks, appearance,

removal of distractor elements or development of softwares that improve cognitive accessibility on these sites, etc.

e. Awareness of needs: Training for staff serving the public, communication, project development or with specific training (such as architects, graphic designers, etc.) to promote universal, cognitively responsible designs.

(4) obligation to validate any action to improve cognitive accessibility by groups who consider themselves 'with reading difficulties or cognitive problems'.

Most of the comments submitted have been taken into account, always respecting the distribution of competences between the State and the Autonomous Communities.

15. ELDERLY AND PENSIONER PLATFORM. He reiterated the contributions of ONCE.

16. Confederación SALUD MENTAL España a) The problems that the initiative intends to solve. We consider that it should be based on the concept of cognitive accessibility agreed by the State CERMI cognitive accessibility subcommittee, which refers to the characteristic of environments, processes, activities, goods, products, services, objects or instruments, tools and devices that enable easy understanding and communication. While it is true that, in principle, the target population of the measures in this regard is those with cognitive problems that make it difficult or impossible for them to understand the environment, consideration must also be given to the benefit to other social groups that, for various reasons, may be affected by their understanding, whether or not they have a disability, and thus to make effective decision-making difficult. Cognitive accessibility can therefore benefit society at large, especially vulnerable groups such as many people with psychosocial disabilities and older people, migrants or even others who may also be affected by their ability to understand, such as tourists or travellers who do not know the language.

They claim the importance of promoting:

— The use and enjoyment of environments, goods, products and services autonomously.

— The widespread use of easy reading and plain language ensuring genuine universalisation of accessibility for all persons with cognitive limitations.

— The special adaptation required by certain environments, such as socio-health environments, to ensure cognitive accessibility, focusing on the use of reduction of sensory stimuli (sirens and lights for example) or with the support of

uses of visual supports that can be supported when access to plain language is lacking.

— Training for people working in socio-health resources, law enforcement agencies or the like related to cognitive accessibility. For all these reasons, the public authorities must design and implement specific planned actions aimed at achieving individual and structural changes that remove barriers that hinder or impede accessibility for persons with disabilities, regardless of the type of disability, in order to remove obstacles to the effective exercise of their rights and everything that does not promote respect for their autonomy, will and preferences.

Most of the contributions carried forward have been taken into account. However, it should be recalled that, in the field of services, Royal Decree 193/2023 of 21 March 2007 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public, which addresses accessibility from a perspective which, as cannot be otherwise, also includes cognitive ones, is also applicable.

17. TRANSMEDIA CATALONIA (UNIVERSITAT AUTONOMA DE BARCELONA). • We consider that the Facil Reading should be governed by Spanish standard UNE 153101: 2018 EX (or the one which may replace it), drawn up by consensus, and should be present in all areas of application of Law 6/2022.

- We call for a broad view of the Facil Reading that takes into account not only the written text but also the oral and audio-visual text.

- We propose to include the obligation to provide written information in an alternative audio format, which benefits not only people with reading difficulties but also those who cannot see the written text.

- We call for a universal vision of accessibility where clear communication is the default version in any information or communication with the public administration and the Facil Reading (more simplified version than clear communication) is a support for people with difficulties of understanding.

- We consider that the difficulties in understanding may be due to cognitive disability but also to other reasons, so we understand that the recipients of the Facil Reading have multiple profiles, not only people with cognitive disabilities.

The comments made have been taken into account.

b) Hearing and public information procedures

The draft royal decree was submitted between 20 November and 12 December 2024 to a hearing and public information on the Ministry's internet portal, in order to obtain any additional input from other persons or organisations.

Contributions and their assessments are incorporated at the end of this document (Annex I).

c) Consultations with the Autonomous Communities

In general, Articles 3.1 (k) and 144.1 (f) of Law 40/2015 of 1 October on the Legal Regime for the Public Sector provide for consultation of the Autonomous Communities on proposals or actions affecting their competences.

In any event, the Autonomous Communities have had the opportunity to know and express their views on this draft royal decree in the Regional Council for Social Services and the System for Autonomy and Care for the Dependency, the comments of which are included in the Annex to this report.

During the process, progress was also made in the processing of the text at the meetings of the Delegated Committee on Disability, a body set up under the aegis of the Territorial Council.

d) Mandatory and optional reports within the General State Administration

Prior to the hearing and public information, a report was requested from the State Legal Service at the Ministry of Social Rights, Consumer Affairs and Agenda 2030. That report was issued on 19 September 2024.

The following reports will be collected in the procedure for drawing up and processing this legislative proposal:

- Report from the Technical Secretariat-General of the Ministry of Social Rights, Consumer Affairs and the 2030 Agenda, in accordance with the fourth paragraph of Article 26.5 of Law 50/1997 of 27 November (pending).
- Prior approval by the Minister for Digital Transformation and the Civil Service, pursuant to the fifth paragraph of Article 26.5 of Law 50/1997 of 27 November (pending).
- Report from the Office for Coordination and Regulatory Quality, in accordance with Article 26 (9) of Law 50/1997 of 27 November (pending).
- Report on the sixth paragraph of Article 26 (5) of Law 50/1997 of 27 November on the Ministry of Territorial Policy and Democratic Memory (signed on 11 December 2024).
- In addition, in accordance with the first paragraph of Article 26 (5) of Law 50/1997 of 27 November, the reports of the following ministries:

- o Ministry of the Presidency, Justice and Relations with Parliament (signed on 4 March 2025).
 - o Ministry of Defence (pending).
 - o Ministry of Finance (signed on 10 February 2025).
 - o Ministry of Interior (signed on 2 April 2025).
 - o Ministry of Transport and Sustainable Mobility (signed on 15 January 2025).
 - o Ministry of Education, Vocational Training and Sport (pending).
 - o Ministry of Labour and Social Economy (pending).
 - o Ministry of Industry and Tourism (signed on 12 December 2024).
 - o Ministry of Culture (pending).
 - o Ministry of Economy, Trade and Enterprise (received with signature on 17 January 2025).
 - o Ministry of Health (signed on 28 November 2024).
 - o Ministry of Science, Innovation and Universities (signed on 5 December 2024).
 - o Ministry of Digital Transformation and the Civil Service (signed on 12 June 2025).
 - o Ministry of Housing and Urban Agenda (signed on 18 December 2024).
 - o Ministry of Youth and Children (received with signature on 14 January 2025).
- Report from the Autonomous Communities and Cities of Ceuta and Melilla via the Territorial Council for Social Services and the System for Autonomy and Care for Dependency (signed on 23 April 2025).
 - Report from the Spanish Federation of Municipalities and Provinces (FEMP) (received on 28 November 2024).
 - Report of the State Council of Non-Governmental Social Action Organisations. (received with signature on 3 December 2024).
 - Report of the National Disability Council (signed on 12 December 2024).
 - Report of the Spanish Data Protection Agency (signed on 13 December 2024).
 - Report of the National Commission for the Market and Competition (signed on 20 December 2024).
 - Report of the Consumer and User Council (signed on 2 November 2024).

- Opinion of the Economic and Social Council, in accordance with Article 7 (1.1) (a) of Law 21/1991 of 17 June establishing the Economic and Social Council (pending).
- Opinion of the Council of State, as provided for in Article 22 (3) of Organic Law 3/1980 of 22 April on the Council of State (pending).
- The consultation was initially launched with the State Council of Older Persons, the State Commission for Coordination and Monitoring of Disability Grading Assessment and the Advisory Committee of the System for Autonomy and Care for Dependency. However, since its members were represented in other collegiate bodies which have already issued a report, that request was ultimately rejected.
- In the opinion of the Technical Secretariat-General of the Ministry of Social Rights, Consumer Affairs and Agenda 2030, the standard is subject to the procedure laid down in Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services and to the provisions of Royal Decree 1337/1999 of 31 July regulating the provision of information in the field of technical standards and regulations and regulations on Information Society services.

IV. IMPACT ANALYSIS

1. General considerations

In accordance with Article 29a(2) of the TRLGD, the draft royal decree approving the basic conditions of cognitive accessibility lays down in Article 2 (1) its scope: '1. This Regulation shall have effect throughout Spain in the areas referred to in Article 5 of Royal Legislative Decree 1/2013 of 29 November 2015 approving the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion'. Thus, the areas covered by the project are as follows:

- Telecommunications and the information society.
- Urbanised public spaces, infrastructure and buildings.
- Transport.
- Goods and services available to the public.
- Relations with public administrations, including access to public benefits and their administrative decisions.
- Administration of justice.
- Participation in public life and electoral processes.

— Cultural heritage, in accordance with historical heritage legislation, always with the aim of reconciling the values of heritage protection and access, enjoyment and enjoyment by persons with disabilities.

— Employment.

However, it should be borne in mind that these areas already contain their own regulation of universal accessibility, which in turn includes cognitive accessibility. What this regulation provides is precisely the detail of cognitive accessibility conditions, as this is an area historically displaced by other shortcomings, which, in terms of accessibility measures, have been given greater attention, such as physical and sensory (visual and auditory).

In short, the impacts that will be considered will only be those that result from the adoption of this Royal Decree.

2. Compliance of the rule with the order of distribution of competences

The draft royal decree is in line with the order of distribution of competences, since it is issued on the basis of the State's competence to regulate the basic conditions guaranteeing equality for all Spaniards in the exercise of rights and in the fulfilment of constitutional obligations, in accordance with Article 149 (1). 1a of the Spanish Constitution.

3. Economic and competition impact

In accordance with the content of the draft Royal Decree, the economic impact of the draft Royal Decree is limited to the actions set out below.

As regards the application of the principles of Article 4 (2) to websites, applications, content, documents and forms in the field of telecommunications and the information society, we can refer to the data contained in the MAIN of Royal Decree 193/2023 of 21 March, which calculated the adaptation of websites to the criteria of universal accessibility at an average of EUR 1 000. It should be noted that the part of the design relating to symbols and pictograms may not entail additional costs if recourse is made to the agreed catalogue provided for in this draft royal decree.

According to the CNAE catalogue, there are currently 15.132 companies under code J061 Telecommunications. Of these, 11.702 belong to code 619 (Other telecommunications activities), 2.782 to code 611 (cable telecommunications), 553 to code 612 (wireless telecommunications) and 95 to code 613 (satellite telecommunications). We have to consider that only the latter 3 groups offer services to end-users and would therefore have to adapt their communications. We can therefore

charge EUR 3.43 million for the adaptation of websites or similar. The amount is very likely to be overestimated because many telecom companies will simultaneously be in the 3 codes by offering several services simultaneously. It should be recalled that, according to data from the CNMC's Sectoral Economic Report for Telecommunications and Audiovisual, the turnover of companies in the telecommunications and audiovisual services sector in Spain reached EUR 34.774 million in 2022, so that the cost of adapting to the cognitive accessibility requirements laid down in the Royal Decree would be marginal.

In the field of public transport, cognitive accessibility measures must be implemented on journeys and vehicles and the necessary measures shall be implemented to ensure access and travel for the accompanying or supporting person. The adaptation of information on journeys and vehicles is understood to have a marginal cost. With regard to the fact that the accompanying person is free of charge, we must consider that, according to the State Data Base for Persons with Disabilities, as of 31 December 2023, there are 795.019 people whose disability is based on limitations relating to the nervous system or mental function, and 294.328 persons whose disability is intellectual or developmental. There would therefore potentially be around 1.1 million people who might need to be accompanied by a supporting person for their movements.

For its part, the adaptation of the basic information on goods and services is considered marginal as these are items (trade name or name, full name and address of the operator, nature, composition and purpose, quality, quantity, category or usual or commercial name, date of production or supply and batch, etc.) which are already presented in that format and considering that many products are already obliged to be cognitively accessible by labelling regulations.

Cognitively adapted information and documentation in relation to health goods and services and health promotion and protection, the prevention of occupational risks and action and emergency protocols or the exercise of professional duties in cases where an intellectual or mental disability of more than 33 per cent is proven, should weigh up the cost to be translated into easy reading – which could be minimised by applying the principles contained in the applicable UNE standard – or the cost of training staff providing such information. In the latter case, the CEACOG offers free training – from its operating budget – so the cost could be zero for state services. The translation into accessible format of documents has also been considered, in order to provide them in a format different from that of the document. The MAIN of Royal Decree 193/2023 of

21 March estimated the cost of adapting documents to make them accessible with screen readers at EUR 0,10 per document.

For these cases, as the volume of documents to be adapted is unknown, it is not possible to provide an overall figure on the total cost.

It should be borne in mind that some measures do not entail additional costs for private operators. This is the case with the adaptation of information on products covered by Royal Decree XX/XXXX of XX of XXXX regulating the accessible labelling of consumer products, which were already obliged to provide such information in plain language, the guarantee of the possibility of lodging a complaint sheet for non-compliance with cognitive accessibility.

Finally, it should be noted that the availability and diversity of accessible services in the areas affected by the Royal Decree will lead to an increase in competition between the operators concerned, which will lead to greater choice for end-users.

4. Impact on the budget

With regard to the specific budgetary impact of the Royal Decree, it should be borne in mind that much of the legislation on accessibility has already been developed prior to this process.

However, budgetary availability is expected to address the following issues related to cognitive accessibility under the already approved items. This is the case for investment in accessibility of transport infrastructure, which, in addition to physical and sensory accessibility, will have to make investments – comparatively much lower by nature in terms of cost but significant impact – in terms of cognitive accessibility, so as to facilitate the use of facilities, favouring spatial orientation.

It is estimated that there are just over 7.400 SIA formalities in the General State Administration, the easy-to-read version of which becomes necessary. If we estimate the easy-to-read translation of each of them at around EUR 100, the adaptation cost will not exceed 800.000 for all active AGE procedures. With regard to public sector websites, they are already required to meet the accessibility requirements in accordance with Royal Decree 1112/2018 of 7 September on the accessibility of public sector websites and mobile applications. However, it should be noted that this estimate could be oversized considering that Artificial Intelligence tools (<https://www.ceacog.es/que-hacemos/aplicacion-para-adaptar-textos-a-lectura-facil/>) are already available for this purpose.

Furthermore, the measures provided for in this Royal Decree may be financed, in whole or in part, by the State Programme for the Promotion of Universal Accessibility

within the General State Administration, provided for in the preliminary draft law amending the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2007 and Law 39/2006 of 14 December 2006 on the promotion of personal autonomy and care for people in a situation of dependency, in order to extend and strengthen the rights of persons with disabilities to inclusion, autonomy and universal accessibility in accordance with Article 49 of the Spanish Constitution. As stated in the draft legislation: this programme will “fully or partially fund initiatives aimed at mainstreaming universal accessibility in public environments and services that ensure the inclusion and exercise of the rights and freedoms of persons with disabilities. Actions to improve accessibility financed through the programme shall include those to be developed by public administrations in order to comply with national legislation.’

For its part, the Ministry for Digital Transformation and the Civil Service, which is already incorporating artificial intelligence projects, through its budget, should address the development of algorithmic chat tools to guide the completion of procedures. In addition, such technology could be used in a multitude of procedures, thus generating significant returns of scale that would improve the efficiency of the tasks carried out by the above-mentioned Secretariat-General.

With regard to the cost of intermediation of a support person in face-to-face procedures, this can be implemented by means of appropriate training measures for public employees. The training, within the scope of the AGE, would be carried out by the CEACOG from its operating budget, without any additional expenditure being required. Such training may also be provided to the INAP and the various departments when it comes to adapting public job notices to easy reading and producing cognitively accessible tests and examinations.

Election boards and political parties, through their public funding, shall ensure equality for electors with cognitive accessibility needs. In doing so, they should apply the principles of easy reading to their communications and electoral programmes, ballot papers and guides and voting documentation. The CEACOG could be responsible both for drawing up voting guides and for training those who, in polling stations, facilitate voting for voters with cognitive limitations that require it, and, as regards standard-setting procedures, for training public employees in order to carry out this process in plain language and in an alternative format to writing.

As regards access to cultural spaces, they are already required to be accessible by Royal Decree 193/2023 of 21 March 2007.

Information, awareness and training activities should be carried out from the budget of the various ministerial departments.

At this point, the introduction of cognitive accessibility tools in court proceedings does not entail any additional costs as this is already covered by the actions of the Justice 2030 initiative, which incorporates a number of projects on accessibility to justice, among which projects include a specific focus on accessible language. This project aims, without abandoning technical rigour, to ensure a better understanding of legal language by citizens. Building on the digital development of procedural management systems and the application of artificial intelligence, improvements will be incorporated that will ensure accessible language. Objectives include:

- Clear language in documents, communications and forms that the administration of justice sends to citizens. Many of these documents are models attached to the court file that are generated by default.
- Adapt legal terms to current language usage by reviewing archaism.
- The use of language respectful of citizens, professionals and other actors involved in judicial proceedings.

This will be done through the Committee on the Modernisation of Legal Languages in cooperation with institutions such as the Royal Spanish Academy (RAE).

In addition, the Justice 2030 initiative incorporates another project dedicated to vulnerable groups. It will cover two areas:

- Accessibility and ageing. Almost 20 % of the Spanish population is over 65 years old. There is an important part that can be considered as analogue. The deep and rapid digitalisation that will take place in the justice administration can lead to a process of exclusion of culturally analogue persons. Structural instruments need to be put in place to overcome this digital divide. On the other hand, justice has been an area with little accessibility for older people who tend to go to it, even if they need it. In the same vein, institutional mediations and tailored procedures should be put in place to facilitate their use. The Office for Justice in Municipalities is an instrument that will incorporate part of the actions of this project and a simple and permanent accessibility gateway for older people.
- Accessibility and disability. To ensure access to justice, actions will be developed for groups with physical, intellectual or sensory disabilities. 1 % of the Spanish population have an intellectual disability and these percentages are reflected in the judiciary. According to a recent study carried out by Plena Inclusion of 49 % of persons with intellectual disabilities who arrived in prison, they were found to be disabled in the prison itself.

Approximately 3.3 % of cases are detected during the hearing. These people require specific actions that do not prevent them from exercising their rights due to a problem of accessibility and understanding. Thus, in procedural areas, necessary and appropriate modifications and adaptations are needed in the context of access to justice, where needed in a given case, to ensure the participation of persons with disabilities on an equal basis with others. Among the lines to be developed are the following:

- o Adapt legal language to easy reading, Braille and sign language.
- o Adapting court seats to ensure accessibility
- o Provide specific training to lawyers, procuradores, experts or social graduates to facilitate access to justice taking into account the barriers that may arise as a result of different types of disability.
- o Use technology to facilitate access for both professionals and disabled users.
- o Deepen the role of facilitators. They work, where necessary, with the staff of the justice system and persons with disabilities to ensure effective communication during proceedings. They help people with disabilities to understand and make informed choices, making sure that things are explained and spoken in a way that they can understand and that adjustments and appropriate support are provided. They do not speak on behalf of persons with disabilities or the justice system, nor lead decisions.

This project is being developed jointly with disability organisations.

Finally, the CEACOG will lead, at no extra cost, the promotion of codes of conduct and good practice and the development of the catalogue of symbols, signs and pictograms. With regard to the expenditure to be borne by other public administrations (Autonomous Communities and Local Authorities), they will have to assume their obligations from their own budgets. However, the measures provided for in this Royal Decree may be financed, in whole or in part, by the State Programme for the Promotion of Universal Accessibility within the General State Administration, provided for in the Draft Law amending the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November and Law 39/2006 of 14 December on the promotion of personal autonomy and care for people in a situation of dependency, to extend and strengthen the rights of persons with disabilities to inclusion, autonomy and universal accessibility in

accordance with Article 49 of the Spanish Constitution. As stated in the draft legislation: this programme “aims to support universal accessibility interventions in public environments and services that ensure the inclusion and exercise of the rights and freedoms of persons with disabilities. Actions to improve accessibility financed through the Programme will include those to be developed by public administrations in order to comply with national legislation”. Consequently, this legal reform includes the possibility of transferring part of those resources to the administrations responsible for financing, inter alia, cognitive accessibility measures linked to this regulatory development.

Finally, with regard to the revenue that the legislation may generate, the rules on infringements and penalties laid down in the law that it sets out in detail on cognitive accessibility obligations can be applied more extensively.

5. Administrative burdens

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DRAFT ROYAL DECREE APPROVING THE REGULATION ON BASIC COGNITIVE ACCESSIBILITY CONDITIONS

Administrative obligations (Table I of the Simplified Method)	Article	Type of cargo	Unitary cost	Frequency	Population	Annual cost
Cognitive adaptation of web pages	7.1	19	100	1	14.228	1.422.800 insert
Inclusion of an assessment in the annual reports of consumer and user associations	10	10	500	1	12	6.000
Development of handbooks of good practice (trade unions)	15.8	10	500	1	500	250.000
...						
TOTAL ADMINISTRATIVE BURDEN						1.678.800

According to the CNAE, there are currently 14.228 telecommunications companies. No account is taken of public authorities, which are already required by Royal Decree 1112/2018 of 7 September 2003. The number of consumer and user associations has been taken from DG Consumer Affairs’s list published on this website:

<https://www.dsca.gob.es/es/consumo/asociaciones-personas-consumidoras/listado-asociaciones-consumidores-usuarios>

DRAFT ROYAL DECREE APPROVING THE REGULATION ON BASIC COGNITIVE ACCESSIBILITY CONDITIONS

Savings in administrative burdens (Table II of the Simplified Method)	Article	Saving rate	Unit savings	Frequency	Population	Saving
Communication, interaction and understanding aid	11.2	5	30	10	7.404	EUR 2 221 200/year
Simplified court decisions	12	5	30	1	6.500.000	195.000.000
TOTAL SAVINGS ADMINISTRATIVE BURDEN						197.221.200

There are 7.404 registered SIA procedures in the AGE. A minimum frequency of 10 per year is estimated for each of them.

6. Impact on gender issues

This legislation has a positive gender impact, fulfilling the legal mandate laid down in Organic Law 3/2007 of 22 March on effective equality between women and men.

The number of women with disabilities⁴ or dependency⁵ is higher than that of men, so accessibility actions will always have a positive gender impact.

Women with disabilities are more likely to experience double discrimination: because of gender and disability.

According to the INE's 2012 Social Integration and Health Survey⁶, by sex, there is a higher prevalence of disability among women (20.0 %) than among men (13.3 %) and, although this is observed in all age groups, from the age of 35 the differences in prevalence by sex are beginning to be more significant.

⁴ According to information from the 2008 Survey on Disability, Personal Autonomy and Dependency Situations drawn up by the INE, there are 3.85 million people who declare that they have a disability, 59.8 % are women. https://www.ine.es/ss/Satellite?L=es_ES&c=INESeccion_C&cid=1259926668516&p=%5C&pagename=ProductosYServicios%2FPYSLayout¶m1=PYSDetalle¶m3=1259924822888

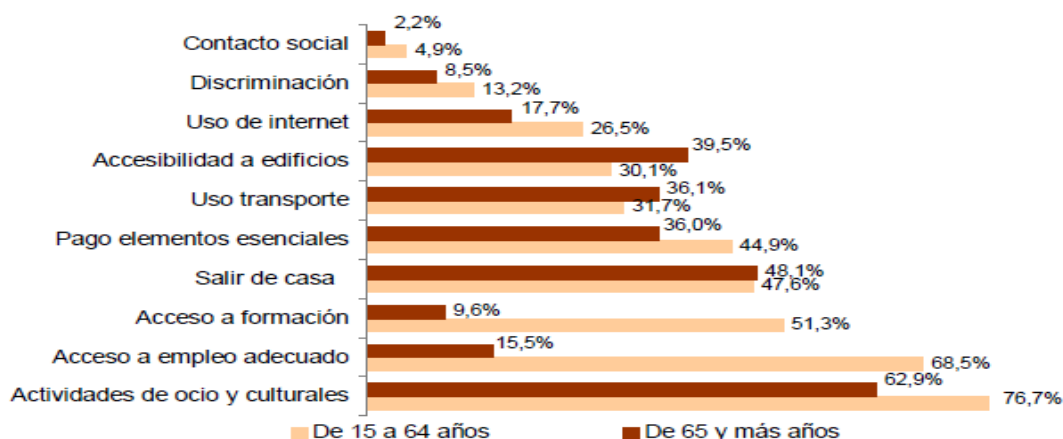
⁵ According to data from Imsero, as of 30 September 2021 there are a total of 1.188.163 persons benefiting from the System for Autonomy and Care for Dependency, of which 762.616 are women and 425.547 are men. <https://www.imsero.es/interpresent3/groups/imsero/documents/binario/estsisaad20210930.pdf>

⁶ <https://www.ine.es/prensa/np817.pdf>

For half of people with disabilities, the lack of technical or personal support is a barrier to participation in everyday activities. This is more common among women (53.2 %) than among men (46.0 %).

Women also face more frequent barriers to participation than men in all areas except social contact. It is worth noting the difference between women who report some form of discrimination against men (14.4 % vs 9.9 %).

Ámbitos donde las personas tienen barreras en la participación (porcentaje de personas)



Source: Social Integration and Health Survey. INE, 2012.

It should also be pointed out that the draft royal decree is expected to promote the autonomy of the persons to whom it is addressed, which indirectly also has a positive impact on the gender impact, since it is expected that the burden of caring for the majority of women in the family will decrease.

In short, the draft Royal Decree will have a positive impact because its implementation is expected to reduce or eliminate inequalities between men and women and will contribute to the achievement of equality policy objectives.

7. Impact on childhood, adolescence and family

In accordance with Article 22d of Organic Law 1/1996 of 15 January 2015 on the legal protection of minors, partially amending the Civil Code and the Code of Civil Procedure, the content of the draft legislation does not have a specific impact on children and adolescents, but this group, like the rest of the population, benefits from the improvements in cognitive accessibility provided for in the legislation.

However, it should be added that, from a substantive point of view, the draft legislation is consistent with Articles 2 and 23 of the Convention on the Rights of the Child, adopted by the United Nations General Assembly on 20 November 1989 and ratified by Spain in 1990 and with the General Observations of the Committee on the Rights of the Child, concerning the right to non-discrimination and the recognition that 'children who are mentally or physically prevented have the right to special care, education and training, aimed at achieving their self-sufficiency and active integration into society'.

Article 3 of Organic Law 1/1996 of 15 January 2015 on the legal protection of minors, partially amending the Civil Code and the Code of Civil Procedure, states that 'children shall enjoy the rights recognised by the Constitution and the international treaties to which Spain is a party, in particular the United Nations Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities, and the other rights guaranteed in the legal system, without discrimination on the grounds of birth, nationality, race, sex, disability or illness, religion, language, culture, opinion or any other personal, family or social circumstance'.

Furthermore, improving cognitive accessibility reinforces the principle of the best interests of the child, in accordance with Article 2 of Organic Law 1/1996 of 15 January 2003, since it facilitates or materialises the child by placing the child at the centre of the decisions concerning them, since, as stated in that Article: 'every child has the right to have his or her best interests valued and considered to be paramount in all actions and decisions concerning him or her'. Furthermore, Article 4 of Organic Law 8/2021 of 4 June on the comprehensive protection of children and adolescents from violence lays down the general principles and criteria for interpreting the best interests and, in particular, section 1 (l) sets out the 'assessment and formal determination of the best interests of the child in all decisions affecting a minor person', which is reinforced by the simplification and adaptation of information and communication, as advocated in this project.

For the same reason, in accordance with Article 2 (1) (f) of Royal Decree 931/2017 of 27 October and the tenth additional provision of Law 40/2003 of 18 November on the protection of multiple families, the content of the draft legislation has a positive impact on the family.

As has already been made, accessibility measures will benefit all people in a uniform manner, regardless of their age, including families, children and adolescence, as users of the areas of application provided for in this Royal Decree.

8. Impact on equal opportunities, non-discrimination and universal accessibility for persons with disabilities.

The analysis of the impact on equal opportunities non-discrimination and universal accessibility for persons with disabilities is provided for in the fifth additional provision of Law 26/2011 of 1 August 2015 adapting legislation to the International Convention on the Rights of Persons with Disabilities, which states that the reports of the regulatory impact analysis shall include it when this impact is relevant. Furthermore, Article 2 (1) (g) of Royal Decree 931/2017 of 27 October provides for an analysis, inter alia, of the impact on equal opportunities, non-discrimination and universal accessibility for persons with disabilities.

The standard clearly has a positive and relevant impact in terms of equal opportunities, non-discrimination and universal accessibility for persons with disabilities, particularly those with intellectual disabilities, development, brain paralysis, autism spectrum disorder, brain damage, mental health problems, dementia, Down syndrome, elderly and other people with difficulties in understanding, learning and interaction with the environment or diseases associated with cognitive impairment.

It must be based on universal accessibility, and consequently, as part of it, cognitive accessibility, as a cross-cutting axis of public disability policies and social cohesion itself, but also as an irreplaceable and absolutely necessary guarantee for the exercise of other rights, which we do not forget, would be part of the human rights sphere linked to several of the Sustainable Development Goals of the 2030 Agenda. From this starting point, it is important to highlight its expansionary effect, given that their respect does not only benefit persons with disabilities but also, as has been shown, other social groups, some of which are particularly vulnerable, such as the elderly and dependent people.

The demand for accessible products and services is high and the number of people with disabilities is expected to grow significantly in the coming years due, inter alia, to population ageing and increased mental health problems. A more accessible environment makes society more inclusive and facilitates independent living for all.

All the measures set out in the draft Royal Decree are aimed at enabling the autonomy of people with intellectual disabilities, development, cerebral paralysis, autism spectrum disorder, brain damage, mental health problems, Down syndrome, elderly people and other people with difficulties in understanding, learning and interaction with the

environment or diseases associated with cognitive impairment, facilitating the exercise of their right to independent living and their full inclusion and participation in society.

Its approval fulfils the mandate set out in Article 29a of the TRLGD, regulating the systematic, comprehensive and consistent set of requirements, requirements, standards, parameters and guidelines deemed necessary to ensure the understanding, communication and interaction of all people with all environments, products, goods and services, processes and procedures, with the ultimate aim of implementing the principle of equal opportunities, avoiding discrimination.

9. Other impacts: social, environmental and due to social and environmental climate change

In relation to other impacts, this standard has no environmental and climate change impact and a positive social impact, as the incorporation of accessible services can lead to a new job niche, leading to the activation of more people and thus to an increase in social contributions, resulting in fewer recipients of unemployment benefits.

V. EX POST EVALUATION

Having taken into account the provisions of Article 28 (2) of Law 50/1997 of 27 November and Article 3 of Royal Decree 286/2017 of 24 March regulating the Annual Regulatory Plan and the Annual Report on Regulatory Assessment of the General State Administration and establishing the Regulatory Planning and Evaluation Board, it has been decided that the assessment of its results is not necessary.

Annex I. Submissions received at the hearing and public information.

#	SENDER	TEXT/MAIN	OBSERVATION	VALUATION
1	MINISTRY OF HEALTH	TEXT	[...] no comments were made. Only one error found in Article 3 (q) of the basic conditions of cognitive accessibility regulation, which reads as follows: "Mental health: a welfare state in which an individual is aware of his or her own abilities, may face normal detentions..." should read: "Mental health: a welfare state in which an individual is aware of his or her own abilities, may face normal tensions ..."	Finding accepted.
2	MINISTRY OF SCIENCE, INNOVATION AND UNIVERSITIES	TEXT/MAIN	No comments	—
3	MINISTRY OF INDUSTRIAL AND TOURISM	TEXT	A general revision of the legislative text is recommended in line with the provisions of the Regulatory Technical Guidelines (RTSD), approved by the Council agreement of Ministers, 22 July 2005. In particular, it is recommended to pay particular attention to the following guidelines: <ul style="list-style-type: none"> - Paragraph (a) of the Appendices on the specific use of capital letters. - DTN 23 on the composition of the chapters. - DTN 31, concerning the division of the article. - Point (k) of the TNDs on quotations. On the other hand, in certain points of the text, efforts should be made to clarify the content or to specify it. For example, it is advisable to supplement the sentence in Article 12 (1), which reads as follows: 'The provisions of Article 27 (1) of Royal Decree 193/2023 of 21 March shall apply.' It is not clear from the wording to which the provision referred to will apply. Its wording could lead to confusion as to whether it is	Accepted, with the result that the text should read as follows: '11.1: 1. The provisions of this Article shall apply without prejudice to Royal Decree 366/2007 of 16 March 2015 establishing the conditions of accessibility and non-discrimination of persons with disabilities in their relations with the General State Administration. 12.1: As regards the administration of justice, universal accessibility and the provision of the support provided for in the third paragraph of Article 27 (1) of Royal Decree 193/2023 of 21 March shall be ensured. 13.1: 1. The provisions of this Article shall apply without prejudice to Royal Decree 422/2011 of 25 March approving the Regulation on the basic conditions for the participation of persons with disabilities in political life and electoral processes. 14.1: 1. The provisions of this Article shall apply without prejudice to Articles 23.4 and 23.5 of Royal Decree 193/2023 of 21 March on the constituent assets of Spanish Historical Heritage.'

			superfluous, since the provision to which the text refers is in force, or whether it is merely a reminder of legal obligations. Similar consideration should be given to Articles 11.1, 13.1 or 14.1.	
4	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE	TEXT	<p>1. There is an error in the second paragraph on the first page: It is <i>not necessary to add "a"</i> in the sentence "<i>this is a vehicular principle</i>" [...].</p> <p>2. The words '<i>Royal Decree</i>' (193/2023) should be placed in capital letters in the penultimate paragraph on the second page.</p> <p>3. A comma should be added between "2022" and "<i>particularly</i>" at the end of the second page.</p> <p>4. On the first sentence on the third page, "<i>like rural environment or gender issues</i>", the word "<i>is</i>" can be omitted.</p> <p>5. The words '<i>factor</i>' and '<i>factors</i>' are very redundant in that paragraph. We suggest this alternative wording: "<i>Rurality means that people with cognitive difficulties face barriers in accessing services and adapting them in the rural environment than in the urban environment, due to events such as depopulation; job insecurity [...]</i>".</p> <p>6. It is suggested to change the words "<i>becomes necessary</i>" (from the penultimate paragraph on the third page) to "<i>necessary</i>".</p> <p>7. It is recommended that Section II be better divided and separated, in accordance with <u>Regulatory Technical Guideline 26</u> '<i>Drafting criteria. The basic guiding criteria for drafting an article are: each article is a topic; each</i></p>	<p>1. The correction of the error is accepted.</p> <p>2. The use of capital letters is accepted.</p> <p>3. The use of the comma is accepted.</p> <p>4. The editorial change is accepted.</p> <p>5. The editorial change is accepted.</p> <p>6. The editorial change is accepted.</p> <p>7. The editorial change is accepted in line with DTN 26.</p> <p>8. The use of the comma is accepted.</p> <p>9. The editorial change is accepted in line with DTN 26.</p> <p>10. The editorial change is accepted in line with DTN 26.</p> <p>11. The justification for the text is accepted.</p> <p>12. The change of score is accepted.</p> <p>13. The deletion of the sentence was rejected.</p> <p>14. The rewording of the personal data protection clause, as proposed by the AEPD, is rejected.</p> <p>15. Justification of the text is accepted.</p>

paragraph shall include a statement; each statement, one idea”.

To this end, this wording is proposed (for the sake of clarity):

‘This Royal Decree consists of a single article, six additional provisions, one derogatory provision and three final provisions.

The Sole Article adopts the basic cognitive accessibility conditions regulation.

For its part, the first additional provision regulates the processing of information; the second additional provision, the call for tenders for public tenders and the third additional provision, the Centro Español de Accessibility Cognitiva (CEACOG). The fourth additional provision provides for an agreed catalogue of pictograms and other visual supports and the fifth additional provision provides for a report on the technical adaptation of airport and railway facilities. In addition, the sixth additional provision updates the rules on the accreditation of the degree of disability, which, in accordance with Article 4 (3) of the recast General Law on the rights of persons with disabilities and their social inclusion, must be laid down by regulation.

Consequently, and in direct relation to the above, the single repealing provision repeals Royal Decree 1414/2006 of 1 December 2014 determining the status of a person with disabilities for the purposes of Law 51/2003 of 2 December 2003 on equal opportunities, non-discrimination and universal accessibility for persons with disabilities.

For its part, the first final provision regulates the applicable title of competence, the second final provision, the financing of the envisaged measures and the third final provision, the entry into force.

The regulation consists of three chapters: The I

- 16.The change with an alternative wording is accepted.
- 17.Accepted.
- 18. The rewording of the text is rejected as the current wording is considered sufficiently clear.
- 19.It is partially accepted, as it is foreseen that this catalogue will be agreed between the various operators involved.
- 20.It is rejected on the basis of a question of division of powers.
- 21. The rewording of the text is rejected as the current wording is considered sufficiently clear.
- 22. The rewording of the text is rejected as the current wording is considered sufficiently clear.
- 23. The wording has therefore been rejected.
- 24. Rejected as cognitive accessibility is already defined in Article 2 (k) TRLGD.
- 25. UNESCO definition is accepted.
- 26. The inclusion of the comma is accepted.
- 27. The addition of the semicolon was rejected.
- 28. The rewording of the text is rejected as the current wording is considered sufficiently clear.
- 29. The rewording of the text is rejected as the current wording is considered sufficiently clear.

contains the general provisions; section II regulates accessibility requirements in the different areas of application and Chapter III refers to positive action measures and other complementary support. These chapters are deployed over 20 articles”.

8.It is recommended to add a comma after “*in particular*” in the first paragraph of the introductory part III as follows: “*in particular, objective 3 on Health and Well-being; objective 4 [..]*”.

9.By the criteria set out above, it is recommended to divide the paragraph on the principles of good regulation slightly further, for example, as follows:
‘Moreover, this Royal Decree complies with the principles of good regulation laid down in Article 129 of Law 39/2015 of 1 October 2003, in line with the principles of necessity, effectiveness, proportionality, legal certainty, transparency and efficiency. Specifically, the principles of necessity and effectiveness are justified by a matter of general interest, given that the regulation of cognitive accessibility involves implementing policies and measures that promote environments, products and services that are understandable and accessible to all, regardless of their cognitive abilities, and comply with the legal mandate imposed by the second additional provision of Law 6/2022 of 31 March. On the other hand, it complies with the principle of proportionality since it contains the rules necessary to meet the aims pursued, and is consistent with the principle of legal certainty, since it is consistent with the rest of the legal order, creating an integrated and clear regulatory framework that facilitates its knowledge and understanding. In addition, it complies with the principle of

30. It is agreed to strengthen the consistency of definitions.

31. It is accepted in order to strengthen the consistency of definitions.

32. Not accepted, it is considered sufficiently clear.

33. The rewording of the text is rejected as the current wording is considered sufficiently clear.

34. The rewording of the text is rejected as the current wording is considered sufficiently clear.

35. The definition is broadened to make it clearer.

36. It is accepted in order to strengthen the consistency of definitions.

37. It is accepted in order to strengthen the consistency of definitions.

38. The rewording of the text is rejected as the current wording is considered sufficiently clear.

39. The rewording of the text is rejected as the current wording is considered sufficiently clear.

40.partially accepted. The replacement of the term “control” by a more appropriate one is accepted.

41. The rewording of the text is rejected as the current wording is considered sufficiently clear.

42. Accepted in part.

transparency, by clearly addressing the problems to be solved and the objectives pursued, and by facilitating the participation of citizens during the procedure for drawing up the standard through prior public consultation, hearing and public information.

Finally, and in accordance with the principle of efficiency, it does not impose administrative burdens on citizens and adequately manages the public resources necessary for the implementation of the measures.”

10. The paragraph on favourable reports could also be clearer, with your organisation through sub-paragraphs:

“This standard has been positively informed by the National Disability Council and analysed by the Territorial Council for Social Services and the System for Autonomy and Care for Dependency.

The Autonomous Communities and the cities of Ceuta and Melilla, as well as municipalities and provinces have also been consulted via the Spanish Federation of Municipalities and Provinces (FEMP).

The legislation has also been the subject of a report by the Spanish Data Protection Agency.

Furthermore, in accordance with the principle of civil dialogue contained in Articles 2 (n), 3 (k) and 54 of the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November, the most representative organisations grouping or representing the interests of persons with disabilities have been consulted in the drafting of this provision.’

11. The text of the wording of the single article must be justified so that it is aligned with the rest of the

43. Correction of errors in the definition of ‘cerebral paralysis’ is accepted.

44. Accepted in part.

45. Accepted in part.

46. Accepted in part.

47. Accepted in part.

The wording would start with “set of elements”

48. It is accepted in order to strengthen the consistency of definitions.

49. The deletion of “is the” is partially accepted in order to strengthen the consistency of the definitions.

50. It is rejected as such a referral is considered relevant.

51. Accepted in part.

52. The rewording of the text is rejected as the current wording is considered sufficiently clear.

53. The rewording of the text is rejected as the current wording is considered sufficiently clear.

54. The rewording of the text is rejected as the current wording is considered sufficiently clear.

55. The rewording of the text is rejected as the current wording is considered sufficiently clear.

			<p>paragraphs on the right.</p> <p>12. It is recommended to add a comma to the first sentence of the single article, between “<i>cognitive</i>” and “<i>under development</i>”, as follows: “<i>basic cognitive accessibility conditions, under development of [...]</i>”.</p> <p>13. Perhaps about the sentence “<i>the text of which is included below</i>” of the single article and can be deleted.</p> <p>14. In the first additional provision on the protection of personal data, we suggest this initial wording: <i>‘The measures provided for in this Regulation relating to the collection and processing of personal data shall comply with Regulation (EU) [...]’.</i></p> <p>15. The text of the second additional provision should be justified so that it is aligned with the other paragraphs.</p> <p>16. We propose the following alternative wording for the second additional provision, for greater clarity: <i>‘Public administrations that publish calls for tenders for public tenders must comply with the current rules on public procurement in order to guarantee the quality of cognitive accessibility, ensuring that everyone, especially those with cognitive difficulties, can access, understand the information and fully interact with the physical and digital environment’.</i></p> <p>17. If the ‘CEACOG’ has been mentioned in brackets in the explanatory part, it may be better to redraft it in this way, rather than between indents, in the third additional provision.</p>	<p>56. The rewording of the text is rejected as the current wording is considered sufficiently clear.</p> <p>57. Accepted in part.</p> <p>58. Accepted in part.</p> <p>59. The proposed alternative wording is accepted as being clearer than the current one.</p> <p>60. The rewording of the text is rejected as the current wording is considered sufficiently clear.</p> <p>61. The proposed alternative wording is accepted as being clearer than the current one.</p> <p>62. The rewording of the text is rejected as the current wording is considered sufficiently clear.</p> <p>63. The rewording of the text is rejected as the current wording is considered sufficiently clear.</p> <p>64. Accepted in part.</p> <p>65. The correction of the error is accepted.</p> <p>66. Rejected. Technical standard UNE 301549 is of a public nature under an agreement concluded with the Ministry for Digital Transformation and the Civil Service.</p> <p>67. Rejected as the current wording is most appropriate.</p> <p>68. The rewording of the text is rejected as the current wording is considered sufficiently clear.</p> <p>69. Rejected as the current wording is most appropriate.</p>
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18. We suggest an alternative wording for the content of this third additional provision:

'The Spanish Centre for Cognitiva Accessibility (CEACOG), as the advisory centre for the Royal Disability Trustee, is the reference entity in validating and monitoring the quality of cognitive accessibility services, as well as in advising public administrations'.

19. We consider that it might be appropriate to consult the catalogue of symbols, signs and pictograms provided for in the fourth additional provision, which could be worded as follows:

"The Royal Disability Trustee, through the Spanish Cognitiva Accessibility Centre, will set up a technical and specialised working group with the aim of drawing up a catalogue of symbols, signs and pictograms.

The Catalogue of symbols, signs and pictograms shall be public and free of charge and shall aim at the widespread use of symbols, signs and pictograms for signalling.

This catalogue shall be drawn up within one year of publication of the Regulation and shall be used in all areas of application of this Regulation.

In order for the Catalogue of symbols, signs and pictograms to be understood by the widest possible number of people, prior to its approval, the views of associations representing the groups on which this standard has the greatest impact, including those of older people and people with different degrees of cognitive disability, shall be sought."

20. With regard to the fifth additional provision, concerning the *'adaptation of infrastructure and means of transport'*, it would be interesting to consider the possibility of having some influence on other means of transport (such as bus and metro stations), with care

70. Accepted in part.

71. The deletion of the term "elements" is accepted in order to avoid redundancies.

72. The rewording of the text is rejected as the current wording is considered sufficiently clear.

73. The rewording of the text is rejected as the current wording is considered sufficiently clear.

74. Finding accepted.

75. The rewording of the text is rejected as the current wording is considered sufficiently clear.

76. The rewording of the text is rejected as the current wording is considered sufficiently clear.

77. The rewording of the text is rejected as the current wording is considered sufficiently clear.

78. The rewording of the text is rejected as the current wording is considered sufficiently clear.

79. The rewording of the text is rejected as the current wording is considered sufficiently clear.

80. The rewording of the text is rejected as the current wording is considered sufficiently clear.

81. The rewording of the text is rejected as the current wording is considered sufficiently clear.

82. The rewording of the text is rejected as the current

not to encroach upon the Autonomous Community and local competences.

21. Alternative wording of the sixth additional provision on accreditation is proposed:

'In accordance with the second paragraph of Article 4 (2) and the second paragraph of Article 35 (1) of the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, the equalisation to the degree of disability of 33 % for social security pensioners with a permanent disability pension in full, absolute or severe invalidity, as well as for pensioners in passive classes with a retirement or retirement pension due to permanent incapacity for service or invalidity, shall be attested by the following means...'

22. Perhaps it may be better to replace 'recognising' (pensioner status) by 'recognising [...]' in subparagraph (b) of this sixth additional provision. In this case, subparagraph (c) should also be changed to this effect.

23. As regards the reference made by Article 2 to the fifth consolidated text of the General Law on the Rights of Persons with Disabilities, it should be borne in mind that regulatory technical guideline 64 recommends avoiding the proliferation of referrals.

24. A definition of cognitive accessibility itself should be included in Article 3.

25. The following alternative wording is proposed for Article 3 (a): *'Illiteracy: This is the quality of an illiterate person who, according to the United Nations Educational, Scientific and Cultural Organisation (UNESCO), is neither able to read, write, understand a simple text, nor be able to expose facts of his daily life*

wording is considered sufficiently clear.

83. The inclusion of the comma is accepted.

84. The rewording of the text is rejected as the current wording is considered sufficiently clear.

85. The correction of the error is accepted.

86. The correction of the error is accepted.

87. The rewording of the text is rejected as the current wording is considered sufficiently clear.

88. The rewording of the text is rejected as the current wording is considered sufficiently clear.

89. The deletion of this expression is accepted.

90. Finding accepted.

91. Finding accepted.

92. Finding accepted.

93. The justification for the text is accepted.

94. The deletion of this expression is accepted.

95. The rewording of the text is rejected as the current wording is considered sufficiently clear.

96. The rewording of the text is rejected as the current wording is considered sufficiently clear.

97. The correction of the error is accepted.

in a elementary manner”.

26. A comma would have to be added after the word “*gesture*” in Article 3 (b). Perhaps it would also be necessary to specify with whom or with what communication (with others?) and interaction (with the environment?) take place. To this end, the following wording would be proposed: *‘any visual element, such as an image, object or gesture, that represents visual information and supports understanding and communication with others and interaction with the environment’.*

27. Where something is listed, as in Article 3 (c), a comparative point should be used for the first item in the list. In this case, for example, the wording could be as follows: *‘Skills related to brain functions, including understanding; attention, memory, language, orientation, organisation and planning’.*

28. It is recommended to change “*are*” to “*are*” in Article 3 (d).

- 29. A possible alternative wording is provided for Article 3 (e):
‘Means employed by a person with oral communication difficulties to express themselves and interact effectively in any environment. This means must have the necessary support and be tailored to their capacities, be shared by their interlocutors and enable them to exercise their rights and actively participate in society on equal opportunities. Augmentative communication is considered when the medium employed complements and accompanies the person’s oral communication. Alternative communication is considered when the

98. Rejected as paragraph (e) already provides for accessible design.

99. The inclusion of the comma is accepted.

100. Finding accepted.

101. This is rejected as this wording is more in line with the application of Law 8/2021 of 2 June.

102. Accepted in part.

103. The correction of the error is accepted.

104. This is rejected as this would undermine the right of persons with disabilities to participate in selection procedures on an equal basis with others, in accordance with Article 113 of Royal Law 6/2023.

105. In accordance with the TNDs, the standard is not accepted as a whole.

106. The deletion of this expression is accepted.

107. The proposed wording is accepted as more secure than the current one.

108. The rewording of the text is rejected as the current wording is considered sufficiently clear.

109. Accepted in part. The inclusion of the comma is accepted.

110. Finding accepted.

medium replaces oral communication.”

30. In Article 3 (f) on the basic conditions of cognitive accessibility, we would remove the words “are” from the beginning of the definition, in order to be consistent with the other definitions, which start directly without verbs. We would also remove the words “from” in the last sentence on processes and procedures.

31. In paragraph (g) on brain damage acquired, we would delete the verb ‘does’ at the beginning of the definition for the same reasons as already stated. We suggest the following alternative wording: ‘any acquired brain injury affecting a previously developed brain, regardless of its cause (traumatic, vascular, tumour, infectious, anoxic, among others). The most common consequences include motor, sensory and neurocognitive deficits, although demonstrations vary significantly among people and may combine one or more of these types of deficits”.

32. For the definition of cognitive impairment in the same paragraph, we make the following proposal: “decline or loss of cognitive functions, which may vary in intensity, from mild degrees (not reaching dementia level) to severe degrees”.

33. Perhaps, for greater clarity, in the paragraph on cognitive difficulties, the phrases “such as poverty or illiteracy” and “such as immigration” should be placed in brackets.

34. We have the following alternative drafting proposal for the definition of intellectual disability in paragraph (h): *It implies a number of limitations on functions that are essential to daily life, such as learning,*

111. Finding accepted.

112. The rewording of the text is rejected as the current wording is considered sufficiently clear.

113. The rewording of the text is rejected as the current wording is considered sufficiently clear.

114. Accepted in part. Concordance is accepted.

115. Accepted in part.

116. Accepted in part.

117. The rewording of the text is rejected as the current wording is considered sufficiently clear.

118. The inclusion of the comma is accepted.

119. Accepted in part.

120. Accepted in part.

121. Accepted in part.

122. Is rejected. It is considered that a regulatory provision such as this at issue should not be reduced to this level of detail. This is without prejudice to its possible further development.

123. Accepted in part.

124. As mentioned above, reference to the full standard would not be necessary according to the TNDs.

125. Is rejected. The definition of cultural centres has

understanding or reasoning, which do not always allow you to adapt appropriately to different situations and environments. This condition manifests itself in the interaction with the environment and depends both on the characteristics of the individual and on the barriers or obstacles surrounding it. Generally, intellectual disability is permanent, which means that it accompanies the person throughout his or her life and has a significant impact on his or her life and that of his or her family.”

35.The definition of “large support needs” should be further developed. A proposal is made: *“situations where an individual requires intensive, frequent or continuous support to develop daily life activities, to ensure their well-being and to participate in society in an appropriate manner”*.

36.In order to be consistent with the other definitions, we recommend deleting the words *“this is”* at the beginning of the reference to cognitive accessibility tools. Two separate points would also be missing, after the phrase *“are divided into several categories:”*

37.We would like the phrases *“refers to”* in subparagraphs (i), (ii) and (iii) of paragraph (j).

38.The definition of guidance resources in paragraph iii is somewhat vague.

It is recommended to develop a bit better, for example: *“Guidance resources: tools designed to facilitate understanding and navigation in the environment, such as signage pictograms, visual maps, accessible signals and other elements that enable people to locate and navigate autonomously using the information available in the environment’*.

been developed by the Ministry of Culture. In addition, it is considered necessary to maintain the reference to plain language in order to provide greater guarantees of compliance.

126. Accepted in part.

127. Finding accepted.

128. Accepted in order to strengthen the coherence of the text.

39. In subparagraph (iii), it seems almost that Artificial Intelligence is considered to be an additional person. For this reason, we suggest an alternative wording such as:

“Products, services and technological tools designed to facilitate communication, guidance and the performance of tasks, as well as to ensure their use and access by as many people as possible with different cognitive abilities. This includes assistive technologies such as artificial intelligence, aimed at delivering accessible and tailored solutions to various needs”.

40. The word “control” may have somewhat negative connotations. It may be better to replace it with one such as “interpret” or “understand”. We suggest the following alternative wording for the last subparagraph of Article 3 (j):

“All cognitive accessibility tools, regardless of their classification, aim to facilitate communication and foster meaningful and reciprocal social interactions. They also seek to provide advance information and feedback on what has been done, ensure inclusive environments that respect diversity and promote a positive emotional social climate.

In addition, they aim to enable participation in safe contexts free of undue personal threat or risks; maintain and increase self-esteem; promoting independence and autonomy; and ensuring the conditions for everyone to have access to their universal basic rights.”

41. We have the following alternative definition of easy reading in paragraph (k): *“a method that includes guidelines and recommendations for the drafting,*

design and validation of documents, aimed at making information accessible to people with reading difficulties. Easy-to-read texts must comply with the guidelines set out in standard UNE 153101: 2018 EX or the analogous standard in force.”

42. Alternative wording is proposed for paragraph (l) on clear language:
“Communication that prioritises readers, taking into account their needs and interests, their level of experience and literacy, as well as the context in which they will use the document. It ensures that they can effectively find, understand and use the information. The monitoring of the guidelines and recommendations of UNE-ISO 24495-1, in its most up-to-date version, will be promoted.”

43. There is no word “of” in the definition of cerebral paralysis in paragraph (n), between “before” and “that”. It is also recommended to replace 2 with the word “two”. The following alternative wording is proposed:
*‘Multi-disability condition caused by an injury to the brain **that** occurred before its development and maturation are complete. Such injury may occur before birth, during childbirth or during the first three years of life. In most cases, cerebral paralysis is linked to large support needs, which may be physical, cognitive, communicative or a combination of **two** or more of these factors.’*

44. For the definition of pictograms, we recommend this alternative wording:
‘Visual representation of a real or abstract reference such as an object, space, action or activity. In cognitive accessibility, pictograms have various uses, such as signposting of public spaces or public use;

augmentative and alternative communication systems, and website iconography to improve navigability and usability.

There are two main types of pictograms: for communication and signalling.

Pictograms for communication are augmentative and alternative systems that can be customised to adapt to each user's communication skills and codes.

Pictograms for signs may be standardised and developed in accordance with the procedures laid down in the reference technical standards.'

45.For a definition of '*augmentative and alternative communication support product*', in section (p), which does not repeat the words contained in the wording itself, the following wording is proposed:

'Device, tool or software designed to improve a person's communication skills and minimise barriers associated with their disability. These products, which may include panels, booklets, software or mobile applications, are specifically manufactured or adapted for this purpose and can be found on the general market'.

46.In paragraph (q), the word "restraints" *should be changed* to stress. We propose to delete the word '*normal*', due to its relativity and ambiguity, and to change *the sentence 'making a contribution to society'*, which has punctual connotations (such as paying a particular tax or making a donation) to '*contribute to society*', which has a broader meaning that is more appropriate to everyday life.

47.In paragraph (r) on "*accessible signage*", in order not to include these words in the definition and to avoid redundancies, we suggest the following wording, which

also replaces the word “*routings*”, a somewhat strange one, with a more common one:

‘Set of visual elements such as texts, pictograms, arrows and indicators designed to provide information, guidance and use of a space. They are understandable by all people, regardless of their abilities.’

48.If consistency with the other definitions is sought, the words “*is the*” should be removed from the beginning of the Down Syndrome definition in paragraph (s).

49.This observation also applies with regard to the definition of Autism Spectrum Treatment in paragraph (t). In addition, we suggest this alternative wording:

‘Condition of neurobiological origin affecting nervous system configuration and brain function, causing difficulties in two areas of evolutionary development: social communication and interaction, and flexibility of thinking and behaviour. There may sometimes be atipicities in the processing of sensory stimuli’.

50.With regard to the reference made by Article 4 to the third consolidated text of the General Law on the Rights of Persons with Disabilities, it should be borne in mind that regulatory technical guideline 64 recommends avoiding the proliferation of referrals.

51.For “ Principles of use derived from universal design ”, we recommend maintaining a degree of consistency between all of them, along the lines of the definitions in Article 3. For example, we would delete the phrases ‘*refers to*’ or ‘*design facilitates*’and look for a more straightforward wording.

52.For Article 4 (2) (a), we propose the following

alternative wording:

'Useful for people with different abilities, providing the same or equivalent means of use for all, ensuring their attractiveness and inclusion, without compromising security and avoiding any form of stigmatisation'.

53.For paragraph ii on “flexible use”, we suggest this wording: *“Ability to adapt use to different preferences and skills, offering multiple options that facilitate understanding, communication and interaction, while ensuring access tailored to each individual’s needs”.*

54.For section iii, we offer the following proposal: *“Easy-to-understand design, regardless of knowledge, previous experiences, language skills or concentration levels. To this end, it is essential that the information is organised according to its relevance, with notices and comments, guides and patterns of use or assistance, and with the guarantee that the person can use it autonomously.’*

55.For paragraph iv, the following wording is proposed: *“sensoryaccess is facilitated regardless of individuals’ abilities and with the presentation of information in different formats, optimising contrast; legibility, differentiation between fundamentals and secondary ones, and in a manner compatible with assistive products.”*

56.For paragraph v, the following wording is proposed: *“reducing the consequences of errors in use, where they are not intentional, by means of warnings or calls for the attention of the person when there is a danger or risk. In addition, the accessibility of the most frequently used elements is prioritised and access is limited to those likely to be more insecure.”*

57.For paragraph viii, in order to avoid redundancy, the following wording is given: *'adequate access, scope, manipulation and use are provided regardless of the size of the user's body, posture or mobility'*.

58.For point (b), we propose the following wording:
"In the field of cognitive accessibility, guidance is understood as a guide and support that facilitates the establishment of policy guidelines, as well as the ability to track what has been done to repeat it or identify possible errors. While traditionally coaching may depend on people with external support, cognitive accessibility promotes integrated orientation in space, products or services, allowing people to act autonomously and without dependence on third parties."

59.For point (c), the following wording is proposed:
*"Security is a fundamental principle of cognitive accessibility and one of its basic operational pillars. It is structured as a dual action mechanism: on the one hand, it ensures physical security and, on the other hand, it ensures an understanding of the actions and steps taken.
In the context of cognitive accessibility, physical security means that anyone can understand the security measures present in the spaces or in the use of goods and services. In terms of actions, security translates into a process that, by ensuring understanding, enables people to be aware of their decisions and actions, favouring control of the steps that follow and avoiding hostile environments."*

60.From paragraph (g), it may be better to change the phrase *'the measures contained here are'* to *'all the*

measures set out above’.

61. In Article 5, it should be borne in mind that, since these are requirements to be met, they must be expressed as such in the subsequent paragraphs. For example, in paragraph (a), *“easily understandable content”* should be replaced by *“easily understandable content”*.

62. For Article 5 (c), the following wording is proposed: *“The adaptation of information to make it cognitively accessible should be done without undue delay, especially when the person is requesting the exercise of an urgent right, activity or performance, by lodging complaints or complaints, or by facing situations of danger or emergency.”*

63. We propose the following wording for Article 5 (2): *‘Where easy reading is not mandatory under this Royal Decree, the information must be provided, where possible, at least in clear language’.*

64. We delete the phrase *“the provisions of”* from the beginning of Article 6 in order to facilitate reading. For this reason, *“what is foreseen in”* could also be deleted.

65. It appears that there is an error in Article 7 (2) (d) and that *‘forms’* should be written in the plural.

66. We have doubts with Article 7 (3). We are not sure whether the standard is UNE 139803: 2012, which annuls UNE 139803: 2004 and the content of which does not appear to be accessible free of charge. If that were the case, such a reference would be of little use to the general public.

67.We propose to delete the phrase “as regards” in Article 8 (1) in order to further promote clarity.

68.The wording of Article 8 (2) can be clarified as follows: *“Town planning memories must include basic cognitive accessibility criteria. The competent public administrations shall regulate the inclusion of cognitive accessibility measures in their urban planning policies. They shall take into account the following criteria”.*

Another option would be the following:
‘Basic cognitive accessibility criteria must be included in town planning memories. The competent public administrations shall regulate the inclusion of cognitive accessibility measures in their urban planning policies. They shall take into account the following criteria.’

69.We delete the phrases “refers to” in Article 8 (a) and (b). The phrase “refers to” in subparagraph (d) should also be deleted.

70.In paragraph (a), the wording can be improved as follows: *“Physical accessibility in accordance with the legislation in force, incorporating the need to identify the roads or elements of the installation adapted to the needs of the person”.*

71.We propose to delete the second word “elements” in paragraph (b), in order to avoid redundancies.

72.For greater clarity, we propose this version for Article 8 (2) (d): *‘all processes for the emission, exchange and receipt of information, regardless of the channel used, including safety-related signalling, public attention and use of installations’.*

73.From paragraph (e), we suggest changing the phrase “*in the use of*” to “*those*” and in order to further simplify the sentence, the last sentence could be worded as follows: “*Standardised and universalised pictograms shall be promoted*”.

74.From paragraph (f), we believe that the verb ‘*follow*’ should be changed to a more appropriate one such as ‘*use*’.

75.To avoid repetitions, paragraph (g) may be amended accordingly: “*Symbology. The symbols used shall be inspired by basic graphic concepts of easy interpretation and rapid orientation and location in a given space.*”

76.We have a possible wording for section (h): “*Haptic, i.e. tactile signalling, especially in key areas for people in need of these resources, will be welcomed. This includes accesses, lifts, handrails and general planes, which shall be supplemented by graphical and tactile sensory plans.*’

77.For paragraph (i), this wording may perhaps be used: “*Control of sensory stimuli: designs shall be encouraged to customise the intensity of sensory stimuli such as light, sound or movement. In addition, the anticipation of information on environmental conditions will be promoted so that users can use their own support resources.*”

78.From Article 9 (1), it may perhaps be replaced by “*in accordance with*”.

79.In Article 9 (2) (b) (ii), the following amendment could perhaps be made: “*the use of written format on*

means of transport, supplemented by audio, pictograms or tactile signalling".

80. In paragraph (c) of Article 9 (2), we consider it better to place *'free of charge', after 'support'*, rather than at the end, for greater understanding and visibility.

81. In Article 10, we consider the words *"For"* to be easier and easier to understand, replacing the words *"With a view to"*.

82. From paragraph (b), we propose to replace *"arrange"* with *"making available"*. It may also be possible to delete the phrase *'format of'*.

83. In paragraph (c), we recommend adding a comma between *"users"* and *"who"*.

84. In Article 10.3, *"relating to"* may be replaced by *"on"*.

85. Failure to correct the concordance of the word *'such'* in Article 10.4. The wording would read as follows: *'In relation to health goods and services and health promotion and protection services, as **such**...'*. If the text is to be further simplified, it is even possible to delete *"put in place"*.

86. In paragraph (b), we understand that there would be a need to add *"communication"* between *"forms"* and *"augmentative"*.

87. We propose to alter the order of the final paragraph (c), in order to make it more understandable: *"so that people with cognitive difficulties can access these goods and services and receive appropriate care, on an equal basis with other citizens"*.

88.For subparagraph (d), the following alternative wording is proposed, with a possible addition, of a guaranteed nature: *“For health goods and services, including those linked to sexual and reproductive health, the staff of the centres shall consult the individual if they wish to receive the information in an accessible or adapted format. It will be the person who chooses the type of adaptation they need, **who can change their mind at any time in order to request a more easily understandable format.** This obligation shall apply to medical treatments, interventions and medications.”*

89.In general, we advise against the use of *the term “within” because it does not add anything.* In paragraph (f), it can be written directly *‘In the health and veterinary emergency services...’.*
In this paragraph, we propose the following wording: *“In the health and veterinary emergency services, it shall be ensured that the person can use his/her usual means of augmentative and alternative communication. In addition, cognitively accessible communication support resources shall be made available to enable them to express their problem or need.”*

90.We note that in paragraph (g) *“with cognitive difficulties”* could be added between the words *“person”* and *“may”*.

91.We propose the following alternative wording of Article 10 (4) (h): *‘Where professional persons in these services identify a risk of gender-based violence, sexual assault or any kind of threat or danger to the accompanying person, the centre shall take appropriate action, ensuring the provision of the*

service by other means and without prejudice to the application of the relevant action protocols.'

92. We believe that it is better to draft the wording of Article 11 as follows '*Relations with public administrations*', along the lines of Article 14 of Royal Decree 674/2023 of 18 July approving the Regulation on the conditions of use of the Spanish sign language and the means of support for oral communication for deaf, hearing and deafblind people.

93. Article 11(1) must be justified in order for it to be right aligned with the rest of the text.

94. In Article 11 (2), we recommend *deleting the phrase "within"*.

95. For the second part of paragraph (a) of the same Article, we propose the following simpler wording: "*This shall entail the availability in easy reading of guides for the completion of procedures and of the forms or applications necessary for carrying out the procedures.*"

96. In paragraph (b), we propose to change "*different*" to "*following*".

97. Point (d) of the relevant paragraph is repeated.

98. In Article 11 (2) and in order to take account of the growing digital or technological divide with regard to older people or certain socio-economic conditions, we propose to add some such paragraphs: "*The implementation of new technologies should not prevent persons with disabilities or cognitive difficulties from carrying out the formalities in person or by telephone assisted by a person trained and trained in*

cognitive accessibility.

In face-to-face care, augmentative and alternative forms of communication and cognitively accessible means of communication shall be made available to the person concerned so that no person is excluded or hindered from accessing these services on a regular basis'.

99. In Article 11 (3), we propose adding a comma between "cognitive" and "that".

100. For paragraph (b) of this Article, we propose the following wording: *"The development of a guide to cognitively accessible administrative procedures, making it possible to identify quickly the procedures available to all administrations. This guide shall include an accessible search system that makes it easier to find the information in a clear and comprehensible manner."*

101. could Article 11 (4) be simplified by this phrase *'or, where appropriate, his representative'*, instead of *'the person chosen by him to represent him'*?

In general, a simpler wording of this paragraph could be:

'The person concerned or his representative may at any time request that the remaining stages of the procedure be carried out with cognitive accessibility measures. At least the following shall be ensured:'

102. For Article 11 (4) (a), the following wording could be used:

All communications, both oral and written, addressed to persons with cognitive difficulties shall be made in simple and accessible language, adapted to their characteristics and needs. Resources such as easy to

read, pictograms or other alternative and augmentative communication systems may be used where necessary.”

103. There is an error at the end of Article 11 (4) (b) and we believe that “de” (between “to” and “communication”) should be deleted.

104. For Article 11 (5), we propose the following wording:

‘Information on calls for public employment, both open access and internal promotion, shall include an easy-to-read version, especially for those offering places reserved for persons with intellectual disabilities.

Where requested and possible in relation to the level of knowledge required in the relevant competition notice, the tests, traineeships and examinations shall also have a cognitively accessible version.’

We add this point in view of the difficulties inherent in certain selection tests, such as those of Subgroup A1, which often require very specialised knowledge and with many technicalities.

105. We note that Article 12 (1) needs to be completed with a full reference to the standard to which it refers: *“regulating the basic conditions of accessibility and non-discrimination for persons with disabilities for access to and use of goods and services available to the public”.*

106. In Article 12 (2), we recommend deleting “within”.

107. Article 12 (3) is ambiguous. We propose to replace “the participant” with “interested person” and to clarify whether that person should also have “cognitive

difficulties" (or the equivalent term preferred). In any case, cognitive accessibility, as a key tool, benefits everyone.

108. In Article 12 (3) (b), we propose adding "*shall be identified*" between the phrases "*scheduled*" and "*in a clear manner*". Furthermore, it should be stated where this identification is made, and therefore, without prejudice to the best opinion of the proposing body of this rule, we suggest adding "*in the documentation*" at the end of this paragraph.

109. We propose to delete the phrase "*which are*" in Article 12 (5) and to add a comma between "*equality*" and "*serving*".

110. We note that Article 12 (5) (a) can be simplified as follows: '*Such adjustments and adjustments shall be made at the request of either party or of the Public Prosecutor's Office, or of its own motion by the Court itself*'.

If you wish to be broader and more secure, "*court*" can be replaced by "*judicial body*".

111. In Article 12 (5) (b), it is recommended to replace "*be referred to*" by "*refer*".

112. In paragraph 12.5 (b) (i), we propose the following wording:

'All communications, whether oral or written, addressed to persons with cognitive difficulties who have requested it shall be made in plain and accessible language, in a way that takes into account their personal characteristics and needs, enabling the use, where necessary, of means such as easy reading, communication pictograms or other alternative and

augmentative communication systems.
In any event, decisions setting out obligations, duties and rights; to put an end to the proceedings and to restrict rights, as well as information on the date and place of the scheduled hearings and procedural acts, must be presented in a clear, simple and accessible manner’.

113. In paragraph ii, we propose to replace “*what it shall include*” by “*including*”.

114. In section iii, we recommend adding “*the*” between “*perform*” and “*tasks*”.
“*Quoted*” should be aligned with “*the designated facilitator*” so as to read as follows: ‘*the designated provided person is obliged to use the procedural acts to which he or she is summoned...*’.
It is also necessary to concur with ‘*being called*’ with ‘*the facilitator*’. It should read as follows: “*the facilitator cannot be called [...]*”.
For the last paragraph, we consider this wording to be clearer: ‘*the costs of proceedings of the assisted person or of the other parties to the proceedings may not be included in the costs of the proceedings*’.

115. There is an error in Article 12(7): or the word “*understanding*” should be added or “*and of*” should be added before.
We propose the following wording for this article:
‘*In physical examination procedures, persons with cognitive difficulties may be accompanied by a supporting person of their choice. If no one is appointed, qualified and trained staff in augmentative and alternative communication systems shall be assigned to support, ensuring that it is of the same sex as the person served.*’

116. In Article 12 (8), we recommend deleting the phrase “within”.

We propose this wording:

‘Judicial Deans and Professional Associations of Lawyers and procuradores must have staff able to assist, support and care for those with cognitive difficulties who so request. Such staff shall offer assistance in procedures such as applying for legal aid, lodging complaints or filing documents which do not require the assistance of a lawyer.’

117. We propose the following wording of paragraph 12.9:

‘For legal aid applications, and whenever requested by the person with cognitive difficulties, information on the process shall be provided in an easy-to-read format. The attention will be provided by professionals trained in cognitive accessibility, belonging to the legal guidance services of professional bodies. In addition, respect and access to an accompanying person or support person designated by the applicant shall be ensured.’

118. We are advised to put a comma between ‘cognitive’ and ‘like’ in Article 13.2.

119. We have deleted Article 13 (3) as follows: *“In electoral processes, ensuring cognitive accessibility entails the obligation to implement the following measures.”*

120. For paragraph (b) of this Article, we propose this wording:

“The use of visual support systems shall be promoted to enable all voters to understand the proposals of

parties and candidates in a clear and accessible manner. Such content shall also be available in written, audio or tactile format and be compatible with assistive technologies that facilitate both understanding and expression.”

121.Paragraph (c) may be amended accordingly:
“Accessible voting materials complying with the easy to read parameters shall be used, both on ballot papers and in instructions for their completion, where applicable.”

122.The complaint mechanism provided for in paragraph (e) should be clarified or a provision should be added at the end of the operative part, which provides for its implementation by means of a protocol.

123.In Article 13 (4), we propose deleting the phrase*“relation to”*.

We provide the following drafting proposal:

“In standard-setting procedures, prior public consultation, hearing and public information procedures shall publish their documentation in plain language and in alternative formats, such as audio, visual support and accessible information and communication technologies. In addition, the publication of such documents in easy-to-read format shall be encouraged wherever possible.”

124.In Article 14.1, it may be appropriate to refer to the full standard.

125.We have the following proposal for Article 14 (2):
‘Brochures and information panels of museums, libraries, archives, auditories, theatres, screenrooms of the Spanish Filmoteca, exhibition rooms and, in

general, all cultural centres and services managed by the General State Administration, the Autonomous Communities or their linked or affiliated public bodies must be available in easy-to-read formats. In addition, they shall be made available in alternative formats, such as audio of the easy-to-read version, visual supports or accessible information and communication technologies.'

126. For the third paragraph of Article 14, we add the following:

"In these spaces, all signs related to safety, travel and organisation of visits shall be accessible, using simple, clear and understandable formats. For this purpose, pictograms, symbols and other graphic elements shall be used to facilitate the orientation and differentiation of the different parts of the exhibition, visit or tour. Efforts shall also be made to provide advance information on environmental conditions and to ensure options for customisation and control of sensory stimuli."

127. We propose the following wording of Article 19:

'Public administrations, within the scope of their competences, shall promote and facilitate the adoption of generic or sectoral codes of conduct and good practices aimed at regulating cognitive accessibility conditions in the matters regulated in this Royal Decree.

These codes of conduct and good practice shall be drawn up by agreement between the most representative trade union organisations, organisations representing persons with cognitive difficulties and their families, and organisations representing persons with cognitive support needs or cognitive difficulties'.

			128.If we have previously suggested to mention the CEACOG in brackets, we also note this in relation to Article 20.	
5	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>To the approval text:</p> <p>The second additional provision states that <i>'public authorities which publish calls for tenders for public tenders shall comply with the provisions of the legislation in force in the field of public procurement...'</i>. It is suggested to revise the reference to "public tenders", since in Law 9/2017 of 8 November on Public Sector Contracts, which transposes into Spanish law Directives of the European Parliament and of the Council 2014/23/EU and 2014/24/EU of 26 February 2014, the term "contest" is used only to refer to a special type of award procedure called "design contest" and regulated in Articles 183 to 187. It should be assessed whether this reference should be replaced, for example, by "public sector contracts".</p>	Finding accepted.
6	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>The third additional provision of the approval text refers to the Spanish Cognitiva Accessibility Centre (CEACOG) as <i>'the advisory centre of the autonomous body of the Royal Disability Trustee, a reference in this area for the validation and monitoring of the quality of cognitive accessibility services, as well as for advice to public administrations'</i>. However, the fourth additional provision of Law 6/2022 of 31 March 2009 characterises this centre as <i>'a tool of the General State Administration for study, research, knowledge generation and transfer, training and qualification, registration and extension of good practices, promotion of technical regulations, observation of reality and trends, foresight actions, monitoring and evaluation,</i></p>	<p>Finding accepted.</p> <p>The provision has been deleted, as it will be regulated through the PROJECT OF REAL DECREE, as amended by REAL DECREE 358/1991 of 15 March 2014, which redirects the NATIONAL ORGANISATION OF SPAIN CIEGOS; ROYAL DECREE 415/1996 OF 1 MARCH 2015 LAYING DOWN THE RULES FOR THE ORGANISATION OF THE SPANISH RED CROSS; ROYAL DECREE 946/2001 OF 3 AUGUST 2015 APPROVING THE STATUTE OF THE ROYAL BOARD OF TRUSTEES ON DISABILITY; ROYAL DECREE 1855/2009 OF 4 DECEMBER 2015 REGULATING THE NATIONAL COUNCIL FOR DISABILITY; AND ROYAL DECREE</p>

			<p><i>and in general the promotion and promotion of all matters relating to cognitive accessibility in Spain'. It also points out that it will involve civil society, and its organisational and operational arrangements will be established by regulation.</i></p> <p>On the one hand, it is considered necessary to align the characterisation made in this third additional provision with that provided for in the fourth additional provision of Law 6/2022 of 31 March 2007, thus identifying and further specifying the scope of the tasks of the Centre.</p> <p>However, this draft should also address the amendment of the Statute of the Royal Patronato on Disability, approved by Royal Decree 946/2001 of 3 August 2015, with a view to complying with the express provisions of the second final provision of Law 6/2022 of 31 March, which calls on the Government to regulate in the Statute the powers, structure, tasks and functioning of the Spanish Cognitive Accessibility Centre, to which the fourth additional provision of that Law refers.</p>	1709/2011 OF 18 NOVEMBER 2015 ESTABLISHING AND REGULATING THE INCLUSIVE CULTURE FORUM.
7	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>With regard to the fourth additional provision, we ask that the composition of the technical group referred to in the provision be specified as much as possible, or at least that the explicit participation of audiovisual media service providers be included for those pictograms that must be used in the audiovisual field, in the light of the development of the code of self-regulation of television content (Article 98 and 99 of Law 13/2022 of 7 July General on Audiovisual Communication) and self-regulation to increase accessibility (Article 108 of Law 13/2022 of 7 July).</p>	<p>Not acceptable.</p> <p>It is not considered necessary to specify this group in this rule, without prejudice to the fact that it is shared that the sectors concerned must participate in it.</p>
8	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>The fifth additional provision of the approval text provides that the Ministry with responsibility for transport shall draw up a report on the cognitive accessibility of airport and railway facilities, with recommendations for improvement and a proposal for the unification of technical specifications.</p>	<p>Not acceptable.</p> <p>It is not considered necessary to specify this by leaving the choice to the competent ministry.</p>

			It is considered that this provision should supplement its terms by indicating which authority, body or agency of the Department is competent to draw up such a report, as well as providing for the submission for approval to the head of the Department or to the authority, body, office or agency deemed relevant for this purpose.	
9	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>The text states in its second final provision that this rule <i>'does not entail any increase in allocations or salaries, staff costs or any other appropriations for the public sector'</i>. However, the implementation of the requirements that <i>'must be guaranteed' 'within relations between public administrations and citizens and irrespective of the channel through which they occur'</i>, as set out in Article 11 (2) of the Regulation, will require significant implementation costs for which there is no budgetary allocation provided for in the part that may be allocated to the State Agency for Digital Administration.</p> <p>The same can be said of the complementary actions that public administrations will promote in accordance with Article 11 (3) of the Regulation and which will require a specific allocation for their implementation.</p> <p>Finally, paragraph 4 of that article lays down the obligation to ensure that <i>'all oral or written communications with persons with cognitive impairments shall be made in plain and cognitively accessible language, taking into account their personal characteristics and needs, using means such as easy reading, communication pictograms or other alternative and augmentative communication systems where necessary'</i>. In this regard, it should be noted that, for example, easy-to-read translation is not a simple process. Each text, procedure, etc. should be simplified to minimum levels without compromising the content. 'Easy to read' is not 'clear language', it is a very different language that is much simpler and more explanatory. Many procedures refer</p>	<p>Accepted in part. Se hopes that the budgetary availability will have to address the following issues related to cognitive accessibility under the already approved items. This is the case for investment in accessibility of transport infrastructure, which, in addition to physical and sensory accessibility, will have to make investments – comparatively much lower by nature in terms of cost but significant impact – in terms of cognitive accessibility, so as to facilitate the use of facilities, favouring spatial orientation.</p> <p>It is estimated that there are just over 7.590 SIA formalities in the General State Administration, the easy-to-read version of which becomes necessary. If we estimate the easy-to-read translation of each of them at around EUR 100, the adaptation cost will not exceed 800.000 for all active AGE procedures. With regard to public sector websites, they are already required to meet the accessibility requirements in accordance with Royal Decree 1112/2018 of 7 September on the accessibility of public sector websites and mobile applications.</p> <p>Furthermore, the measures provided for in this Royal Decree may be financed, in whole or in part, by the State Programme for the Promotion of Universal Accessibility within the General State Administration, provided for in the Draft Law amending the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2007 and Law 39/2006 of 14 December 2006 on the promotion of personal autonomy</p>

			<p>to laws to complete the information, they have complex fields on which the options and the different implications of each option need to be explained. It therefore refers to a multitude of content that is associated with a very large amount of adaptation work.</p> <p>As far as the ICT part is concerned, changes to all electronic procedures are needed to adapt them to providing easy-to-read information and assistance with guides and aids to do so, which implies a change of many elements in each of the procedures managed or the possibility of having to implement specific procedures in certain procedures, as legal information on the procedure should not be dispensed with for all citizens.</p> <p>Therefore, it is understood that the cost of the obligations set out in this draft Royal Decree for the administration has not been correctly quantified and cannot be borne by the budgetary means currently available, at least in the case of obligations that may be incumbent on the State Agency for Digital Administration.</p>	<p>and care for people in a situation of dependency, to extend and strengthen the rights of persons with disabilities to inclusion, autonomy and universal accessibility in accordance with Article 49 of the Spanish Constitution. As stated in the draft legislation: this programme “aims to support universal accessibility interventions in public environments and services that ensure the inclusion and exercise of the rights and freedoms of persons with disabilities. Actions to improve accessibility financed through the Programme shall include those to be developed by public administrations in order to comply with national legislation.’</p>
10	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>To the Regulation:</p> <p>Article 1 of the Regulation, which sets out the purpose of the legislation, must comply with the terms of reference contained in Article 29a of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion and in the second additional provision of Law 6/2022 of 31 March 2007, which refers to the adoption of a regulation laying down the ‘<i>basic conditions for cognitive accessibility, and their requirement within the time limits and terms laid down</i>’. In this case, the establishment of cognitive accessibility is already determined in the recast text itself. The same consideration is made in relation to what is stated in the sole article of the approved royal decree.</p>	Finding accepted.
11	MINISTRY FOR THE DIGITAL	TEXT	Article 3 contains a list of up to 21 definitions for the	Finding accepted. Only definitions whose concepts appear in the text are retained (including the definitions

	TRANSFORMATION AND THE CIVIL SERVICE (TSG)		<p>purposes of this Royal Decree. Some of them, such as those contained in paragraphs (d) ('code for augmentative and alternative communication'), paragraph (g) – 'acquired brain damage' -, paragraph (l) – 'sign language' -, paragraph (p) – 'support product for augmentative and alternative communication' -, paragraph (q) – 'mental health' -, paragraph (s) – 'Down syndrome' – and paragraph (u) – 'mental disorder' – do not appear in the text of the Royal Decree or of the regulation in question.</p> <p>In view of the above, it is not necessary to include them in the list of definitions, the aim of which should be to allow a proper interpretation of the terms and mandates contained in the project. Paragraphs (d), (g), (l), (p), (q), (s) and (u) of Article 3 should therefore be deleted and only the definitions necessary for the correct interpretation of the terms in this provision should be maintained. In this regard, the Council of State has recently stated, in line with repeated previous opinions, that 'the definitions, unless strictly necessary, should be deleted from the draft royal decree submitted for consultation' (Opinion No 627/2024 of 25 April).</p> <p>On the other hand, paragraph (j) defines 'cognitive accessibility tools' in excessively broad terms by incorporating their different categories and the objectives they pursue, and would therefore go beyond the concept of a definition specific to those initial provisions of the rules. It is therefore proposed that this content be moved to an article dealing specifically with this issue. In turn, the definition of pictograms in paragraph (o) should be revised in order to avoid unnecessary redundancy, also indicating that the illustration of uses contained in that definition is less than complete.</p>	<p>themselves). The “cognitive accessibility tools” are moved to the explanatory part of the text, considering that they fit better with them.</p>
12	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE	TEXT	<p>With regard to Article 7, the following findings are made: Firstly, it is proposed to include a reference in Article 7 (2) to taking into account, in the application of the principles and requirements referred to therein, the concept of 'reasonable</p>	<p>Not acceptable.</p> <p>With regard to the proposed amendment to Article 7 (2), it is not considered necessary since it refers to accessibility measures, in application of the general law, the definition</p>

	(TSG)		<p>accommodation' provided for in Article 2 (m) of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, in accordance also with Article 66 (2) of the recast text. In this respect, Article 66 distinguishes between two types of measure: accessibility requirements, which refer to new goods and services; and requirements to make reasonable accommodation, taking into account that, <i>in determining whether an adjustment is reasonable, 'account shall be taken of the costs of the measure, the discriminatory effects of non-adoption on persons with disabilities, the structure and characteristics of the person, entity or organisation that is to implement it and the possibility of obtaining official funding or any other assistance'</i>.</p> <p>In connection with the above, account should also be taken of the reference to graduality in Article 23 (1) of the recast text, which now expressly refers also to cognitive accessibility, following the amendment made by Law 6/2022 of 31 March, stating that the <i>Government shall 'regulate the basic conditions of accessibility and non-discrimination', that 'all reference to accessibility and universal accessibility in this law is understood to include cognitive accessibility'</i> (this is the point added in 2022) and that <i>'this regulation shall be gradual in time and in the scope and content of the obligations imposed'</i>.</p> <p>Secondly, it is proposed to include a paragraph 6 in Article 7, in order to expressly include in this provision a reference to the regulation on accessibility in linear or on-demand audiovisual media services laid down in Law 13/2022 of 7 July, given that this Law already includes a complete accessibility regime with full guarantees: <i>'6. Audiovisual media service providers shall be governed by the provisions on accessibility laid down in Law 13/2022 of 7 July 2003 on Audiovisual Media'</i>.</p>	<p>of which already states that this 'is without prejudice to the reasonable accommodation to be adopted' (Article 2 (k)).</p> <p>With regard to the inclusion of paragraph 6, the reference is unnecessary and, in any event, incomplete, since it overlooks the obligations contained in other legislation such as Law 11/2023 of 8 May.</p>
13	MINISTRY FOR THE DIGITAL	TEXT	As regards, in the first place, Article 11, the reference to	Accepted in part.

	TRANSFORMATION AND THE CIVIL SERVICE (TSG)		<p><i>'access to public benefits and administrative decisions'</i> in its title cannot be understood, since the content of that provision is limited to the requirements in relations between public administrations and citizens, as well as to complementary measures in the field of cognitive accessibility.</p> <p>Secondly, in Article 11 (2) (a), it is proposed to replace the <i>phrase 'Documentation shall be presented in a clear and simple manner'</i> with the most precise (and grammatically consistent with the wording of the following paragraphs) of <i>'Provision of documentation in a clear and simple manner'</i>.</p> <p>Article 11 (2) (D) lays down as a requirement to ensure cognitive accessibility in relations between public administrations and citizens <i>that 'the information and procedures of all digital formalities of public administrations must be designed in a cognitively accessible manner'</i>. It is necessary, however, to clarify the scope of <i>the expression 'procedures for all digital formalities'</i>, since either the intention is to indicate that all procedures carried out electronically must be cognitively accessible, in which case they should be transposed to the legislation governing those procedures, or that the digital formalities to be carried out electronically must be cognitively accessible.</p> <p>In Article 11 (4), <i>the words 'the person chosen by it to represent it' should be replaced by the words 'the representative' for this purpose, given that the provisions of Article 5 of Law 39/2015 of 1 October on the Common Administrative Procedure of Public Administrations apply.</i></p> <p><i>Finally, the reference in Article 11 (4) (b) to the effect that 'professional assistance shall be provided to persons with cognitive difficulties' should be clarified and, in particular, it should be clarified whether such assistance will be provided by staff serving public administrations.</i></p>	<p>The title of Article 11 has already been changed.</p> <p>In relation to 11.2a, it accepts the following wording: The documentation shall be provided in a clear and simple manner.</p> <p>I would accept the proposal of 11.2.d as it is not clear, I propose to leave only "digital formalities".</p> <p>The proposal in Article 11 (4) is partially accepted and reads as follows: <i>'... an intellectual disability by means of the certificate referred to in paragraph 1 of the first additional provision of Royal Decree 888/2022 of 18 October, or, where appropriate, the person concerned chooses to represent it...'</i></p> <p>Finding accepted. Article 11 (4) (b) shall read as follows: b) A person with cognitive difficulties may be accompanied by a person of his choice from the first contact with the authorities and the civil servant.</p>
14	MINISTRY FOR THE DIGITAL TRANSFORMATION	TEXT	<p>In Article 13 (1), with the same aim of improving the wording, it is proposed to include an <i>initial indent stating 'In the</i></p>	<p>Accepted in part.</p> <p>The first proposal is not accepted, since it is clear in the</p>

	AND THE CIVIL SERVICE (TSG)		<p><i>field of participation in public life and electoral processes</i>’ or similar expression, so that it expressly links the application of the rule to this specific area. The same observation is made for what is provided for in similar terms in Article 14 (1), proposing the addition of <i>the words ‘in the field of cultural heritage and historical heritage’</i>.</p> <p>On the other hand, Article 13 (2) has an explanatory content which is not specific to the operative part: <i>“the importance of full participation in public life and electoral processes of people with cognitive difficulties as a guarantee of democratic quality and full inclusion is recognised”</i>, the appropriate place being the Preamble, as indicated by Rule 26 of the TNDs. It is therefore proposed to be moved to the narrative part of this project.</p> <p>In Article 13 (4), it is proposed <i>to refer to ‘public participation in standard-setting procedures’</i>, which is the term used in Article 133 of Law 39/2015 of 1 October on the Common Administrative Procedure of Public Administrations.</p>	<p>title of the article that we refer to the scope of this proposal, and with the current wording it is understood that the provisions of both the Article and the specific rule on the subject apply.</p> <p>Article 13(2) has been deleted.</p> <p>The proposal on Article 13 (4) is not accepted as the current wording is clear.</p>
15	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>Article 15 (9) provides that <i>‘private and public contracting entities shall promote the development of easy-to-read guides and manuals...’</i>. The term <i>“public entities”</i> should be replaced by <i>“general government”</i>, which is more appropriate to express the scope of this provision.</p>	<p>Finding accepted.</p>
16	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>It is suggested that the wording of Article 17 be revised, as it seems to be incomplete, since it does not go so far as to specify the purpose of the aid that can be established, beyond referring to the subjects to whom it is addressed, who are required to comply with the cognitive accessibility obligations laid down in the project. In other words, it is stated that aid <i>‘intended to be provided’</i> may be established, but there is no indication of what can be provided with such aid.</p>	<p>Not acceptable.</p> <p>The purpose of the aid is specified in the regulation.</p>

17	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>Article 19 provides for the promotion of codes of conduct. In this regard, it should be noted that codes of conduct are also provided for in the audiovisual media sector, with specific rules. In particular, Article 15 (2) of Law 13/2022 of 7 July contains a number of features that codes of conduct must meet:</p> <p><i>“(a) Accepted by the main stakeholders. (b) set out clearly and unequivocally its objectives. (c) Provide regular, transparent and independent monitoring and evaluation of the achievement of the objectives pursued. (D) Provide the means for effective enforcement, including effective and proportionate sanctions. (e) Provide user complaints mechanisms. f) Prevent out-of-court dispute resolution systems to entities accredited as ADR entities, in accordance with the provisions of Law 7/2017 of 2 November transposing into Spanish law Directive 2013/11/EU of the European Parliament and of the Council of 21 May 2013 on alternative dispute resolution for consumer disputes. (g) establish prior consultation mechanisms to ensure compliance and avoid potential breaches and reputational risks. (h) establish independent monitoring bodies to ensure the effective implementation of the commitments undertaken. (i) Respect for antitrust rules.”</i></p> <p>It is recommended to include in Article 19 of this project the requirements laid down in audiovisual legislation, in particular (a).</p>	<p>Not acceptable.</p> <p>The standard referred to does not regulate codes of conduct in a general way, but only those relating to audiovisual communication.</p> <p>It is therefore considered that the current wording is sufficiently secure.</p>
18	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	TEXT	<p>In Article 20, it is proposed to replace the reference to “Ministries” with the more comprehensive reference to “the General State Administration and its bodies and bodies governed by public law which are linked or dependent”, so as to ensure the necessary breadth of this measure.</p>	<p>Finding accepted.</p>

19	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	MAIN	<p>To the Report on Regulatory Impact Analysis:</p> <p>The content of the report must be updated in order to reflect the significant developments that have occurred during the process, in accordance with Article 2 (2) of Royal Decree 931/2017 of 27 October. Specifically, a reference to the issuance of this report should be included and the assessment of the observations made in this report should be reflected, in accordance with Article 2 (1) (i) (3) of Royal Decree 931/2017 of 27 October.</p>	Finding accepted.
20	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	MAIN	<p>Section III.1.b) of the notes on the content of the standard states that the single article consists of three chapters. It is suggested that the wording be revised, as it is the Regulation that adopts this article but does not form part of it, which actually consists of three chapters.</p> <p>Furthermore, at the end of that paragraph, with regard to the third final provision, Article 23 of Law 50/1997 of 26 November 2003 on the Government is cited, concluding that '[t] he legislation shall therefore be valid indefinitely'. This reference is not understood, since Article 23 of that law refers to the entry into force of the rules and has nothing to do with their indefinite duration, which is merely a consequence of the fact that all the rules are intended to remain, unless a specific period is indicated.</p>	Finding accepted.
21	MINISTRY FOR THE DIGITAL TRANSFORMATION AND THE CIVIL SERVICE (TSG)	MAIN	<p>Section IV.4 of the Report, on the budgetary impact, expressly mentions the actions to be taken by the Secretariat-General for Digital Administration (now the National Agency for Digital Administration) in the implementation of this Royal Decree as follows:</p> <p><i>'It is estimated that there are just over 7.590 SIA formalities in the General State Administration, the easy-to-read version of which becomes necessary. If we estimate the</i></p>	<p>Accepted in part.</p> <p>With regard to Royal Decree 1112/2018 of 7 September, Article 5 <i>ensures that its content is perceivable, operable, understandable and robust, taking into account the rules laid down in Article 6.</i> Therefore, a cognitive accessibility measure is already ensured.</p> <p>With regard to the last proposal, it is considered</p>

			<p><i>easy-to-read translation of each of them at around EUR 100, the adaptation cost will not exceed 800.000 for all active AGE procedures. With regard to public sector websites, they are already required to meet the accessibility requirements in accordance with Royal Decree 1112/2018 of 7 September on the accessibility of public sector websites and mobile applications.</i></p> <p><i>For its part, the Secretariat-General for Digital Administration, which is already incorporating artificial intelligence projects, through its budget, should address the development of algorithmic chat tools to guide the completion of procedures.</i></p> <p><i>In addition, this technology could be used in a multitude of procedures, thus generating significant returns of scale that would improve the efficiency of the tasks carried out by the above-mentioned Secretariat-General”.</i></p> <p>As already stated, easy-to-read translation is not a simple process, as it involves the transformation of many content and elements. Therefore, the assessment in the MAIN of EUR 100 per SIA procedure is scarce for the scope of the operation envisaged. It is proposed to incorporate a full budgetary analysis covering all the elements necessary to obtain the real cost of the obligations contained in this draft Royal Decree.</p> <p>As regards Royal Decree 1112/2018 of 7 September on the accessibility of public sector websites and mobile applications, which is mentioned, it should be recalled that it does not include explicit considerations in cognitive accessibility matters, beyond the general references to the use of plain language.</p> <p>Finally, it is suggested that the reference to the SGAD and the obligations laid down for this unit be removed from the MAIN, given that, in the context of its conversion into an Agency, it has defined a roadmap with a number of priority actions linked to the allocation of appropriations available to it, which do not cover the actions identified in the MAIN and the draft Royal Decree.</p>	necessary to clarify which unit has been bound by the obligations of the former SGAD.
22	MINISTRY FOR THE DIGITAL	MAIN	Section IV.5 of the Report, on the analysis of administrative	Finding accepted.

<p>TRANSFORMATION AND THE CIVIL SERVICE (TSG)</p>		<p>burdens, includes the study of the administrative burdens arising from the draft legislation in relation to the previous regulation, in accordance with Article 2 (1) (e) of Royal Decree 931/2017 of 27 October.</p> <p>That analysis indicates that this regulation does not entail an increase in administrative burdens.</p> <p>It is recalled that administrative obligations imposed by the rule on citizens and businesses are considered to be administrative burdens. These obligations are those listed in Table I of the Simplified Method of Measurement of Administrative Burdens and their reduction. In line with this, a number of clarifications can be made, since this draft law has an impact on administrative burdens, resulting in both an increase in and a reduction in administrative burdens.</p> <p>Firstly, the project involves various administrative burdens for companies, namely in the following articles:</p> <p>Article 7, stating that: <i>'1. Public administrations and private providers involved in their activities in the field of telecommunications and the information society must implement measures to guarantee and enjoy cognitive accessibility.'</i> <i>'3. Where the services in question are provided via a website or mobile application, compliance with criteria A and AA of standard UNE 139803 must be ensured.'</i></p> <p>Article 10, which states: <i>"... the inclusion of an assessment of cognitive accessibility of goods and services in the annual reports of consumer and user associations shall be in the public domain."</i></p> <p>Article 15: <i>'7. Companies shall have the obligation to provide and provide support and reasonable accommodation in relation to working hours, time allocated and workload and the possibility to use assistive technologies on request and with the involvement of the worker concerned. These support schemes shall be reviewed on a regular basis.'</i> <i>8. "Trade unions shall produce handbooks of good practice"</i> <i>9. "Private and public</i></p>	
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contracting entities shall promote the development of easy-to-read guides and manuals”

These administrative burdens entail the obligation of reports or studies to ensure compliance with these obligations, which corresponds to burden 10 in the table for measuring direct cost, the cost of which is EUR 500 per report. In the case of Article 7.3, it also involves an audit, load 16 of the table for measuring the direct cost, the cost of which is EUR 1.500.

Furthermore, Articles 11 and 12 of the Regulation are considered to represent a reduction in administrative burdens, since they establish specific systems of support for completion, which corresponds to point 5 of the Table for measuring the aggregate cost of the reduction, savings of which is EUR 30 per person and per procedure.

For all of the above reasons, in order to complete the MAIN, efforts are required to quantify the unit cost, frequency and population aspects. The corresponding estimate is carried out when these quantities are not accurately known, as stated in Article 2 (1) (e) of Royal Decree 931/2017 of 27 October, and applying the simplified method for measuring loads.

Tables are provided below to facilitate the calculation. The overall balance of the rule (increase or savings in administrative burdens) will be given by the difference between the increases and total reductions:

DRAFT ROYAL DECREE APPROVING THE REGULATION ON BASIC COGNITIVE ACCESSIBILITY CONDITIONS

Administrative obligations (Table I of the Simplified Method)	Article	Type	Unitary cost	Frequency	Population	Annual cost
Study, report or report	7	10	500	1	report	report

Study, report or report	10	10	500	1	report	report
Study, report or report	15	10	500	1	report	report
External audit or control	7.3	16	1.500	1	report	report
...						
DRAFT ROYAL DECREE APPROVING THE REGULATION ON BASIC COGNITIVE ACCESSIBILITY CONDITIONS					report	
Savings in administrative burdens (Table II of the Simplified Method)	Article	Saving rate	Unit savings	Frequency	Population	Saving
Shortened time limits	11	5	30	1	report	report
Shortened time limits	12	5	30	1	report	report
TOTAL SAVINGS ADMINISTRATIVE BURDEN					report	

23	MINISTRY OF THE PRIME MINISTER'S OFFICE, JUSTICE AND RELATIONS WITH PARLIAMENT	TEXT	<p>(A) TO THE NARRATIVE PART</p> <p>First. On the appropriateness of including references to the amendments made to the Code of Civil Procedure, the Law on Voluntary Jurisdiction and the Code of Criminal Procedure in order to bring our legal system into line with the International Convention on the Rights of Persons with Disabilities; as well as the Organic Law on the Law of Defence.</p> <p>In the explanatory part of the draft Royal Decree (and in the MAIN), it is suggested to consider the possibility of referring to the amendments made to the Code of Civil Procedure, the Law on Voluntary Jurisdiction and the Code of Criminal Procedure in order to bring our legal system into line with the International Convention on the Rights of Persons with Disabilities. It is also suggested to assess the possibility of including a reference to Organic Law 5/2024 of 11 November on the Law of Defence, which implements Article 24 of the Spanish Constitution on the fundamental right to effective judicial protection and access to a lawyer, and Article 10 of which recognises the right ‘To recognise disability as a criterion worthy of special legal protection and access to universally accessible resources.’ The following is a drafting proposal that could be incorporated into the explanatory part and the MAIN: ‘In the area of the administration of justice, Law 8/2021 of 2 June on the reform of civil and procedural legislation to support persons with disabilities in the exercise of their legal capacity introduced various amendments to civil and procedural law in order to bring our legal system into line with the International Convention on the Rights of Persons with Disabilities, done at New York on 13 December 2006. Thus, Law 1/2000 of 7 January 1992 on Civil Procedure was amended by the addition of a new Article 7a on ‘Adjustments for persons with disabilities’, which was also introduced in Law 15/2015 of 2 July 2015 on Voluntary Jurisdiction. These articles regulate adaptations and adjustments to procedures involving persons with disabilities, regardless of whether they do so as a party or in a different party and which shall be carried out at all stages and procedural steps at which it is necessary, including acts of</p>	<p>(A) TO THE NARRATIVE PART</p> <p>First. Is rejected. In the light of DTN 12, the explanatory part of the provision must be limited to describing the content, purpose, background, powers and powers in the exercise of which it is issued. It is therefore considered that, in the case of a draft Royal Decree on cognitive accessibility, there is no need for an exhaustive reference to the Code of Civil Procedure, the Law on Voluntary Jurisdiction, the Code of Criminal Procedure, or the Organic Law on the Law of Defence.</p> <p>(B) THE ENACTING TERMS OF THE DRAFT ROYAL DECREE</p> <p>Secondly. Not accepted, this provision has already been deleted.</p> <p>(C) THE TEXT OF THE REGULATION ON BASIC COGNITIVE ACCESSIBILITY CONDITIONS</p> <p>Third. Finding accepted. The following wording is proposed to bring the penalty system into line with the reservation of law: ‘Actions and omissions that violate the provisions of cognitive accessibility conditions and are defined in Title III of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion shall be sanctioned in accordance with the provisions of this Law’.</p> <p>Four. Finding accepted. The wording of Article 12 will be revised from a dual formal perspective, in order to bring it into line with the DTN, 4 and material, in order to avoid encroaching on the existing reservation of law in substantive aspects of procedural law.</p> <p>(D) COMMENTS OF A FORMAL AND TECHNICAL NATURE</p>
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communication. In addition, the disabled person is allowed to use an expert professional who, as a facilitator, carries out adaptation and adjustment tasks. Article 7a of the Code of Civil Procedure was amended by Royal Decree-Law 6/2023 of 19 December approving urgent measures for the implementation of the Recovery, Transformation and Resilience Plan in the area of public justice service, civil service, local regime and sponsorship, in order to address the situation and needs of older people, removing barriers that prevent them from participating in judicial proceedings on an equal basis and thus contributing to the creation of an inclusive and friendly public justice service. In addition, Royal Decree-Law 6/2023 of 19 December introduced an amendment to Article 109 of the Code of Criminal Procedure, approved by the Royal Decree of 14 September 1882, in order to allow the necessary adaptations and adjustments to be made in proceedings involving persons with disabilities, including the participation of an expert professional who, as a facilitator, carries out the necessary adaptation and adjustment tasks so that the person with disabilities can understand and be understood. Article 10 of Organic Law 5/2024 of 11 November 2015 on the Law of Defence enshrines the right to recognition of disability as a criterion worthy of special legal protection and access to universally accessible resources. In this regard, Article 4 regulates the appropriateness of making or requesting the necessary adaptations to ensure the effectiveness of the cognitive accessibility right of persons with intellectual disabilities. Article 6, for its part, provides for the right to be informed in a clear, simple, comprehensible and universally accessible manner, using any necessary support, instruments and adjustments. Article 9 also lays down the right to clear language and Article 19 requires legal practitioners to implement the additional guarantees necessary to ensure the effective defence of clients with disabilities. The purpose of the legal guidance services of bar associations shall be to provide information in a universally accessible manner and taking into account the most deprived persons in society, as set out in the second additional provision. In

Fifth. It is accepted in order to bring the composition of the chapters into line with the provisions of TTD 23.

Six It is accepted in order to bring the internal division of articles into line with the provisions of DTN 31.

Question 7. Finding accepted.

short, the protection of persons with cognitive disabilities is therefore enshrined not only in the Spanish Constitution, but also in Organic Law 5/2024 of 11 November on the Law of Defence and in the civil and procedural legislation referred to above, the provisions of which are now being supplemented by this Royal Decree.’

(B) THE ENACTING TERMS OF THE DRAFT ROYAL DECREE

Secondly. — To the third additional provision. The third additional provision of the draft royal decree states: ‘Third additional provision. The Spanish Centre for Accessibility Cognitiva. The Spanish Centre for Accessibility Cognitiva – CEACOG – is an advisory centre for the Royal Disability Trustee, a reference centre in this area for validating and monitoring the quality of cognitive accessibility services, as well as for advising public administrations.’ This provision consists only of an explanatory statement on the CEACOG, which was created under the fourth additional provision of Law 6/2022 of 31 March 2003, which already identifies its functions and scope of action. Therefore, pending its own normative content, it is suggested that the third additional provision be moved to the explanatory part, in accordance with Guideline 26 of the Regulatory Technical Guidelines (DTN 26), approved by the Agreement of the Council of Ministers of 22 July 2005, according to which: ‘The articles shall not contain reasons or explanations, the appropriate place of which is the explanatory part of the provision.’

(C) THE TEXT OF THE REGULATION ON BASIC COGNITIVE ACCESSIBILITY CONDITIONS

Third. — Article 6. Article 6 of the draft regulation provides: ‘Article 6. Penalties. Actions and omissions that violate the cognitive accessibility conditions laid down in this Royal Decree shall be sanctioned in accordance with the provisions of Title III of the consolidated text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion.’ The principle of legality in matters of penalties, enshrined in Article 25 (1) of the Spanish Constitution (EC), provides that ‘no one may be

			<p>convicted or punished for actions and omissions which, at the time of occurrence, do not constitute an offence, misconduct or administrative offence, in accordance with the legislation in force at the time'. According to settled constitutional doctrine, the fundamental right under Article 25 (1) EC includes a dual guarantee: a first, of a substantive nature and absolute scope, resulting in the need for 'regulatory predetermination of unlawful conduct and corresponding penalties'; the other, of a formal nature, refers to the necessary status of the rules on criminalisation of such conduct, which is reflected in the existence of a reservation of law in matters relating to penalties. Thus, 'Article 25.1 of the Constitution obliges the legislator to regulate by itself the types of administrative offences and the corresponding penalties, to the extent necessary to comply with the reservation of the Law (...) and as long as this legal regulation does not occur, it is not permissible, from the Constitution, to criminalise new infringements or introduce new penalties or alter the table of existing ones by a regulatory provision whose content is not sufficiently predetermined or delimited by another law' (STC 42/1987 of 7 April, FFJJ 2 and 3). This principle is positivised in the same numbering article in Law 40/2015 of 1 October on the Legal Regime for the Public Sector (LRJSP), by requiring that 'The power to impose penalties of public administrations shall be exercised when it has been expressly recognised by a law' (Article 25 (1) of the LRJSP). However, this is a relative reservation of law which allows the regulation to work together, provided that the system of infringements and penalties in force is not thereby circumvented, and the regulatory provision is limited to supplementing, applying or specifying the legal provisions to a specific subject, without calling into question the statutory reservation. This doctrine on the principle of criminality has been incorporated by the legislature in Article 27 (3) of the LRJSP: 'The implementing regulatory provisions may introduce specifications or graduations to the table of infringements or penalties laid down by law which, without constituting new infringements or penalties, or altering the nature</p>	
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or limits of those laid down by law, contribute to the most correct identification of the conduct or to the more precise determination of the corresponding penalties'. We should therefore refer to the observations made by the State Legal Service in its report on this draft royal decree, pointing out that only conduct falling within one of the offences defined in Title III of the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion may be sanctioned, with the penalty laid down in that law being imposed. However, actions or omissions contrary to the cognitive accessibility obligations set out in this Regulation may not be penalised where non-compliance is not classified as an infringement in the aforementioned law, as this would amount to introducing an innovation in the table of infringements and penalties contrary to the principles of legality and criminality in relation to penalties.

Four. — Article 12. It is considered that Article 12 of the draft regulation, relating to the 'Administration of Justice', does not constitute a substantive implementation of Law 6/2022 of 31 March 2003, but rather of the rules which, with regard to the concept of judicial facilitator, are contained in procedural law, namely in the Code of Civil Procedure (Article 7a), in the Law on Voluntary Jurisdiction (Article 7a) and in the Code of Criminal Procedure (Article 109). On the one hand, it is noted that Article 12 of the proposed regulation, in various paragraphs, partially reproduces the content of Article 7a of Law 1/2000 of 7 January 1992 on Civil Procedure (LEC); Article 7a of Law 15/2015 of 2 July 2015 on Voluntary Jurisdiction (LJV); and Article 109 of the Code of Criminal Procedure, approved by the Royal Decree of 14 September 1882 (LECrim). In that regard, DTN 4, relating to the reproduction of statutory provisions in regulatory provisions, provides that: 'Mere reproduction of legal provisions is not correct, except in the case of legislative delegation, in regulations or their inclusion with certain specific amendments, which, in certain cases, may create confusion in the application of the rule. It is therefore necessary to avoid the incorporation of legal provisions which are unnecessary (because

			<p>they merely reproduce the law literally, without contributing to a better understanding of the rule) or which lead to confusion (because the legal provision is reproduced with nuances).’ Furthermore, it is also noted that, in other paragraphs, Article 12 is not limited to transcribing in part the content of the legal provisions referred to, but goes further by developing aspects specific to the judicial process when a person with cognitive disabilities is involved. Thus, the proposed regulation regulates a matter subject to a law under Article 117 (3) of the Spanish Constitution and Article 1 of the LEC, without there being any specific legal authorisation on which such regulatory implementation can be invoked. Article 12 (3) (b) and (c) of the LEC further develops the content of Article 7a of the LEC, specifying, inter alia, what is meant by clear, plain and accessible language in judicial communications: “They are included in the accessible format (...) (b) Identification of obligations, time limits, dates, appearances and procedural acts which are scheduled in a clear, simple and prominent manner. (c) The possibility of requesting decisions and other documents indicated in an alternative format to the document.” Identity observations can be made in respect of section 5 (c) and its different headings, where clearly procedural issues are also developed. In particular, section 5 (c) (iii) sets out extensively the concept of judicial facilitator, with a number of issues on which procedural laws are not adopted, which undoubtedly correspond to aspects specific to the court proceedings subject to the law, to be regulated by regulation: ‘5. (...) (c) (...) iii. (...) The designated facilitator is obliged to use the procedural steps he/she is summoned to assist the person with cognitive difficulties. The facilitator is not a procedural representative of the disabled person. However, if necessary for a better guarantee of fundamental rights in the proceedings of a person with cognitive difficulties, he or she shall be notified of any decisions the knowledge of which is appropriate in order to be able to perform his or her role of assistance properly. The facilitator cannot be called upon to testify about the content of the conversations he or she has with the person he or</p>	
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		<p>she assists. Like the other parties to the proceedings, it assumes the duties of secrecy and confidentiality laid down in the rules of procedure. The costs arising from the intervention of the person designated as facilitator shall be borne by the relevant administration and may not be passed on through legal costs either to the assisted person or to the other parties to the proceedings.’ (emphasis added). The same applies to paragraph 6, which also imposes obligations to provide information on the possibility of requesting procedural adjustments at police level, an issue currently not covered by our procedural law: ‘6. Persons with cognitive difficulties shall be informed of the right to request procedural adjustments in both police and judicial offices.’ Paragraph 7 also sets out procedural issues, with the above objections being extended by regulation: ‘7. In physical examination procedures, a person with cognitive difficulties may always be accompanied by a supporting person. In the event that it does not appoint one, qualified staff trained in augmentative and alternative means of communication shall be appointed for accompanying persons and shall always be of the same sex.’ Finally, paragraph 9 regulates various issues relating to the procedure for applying for legal aid by persons with cognitive difficulties, departing from the provisions of Law 1/1996 of 10 January on legal aid and its implementing regulations: ‘9. For legal aid applications and when requested by a person with cognitive difficulties, all information on this application process shall be provided in an easy-to-read format. The applicant shall be served by professionals trained in cognitive accessibility and belonging to the legal guidance services of professional bodies. In addition, access to an accompanying person or support person designated by the applicant will always be respected and allowed.’ In short, it is considered that Article 12 of the proposed Regulation does not materially constitute an implementation of Law 6/2022 of 31 March 2007, but of the rules which, with regard to the judicial facilitator, are contained in procedural law. In short, it is legally objectionable that, by way of regulation and in the absence of an express legal authorisation, substantive aspects of</p>	
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procedural law subject to statutory conditions may be regulated.

(D) FORMAL AND NORMATIVE TECHNICAL OBSERVATIONS. — On the composition of the chapters into which the basic cognitive accessibility conditions regulation is divided. As a purely formal remark, in the composition of the chapters into which the Regulation is divided of the basic cognitive accessibility conditions, it is suggested to delete the endpoint after numbering each chapter and to express the title of each chapter in lower case, except for the first letter, as provided for in TLD 23:
“CHAPTER I
□ centered, capital case, without a pt – General Provisions – centered, lower-case, bold, without a point’

Six — On the internal division of the articles of the Regulation of the basic cognitive accessibility conditions. As a purely formal observation, in the text of the Regulation on the basic conditions of cognitive accessibility, the division of the articles into paragraphs and, in turn, that of the articles into paragraphs and other subdivisions must comply with the provisions of DTN 31, which we repeat: ‘31. Splitting of the article. The article is divided into paragraphs, which shall be numbered with Arabic cardinals in numerals, unless there is only one; in that case, it shall not be numbered. The different subparagraphs of a paragraph shall not be considered as subdivisions of the paragraph and shall not be numbered. Where a paragraph is to be subdivided, it shall be given in subparagraphs marked with lower case letters, alphabetically arranged: (a), (b), (c). Where the paragraph or text block is to be further subdivided, which must be exceptional, the divisions shall be numbered with Arabic ordinals (1°, 2°, 3° or 1a, 2a, 3a, as appropriate). Under no circumstances may dashes, asterisks or other marks be used in the text of the provision. For the quotation of these internal divisions of an article, the provisions of Guideline 68 shall apply.” (emphasis added). Therefore, where it is considered necessary to subdivide the paragraphs of an article (which must be exceptional), the divisions shall be numbered with Arabic ordinals (1°, 2°, 3°, 1a, 2a, as

			<p>appropriate), instead of using other formulae such as “i., ii., iii., iv...”. To this end, it is suggested to revise the internal divisions contained in Articles 3, 4, 9, 10, 11, 12 and 13 of the Regulation, in order to bring them into line with the provisions of NTD 31.</p> <p>Furthermore, in the third paragraph of Article 13 “Participation in public life and electoral processes”, it is suggested that subparagraph (e) be inserted as a last indent in the previous paragraph, since there is a thematic unit between the two clauses (to ensure the presence at polling stations of a person who can assist the person with cognitive difficulties while guaranteeing secrecy and freedom to vote), without there being any reason to treat it as separate paragraphs.</p> <p>Question 7. — Use of capital letters. It is suggested that the references in Article 12 to the ‘administration of justice’ be replaced by ‘Administration of Justice’, thus incorporating the initial capital case into the substantive letters designating entities or bodies of an institutional nature, in accordance with the general language rules of the RAE and as is the case with the references to ‘Administration of Justice’ in Articles 121, 122, 125 and 149.1.5a of the Spanish Constitution. Similarly, it is suggested to standardise the use of capitals and lower case letters in the references to ‘public administrations’ throughout the draft legislation (see the second and third additional provisions of the draft Royal Decree, as well as Articles 8.2, 9.2 (d), 11, 17, 18 and 19 of the Regulation).</p>	
24	MINISTRY OF THE PRIME MINISTER’S OFFICE, JUSTICE AND RELATIONS WITH PARLIAMENT	MAIN	<p>Eighth. — On the appropriateness of identifying in the MAIN, specifically and individually, those issues which are new in the legal system resulting from the adoption of this Royal Decree. The MAIN explains that ‘the draft royal decree not only complies with the mandate imposed by the second additional provision of Law 6/2022 of 31 March, but also supplements the regulatory acquis on universal accessibility, expressly determining the conditions which, in addition to those relating to physical and sensory accessibility, allow persons with cognitive difficulties to make use of the services referred to in the scope of the TRLGD, on an equal basis with the others’ (Section III.2.c, page 18).</p>	<p>Eighth. Finding accepted. There will be a more detailed explanation of what this regulation provides with regard to universal accessibility already regulated.</p> <p>Ninth. It is not accepted because the MAIN already includes the reference to the standards required by the aforementioned reports.</p> <p>Tenth. It is not accepted, as the current wording is considered sufficient.</p>

			<p>However, the MAIN itself also states that the various areas covered by the draft Royal Decree ‘already contain their own regulation of universal accessibility, which in turn includes cognitive accessibility’ (Section IV, p. 37), since ‘much of the legislation on accessibility has already been developed prior to this process’ (Section IV, p. 39). It is suggested to assess the possibility, in the relevant section of the MAIN, of identifying specifically and individually the issues that result from the adoption of this Royal Decree, in order to be able to properly analyse the consistency of the legislation with the rest of the legal system, the administrative burdens and the impacts that will result from the application of this rule.</p> <p>Ninth. — Under the heading ‘III.3. Description of the processing’. Under the heading ‘III.3. Description of the procedure’, it is suggested to assess the possibility of including an express mention of the optional or mandatory nature of the consultations and reports collected, indicating in each case the legislative provision on which the petition is based, in line with section VI.B) of this report.</p> <p>Tenth. — Under the heading ‘IV. Analysis of impacts’. In general, it is suggested to assess the possibility for the MAIN to identify specifically and individually the issues that result from the adoption of this Royal Decree, in the terms set out in the ninth observation of this report, in order to be able to give a reasoned assessment of the impact analysis. Without prejudice to the above, the following observations should be made. • Budgetary impact. Beyond the explanation of the various actions, the expenditure and revenue arising from the draft Royal Decree should be quantified and identified, identifying the budget items that may be affected, following the classification in force in the General Budget Law, as specified in the annual Law on the General State Budget. Consideration should also be given to the costs that the draft royal decree may generate for staff costs (for example, because it affects the duties of staff serving the public sector). If there are no personnel costs, this should be explicitly stated. The budgetary impact on the Autonomous Communities, the cities of</p>	
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			<p>Ceuta and Melilla and local authorities, where appropriate, should also be assessed. All of this is in accordance with the Methodological Guide for drawing up the Regulatory Impact Assessment Report.</p> <ul style="list-style-type: none"> • Administrative burdens. The MAIN states: ‘As noted in the previous section, no administrative burdens are foreseen.’ Administrative burdens are those activities of an administrative nature that must be carried out by businesses and citizens in order to comply with the obligations arising from the legislation. If it is considered that the draft legislation does not introduce new administrative burdens, an analysis should be included in the MAIN to support such a conclusion, taking into account the method of measuring administrative burdens and their reduction provided for in Annex V to the Metodological Guide for drawing up the Regulatory Impact Assessment Report. This is particularly relevant given that the draft legislation refers to various issues that could, prima facie, entail administrative burdens, such as the implementation of ‘measures to guarantee and enjoy cognitive accessibility’ (Article 7 (1)) and the need for ‘augmentative and alternative communication systems in the media and channels of public service’ (Article 7 (4)) by private telecommunications operators and the information society; or the requirement that, in applications for legal aid, the applicant with cognitive difficulties be taken into account ‘by professionals trained in cognitive accessibility and belonging to the legal guidance services of professional bodies’; and others. The analysis that led to the conclusion that such requirements, as well as other requirements arising from the legislation, do not entail new administrative burdens, either because they do not constitute an innovation in the legal system or for other reasons, should be noted in the MAIN. 	
25	Ministry of Internal Affairs	TEXT	<p>General observation. Article 13 of the project concerns ‘<i>Participation in public life and electoral processes</i>’: As a general consideration, reference should be made to paragraph 1 thereof, which states that ‘<i>the provisions of Royal Decree 422/2011 of 25 March approving the Regulation on the basic</i></p>	It is rejected as such a level of detail is not necessary in the explanatory part.

			<p><i>conditions for the participation of persons with disabilities in political life and electoral processes shall apply’.</i></p> <p>Indeed, there is a specific regulation on accessibility and electoral processes. For this reason, it is considered that the measures now included in the project should be included in this specific regulation, by amending them through the final provisions of the project. For reasons of legal certainty, the legal provisions on the exercise of the right of sufragio should be contained in electoral law.</p> <p>In addition, the project sets out actions that are already being implemented: manual of instructions for the persons making up the election tables in easy reading, as well as other documentation, accessible posters, etc.; or support for persons with disabilities who come to the election room to vote through government representatives, among others, so they should be explicitly mentioned in the narrative part of the project.</p>	
26	Ministry of Internal Affairs	TEXT	<p>Comments on the Articles.</p> <p>1.- Article 13 on electoral processes also includes ‘participation in public life’.</p> <p>This issue is given concrete expression in the project in participation in the standard-setting process and has nothing to do with “participation in electoral processes”. These are two distinct areas. Bearing in mind, moreover, that the matter relating to electoral processes must, in any event, be incorporated into the existing ad hoc regulation, this Article should refer only to ‘participation in public life’.</p> <p>2.- Article 13(2) (<i>‘ recognising the importance of full participation in public life and electoral processes of persons with cognitive difficulties as a guarantee of democratic quality and full inclusion’</i>) has no operative content but rather an expression, and should therefore be incorporated into the narrative part of the project.</p> <p>3.- Article 13(3) sets out the substantive content of the project and introduces amendments, as noted in the general consideration, to the current Regulation on the basic conditions for the participation of persons</p>	<p>1. Not acceptable. The fields reproduce the wording of Article 5 (‘Scope’ of the TRLGD).</p> <p>2. Finding accepted.</p> <p>3. The wording is clarified in the proposed sense.</p> <p>4. The wording is clarified in the proposed sense.</p> <p>5. The obligation for electoral programmes to be drawn up in plain language is amended.</p>

with disabilities in political life and electoral processes, approved by Royal Decree 422/2011 of 25 March 2007. This section 3 sets out a number of obligations: [...]

With regard to the obligation set out in subparagraph (a) that the content of the programmes elections are made available in easy reading, it should be borne in mind that there is no legal provision for the convening public authority to provide information on the electoral programmes of the candidacies, the latter being responsible for providing such information through the electoral campaign. Applications should therefore be addressed to candidates and should be included in the text.

4.- as regards the obligations laid down in Article 13(3) (b) (promoting a visual support system that enables all voters to understand the proposals put forward by parties and candidates visually and that this content is available in audio or tactile format and with the possibility of using assistive technologies to facilitate understanding and expression), it should also be noted that the tools described in making such dissemination should be used by the political formations, and should be expressly stated in the project. Only political formations disseminate their electoral programmes, through the election campaign.

Thus, Articles 6 and 7 of the current rules, namely the Regulation on basic conditions for the participation of persons with disabilities in political life and electoral processes, refer to public electoral campaign events and electoral propaganda, respectively, to state that:

“Candidates, political parties, federations, coalitions and associations of voters participating in an electoral process shall ensure that electoral campaign events are accessible.

Candidates, political parties, federations, coalitions and associations of voters shall ensure that electoral propaganda is accessible.

Free electoral propaganda facilities drawn up by candidates, political parties, federations, coalitions and associations of voters shall aim to address the specific accessibility needs of persons

			<p><i>with disabilities.’</i></p> <p>Finally, Article 13 of the Regulation on basic conditions for the participation of persons with disabilities in political life and electoral processes states that:</p> <p><i>‘1. Political organisations shall ensure that their public activities are accessible to persons with disabilities.</i></p> <p><i>2. For the purposes of the previous paragraph, political organisations shall endeavour to provide accessible information, whenever possible, inter alia by:</i></p> <p><i>(a) Internet pages.</i></p> <p><i>(b) Print documentation containing your electoral programmes or policy proposals in formats accessible to persons with disabilities</i></p> <p><i>(c) call services.</i></p> <p><i>(D) Audiovisual media.’</i></p> <p>This is a good example of this obligation being attributed to political formations, so it is necessary for this to be explicitly stated in the project.</p> <p>5.- on the other hand, the current Regulation on the basic conditions for the participation of persons with disabilities in political life and electoral processes uses expressions such as “ensure” and “shall seek”, optionally and not as taxation, while Article 13 (3) of the project uses the terms “shall” and “shall”, which is mandatory.</p> <p>In this respect, attention should be drawn to the limited resources available to the smaller trainings or, in case of having to rely on disability rights organisations (such as full inclusion for easy reading), the demand for action in the case of local elections (with such a high number of candidates) may be unacceptable. It must therefore be considered that, at least in the case of local elections, those obligations are optional.</p>	
27	Ministry of Internal Affairs	TEXT	<p>6.- Article 14 of the Regulation on basic conditions for the participation of persons with disabilities in political life and electoral processes provides, in Article 14, <i>that ‘political organisations may bring to the attention of the National Council for Disability any good practices that have been put into effect in</i></p>	Finding accepted.

			<p><i>terms of accessibility and non-discrimination for persons with disabilities’.</i></p> <p>However, legislation on accessibility and electoral processes is missing a performance of the accounts of political formations in relation to the obligations assigned to it in this area, which would serve to ascertain the actual state of accessibility of the materials, campaign events and, in general, of all actions taken by the political formations.</p> <p>It would therefore be appropriate to include in the draft a provision that, during each electoral process, competing political formations should submit a report on the accessibility measures implemented in the electoral process to the election boards. Thus, the Provincial Elections Boards, in the case of the General Elections, and the Central Electoral Board, in the case of elections to the European Parliament. It would also be desirable in the case of local elections, even if it were optional, for the Regional Election Boards. In the case of autonomous elections, either to the Provincial Elections Boards or to the Electoral Board of the Autonomous Community.</p> <p>It is also suggested that political training should make these accessibility reports public on their websites, which must include their statutes in accordance with Article 3 (3) of Organic Law 6/2002 of 27 June on political parties.</p>	
28	Ministry of Internal Affairs	TEXT	<p>7.- paragraph (c) of Article 13 (3) of the project refers to the use of easy reading both on ballot papers and in the instructions for their completion.</p> <p>The content of ballot papers is limited to the identification of the electoral process, the constituency (province or municipality), where applicable, the name of the application, the symbol and list of candidates.</p> <p>It is not clear how an easy-to-read system can be implemented in what is just a list of names. The reference to ballot papers should therefore be deleted from this paragraph.</p>	Finding accepted.
29	Ministry of Internal Affairs	TEXT	<p>9.- finally, it is considered appropriate to include in the draft a final provision (second or third) incorporating a necessary</p>	Finding accepted.

			<p>amendment to Article 3 (1) of Royal Decree 1612/2007 of 7 December regulating an accessible voting procedure that makes it easier for visually impaired persons to exercise their right to vote. According to this article, <i>‘Persons with visual impairments who are aware of the braille literacy system and who have a recognised degree of disability of 33 per cent or more or are affiliated to the Spanish National Blind Organisation, and who wish to use the accessible voting procedure provided for in this Royal Decree, must notify the Ministry of the Interior, using specific means to be determined by order of the Minister for the Interior.’</i></p> <p>This paragraph needs to be amended on two specific issues: to remove the term ‘disability’, which should be replaced by ‘disability’, and to remove the reference to the Spanish National Blind Organisation, which de facto discriminates against persons who are blind or visually impaired with difficult justification. And even, in order to give a greater guarantee that anyone who needs it can resort to the procedure, more generous wording is needed and requirements should be removed.</p> <p>The following wording is therefore suggested: <i>‘Final provision.... Amendment of Article 3 (1) of Royal Decree 1612/2007 of 7 December regulating an accessible voting procedure that makes it easier for visually impaired persons to exercise their right to vote.’</i></p> <p><i>Article 3(1) of Royal Decree 1612/2007 of 7 December 2007 regulating an accessible voting procedure facilitating the exercise of the right to vote by visually impaired persons is amended to read as follows:</i></p> <p><i>‘1. Persons with visual impairments who are aware of the braille literacy system and wish to use the accessible voting procedure provided for in this Royal Decree must inform the Ministry of the Interior by specific means to be determined by order of the Minister for the Interior.’</i></p>	
30	MINISTRY OF TERRITORIAL POLICY AND DEMOCRATIC	TEXT	<p>[...]</p> <p>b) Analysis of the most relevant competition issues raised by the project.</p>	Finding accepted.

	MEMORY	<p>Law 6/2022 of 31 March 2010 amending the TRLGD, to which the second additional provision of the project is being implemented, has not been the subject of any constitutional appeal, nor has Royal Decree 1414/2006 of 1 December 2014 determining the status of a person with disabilities for the purposes of Law 51/2003 of 2 December 2003 on equal opportunities, non-discrimination and universal accessibility for persons with disabilities, repealed by the project.</p> <p>However, legislation on accessibility has occasionally given rise to jurisdictional disputes. In this regard, we can recall the requests for lack of competence raised by the Generalitat of Catalonia in relation to Royal Decree 173/2010 of 19 February 2009 amending the Technical Building Code, approved by Royal Decree 314/2006 of 17 March 2015 on accessibility and non-discrimination for persons with disabilities, Order VIV/561/2010 of 1 February 2013 implementing the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces or Royal Decree 1544/2007 of 23 November 2009 regulating the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities. All of them were accused of the fact that the provisions adopted pursuant to Article 149 (1.1) (a) involved overregulation which undermined the competences of the Autonomous Communities in the areas of housing and social assistance or transport.</p> <p>[...]</p> <p>IV. ASSESSMENT AND OBSERVATIONS OF A COMPETENCY-BASED NATURE.</p> <p>The draft would be issued under Article 149 (1.1) (a) of the Constitution, which confers on the State exclusive competence to regulate the basic conditions guaranteeing equality for all Spaniards in the exercise of constitutional rights and duties.</p> <p>However, in accordance with the findings of this report, given the background of conflicts that have been raised by other accessibility rules, any disputes of competence cannot be ruled out.</p>	
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31	MINISTRY HOUSING AND URBAN AGENDA	TEXT	<p>IV. OBSERVATIONS IV.1 TO THE DRAFT LEGISLATION: Of a general nature.</p> <p>Chapter II of the Regulation contains specific mandatory rules in different material areas. In turn, it identifies the royal decrees in which those matters are regulated, as specific legislation applicable in those areas; for example, in its Article 9 and in relation to transport, Royal Decree 1544/2007 of 23 November regulating the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities. Consequently, in accordance with the principle of the material division of the legal system and in order to ensure legal certainty, it is proposed to assess whether it is appropriate to include in the draft Royal Decree the final provisions necessary to amend the specific legal order in force in this area, in order to supplement this substantive regulation with the new requirements or regulatory developments set out in the proposed legislation, and thus to avoid regulatory inconsistencies and the resulting legal uncertainty that may result from the failure to make such updates.</p>	It is not accepted, as the legal order is not amended, but is complemented by new rules.
32	MINISTRY HOUSING AND URBAN AGENDA	TEXT	<p>Of a special nature. To the third additional provision of the Royal Decree</p> <p>This provision refers to the Spanish Centre for Accessibility Cognitiva (CEACOG), the advisory centre of the Royal Disability Trustee, as regulated by Royal Decree 946/2001 of 3 August 2015 regulating the Statute of the Royal Disability Trustee, as the reference centre in this area. However, a draft royal decree, proposed by the same Ministry, amending various royal decrees, including, as provided for in Article 3, Royal Decree 946/2001 of 3 August 2014, is in progress. Section 15 of this project specifically defines the functions of the aforementioned Spanish Cognitiva Accessibility Centre. In view of the above, in accordance with the principles of legal certainty and regulatory unity, it is proposed to include this</p>	Finding accepted.

			designation as a reference centre in the amendment of Royal Decree 946/2001 of 3 August 2014, and thus to unify the regulation of the Spanish Cognitiva Accessibility Centre into one and the same standard.	
33	MINISTRY HOUSING AND URBAN AGENDA	TEXT	<ul style="list-style-type: none"> • Article 8 of the Regulation • Paragraph 1, the wording of which is: <i>‘As regards the visual and acoustic signalling of built-up public spaces, infrastructure and buildings, the provisions of Article 41 of Order TMA/851/2021 of 23 July 2003 shall apply.’</i> In this regard, it should be noted that Order TMA/851/2021, of 23 July, implementing the technical document on basic accessibility and non-discrimination conditions for access to and use of urbanised public spaces, only develops the technical document on basic accessibility and non-discrimination conditions for access to and use of urbanised public spaces, but not for infrastructure and buildings. These basic conditions shall ensure that urbanised public spaces can be understood, usable and practicable by all, in conditions of safety and convenience and in the most autonomous and natural manner possible, in accordance with the terms laid down in this technical document and in order to give effect to universal accessibility and the right to equal opportunities and treatment. In this regard, it should be borne in mind that, in both building and urban public spaces, the applicable national legislation on accessibility distinguishes between: <ol style="list-style-type: none"> 1. The basic conditions of accessibility and non-discrimination of persons with disabilities in buildings, which is the Basic Use and Accessibility Safety Document (DBSUA) of the Technical Building Code (CTE), since the approval of the Royal Decree 2. approved by Royal Decree 314/2006 of 17 March 2009 on accessibility and non-discrimination for persons with disabilities. 3. The one laying down these conditions in urbanised public 	Accepted in part. The article focuses on the content of the scope of the TRLGD, which literally indicates “urbanised public spaces, infrastructure and buildings” (Art. 5c). In relation to paragraph 2, the competence of other administrations is assumed and criteria are provided for its regulation, which, moreover, is made essential (accessibility, in this case cognitive, cannot be given at will, but is a constitutional obligation on the part of the public authorities).

spaces, which is Order TMA/851/2021 of 23 July 2013 laying down the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces.

4. Both regulations are covered by Royal Decree 505/2007 of 20 April 2015 approving the basic conditions of accessibility and non-discrimination for persons with disabilities for access to and use of urbanised public spaces and buildings, which in turn results from higher legislation on equal opportunities, non-discrimination and universal accessibility for persons with disabilities. These rules are also complemented by the relevant regional legislation. Among the basic conditions regulated are conditions relating to signage. In Order TMA/851/2021 of 23 July, these conditions are to be found in Chapter XI and the DBSUA are contained in Section SI2 '*Conditions and characteristics of accessibility information and signalling*' of Section SUA 9 '*Accessibility*' of the DBSUA, and partly in Section SI7 '*Signalling means of escape*'. '*Evacuation of occupants*' of the CTE Basic Fire Safety Document (DBSI).

5. We therefore consider that Article 8 (1) should refer to the provisions of Order TMA/851/2021 of 23 July and, in the case of buildings, to the DBSUA and to the DBSI of the CTE in relation to the visual and acoustic signalling of urbanised public spaces.

6. In the event that conditions relating to visual and acoustic signs are to be laid down other than those in force, they should be amended in order to avoid inconsistencies or legal uncertainty. At this stage, a project to amend the ETC is under way, partially affecting both the DBSUA and the DBSI, in the context of which consideration could be given to introducing any changes deemed appropriate with regard to these signalling conditions adapted to the scale and particular circumstances of the buildings, which are not the same as the scale and circumstances of the urbanised public spaces. Furthermore, with regard to infrastructure, it would be necessary to study and assess in depth the type of infrastructure in question by the proposing department and whether there are

also specific rules in this regard, such as Royal Decree 1544/2007 of 23 November 2009 regulating the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities.

7. On the other hand, it should be noted that, in order to require accessibility requirements for existing built environments, account must be taken of the precedent of Royal Legislative Decree 1/2013 of 29 November 2015 approving the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, specifically its third additional provision. Setting requirements for existing built environments makes it necessary to determine adaptation times where appropriate and even adaptation criteria, taking into account the possibility for environments to have features that prevent them from meeting the basic conditions.

8. In this regard, it is also important to note that the scope of Order TMA/851/2021 of 23 July 2007 is the projection and construction of new urbanised public spaces, so that, in the case of actions in existing urbanised public spaces, it is only necessary for renovation.

9. Similarly, the scope of the ETC is newly constructed buildings, large interventions on existing buildings and other interventions on existing buildings only in those elements that are affected by the intervention. In other words, it does not apply to existing buildings where no intervention is being carried out. In the light of the above, we propose the following alternative text from the proposed Article 8 (1) as regards urban public spaces and buildings, leaving the proposing department to assess the text to be included in relation to infrastructure, in accordance with the considerations set out above:

10. *'Article 8. Urbanised public spaces, ~~infrastructure~~ and buildings.*

11. *1. As regards the visual and acoustic signalling of built-up public spaces, ~~infrastructure and buildings~~, the provisions of Article 41 of Order TMA/851/2021 of 23 July 2003 shall apply within its scope. The provisions of the Technical Code for*

buildings shall apply with regard to the visual and acoustic signalling of buildings.
Building approved by Royal Decree 314/2006 of 17 March 2015, within its scope. [...]
— **Paragraph 2**, which reads as follows: ‘2. *Basic cognitive accessibility criteria will be mandatory in town planning memories. The competent public administrations shall regulate the inclusion of cognitive accessibility measures in their urban planning policies. They shall take into account the following criteria: [...]*’.

In this regard, with regard to the requirement to establish obligations linked to planning instruments (town planning memories), it should be noted that:

The State does not have competence in urban planning matters, except those recognised by the legislation in force, in relation to the cities of Ceuta and Melilla, and the proposal is therefore liable to encroach on regional competences in this area.

The term ‘town planning memories’ is very broad and can cover infinity of planning instruments and documents with an urban development component, leaving any administration dealing with such planning clearly undefeasible in law.

In addition, the second part of the first subparagraph of this paragraph reads: “[...]. The competent public administrations shall regulate the inclusion of cognitive accessibility measures in their urban planning policies. They shall take into account the following criteria: [...]’.

In addition to the reasons set out above and which entail the introduction of an obligation specific to an area which falls within the exclusive competence of the Autonomous Communities, we should add:

in this case, with the proposed wording, specifications could become mandatory.

imprecise, which runs counter to the principle of legal certainty that any regulation must guarantee and which gives certainty to the applicable legal order by

			<p>contributing to the protection of interests legal guardianship, ensuring clarity and not regulatory confusion. This is merely a list of criteria that are very broad and even the terminology used in some of them is far from the urban planning scale such as ‘elements of the installation’ or ‘use of the installation’.</p> <p>It is therefore proposed that, should the Article be retained, the wording worded as follows: ‘2. <i>“The competent public administrations may regulate the inclusion of cognitive accessibility measures in their urban planning policies. In doing so, they may take into account the following criteria: [...]”</i>.</p>	
34	MINISTRY HOUSING AND URBAN AGENDA	TEXT	<p>(c) The formal and technical nature of the legislation.</p> <p>Finally, it is proposed to carry out a grammatical, spelling and scoring review of the project in order to bring it into line with the Regulatory Technical Guidelines, approved by agreement of the Council of Ministers of 22 July 2005 and published by Resolution of 28 July 2005 of the Undersecretariat (hereinafter DTN), for example:</p> <p>The heterogeneity in the way the same term is written in different parts of the project, with the most significant references to ‘public administrations’ which are written indistinctly in upper or lower case throughout the project.</p> <p>The full citation of the rules, in the case of a first quotation, in accordance with Rule 80 of the TNDs, for example in Article 2 of the Regulation.</p> <p>The use of uppercase starting to refer to the standard in a generic manner or parts of the same standard, as provided for in Appendix (a) to the TTDs, paragraphs 2° and 4° respectively, for example in Article 19 when referring to this Royal Decree or in Article 6 when referring to Title III.</p> <p>The enumeration used to identify the subdivisions of a paragraph must be in accordance with regulation 31 of the NTDs, and thus be listed using arabic ordinals instead of (i), (ii), (iii), etc., used, for example, in Articles 4.2 (a), 9.2 (b), 10.2 (a), 11.2 (b) or 12.5 (c) of the Regulation.</p>	Finding accepted.

			Furthermore, with regard to the errors detected, it should be noted that, in Article 3 of the Regulation, the definitions of cognitive impairment > and cognitive impairment > are not properly linked, falling between paragraphs (g) and (h). For its part, in Article 3 (j) there is a lack of punctuation signs for the completion of different points and in subparagraph (q) the term ‘detentions’ is used instead of ‘stresses’.	
35	MINISTRY HOUSING AND URBAN AGENDA	TEXT	IV.2 TO THE REGULATORY IMPACT ASSESSMENT REPORT (MAIN). Of a formal nature, an error has been detected in the section analysing the economic and budgetary impact, stating in the executive summary sheet that the rule entails revenue, which is not subsequently justified in the body of the MAIN.	Finding accepted.
36	MINISTRY ECONOMY, TRADE AND BUSINESS	TEXT	1. Comments on the Articles of the draft Royal Decree <i>1.1. Second additional provision of the Royal Decree. Call for tenders for public contracts.</i> This provision states that ‘public authorities which publish calls for tenders for public tenders shall comply with the provisions of the legislation in force on public procurement’. This information is accepted without the need to be specified and it is therefore suggested that it be deleted for the sake of clarity of the text.	Not acceptable. However, at the request of the competent ministry, the wording of the provision has been amended.
37	MINISTRY ECONOMY, TRADE AND BUSINESS	TEXT	<i>1.2. Sole repeal provision</i> <i>Since this provision already includes in its content the legislation which it repeals under its full name, namely Royal Decree 1414/2006 of 1 December 2013, by which the status of a person with a disability is determined for the purposes of Law 51/2003.</i> <i>of 2 December, on Equal opportunities, non-discrimination and universal accessibility for persons with disabilities, the following title is proposed:</i> Sole repeal provision <i>Repeal of legislation.</i>	Not acceptable. The wording is in line with the Resolution on TNDs.
38	MINISTRY ECONOMY, TRADE AND BUSINESS	TEXT	<i>1.3. Article 10 of the Regulation. Goods and services available to the public.</i> Within the framework of the internal trade planning powers of this ministerial department, and analysing Article 10 (1) to (3) which	Finding accepted.

			govern specific measures applicable to cognitive accessibility conditions for goods and services available to the public, also applicable to goods offered to the public by commercial distribution operators, are considered reasonable measures and we consider that they do not constitute unjustified obstacles or burdens to the exercise of commercial activity, some of which are even mandatory under other national and European legislation in force, such as transparency and clarity in the information provided to consumers on food allergens and intolerances.	
39	MINISTRY ECONOMY, TRADE AND BUSINESS	TEXT	<i>1.4. Article 3 of the Regulation. Definitions</i> In the list in paragraph (j) of this Article, relating to cognitive accessibility tools, account must be taken of the provisions of Regulatory Technical Guideline No 31, and the divisions of this paragraph must be numbered with Arabic ordinals (1°, 2°, 3°, 1a, 2a, 3a, as appropriate). The same remark is made for Article 4 (2) (a); 2 (b) of Article 9; 2 (a) of Article 10; 2 (b) of Article 11; 5 (c) of Article 12; and 3 (a) of Article 13.	Finding accepted.
40	MINISTRY ECONOMY, TRADE AND BUSINESS	TEXT	<i>1.5. Article 15 of the Regulation. Employment</i> This article sets out the employment duties for companies, we understand that, for both public and private companies, when their workers demonstrate a disability of 33 per cent or more and a cognitive disability. In this sense, a number of obligations are laid down (such as ‘ <i>companies will have an obligation to provide and provide support and reasonable accommodation in relation to working hours, allocated times and workload and the possibility of using assistive technologies on request and with the involvement of the worker concerned</i> ’) and recommendations (‘ <i>private and public contracting entities shall promote the promotion of easy-to-read guides and manuals, as well as a person assigned to provide support to the worker during their period of employment and adaptation</i> ’) for companies. This department shares the need to promote the adaptation of the workplace to the needs of this group, but it should be borne in mind that the obligations imposed will generate a number of costs for companies that could harm the hiring of this type of person. It	Accepted in part. Aid for the implementation of the measures provided for in the project is included in Article 18. With regard to the fiche, and without prejudice to subsequent regulation, we believe it should be maintained in order to speed up the measures and thus guarantee the right of all workers.

			<p>is therefore recommended that any compensation or aid be provided for the necessary adjustments by the company.</p> <p>As regards the reference to fiche systems, it should be recalled that in the context of social dialogue, the working day register is currently being negotiated.</p> <p>subject matter could have a better place in such a rule.</p>	
41	MINISTRY ECONOMY, TRADE AND BUSINESS	MAIN	<p>2. Comments on the Regulatory Impact Assessment Report (MAIN)</p> <p><i>2.1. Impact analysis: economic impact.</i></p> <p>Section IV of the MAIN provides an estimate of the economic impact of the implementation of several of the measures proposed in the standard, such as adapting websites, private transport, health goods and services, etc.</p> <p>This department considers that this estimate should be drawn up for all areas covered by the standard, be more exhaustive (for example, within health services, the amount of material resources and staff needed to support people with cognitive difficulties should be estimated), and provide the estimated total cost of the measure.</p> <p>Furthermore, it is stated that <i>‘the costs arising from the approval of this Royal Decree must be regarded as an investment since it will also increase the public who can access the goods and services in question’</i>. It is considered that this statement should be supported by an estimate of the number of individuals expected to access those goods and services.</p>	Finding accepted.
42	MINISTRY ECONOMY, TRADE AND BUSINESS	MAIN	<p><i>2.2. Ex post evaluation</i></p> <p>With regard to the determination not to carry out an <i>ex-post</i> evaluation (paragraph V of the MAIN), it would be useful to prepare them in order to improve the effectiveness of the future plans.</p>	<p>Not acceptable.</p> <p>The National Disability Council will assess the level of implementation of the standard. However, depending on its results, the possibility of evaluation will be considered, which would in any case take a few years.</p>
43	MINISTRY ECONOMY, TRADE AND BUSINESS	TEXT	<p>3. Comments of a formal nature</p> <p><i>3.1. Formal comments to MAIN</i></p> <p>— It is recommended to include the input received during the prior public consultation, and the assessment thereof by the proposing department of the standard, in a</p>	Finding accepted.

			<p>Annex to MAIN. The same observation is made for the hearing procedure once it has been carried out.</p> <p>The following error has been detected: <i>Ministry for Digital Transformation and for the Civil Service.</i></p> <p>— It is proposed to include the section ‘Adding the rule to the order of distribution of competences of the MAIN’, which is placed under the heading on impact analysis: the part where the information on the legal analysis is collected.</p>	
44	MINISTRY TRANSPORT AND SUSTAINABLE MOBILITY	TEXT	<p>5. Observations and assessment.</p> <p>In the light of the dossier submitted and in accordance with the proposals received, the Technical Secretariat-General has the following comments:</p> <p>1. Comments on the draft royal decree</p> <p>(a) Article 10. Goods and services available to the public.</p> <p>Article 10 (4) (a) of the project provides: (...) ‘4. With regard to health goods and services and health promotion and protection services, meaning those which are made available to the public in facilities, premises and other physical spaces dedicated to health services and health promotion and protection services of health centres or establishments referred to in Royal Decree 1277/2003 of 10 October laying down the general rules on the authorisation of health centres, services and establishments, and in veterinary centres, the following requirements are laid down: (a) The dissemination of information on all services offered, in cognitively accessible formats and media, both general and specifically aimed at persons with cognitive difficulties, shall be promoted.’ (...) It is considered that it would be necessary to assess whether actually speaking that a medium must be cognitively accessible is correct. In the view of the Ministry, it is considered that the information contained in that medium must be cognitively</p>	<p>Not acceptable.</p> <p>Cognitive accessibility implies not only the comprehensibility of information but also the use of tools or guidance in space.</p>

			<p>accessible.</p> <p>The following alternative wording is therefore proposed:</p> <p>(a) The dissemination of information on all services offered through formats and media enabling information to be cognitively accessible, both for services of a general nature and services specifically targeted at persons with cognitive difficulties, shall be promoted.</p>	
45	MINISTRY TRANSPORT AND SUSTAINABLE MOBILITY	TEXT	<p>Article 9 (1) of the draft Royal Decree refers to the national legislation which already regulates the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities, Royal Decree 1544/2007 of 23 November, as follows:</p> <p><i>‘1. All signals and warnings in access to and use of modes of transport must be accessible cognitively, in accordance with the rules laid down in Royal Decree 1544/2007 of 23 November 2011 regulating the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities.’</i></p> <p>Royal Decree 1544/2007 provides for a deadline for adapting railway stations and vehicles according to the traffic supported, with the need to adapt to stations with more than 750 passengers per day on average per year and fewer passenger stations to be excluded from the need for adaptation.</p> <p>Therefore, in order to avoid misinterpretations and to ensure consistency between the two rules, it is suggested to delete the word “All”, which would read as follows:</p> <p><i>‘Signals and warnings on access to and use of modes of transport must be accessible cognitively, in accordance with the rules laid down in Royal Decree 1544/2007 of 23 November 2011 regulating the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities.’</i></p>	Finding accepted.
46	MINISTRY TRANSPORT AND SUSTAINABLE	TEXT	<p>2. Comments to MAIN</p> <p>In the MAIN, when it states that <i>‘in the field of private transport,</i></p>	It is accepted, erratic and we actually refer to public transport.

	MOBILITY		<p><i>cognitive accessibility measures must be implemented on journeys and vehicles and the necessary measures will be implemented to ensure access and travel for the accompanying or supporting person. The adaptation of information on journeys and vehicles is understood to have a marginal cost. With regard to the free of charge of the accompanying person, we must consider that, at present, according to the State Data Base for Persons with Disabilities, as of 31 December 2023, there are 795.019 people whose disability is based on limitations on the nervous system or mental function, and 294.328 people whose disability is intellectual or developmental. Therefore, there would potentially be around 1.1 million people who might need to be accompanied by a support person for their journeys', we believe that this should relate to public rather than private transport.</i></p> <p>In accordance with Article 62 of Law 16/1987, of 30 July, regulating land transport, public transport is transport carried out for hire or reward. On the other hand, private transport is defined as transport carried out on its own account, either for special needs or as a complement to other main activities carried out by undertakings or establishments of the same subject and directly linked to the proper conduct of those activities.</p>	
47	MINISTRY TRANSPORT AND SUSTAINABLE MOBILITY	TEXT	<p>Finally, depending on the assessment made of the comments raised, it is suggested that the Regulatory Impact Assessment Report that must accompany the project justifies the consistency of the draft legislation with European Union law, in particular with regard to Regulation (EC) No 261/2004 of the European Parliament and of the Council and Regulation (EC) No 1107/2006 of the European Parliament and of the Council.</p> <p>3. Compatibility with European Union law</p> <p>A. While the draft royal decree aims to 'establish and regulate cognitive accessibility', which is not the mobility of persons with a disability, certain circumstances or conditions may affect both cognitive and mobility accessibility, or may make mobility dependent on it (blind, deaf, age-related diseases, unaccompanied</p>	Finding accepted.

minors, etc.), since, in so far as a person does not have sufficient cognitive capacity, this may also imply his or her inability to navigate and mobilise in a given environment.

Under the above consideration, some of the provisions of the draft royal decree might be incompatible with European Union law on denied boarding in air transport, in accordance with: Regulation (EC) No 261/2004 of the European Parliament and of the Council of 11 February 2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of **flights, and repealing Regulation (EEC) No 295/91, and in particular with the definition of ‘denied boarding’ in Article 2(j) thereof; and with Regulation (EC) No 1107/2006 of the European Parliament and of the Council of 5 July 2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air, in particular with the exceptions to the prohibition of denied boarding for persons with disabilities set out in Article 4 thereof.**

The draft legislation would be incompatible with the aforementioned European Union legislation in so far as the draft legislation contains a regulation which, without excluding its application to air transport in the fields already covered by those regulations, did not correspond to the provisions of the aforementioned European Union rules and which govern the same situation.

Regulation (EC) No 261/2004 of the European Parliament and of the Council provides for the rights of air passengers in the event of denied boarding. Article 2 of that regulation defines denied boarding as follows:

“(j) denied boarding means a refusal to carry passengers on a flight, despite presenting themselves for boarding under the conditions laid down in Article 3(2), unless there are reasonable grounds to deny boarding, such as health or safety reasons or inadequate travel documents;”

In line with this provision, air carriers may deny boarding of disabled persons on the basis of access limitations established on the basis of operational needs, in particular taking into account the capacity of the means of transport and the safety of the operation. Furthermore, **Regulation (EC) No 1107/2006 of the European Parliament and of the Council provides for disabled persons and persons with reduced mobility (Article 2(a))**, applying to persons using or intending to use commercial passenger flights departing from, arriving at or transiting through airports situated in the territory of a Member State to which the Treaty applies (Article 1(2)). This Regulation lays down a general prohibition on denied boarding (Article 3), but air carriers may do so in the following cases:

“Article 4 derogations, special conditions and information
1. *By way of derogation from Article 3, air carriers or their agents or tour operators may refuse, on the grounds of: disability or reduced mobility, to accept a reservation from or to embark on a disabled person or person with reduced mobility:*

(a) for the purpose of complying with safety requirements established by international, Community or national law, or in order to comply with safety requirements established by the authority that issued the air operator certificate to the air carrier concerned;

(b) if the dimensions of the aircraft or its doors make it physically impossible to embark or transport the disabled person or person with reduced mobility.

In the event of refusal to accept a reservation on the grounds referred to in points (a) or (b) of the first subparagraph, the air carrier, its agent or tour operator shall make reasonable efforts to propose an acceptable alternative to the person concerned (...).”

In addition, Regulation (EC) No 1107/2006 of the European Parliament and of the Council provides for the provision of assistance by air carriers without additional charge (Article 10), as set out in Annex II to that regulation.

The transport of persons with some kind of cognitive difficulty by

air is therefore considered possible provided that it does not fall within one of the abovementioned exceptions in Article 4 which would justify denied boarding (security requirements, physical impossibility of boarding or transport).

It is therefore suggested that, either in Article 2 on the scope or in Article 9, or both, or where it is considered more appropriate, an exception should be introduced in relation to air transport, by delimiting the scope of the proposed rule in relation to air transport to all matters not covered by the aforementioned specific EU legislation, and in so far as it is compatible with the European Union.

This would give as much legal protection as possible to people with some cognitive difficulties without infringing European Union law.

The exception contained in Article 2(2) of the project, according to which ‘2. The conditions of use laid down in this Regulation are without prejudice to the provisions of the rest of the legal order in respect of each area or subject matter’, is not considered sufficient, since European Union law constitutes a legal order of international law which is autonomous and distinct from the legal systems of the Member States (judgment of the Court of Justice of the European Union 05/02/1963, Case 26/62 Van Gend de Loos; Judgment in Commission v Council of the EU, C-28/12, paragraph 39; Judgment of the Court of Justice of the European Union, C-621/18, paragraphs 44 and 45).

B. Article 9 (2) (c) on transport provides for the free access and travel of the accompanying or supporting person, where ‘a disability percentage of 33 % or more and an intellectual disability are demonstrated by means of the certificate referred to in paragraph 1 of the first additional provision of Royal Decree 888/2022 of 18 October establishing the procedure for the recognition, declaration and qualification of the degree of disability’.

In the field of air transport, the provision of free access and travel for the accompanying or supporting person is not covered by the

forementioned European Union regulations. Therefore, where the problem of cognitive accessibility arises from the application of those rules, the requirement that the accompanying person be free of charge may lead to a breach of the aforementioned European legislation.

In the European Union, work is under way to amend Regulation (EC) No 1107/2006 of the European Parliament and of the Council so that, if necessary for a safety issue, it is for the air carrier itself to require the passenger with reduced mobility (which may be due to cognitive disability) to be accompanied by an accompanying person in order to ensure flight safety. In such cases, the accompanying person would enter and return free of charge, but the condition would be imposed by the airline. However, this amendment is still under preparation.

C. Fifth Additional Provision. *Adaptation of infrastructure and means of transport.*

In the field of rail, the technical specifications for railway installations and vehicles are to a large extent determined by the technical specifications for interoperability (TSIs) approved by the European Union and which must be complied with in all Member States. Therefore, it will not always be possible to achieve the unification of specifications with the airborne mode set out in this additional provision. This limitation is particularly critical in the case of TSIs affecting vehicles, as vehicles can move between different EU countries and no specifications which differ from those laid down in the TSIs may be imposed on them.

As a result, it **is proposed to delete the text relating to the proposed unification of specifications**, which would read as follows:

Fifth additional provision *Adaptation of infrastructure and means of transport.*

‘Within two years of the entry into force of this Royal Decree, the Ministry with responsibility for transport shall draw up a report on the cognitive accessibility of airport and railway facilities, paying particular attention to facilities in terms of physical,

			<p><i>signalling, easy reading and guidance, as well as other available support. The report shall include concrete recommendations for improvement.” and a proposal for unification of technical specifications for vehicles and installations.</i></p> <p>If it is considered absolutely essential to maintain a reference to a possible unification of specifications, the following could be accepted as an alternative wording:</p> <p>Fifth additional provision <i>Adaptation of infrastructure and means of transport.</i></p> <p><i>‘Within two years of the entry into force of this Royal Decree, the Ministry with responsibility for transport shall draw up a report on the cognitive accessibility of airport and railway facilities, paying particular attention to facilities in terms of physical, signalling, easy reading and guidance, as well as other available support. The report may include concrete recommendations for improvement and a proposal for unification of technical specifications for vehicles and installations, insofar as such unification is possible within the framework of the European Union’s technical specifications for rail interoperability.’</i></p>	
48	National Commission for markets and Competition (CNMC)	TEXT	<p>3. VALUATION</p> <p>The Commission welcomes the PRD to be reported, in so far as it aims at the social integration of persons with disabilities, in a way that:</p> <p>they benefit from the enjoyment of all their constitutionally recognised rights and create an environment in which products and services are more accessible, promoting inclusion and the autonomy of those who make use of them.</p> <p>Beyond the above, this protection has positive effects from the point of view of competition since (i) these persons will be able to have easier access to the market as an offeror or consumer of goods and services, resulting in greater competition in the markets and (ii) the PRD will make it easier for persons with disabilities to exercise their rights more effectively.</p> <p>rights and skills as consumers and users, calling for higher quality</p>	It is not accepted as the areas in which it is unclear who are responsible for carrying out the obligations are not specified and the proposing management body does not see an indeterminate definition.

goods and services and thus stimulating a higher level of competition in markets (Article 10 of the PRD).

It should also be noted, as stated in the explanatory memorandum, that all RDP measures have the character of minima, with the potential of communities, autonomous communities, the cities of Ceuta and Melilla and local authorities to establish additional or more demanding ones, always within the sphere of their competences.

Without prejudice to the above, it is important to recall the importance of rigorous application of the principles of necessity and proportionality in the development of the RDP measures by the State Administration, the Autonomous Communities and local authorities, within the scope of their respective competences, in order to **minimise possible discrepancies unjustified in accessibility and non-discrimination requirements**, which, as pointed out in the aforementioned Directive (EU) 2019/882, *negatively affect the competitiveness and growth, due to the additional costs of developing and marketing accessible products and services for each national market.*

[...]

Without prejudice to a positive assessment of the objectives pursued of accessibility for persons with disabilities, the following additional comments are made:

First, the PRD is somewhat unclear as to the subjective scope of the provision. In so far as it regulates many and very different areas of administrative activity and economic activity, it is not always easy to identify exactly which actors are responsible for carrying out the obligations laid down in the PRD. Greater clarity in this area would be in the interest of the actors involved.

In this respect, and from the point of view of competitive neutrality, it is important to ensure that the level of obligations to which the public sector is subject (which should include public administrations, but also those

			bodies governed by public and private law) is equivalent to the level of obligations to which private undertakings are subject 10.	
49	National Commission for markets and Competition (CNMC)	TEXT	Secondly, with regard to the references made to UNE standards (Articles 3 and 7), it is recommended that the standard specify the specific requirements and requirements considered to be precise, avoiding reference to technical standards issued by third parties. In the event that this is not possible and the use of technical standards issued by third parties is indispensable, it is recommended to include so many similar national and international quality accreditation mechanisms, as possible, and the establishment of open clauses to demonstrate the required quality standards by means of mechanisms not expressly provided for in the standard.	Not acceptable. UNE standards are incorporated as recommendations or references.
50	National Commission for markets and Competition (CNMC)	TEXT	Finally, it should be stressed that the DRP points out that cognitively accessible information should be provided at no extra cost, even in cases where it is supported by virtual technology tools, applications or assistants. In line with the above, MAIN charges telecommunications and information society operators costs of EUR 3.43 million for the adaptation of websites or similar (the turnover of companies in the telecommunications and audiovisual services sector in Spain reached EUR 34.774 million in 2022 and the cost of adaptation to the cognitive accessibility requirements laid down in the Royal Decree would be marginal according to the MAIN). Consideration should also be given to the cost of translating documents into accessible format, in order to make them available in a format different from that of the document. The MAIN of the aforementioned Royal Decree 193/2023 of 21 March estimated the cost of adapting documents to make them accessible with screen readers at EUR 0,10 per document. For these cases, as it is unknown the volume of documents to be adapted cannot provide an overall figure on the total cost. Moreover, this lack of definition is reproduced in relation to	Not acceptable. There are currently numerous IT tools, many of which are free of charge, which minimise the cost of alternative systems.

			<p>Article 17, which provides for the possibility of granting public aid to ‘facilitate’ compliance with ‘the obligations of cognitive accessibility contained in this Royal Decree’, always ‘in accordance with European rules on State aid’.</p> <p>Drafted in this way, the article is in fact of little legal significance, since identifying cognitive access measures as a legitimate cause for the granting of public aid seems somewhat repetitive in view of the numerous reasons justifying the very existence of the Regulation (from Article 49 of the Spanish Constitution itself to the aforementioned Article of the Spanish Constitution). International Convention on the Rights of Persons with Disabilities), and does not provide certainty as to whether companies can legitimately expect public administrations to bear part of the costs of complying with this legislation.</p>	
51	Spanish Protection Agency (AEPD)	Data Agency	<p>TEXT</p> <p>[...]</p> <p>As is clear from the content of the project, (Article 1 of the proposed regulation) its objective is <i>to establish and regulate cognitive accessibility and its requirements and implementation, in order to contribute to the exercise of the rights and duties of citizens and to ensure that equal opportunities and non-discrimination for all and, in particular, people with difficulties in understanding, communicating and interacting as a result of intellectual, mental, brain damage, cerebral paralysis, autism spectrum disorder, cognitive impairment or socio-economic situations such as immigration or illiteracy.</i> In other words, it is not it follows from the purpose of the regulation to provide for no data processing</p> <p>but to regulate the measures to ensure that the relationships arising in the different areas of application of the Regulation (to which reference has already been made when mentioning the activities contained in Article 5 of the recast General Law on the Rights of Persons with Disabilities and its social inclusion) can be exercised by the persons to whom it refers with full rights and subject to equality. The data</p>	Finding accepted.

			<p>processing resulting from such relationships must therefore be governed in all respects by the rules governing them; in other words, it will be for the Justice Administration (for example) to regulate the processing of data resulting from such relationships (bases of:</p> <p>lawfulness of processing (Article 6 GDPR), principles relating to processing:</p> <p>minimisation, purpose limitation, etc. (Article 5 GDPR), the regulation now being informed as a cross-cutting rule to guarantee the rights to equality persons with cognitive disabilities.</p> <p>Since cognitive disability is a health data as defined in Article 4.15 GDPR: 'data concerning health' means: personal data concerning the physical or mental health of a natural person, including the provision of health care services, which disclose information on their state of health, will be the rules governing the different areas to which the legislation is addressed which must establish or adapt their data processing in the various laws governing such processing (see, for example, for the field of employment (Article 5 (i) of the abovementioned recast text), Article 16 of Law 3/2023 of 28 February, and specifically the second paragraph of paragraph 6:</p> <p><i>As regards the processing of special categories of data, the provided for in Article 9 (2) (b) of Regulation (EU) 2016/679, as necessary for compliance with the obligations and exercise of specific rights of the controller or of the data subject in the field of labour law, social security and social protection law)</i> to the fact that data will be processed.</p> <p>special categories of Article 9 GDPR, which requires not only a basis for lawfulness under Article 6.1 GDPR, but also a ground that removes the prohibition on processing such data (Article 9.2 GDPR), which is a prohibition contained in Article 9.1 GDPR).</p> <p>In any event, the notified draft contains a specific provision (the first additional provision) aimed at regulating personal</p>	
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			<p>data within the scope of the regulation, which makes a general reference to compliance with the GDPR and the LOPDGDD, which reads as follows: [...]</p> <p>In the context of the notified project, the Agency does not object to this wording, but points out – as has already been pointed out in the previous paragraphs and in this Agency’s reports – that, for the various sectors.</p> <p>substantive laws specifically regulating the processing of personal data of special categories, the doctrine of the Constitutional Court (essentially set out in judgments 292/2000 of 30 November and 76/2019 of 22 May 2013) has established that the limits on the fundamental right to the protection of personal data must be laid down by a law, after balancing the interests at issue by the legislator in accordance with the principle of proportionality, defining all the substantive conditions of the limiting measure by means of precise rules that make it possible for the data subject to foresee the imposition of such a restriction and its consequences, and establishing the appropriate safeguards, with the law itself having to contain the</p> <p>appropriate safeguards against the collection of personal data it authorises. The Constitutional Court (Constitutional Court) has been clear that the provision of appropriate safeguards cannot be deferred to a later point in time than the legal regulation of the processing of personal data concerned. Guarantees</p> <p>they must be incorporated into the legal rules governing processing itself, either directly or by express and clearly defined reference to sources.</p> <p>external entities with the appropriate regulatory status. Only such an understanding would be</p> <p>compatible with the dual requirement arising from Article 53 (1) EC. Thus, if the provision included a reference for the incorporation of the law with the appropriate safeguards laid down in rules of lower rank than the law, it would be</p>	
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			<p>regarded as a delegalisation which sacrifices the reservation of law under Article 53 (1) CE, and for this reason alone, it should be declared unconstitutional and null and void. In short, these are “appropriate technical, organisational and procedural safeguards that prevent risks of varying likelihood and severity and mitigate their effects, since only in this way can it be ensured that the substance of the substance of the case is respected. own fundamental right”. Nor, therefore, does the law refer to the GDPR itself or to the LOPDGDD for the establishment of such appropriate and specific safeguards.</p>	
52	MINISTRY FOR FINANCE	TEXT	<p>[...] 3.- having examined the text of the draft, and having consulted the competent bodies of the Department, we would like to make the following comments: One. As pointed out in the previous section of this report, the MAIN argues that there is no increase in public expenditure in the fact that the implementation of the measures provided for in the project will be taken on board. to the budget items already approved under the other legislative history adopted in the area of accessibility. In any event, this aspect should be clarified in the MAIN since, although the costs arising from the implementation of the obligations imposed by the standard must be financed from the budgets of the respective administrations, this does not mean that they could not increase the costs. expenses for the provision of new services or the modification of the conditions under which they were provided, resulting from the basic cognitive accessibility conditions recognised ex novo. Therefore, from a budgetary point of view, it would be appropriate that the budgetary impact section of the MAIN be completed by clearly indicating the absence of budgetary impact, in line with the provisions of the second final provision of the project.</p>	<p>The first proposal is accepted.</p> <p>The second proposal is accepted (it will be delayed at least until 2 January 2026).</p> <p>There are many ways of covering the third proposal, such as the use of plain language. It is a high-impact sector which, if the proposed formula is used, would remain uncovered, which cannot be acceptable.</p> <p>With regard to the fourth proposal, it is rejected because easy reading covers only formulations, requests and procedural guides, which is a minimum requirement in the interaction of the administration with the citizen. On all other issues, simple language will suffice. The administration must act as a stone of touch, operators cannot be required to deprive them of higher standards than public administrations.</p> <p>The fifth observation is accepted.</p> <p>DA3 has been deleted and therefore the sixth remark is accepted.</p>

			<p>In this regard, and in so far as the various departments concerned confirm that the implementation of this project will be carried out on the basis of their existing budgetary resources, without requiring additional resources, there should be no need for a problem of budgetary coverage in this area.</p> <p>Without prejudice to the above, and in relation to the obligations arising from the project for the Autonomous Communities and local authorities, it is considered that there is a contradiction between the two paragraphs of the second final provision, which states, on the one hand, that the Royal Decree does not entail any increase in allocations or salaries, or in personnel costs, or in any other appropriations for the public sector and, on the other hand, provides that, in the context of their respective competences, the Autonomous Communities and local authorities they shall bear the expenditure arising from their implementation, taking into account compliance with the principles of fiscal stability and financial sustainability.</p> <p>It is therefore estimated that, when establishing new executive obligations for the Autonomous Communities and local authorities within the scope of their competences, the MAIN should include a reference to the impact on the financial resources of the other public administrations concerned. To in that regard, it should be noted that, by imposing additional obligations on the Autonomous Communities and Local Entities, they could claim financial resources.</p> <p>SECOND.- In general terms, the proposed standard represents an important step forward in the right to cognitive accessibility. However, a more realistic assessment of the time needed to give compliance with its forecasts, as the expected entry into force on 1 July 2025 is estimated to be insufficient.</p> <p>As an example, we would point out the impact of the project</p>	
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on the National Agency for Tax Administration, which would require a temporary margin for gradual adaptation to the requirements laid down, given the difficulty of setting up the project, as well as the increase in staff resources and time to be spent on these tasks, in addition to training costs.

In any event, it is essential to stress, in the case of the Tax Agency, the role that third parties play, as the most effective measures to achieve the objectives set out in the project, with the role of the representative for all the procedures that persons with disabilities can take, as well as the support of organisations that manage the interests of groups with disabilities.

THREE.- In relation to the requirements set out in Article 7 (1) and (2) of the Regulation, relating to telecommunications and society of the information, they are considered to be very difficult to comply with in the field of the service provided by the Spanish Tax Administration Agency, either in the medium or even in the long term. These requirements should rather be understood as a course of action to inform the activity of the whole administration. It is therefore proposed to replace, in Article 7(1), the words “shall *implement measures*” by “promote measures”.

Four. In Article 11, which regulates relations with public administrations, including access to public services and their administrative decisions, it is considered more appropriate to replace the references on ‘easyreading’ with ‘**clear** language’, given the difficulties in developing easy-to-read materials. It is also suggested that “1. *The provisions of Royal Decree 366/2007 shall apply. of 16 March, establishing the conditions of accessibility and non-discrimination for persons with disabilities in their relations with the General State Administration.*

2. *In order to ensure cognitive accessibility within relations between public administrations and citizens and irrespective of the channel through which they occur, the following*

requirements must be ensured:

(a) The documentation shall be presented in a clear and simple manner. This will entail the availability, in **clear language easy** to read, of both forms or applications and guides to the completion of procedures.

(b) [...]

(c) Facilitating communication through the use of cognitively accessible communication options. In the digital environment, it will be possible to implement with live chat or artificial intelligence guiding the process in written, voice and visual support. Accessibility **training and capacity building will be ensured** cognitive of government staff to **ensure** that other aspects are modified in this Article 11, as follows: face-to-face care in procedures to ensure understanding, the communication and interaction of people with cognitive difficulties.

(D) Information and procedures for all digital formalities of public administrations ~~shall be designed~~ in a cognitively accessible manner so that any the person is able to do so and must comply with the accessibility guidelines laid down in Royal Decree 1112/2018 of 7 September 2007 on the accessibility of public sector websites and mobile applications.

3. Public administrations shall promote complementary actions on cognitive accessibility, which may consist of:

(a) Unification of the interface of administrative electronic sites, **provided that this does not impair the proper identification of the respective websites.**

(b) The inclusion of a guide to cognitively accessible administrative procedures that quickly identify the formalities that can be carried out in all administrations and in which an accessible search system finds the related information in a comprehensible manner.

4. [...]

5. Information relating to calls for public employment, both

*open access and internal promotion, and in particular those including places reserved for persons with intellectual disabilities, shall be communicated through a **clear language readable** version.*

Where requested, the tests, practices and examinations shall also have a cognitively accessible version.'

Five – In relation to the second additional provision, we consider it necessary to improve the wording of the provision in order to make it clearer, thus ensuring legal certainty and consistency between the legislation on accessibility and the sectoral legislation on public procurement, which already provides for the guarantee of accessibility for all by referring to the definitions laid down in Royal Legislative Decree 1/2013 of 29 November 2015. The alternative drafting proposal is the next:

'Second additional provision. Call for tenders for public contracts.

With regard to cognitive accessibility, public administrations which publish calls for tenders for public contracts shall be governed by the provisions of the legislation in force on public procurement.'

Six. The third additional provision of the project regulates the Spanish Cognitiva Accessibility Centre – CEACOG. However, this centre was already created by the fourth additional provision of Law 6/2022 of 31 March 2015 amending the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2015, to establish and regulate accessibility. cognitive and its requirements and implementation conditions, therefore this should be clarified.

Finally, on a purely formal basis, we would point out the following:

— It is suggested to revise the second paragraph of the preamble, which states that “(...) *this is a vehicular principle*

			<p>(...)"</p> <p>— The content of the second final provision of the project should actually be included as an additional provision and not as a provision final, in accordance with Guideline 39 of the Regulatory Technical Guidelines, approved by agreement of the Council of Ministers of 22 July 2005.</p>	
53	MINISTRY YOUTH AND CHILDREN	TEXT	<p>[...]</p> <p>1. Observations</p> <p>I. The text of the draft</p> <ul style="list-style-type: none"> • Article 4 <p>Paragraph 1 refers to the principles set out in the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion and, in paragraph 2, sets out other principles.</p> <p>While principles such as “fair use”, “flexible use” or “diversities of needs” are established, it is suggested to introduce the age adaptation principle in such a way that the specificities of this group with specific needs are taken into account as legally recognised.</p> <p>The second paragraph of Article 5 (3) of Organic Law 1/1996 of 15 January on the legal protection of minors, partially amending the Civil Code and the Code of Civil Procedure, on the right to information, requires accessibility for minors with disabilities, with the necessary reasonable accommodation, in messages disseminated in the media. The same provision refers to the right of minors to receive information appropriate to their development and Article 9 indicates the need for understandable language, in accessible formats adapted to their circumstances.</p> <p>Furthermore, Article 2 of that law requires that the best interests of the child be regarded as paramount in all actions concerning the child, both in the public and private spheres.</p>	<p>It is not accepted, as the standard is addressed to all persons with cognitive difficulties and not only to minors with disabilities, without prejudice to the fact that they will also benefit from improvements linked to cognitive accessibility. Furthermore, age is expressly mentioned in the definition of cognitive difficulties.</p>

			<p>Furthermore, General Comment No 9 of the Committee on the Rights of the Child, which addresses the rights of children with disabilities, highlights that they face social, cultural and physical barriers that limit their access to education, health and full participation in society and proposes measures to combat discrimination, ensure inclusion and promote public policies that address their specific needs.</p> <p>It is therefore proposed to include the age adaptation principle by defining it, for example, as “accessibility measures shall be designed taking into account the needs of minors in language and formats appropriate to their development”.</p>	
54	MINISTRY YOUTH AND CHILDREN	TEXT	<ul style="list-style-type: none"> • Formal and regulatory technique <p>Article 3 of the Regulation contains a number of definitions for the purposes of the Royal Decree, but it is noted that certain definitions are not subsequently used in the text of the draft.</p> <p>We recommend a general review of compliance with the Regulatory Technical Guidelines (NTS), approved by agreement of the Council of Ministers of 22 July 2005 and published by Resolution of 28 July 2005 of the Undersecretariat. For example, citations should be brought into line with Regulations No 73 and No 76 of the Guidelines; in the first final provision, the title of jurisdiction should reproduce the full wording of the constitutional provision; it is suggested to revise the numbering of Articles 3, 5 and 11.2 as well as the acronyms.</p>	Finding accepted.
55	MINISTRY YOUTH AND CHILDREN	MAIN	<p>II. To the Regulatory Impact Analysis Report (MAIN)</p> <ul style="list-style-type: none"> • Section IV.7, impact on childhood, adolescence and family. <p>This section deals jointly with the impacts on children and adolescence and the impact on the family. However, it is considered necessary to carry out an analysis of the impact</p>	<p>Accepted in part.</p> <p>It is kept as a single paragraph but is supplemented by the regulatory references indicated to justify the positive impact.</p>

			<p>on children and adolescents in a sub-section different from that of the family, given that they have a different legal basis and the objectives of each of them must be analysed independently. This differentiated treatment is also provided for in Article 2 (1) (f) of Royal Decree 931/2017 of 27 October and follows <i>from</i> Article 22d of Organic Law 1/1996 of 15 January on the legal protection of minors, partially amending the Civil Code and the Code of Civil Procedure.</p> <p>From a substantive point of view, reference should be made to Articles 2 and 23 of the Convention on the Rights of the Child, adopted by the United Nations General Assembly on 20 November 1989 and ratified by Spain in 1990 and the General Comments of the Committee on the Rights of the Child, concerning the right to non-discrimination and the recognition that children who are mentally or physically prevented have the right to special care, education and training, aimed at achieving their self-sufficiency and active integration into society.</p> <p>Article 3 of Organic Law 1/1996 of 15 January 2015 on the legal protection of minors, <i>partially amending the Civil Code and the Code of Civil Procedure</i>, states that '<i>children shall enjoy the rights recognised by the Constitution and the international treaties to which Spain is a party, in particular the United Nations Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities, and the other rights guaranteed in the legal system, without discrimination on the grounds of birth, nationality, race, sex, disability or illness, religion, language, culture, opinion or any other personal, family or social circumstance</i>'.</p> <p>It would also be useful to provide a brief explanation of the consideration of the best interests of the child in accordance with Article 2 of Organic Law 1/1996 of 15 January, which provides that '<i>every child has the right to have his or her best interests assessed and considered to be paramount in all actions and decisions concerning him or her</i>' and with</p>	
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			<p>Article 4 of Organic Law 8/2021 of 4 June on the comprehensive protection of children and adolescents from violence, which lays down the general principles and criteria for interpreting the best interests of the best interests and, in particular, paragraph 1 (l) provides for <i>the 'assessment and formal determination of the best interests of the child in all decisions affecting a minor person'</i>.</p> <p>In the light of the above, it is suggested that this paragraph be supplemented by a reference to the legal instruments identified in this report that form the basis for action on children in the field of accessibility.</p>	
56	DIRECTORATE-GENERAL FOR PERSONS WITH DISABILITIES OF THE DEPARTMENT OF SOCIAL INCLUSION, YOUTH, FAMILIES AND EQUALITY OF THE ANDALUSIA	TEXT	<p>1. It is proposed that the wording of the text be revised in order to follow the language guidelines. clear". In this way, it will be more understandable for everyone, by using easy-to-understand language, making an effort to promote the regulation it contains.</p> <p>2. It is proposed to avoid mentioning a UNE standard that involves financial expenditure. The parts of such rules to be complied with must be described in the text of the Royal Decree. Alternatively, a webpage is available to consult these rules free of charge. Otherwise, compliance with the regulations is hampered.</p> <p>3. <i>"Third additional provision. Catalogue of pictograms for signalling."</i> (Page 6)</p> <p>Andalusia has just published a Guide to Good Practice in the Accessible Signalling of Buildings, in its second edition, which includes a Catalogue of Accessible Pictograms (a total of 150 pictograms) for all persons (not only persons with ASD) and which is available to all administrations, entities and companies for use. Its approval by decree shall entail its use in the necessary spaces.</p> <p>These pictograms have passed a meaningful validation process as understandable.</p> <p>Link to the Guide: https://juntadeandalucia.es/organismos/inclusion-social-juventud-familia-e-igualdad/areas/disability/accessibility.html # toi-accessibility-cognitive</p>	<p>1. Is rejected. Clear language is linked to UNE-ISO 24495-1. That technical rule is not public in nature and cannot therefore be taken into account in the drafting of a rule intended for the general public. However, this draft has been prepared taking into account the Regulatory Technical Guidelines.</p> <p>2. partially accepted. References to technical standards are always made on an optional basis, except in the case of technical standard UNE 301549. The latter is public in nature under an agreement concluded with the Ministry for Digital Transformation and the Civil Service.</p> <p>3. Accepted in part. It may be taken into account, where appropriate, in the development of the catalogue of pictograms referred to in the first additional provision of this draft Royal Decree.</p> <p>4. The assimilation between clear and plain language is rejected, since, although similar, they are different concepts. Clear language is linked to UNE-ISO 24495-1, while plain language is not associated with any technical standard.</p> <p>5. Rejected. Article 7 on telecommunications and the</p>

4. *Article 3. Definitions*, Chapter I of the Regulation. Page 13
 The text submitted for comments includes a difference between clear language and plain language.
It is proposed to unify the two and to qualify it as “**clear language**” in order to avoid confusion. Clear language is also used in oral transmission.
 Furthermore, throughout the text, the expression “clear language” is used appropriately and it is therefore proposed that where it reads “... plain language...” it should read as follows: “... clear language...”.

5. *Article 9. Transport*. Page 20.
 It is proposed that the wording of Article 9(c) (2) include references to easy reading as follows:
'2. It also lays down the following obligations:
*(c) Information offices and services located in transport infrastructure shall make available to users in **need of augmentative and alternative communication systems, accessible signage and the provision of documentation in easy-to-read format.**’;*

6. Article 18. Information activities, awareness raising campaigns and training activities.
 Page 32.
 Article 18 provides:
‘Article 18. Information activities, awareness raising campaigns and training activities.
The public administrations, within the scope of their competences, with the advice of the Spanish Cognitiva Accessibility Centre (CEACOG), will develop information activities, awareness-raising campaigns and training actions and all other activities necessary to promote cognitive accessibility and to raise awareness of the large number of people.
benefiting from its implementation.’
It is proposed that the advice of the Spanish Cognitiva Accessibility Centre – CEACOG should not be mandatory, although it should be made available to the Administrations.

information society already provides for a diversity of communication formats accessible in public service offices.

6.Rejected. Article 20 provides for advice, if any, from the CEACOG. There is no provision for such cooperation to be compulsory or exclusive.

			<p>We understand that their location in a Royal Decree is not necessary.</p> <p>In this regard, autonomous communities such as Andalusia have been working for years on accessibility both in the field of communication and in training. Therefore, the shared experience of some bodies and others will be based on constructive cooperation.</p>	
57	BIZKAIA PROVINCIAL COUNCIL	TEXT	<p>The inclusion of the fifth provision (see text below) in a RD corresponding to another issue such as cognitive accessibility is not considered appropriate.</p> <p>We also do not consider it appropriate to revert to the equalisation of work disabilities with disability for different purposes (employment, accessibility and social protection effects); in short, the same as persons with recognition of disability equal to or greater than 33 %</p>	<p>Is rejected. This equalisation provided for in the fifth additional provision is made solely for the purposes of updating the procedures provided for in Article 4 (2) of the TRLGD.</p>

Disposición adicional quinta. *Acreditación del reconocimiento del grado de discapacidad al que se refiere el artículo 4.2. del Texto Refundido de la Ley General de derechos de las personas con discapacidad y de su inclusión social.*

1. El reconocimiento del grado de discapacidad igual o superior al 33 por ciento al que se refiere el párrafo primero del artículo 4.2. del Texto Refundido de la Ley General de derechos de las personas con discapacidad y de su inclusión social se acreditará mediante resolución, certificado o tarjeta acreditativa expedidos por el Instituto de Mayores y Servicios Sociales (IMSERSO) u órgano competente de la comunidad autónoma correspondiente. En estos supuestos, será de aplicación el Real Decreto 888/2022, de 18 de octubre, por el que se establece el procedimiento para el reconocimiento, declaración y calificación del grado de discapacidad.
2. **A los efectos de lo dispuesto en el párrafo segundo del artículo 4.2. y en el párrafo segundo del artículo 35.1 del Texto Refundido de la Ley General de derechos de las personas con discapacidad y de su inclusión social, la equiparación legalmente establecida con un grado de discapacidad igual al 33 por ciento de las personas pensionistas de la Seguridad Social** que tengan reconocida una pensión de incapacidad permanente en el grado de total, absoluta o gran invalidez y las personas pensionistas de clases pasivas que tengan reconocida una pensión de jubilación o de retiro por incapacidad permanente para el servicio o inutilidad, se acreditará por los siguientes medios:

			<p>Disposición adicional quinta. <i>Acreditación del reconocimiento del grado de discapacidad al que se refiere el artículo 4.2. del Texto Refundido de la Ley General de derechos de las personas con discapacidad y de su inclusión social.</i></p> <ol style="list-style-type: none"> 1. El reconocimiento del grado de discapacidad igual o superior al 33 por ciento al que se refiere el párrafo primero del artículo 4.2. del Texto Refundido de la Ley General de derechos de las personas con discapacidad y de su inclusión social se acreditará mediante resolución, certificado o tarjeta acreditativa expedidos por el Instituto de Mayores y Servicios Sociales (IMSERSO) u órgano competente de la comunidad autónoma correspondiente. En estos supuestos, será de aplicación el Real Decreto 888/2022, de 18 de octubre, por el que se establece el procedimiento para el reconocimiento, declaración y calificación del grado de discapacidad. 2. A los efectos de lo dispuesto en el párrafo segundo del artículo 4.2. y en el párrafo segundo del artículo 35.1 del Texto Refundido de la Ley General de derechos de las personas con discapacidad y de su inclusión social, la equiparación legalmente establecida con un grado de discapacidad igual al 33 por ciento de las personas pensionistas de la Seguridad Social que tengan reconocida una pensión de incapacidad permanente en el grado de total, absoluta o gran invalidez y las personas pensionistas de clases pasivas que tengan reconocida una pensión de jubilación o de retiro por incapacidad permanente para el servicio o inutilidad, se acreditará por los siguientes medios: 	
58	Directorate-General for Dependency, Disability and Senior Service for Dependency and Persons with Disabilities Navarra	TEXT	In the third additional provision. Catalogue of pictograms for signs (page 6) states that ‘a technical and specialised working group shall be set up with the aim of drawing up, within two years of publication of the regulation, a catalogue of pictograms’. It is not clear whether it is one or two years.	Accepted, the wording has already been amended and extended to 3 years.
59	Directorate-General for Dependency, Disability and Senior Service for Dependency and Persons with Disabilities	TEXT	In the sixth additional provision. The financing of the planned measures (page 8) states that ‘The Royal Decree does not entail any increase in appropriations or salaries, staff costs or any other appropriations for the public sector’. It also states that “Within their respective competences, the regions and local authorities shall take into account compliance with the principles of fiscal stability and financial sustainability.”	Accepted, the financing of the regulated measures will be reviewed.

	Navarra		<p>The financial envelope is not taken into account, but throughout the enacting terms of the Regulation, several points identify the need to provide the budget with the content of the article. They serve as an example:</p> <ul style="list-style-type: none"> — Article 9. Transport. 2 (D) [...] there is no provision for the funding and budgetary implication that this may have. No financial report has been provided. Who and how will it be financed? — Article 11 (2) (d) [...] in order to empower general government staff it is necessary to devote a budget item to this end. Similarly, there is no provision for the funding and budgetary implication that this may have. No financial report has been provided. Who and how will it be financed? — Article 11 (3) (a) and (3) (b) does not seem to be possible to create a common interface for all administrations, or to draw up guides without funding. — Article 12. Administration of justice. 5.c.iii. [...] A budget item is again needed to cover this expenditure. — Article 12. Administration of justice. 9. [...] Training in cognitive accessibility for these professionals needs to be provided financially. — Article 16. Rural environment. [...] — Article 17. State aid. [...] <p>For its development and implementation it is necessary to earmark budget items for the financing or co-financing of these actions among all public administrations.</p>	
60	Directorate-General for Dependency, Disability and Senior Service for Dependency and Persons with Disabilities Navarra	TEXT	Sole repealing provision of Royal Decree 1414/2006 of 1 December 2007 is repeated. (PAG 8)	The error has been solved, in the new version it is not repeated.
61	Directorate-General for	TEXT	Article 12. Administration of Justice. 5 (c) iii. As regards the	This provision has been deleted from the text.

	Dependency, Disability and Senior Service for Dependency and Persons with Disabilities Navarra		professional support of the facilitator, it is not clear who appoints that person or whether he or she is a professional in the justice system or in another field.	
62	Plataforma del Tercer Sector (Third Sector Platform)	TEXT	[...] Article 3. Definitions For the purposes of this Royal Decree: (a) Alhabetism: an illiterate person, according to UNESCO, is an illiterate person who cannot read, write, understand a simple text, nor can he or she give elementary presentation of facts of his daily life. COMMENT: People who, while being able to read and write, cannot use these skills for their personal, employment or social development due to their limited level of understanding should also be taken into account.	Not acceptable. A limited level of understanding would be a cognitive difficulty different from illiteracy.
63	Plataforma del Tercer Sector (Third Sector Platform)	TEXT	(h) Intellectual disability: it entails a number of limitations in the functions of the daily life of the individual, such as learning, understanding or reasoning, and allowing them to respond to different situations and places. Intellectual disability is expressed in relation to the environment. It therefore depends both on the individual and on the barriers or obstacles around it. Intellectual disability is generally permanent, i.e. for life, and has a major impact on the life of the person and his/her family. COMMENT: It should be stressed that intellectual disability is also expressed in adaptive behaviour.	The definition has been deleted from the text.
64	Plataforma del Tercer Sector (Third Sector Platform)	TEXT	Article 19. Promotion of codes of conduct and good practices. Public administrations, within the scope of their competences, shall promote and facilitate the adoption of generic or sectoral codes of conduct and good practice by agreement between the most representative trade union organisations, and organisations.	Finding accepted.

			<p>representative of people with cognitive difficulties and their families, organisations representing people with cognitive support needs or cognitive difficulties.</p> <p>they aim to regulate cognitive accessibility conditions in the matters regulated in this Royal Decree.</p> <p>COMMENT: The agreement between the public administrations and the most representative trade union organisations must also include organisations representing persons with disabilities, persons with cognitive difficulties and their families, organisations representing persons with cognitive support needs or cognitive difficulties aimed at regulating cognitive accessibility conditions in the matters regulated in this Royal Decree.’</p>	
65	EMFF (social policy area)	TEXT	<p>[...]</p> <p>3. Input from the Local Perspective</p> <p>3.1. Proposals for action</p> <p>1. Strengthening training in cognitive accessibility: Implement specific training programmes for municipal employees in collaboration with the CEACOG. Providing workshops for neighbourhood associations, local businesses and social groups.</p> <p>2. Promotion of accessible tools in local spaces: Incorporate accessible pictograms and signage in libraries, civic centres and citizen care offices. Create cognitively accessible routes in natural and heritage areas.</p> <p>3. Strengthening municipal digital services: Adapt local websites and mobile applications to easy-to-read and intuitive design patterns. Provide virtual assistance with augmentative and alternative communication tools.</p> <p>4. Specific programmes for rural environments: Promote targeted support for small municipalities facing structural barriers. Create local support networks between rural municipalities to share resources.</p> <p>5. Constant and participatory evaluation:</p>	<p>Accepted in part.</p> <p>As regards training, the proposed measure is already provided for in Article 18.</p> <p>With regard to the promotion of accessible tools in local spaces, it has also been included in Article 14 and Article 11 (2) (c).</p> <p>Moreover, the text replicates the scope of the law which it develops (TRLGD). Natural areas are regulated in Article 26 of Royal Decree 193/2023 of 21 March, and would therefore fall within the category of good/service.</p> <p>With regard to strengthening municipal digital services, it is already provided for in Article 7.</p> <p>With regard to the rural environment, Article 16 already provides for the necessary allocation for the implementation of the measures contained in this provision.</p> <p>With regard to evaluation, Article 20 provides for the creation of interdisciplinary research networks and collaborative environments.</p> <p>In relation to financing, Article 17 already provides for a State aid scheme.</p>

			<p>Establish local monitoring committees with the participation of persons with disabilities and accessibility experts. Propose the creation of a local cognitive accessibility index that regularly assesses progress on these measures.</p> <p>3.2. Comments on financing Although the Royal Decree provides that the measures shall not entail budgetary increases, it is suggested: Include specific State aid for municipalities with greater budgetary difficulties. Prioritise the allocation of European funds for cognitive accessibility projects.</p> <p>3.3. Supplementary Legislation Proposals 1. Extend the reference to the use of artificial intelligence in cognitive accessibility by promoting their integration in local applications. 2. Include specific guidelines for educational and sports environments, given their importance in community life. 4. Conclusion From the EMFF, we consider that the contributions described not only reinforce the positive impact of the Royal Decree, but also allow for a more inclusive and enforceable approach to the various local realities in Spain. We request your inclusion and thank you for the opportunity to participate in this public consultation process.</p>	As regards AI, it is already regulated in Articles 3 and 11.
66	General Council of Associations of Logopedas/OSPA	TEXT	<p>(a) General contributions to the whole document It is proposed to standardise the formula used to refer to people. The most commonly used expression is “people with cognitive difficulties”, which we consider to be the most appropriate given the context of the regulation. It is noted that some paragraphs include the words ‘of all persons with cognitive difficulties and communication’ (first paragraph, page 2). It is proposed to replace “plain language” by “clear language”, in accordance with Article 3, definitions, in all relevant references, in order to make their denomination uniform. Due to their specificity, the corrections to the references to the term ‘augmentative and alternative communication systems’, to</p>	The use of the concept of “persons with cognitive difficulties” has been agreed. The definitions set out the concepts of plain language and plain language.

			the one most in line with Article 3, definitions, relating to ‘augmentative and alternative communication’, are dealt with in specific paragraphs according to the article in which they appear.	
67	General Council of Associations of Logopedas/OSPA	TEXT	(b) Contributions to Article 3, definitions Point (a) ‘Illiterate’ could be replaced by an illiterate person that does not result in his or her adjective, as it gives rise to a negative connotation attributed to the person himself. We suggest it be amended as follows: Illiteracy: a situation in which a person finds himself or herself who, according to UNESCO, does not know how to read, write, understand a simple written text or set out facts of his or her daily life in a elementary manner.	Finding accepted.
68	General Council of Associations of Logopedas/OSPA	TEXT	Letter (m) It is proposed to delete the references to reading in the definition of clear language. According to UNE-ISO 24495-1: 2024, paragraph 1, Subject matter and field of application, all types of communication are intentionally excluded from this standard. In other words, the rule applies only to written information. However, clear language includes oral communication, which is key in the deployment of cognitive accessibility, as it facilitates the understanding of the person’s oral message, thus contributing to effective communication. We suggest it be amended as follows: (m) Clear language: communication which, either in its oral form, in writing or in combination, addresses what the recipients want and need to know, their interest, experience and linguistic competence, including the context of such communication, ensuring that they can find what they need, understand and use it. Its implementation should follow the guidelines and recommendations of UNE-ISO 24495-1: 2024 or its most up-to-date version.	The rule clarifies the differences between clear and plain language that seem to be confused in the observation.
69	General Council of Associations of Logopedas/OSPA	TEXT	Letter (o) The reference to pictograms for communication is proposed to be consistent with the definition of a communicative code. Pictograms represent the communicative code used by children	Finding accepted.

			<p>with disabilities who are not yet able to read and write and are in the process of teaching – learning. It is also used by people who, after brain damage, have lost the ability to read and write. This type of pictograms, as a communication code for augmentative and alternative communication, should be clearly distinguished in the Regulation from other types of pictograms linked to accessible signage or iconography on a website.</p> <p>In turn, we consider it important to add the word “person” to the list of references.</p> <p>We suggest it be amended as follows:</p> <p>(o) Pictograms: visual representation of an actual or abstract comparator, such as an object, space, action, activity or person. The main uses of pictograms in cognitive accessibility are, inter alia, as a communicative code in augmentative and alternative communication, signposting of public or public spaces, or as an iconography on websites to facilitate navigability and usability. When used as a communication code, pictograms are adapted to the user’s cognitive and linguistic abilities, while pictograms for signage are standardised according to the reference technical regulations in terms of design and assessment of their perception and comprehensibility, and are widely available.</p>	
70	General Council of Associations of Logopedas/OSPA	TEXT	<p>(c) Submissions to Article 5, General measures on information and communication</p> <p>A wording is proposed to include the word “spoken”, in line with the term “visual – written”. On the other hand, it is considered more appropriate to use the word “hearing” instead of “sound”. It is important to specify the visual format – in images. In turn, it would be essential to add the reference to media diversity with regard to emergencies. We also consider that clear language should be mandatory, otherwise it would be contrary to the regulation itself.</p> <p>We suggest it be amended as follows:</p> <p>Cognitively accessible information must meet the following requirements:</p> <p>Its content is easy to understand and is provided in visual – written, visual format – images, such as photographs, pictograms</p>	<p>Not acceptable.</p> <p>The current wording is considered to be clear.</p>

			or iconography, in auditory – spoken format, with visual support or accessible information and communication technologies. In the context of information relating to the safety and protection of the physical integrity and health of persons, as well as in situations of emergency, such information shall be easily and rapidly perceptible and identifiable by all persons irrespective of their cognitive abilities and the augmentative and alternative means of communication used. 2. In cases where, according to this Royal Decree, easy reading is not an obligation, the information must be provided in clear language.	
71	General Council of Associations of Logopedas/OSPA	TEXT	(D) Submissions to Article 7.4, Telecommunications and the Information Society It is proposed to make the text more consistent by using the term Augmentative and Alternative Communication, contained in the definitions, which is currently used in scientific discipline. We suggest it be amended as follows: The media and channels of public attention shall consider the diversity of communication modes, media and formats, in particular augmentative and alternative communication.	Finding accepted.
72	General Council of Associations of Logopedas/OSPA	TEXT	(e) Contributions to Article 9, Transport, paragraph 2 (b) (i), (ii) It is proposed, as in the previous one, to make the text more consistent by using the term “augmentative and alternative communication”. In turn, it is important to add the need to address acoustics, as it is part of the problems of sensory hypersensitivity that may occur in people with autism disorder. We suggest it be amended as follows: The necessary measures to facilitate spatial orientation shall be implemented in accordance with the following criteria: I. Considering sensory needs in relation to lighting, acoustics and adequate ventilation. II. Attention to cognitive accessibility by facilitating understanding of information, accessible communication, in particular augmentative and alternative communication, as well as interaction in the environment, including tactile signalling, in all modes of transport.	Accepted in part. It is understood that the current wording is clearer.
73	General Council of	TEXT	(f) Contributions to Article 10, Goods and services available to	Not acceptable.

	Associations of Logopedas/OSPA		<p>the public</p> <p>Paragraph 4 (b)</p> <p>We propose that not only alternative forms of communication should be made available, but also, in particular, that it should be ensured that users of augmentative and alternative media can use them in their interaction with public or private health services and health promotion and protection services.</p> <p>We suggest it be amended as follows:</p> <p>The diversity of cognitively accessible modes, media and formats of communication shall be enabled, and individuals shall be enabled to use their augmentative and alternative means of communication, in order to avoid exclusion or difficulty in regular access to these services.</p>	<p>The current wording is clearer. However, the expression “augmentative and alternative communication” is used throughout the text.</p>
74	General Council of Associations of Logopedas/OSPA	TEXT	<p>Paragraph 4 (e)</p> <p>It is proposed, as in the previous paragraphs, to use the term “augmentative and alternative communication” in order to bring consistency in the wording.</p> <p>We suggest it be amended as follows:</p> <p>Health institutions and veterinary centres shall enable people to use their augmentative and alternative means of communication or other cognitively accessible means, means and formats of communication to ensure that they can make full and appropriate use of their facilities, goods and services.</p>	<p>Not acceptable.</p> <p>The current wording is clearer. However, the expression “augmentative and alternative communication” is used throughout the text.</p>
75	General Council of Associations of Logopedas/OSPA	TEXT	<p>(g) Contributions to Article 11. Relations with public administrations, including access to public benefits and their administrative decisions</p> <p>Paragraph 2 (c)</p> <p>It is proposed to use the term “augmentative and alternative communication”.</p> <p>We suggest it be amended as follows:</p> <p>In order to ensure cognitive accessibility within relations between public administrations and citizens and irrespective of the channel through which they occur, the following requirements must be ensured: (...)</p> <p>The provision of cognitively accessible modes, media and formats of communication. In the digital environment, among others, it</p>	<p>It would accept it in part, worded as follows:</p> <p>(e)Facilitating communication through the use of cognitively accessible communication options.</p> <p>Finding accepted.</p>

			will be possible to implement with live chat, artificial intelligence that guides the process in writing, voice and visual support, making it easier for the person to interact with his or her usual means of augmentative and alternative communication. Training and capacity building in cognitive accessibility for public administration staff shall be ensured for face-to-face care in procedures that ensure the understanding, communication and interaction of people with cognitive difficulties, in particular those using augmentative and alternative communication.	
76	General Council of Associations of Logopedas/OSPA	TEXT	<p>Paragraph 4 (a)</p> <p>It is proposed to replace the last sentence with “and enabling augmentative and alternative means of communication and other cognitively accessible modes, media and formats of communication”.</p> <p>We suggest it be amended as follows:</p> <p>Oral or written communications with persons with cognitive difficulties shall be made in clear language, taking into account their personal characteristics and needs, using means such as easy reading, as well as the use of their augmentative and alternative means of communication or other cognitively accessible modes, media and formats of communication.</p>	<p>Accepted in part.</p> <p>The definitions article clarifies the concepts.</p>
77	General Council of Associations of Logopedas/OSPA	TEXT	<p>Paragraph 4 (b)</p> <p>It is proposed to use the expression: ‘their usual means of augmentative and alternative communication’. In turn, we consider that it might be appropriate to introduce the term “be understood”, in line with the current legislation.</p> <p>We suggest it be amended as follows:</p> <p>The person with cognitive difficulties shall be provided with the professional assistance or material or other support necessary to be understood with his or her usual means of augmentative and alternative communication.</p>	<p>Finding accepted.</p> <p>Simplifies the wording.</p>
78	General Council of Associations of Logopedas/OSPA	TEXT	<p>(h) Contributions to Article 12</p> <p>Paragraph 5 (c) (i)</p> <p>We propose to replace “pictograms for communication or other alternative and augmentative communication systems” by the wording proposed in the previous changes “enabling them to use</p>	<p>The wording of the Article has changed substantially, so the comment cannot be taken into account.</p>

			<p>their usual augmentative and alternative means of communication or other cognitively accessible modes, media and formats of communication”. In turn, we consider the reference to “easy to read” important.</p> <p>We suggest it be amended as follows: Oral or written communications to persons with cognitive difficulties shall be made in clear and accessible language, or in easy reading if requested, taking into account their personal characteristics and cognitive accessibility needs, enabling them to use their usual augmentative and alternative means of communication or other cognitively accessible modes, means and formats of communication where necessary.</p>	
79	General Council of Associations of Logopedas/OSPA	TEXT	<p>Paragraph 5 (c), (ii)</p> <p>It is again proposed to use the term “its usual means of augmentative and alternative communication”. In turn, the facilitator is considered to provide a professional service and not only support. Finally, we propose to use the term “be understood”.</p> <p>We suggest it be amended as follows: The person with cognitive difficulties shall be provided with the assistance (s) necessary to enable him/her to understand, including using his/her usual means of augmentative and alternative communication and, where appropriate, the professional intervention of a facilitator.</p>	The wording of the Article has changed substantially, so the comment cannot be taken into account.
80	General Council of Associations of Logopedas/OSPA	TEXT	<p>Paragraph 5 (d)</p> <p>We propose to use the words “the individual’s employment of his or her usual means of augmentative and alternative communication”.</p> <p>Cognitive accessibility tools will be implemented in the courtrooms and in the videoconferencing system, which will include, inter alia, the possibility of subtitling the interventions automatically, the intervention of the facilitator, the use by the person of his or her usual means of augmentative and alternative communication, and the instant availability of visual support, especially in the context of statements, whether as a person reported, filled, investigated or charged, in criminal proceedings and in testimonial statements specific to any jurisdiction.</p>	The wording of the Article has changed substantially, so the comment cannot be taken into account.

81	General Council of Associations of Logopedas/OSPA	TEXT	<p>Paragraph 7 We propose to detail in particular training in communication interaction with users of augmentative and alternative communication, as well as the correction of the error in ‘cognitive difficulties’.</p> <p>We suggest it be amended as follows: In physical examination procedures, a person with cognitive difficulties may always be accompanied by a supporting person. In the event that he does not appoint one, qualified and trained staff in communication interaction with augmentative and alternative communication users shall be appointed for support and shall always be of the same sex.</p>	The wording of the Article has changed substantially, so the comment cannot be taken into account.
82	General Council of Associations of Logopedas/OSPA	TEXT	<p>Paragraph 9 As in the previous one, we consider it essential to specify specific training on how to interact with users of augmentative and alternative communication, due to their specific nature. In this regard, we believe that training is important, not only in the various current augmentative and alternative media, but also in how to be an effective interlocutor when interacting with users, given the existing individuality and heterogeneity.</p> <p>We suggest it be amended as follows: For legal aid applications and when requested by a person with cognitive difficulties, all information on this application process shall be provided in an easy-to-read format. The applicant shall be served by professionals trained in cognitive accessibility, and specifically in interaction with users of augmentative and alternative communication, belonging to the legal guidance services of professional bodies. In addition, an accompanying person or support person designated by the applicant shall always be respected and allowed access.</p>	The wording of the Article has changed substantially, so the comment cannot be taken into account.
83	General Council of Associations of Logopedas/OSPA	TEXT	<p>(I) Contributions to Article 15, Employment The phrase “may request communication by augmentative and alternative systems” is confusing, given that the media is the individual of the individual. It is proposed to “make it easier for workers to communicate with their usual means of augmentative and alternative communication”.</p>	Finding accepted.

			<p>In turn, we propose adding “orally”, as there may be situations of illiteracy that encounter more difficulties in written understanding than in oral understanding.</p> <p>We suggest it be amended as follows:</p> <p>Workers shall be provided with communication with their usual means of augmentative and alternative communication where appropriate, and shall be provided with the adaptation of the documents necessary for the tasks entrusted to them and the meetings in which they participate. The undertaking shall be obliged to make such adaptation except for duly justified reasons, which must be communicated in a cognitively accessible form, in written form, orally or both if the person so requires. Any change of task or communication of information relevant to the fulfilment of the objectives shall be communicated at least in writing, including orally if required by the person concerned.</p>	
84	OSPA	TEXT	<p>After detailed analysis and analysis of the proposal, we can only say that for a combined cognitive accessibility, the following needs to be taken into account: 1- technical Measures 2- Material Measures. 5. Human measures. In the latter measure, the EDUCATIVE AND LABORAL TECHNICAL ASISTENT, which accompanies the pupil and pupil in the school to support it in their regular curriculum, must be guaranteed and that it is not fair in all Autonomous Communities, creating a disadvantage for those that do not apply. The ATE is included in the boxes in Law 39/2006 of 14 December 2006 on the promotion of personal autonomy and care for people in a situation of dependency. But not recognised in many educational establishments, leaving students at NEE, who are already vulnerable in themselves, at a disadvantage compared to other pupils and leading to early school leaving. On the other hand, and also in human terms, reference should be made to the Legal and Administrative FACILITATION, as detailed in Law 8/2021 of 2 June 2010, reforming civil and procedural legislation to support persons with disabilities in exercising their legal capacity, which specifies that this figure must be provided in order to guarantee the right to personal accessibility and dignity of individuals.</p>	<p>Not acceptable.</p> <p>Judicial facilitation is already covered by Article 12 and is awaiting development.</p> <p>With regard to education and employment assistants, Article 10 refers to the Royal Decree on goods and services in which education is specifically regulated.</p>

85	Senior and Pensionist Platform	TEXT	<p>First – Preliminary approach and considerations</p> <p>Apart from the basic conditions that are generally laid down for each of the areas set out in Article 5 of the recast text, it is necessary for the draft Regulation to expressly provide for a regulation with special provisions for older persons, bearing in mind that their cognitive accessibility difficulties may result in specific circumstances different from those of other persons. However, it is specifically stated that all the basic conditions intended to be regulated in the draft regulation ‘<i>must be of a minimum character, with the possibility for the Autonomous Communities and local authorities to establish additional or more stringent conditions within their sphere of competence</i>’.</p> <p>It is considered that although the empowerment of the Autonomous Communities and local authorities to raise the level of intensity of these basic conditions is a positive aspect, it is essential that this does not prevent the draft Regulation from containing a regulation that is clearly detailed and which clearly restates the basic conditions of accessibility and the way in which they must be guaranteed, so that the absence of specific action by the Autonomous Communities or local authorities does not create a risk of lack of protection, especially given the State competence assumed through Article 149.1.1 (a) of the Spanish Constitution. It is also considered essential that the draft Regulation specifically provides for the participation of associations representing older people in decision-making or in drafting regulatory initiatives under it. The competent public administrations should promote the adoption of technical standards, certifications and attestations of compliance with the basic cognitive accessibility conditions in which the specialised community sector may be involved.</p> <p>It should be noted that in relation to digital accessibility and emerging technologies data of people with cognitive difficulties of all ages is needed to avoid bias that discriminates. Appropriate and dignified treatment of persons with cognitive disabilities and potential beneficiaries of such accessibility, such as the elderly, is important to avoid discrimination, and requires specific training, to be ensured through this standard.</p>	<p>Accepted in part.</p> <p>The generic reference to persons with cognitive difficulties has been agreed.</p> <p>With regard to the participation of associations representing older people in decision-making or in the drafting of regulatory initiatives, it is noted that this participation already exists through the regulatory procedures for prior public consultation and public hearing and information.</p> <p>With regard to having data of people with cognitive difficulties of all ages, it is considered a good measure, but it is not within the scope of this rule.</p> <p>In relation to Braille, there is no reference to specific media, but to the information they convey or the communication they provide, so that no express mention is considered necessary.</p> <p>As regards the prevalence of the most favourable rule, it is a regulatory principle that is already applied in our domestic legal system.</p> <p>Compliance reports shall be forwarded in due time and, where appropriate, to the Non-Diff.</p>
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86	Senior and Pensionist Platform	TEXT	<p>Two – Modi fiproposals for the draft Royal Decree ONE. Article 1. Object</p> <p>It is proposed to amend Article 1 of the Draft, suggesting an addition in the following terms (in bold text it is proposed to add): <i>‘The purpose of this regulation is to establish and regulate cognitive accessibility and the conditions under which it is required and implemented, with a view to contributing to the exercise of the rights and duties of citizens, and to ensure equal opportunities and non-discrimination for all persons and, in particular, for the elderly and people with relationships of understanding, communication and interaction resulting from</i></p>	<p>Not acceptable.</p> <p>The term “people with cognitive difficulties” is used without enumeration.</p>

			<p><i>intellectual, mental, sensory, brain damage, cerebral paralysis, autism spectrum disorder, cognitive impairment or limited cognitive abilities due to ageing or socio-economic situations such as immigration or functional illiteracy.'</i></p> <p>Motivation</p> <p>In our view, in addition to what is envisaged, it would be appropriate to incorporate the specific mention of sensory disability, in that it involves adapting physical and digital environments, as well as products, services and technologies to ensure that all people, regardless of their sensory abilities, can interact on an equal footing and effectively with different means and environments at their disposal; following universal accessibility patterns. Similarly, as explained above, it is necessary for the draft Regulation to expressly provide for a regulation with special provisions for older persons, bearing in mind that their cognitive accessibility difficulties may result in specific circumstances different from those of other persons. With regard to the specific reference to functional illiteracy, see below and based on the proposed amendment to Article 3 (a).</p>	
87	Senior and Pensionist Platform	TEXT	<p>TWO. Article 3. OfFinitions</p> <p>It is proposed to incorporate and amend Article 3 of the text. To this end, it is suggested that some content be added and replaced (in bold text proposed to be inserted and deleted):</p> <p>It would be desirable to define what is meant by Cognitive Accessibility in Article 3 of the provision:</p> <p>Beyond the concept of universal accessibility in Article 2 (K) of the TRLGDPD, which refers to cognitive accessibility and Article 29a, which refers to conditions (see: https://www.boe.es/buscar/act.php?id=BOE-A-2013-12632), it is considered appropriate and clarifying that this regulation has a definition of its own, given that it is precisely the subject matter of this provision that is in progress.</p> <p>Proposal:</p> <p>Section 3 of Standard UNE-EN ISO 21801-1 on cognitive accessibility states: terms and definitions, that cognitive accessibility is: “<i>the extent to which systems (3.5) can be used by</i></p>	<p>Accepted in part.</p> <p>Cognitive accessibility is already defined in TRLGD: “cognitive accessibility: it is one that allows everyone to understand, communicate and interact easily. Cognitive accessibility is deployed and made effective through easy reading, alternative and augmentative communication systems, pictograms and other human and technological means available for that purpose.”</p>

people from a population with the widest range of user needs, cognitive characteristics and abilities to achieve identified objectives within identified use contexts”

Section 3.5, which refers to this concept, states that the **system** is: *“Product, service, or built environment or any combination thereof with which the user interacts (3.7)”* This number 3.7 defines a **user** as: *‘individual accessing or interacting with a system’*.

Combining these definitions, it could be indicated that cognitive accessibility is: the extent to which systems (products, services, or built environments or any combination thereof with which users interact, access or interact with such systems) can be used by people from a population with the widest range of user needs, cognitive characteristics and abilities to achieve objectives identified in identified use contexts.

CERMI states that: *“Cognitive accessibility is one characteristic of environments, processes, activities, goods, products, services, objects or instruments, tools and devices that enable easy understanding and communication.”*

Full Inclusion, defines it in an easy-to-read format as follows: *“Characteristic of things, spaces or texts that make them understood by everyone”*.

— For CEACOG: *“Cognitive accessibility is to make the world easier to understand”*.

In conjunction with the provisions of the TRLGDPD and these references, two concepts are proposed, one broader and the shorter one (to be chosen, if deemed appropriate): ***Cognitive accessibility is the characteristic of environments, processes, activities, goods, products, services, objects, tools and instruments that ensure their easy understanding, communication and use. It is based on a systematic, comprehensive and coherent set of conditions, requirements, standards and guidelines designed to ensure that everyone is able to interact, understand and communicate in a manner that falls into the different elements of their environment and***

			<p><i>with the products, goods and services it offers.”</i></p> <p>A shorter concept could be: “Cognitive accessibility is the characteristic that environments, activities, products and services should have to ensure their understanding, communication and use for all, through rules and guidelines that ensure effective interaction and understanding”.</p>	
88	Senior and Pensionist Platform	TEXT	<p>I. Point (a) of Article 3, in our view, would seem appropriate to add, where appropriate, the special reference (and subsequent processing) to the so-called: Functional illiteracy.</p> <p>Motivation</p> <p>While the definition of illiteracy is provided with reference to UNESCO, it would be appropriate to have the concept and development in the PRECOBAC (Draft Royal Decree n-24-012-DCA, version 18/11/2024, approving the Regulation on the Basic Conditions of Cognitive Accessibility) of the functional illiteracy variant, also dealt with by UNESCO (see pages 9 and 10 of: https://unesdoc.unesco.org/ark:/48223/pf0000132679). [...]</p> <p>In particular, attention is drawn to the need for understanding, in particular in communications that are very relevant to this age group, such as those on instructions, guidance and understanding and drafting of documents, such as pharmacists, doctors, administrative law, especially social security, tax, and those expressed in digital environments. This would mean considering the need to remedy the special needs that social groups such as older people require, and for communications to be clear and, in easy-to-read format and always with very simple and graphical expression, if easy reading is not used.</p>	<p>Not acceptable.</p> <p>The general consensus refers to the UNESCO definition.</p>
89	Senior and Pensionist Platform	TEXT	<p>III. To Article 3 (c), as regards “cognitive abilities”, the following addition is proposed: <i>“(c) cognitive skills: those relating to brain functions, including understanding, attention, memory, language, orientation, organisation and planifi. These abilities may be affected by</i></p>	<p>It is not accepted as the definition of “cognitive difficulties” is already regulated.</p>

			<p><i>people with different types of custom (intellectual, physical, mental, osensory), older people, people who do not know the official languages or with a low level of literacy, including the general population.”</i></p> <p>Motivation Cognitive skills limited by old age or difficulties due to lack of language knowledge or constraints commensurate with different types of disability should be considered for the design of cognitively accessible environments, goods and services. It is proposed that the definition be made more specific, with an express reference to such circumstances, in order to improve the text by giving it a higher level of precision.</p>	
90	Senior and Pensionist Platform	TEXT	<p>IV. In section e) Augmentative and alternative communication, the following addition is proposed: <i>“(e) Augmentative and alternative communication: means employed by a person with failings in oral or written communication to express themselves and interact effectively in any environment, with the necessary support and appropriate to their abilities (...)”</i></p> <p>Motivation Improvement of the text in order to provide greater precision in terms of communication, with two forms of textual transmission, depending on the channel through which messages are conveyed, which are equally relevant to the interaction.</p>	Not accepted, as this is oral and not textual communication. All the appeals listed in Article 4 (i) of Royal Decree 674/2023 of 18 July 2007 relate to oral, non-textual communication.
91	Senior and Pensionist Platform	TEXT	<p>V. The following amendments and additions are suggested in paragraph (j): cognitive accessibility tools: <i>“(j) cognitive accessibility tools: I. Information and communication accessibility resources: tools such as clear language include clear communication, easy reading, Braille, audio and augmentative and alternative communication media and systems, to facilitate reading understanding and communicative interaction by providing cognitively accessible alternatives to communication and oral and written information.</i></p>	The definition has been deleted from the article.

			<p>II. Guidance resources: it goes back to signalling tools such as signage pictograms, sound systems, Braille signals, relief maps, tactile tiles and guidance processes using information from the environment. Technological accessibility resources: it refers to technology support products and services that enable better communication, guidance, and performance of tasks, as well as the possibility for the use and consumption of technological tools, products and services by the highest possible range of people with different cognitive skills including artificial intelligence. These resources will include screen readers, voice recognition software, adapted keyboards, simultaneous sign language interpretation, taped sympli interfaces, etc.</p> <p>Motivation Improvement of accessibility tools for all persons with sensory disabilities.</p> <p>It is also suggested to replace the term “clear language” with that of “clear communication” since, using language, we usually deal with the way we speak or write and the term communication also incorporates the reference to the communication process with a number of broad elements that influence the effectiveness of the message issued and received. Thus, communication takes into account visual design, use, accessibility, etc. Therefore, clarity should be extended to all possible elements in a communication so that it reaches the recipient in the most comprehensive and effective way, especially in the case of groups with special needs, such as older people or people with intellectual disabilities. Indeed, the concept in paragraph (m) Clear language begins by indicating that it is <i>the communication that [...]</i>. At the end of the third line and the beginning of the fourth line of paragraph (m), it is stated: “<i>It ensures that readers can find what they need, understand and use it.</i>” By referring to readers, it excludes oral or other communications, such as Braille. For those reasons, that guarantee must apply to all persons, not only to readers in a restrictive sense.</p>	
92	Senior and Pensionist Platform	TEXT	VI. To paragraph (m) Clear language , the following	Not accepted, we insist on the above justification.

			<p>replacement is suggested: <i>“(m) Clear language clear communication: it is the communication that puts the readers first and considers what they want and need to know; the level of interest, their experience and literacy; and the context in which they will use the document. It ensures that readers can find what they need, understand and use it. The monitoring of the guidelines and recommendations of UNE-ISO 24495-1, in its most up-to-date version, shall be promoted.”</i> Motivation It is proposed that the term “clear language” be changed to that of “clear communication” for the reasons set out above.</p>	
93	Senior and Pensionist Platform	TEXT	<p>VII. To section p) Support product for augmentative and alternative communication, the following additions and amendments are proposed: <i>“(P) Supporting product for augmentative and alternative communication: assistive product that optimises the communication performance of the person and reduces the person’s disability. It includes devices, instruments, equipment, software or any other product intended for such aFi n, manufactured in particular on the general market, such as boards, relief objects, macro characters, braille, notebooks, software or mobile applications.”</i> Motivation Technical improvement in relation to the incorporation of specific support products targeting people with visual disabilities.</p>	<p>Not acceptable. There are no examples.</p>
94	Senior and Pensionist Platform	TEXT	<p>VIII. In section (r) Accessible Signalling, the following additions are suggested: <i>“(R) Accessible marking: signalling system consisting of a set of text elements in ink or braille, pictograms, fl echas, relieves, audio and routings with the function of informing, identificar, guiding, directing or regulating the understanding and use of a space. These signalling elements are understandable to all people, regardless of their skills or disabilities.”</i></p>	<p>Not acceptable. Simplifies the wording.</p>

			<p>Motivation Technical improvement in relation to signage accessible through specific means targeted at visually impaired persons.</p>	
95	Senior and Pensionist Platform	TEXT	<p>THREE. Article 5. General measures on information and communication It is proposed to amend Article 5 of the Draft, suggesting an addition in the following terms (in bold text it is proposed to add): ‘Cognitively accessible information must meet the following requirements: (a) <i>Aquella whose content is easy to understand, provided in written visual format, visual formatpictográ fico, sound, by means of Braille visual supports, relief or accessible information and communication technologies. In the context of information relating to the safety and protection of the physical integrity and health of persons, as well as in situations of emergency, as well as in the prevention, warning and monitoring of risks to physical integrity and of human, technological or natural disasters, this information shall be easily and rapidly perceptible and identifiable by all persons regardless of their cognitive abilities.’ It is also proposed to add a third point to Article 5 to read as follows: ‘While cognitive accessibility focuses on making information understandable, it should also include measures related to other types of accessibility, such as physical or sensory accessibility, to ensure that everyone, regardless of their abilities, can access it.’ Motivation The prevention, warning and monitoring of risks to physical integrity and disasters of various kinds such as those arising from, <i>inter alia</i>, climate change, and taking into account their particular relevance, should be universally accessible, including cognitive accessibility in all its areas for ensuring, with the greatest possible safeguards, the principles of non-discrimination and a level playing field in effective access to this information and communication.</i></p>	<p>Not acceptable. The current wording is simpler and sufficiently clear.</p>
96	Senior and Pensionist Platform	TEXT	<p>FOUR. Article 7. Telecommunications and the information society</p>	<p>Finding accepted.</p>

			<p>It is proposed that the wording of Article 7 of the provision be added and amended as follows:</p> <p>— Article 7.1 <i>‘1. Public administrations and private providers involved in telecommunications and the information society must implement measures to guarantee and enjoy cognitive accessibility.’</i></p> <p>Motivation It is considered necessary to add that these measures should be sufficient to ensure cognitive accessibility. Indicating only a general duty to implement guarantee measures without indicating that they are sufficient and that there is a reference to specific guidelines may lead to inaction or minimal action. It is therefore also suggested that reference be made to the application of UNE standards, which provide cognitive accessibility, clear language and easy-to-read standards. Administrations should regularly report on the implementation and evaluation of these measures and inform groups or social groups particularly in need of this implementation, such as older people and others with special needs. The UNE standards suggested to inform these measures are the updated versions of the following: Standard UNE-EN ISO 21801-1 for cognitive accessibility Standard UNE-ISO 24495-1, clear language — Standard UNE 153101: 2018 EX, easy-to-read</p>	
97	Senior and Pensionist Platform	TEXT	<p>— Article 7 (2). Paragraph d. <i>“(D) Interaction systems and mechanisms and, in particular, forms of consent provision, processes of identification, authentication, firma and payment, and all forms or digital tools and those involving the use and application of artificial intelligence linked to the procurement, acceptance of terms and conditions or assimilation of terms and conditions.”</i></p> <p>Motivation Technical improvement, given the frequency and expanding use of artificial intelligence measures in relation to the forms and digital tools referred to in this Article.</p>	It is not accepted because specific procedures are not listed for appeals.
98	Senior and Pensionist	TEXT	<p>— Article 7 (3).</p>	Not acceptable.

	Platform		<p>‘3. When the services in question are provided via a website or mobile application, compliance with criteria A and AA of standards UNE 139803, UNE-EN ISO 21801-1, UNE-ISO 24495-1 and UNE 153101: 2018 EX must be ensured. All measures shall also be implemented to ensure cognitive accessibility of these services.”</p> <p>Motivation</p> <p>In our view, we consider it necessary to make an express mention that the measures must be sufficient to ensure cognitive accessibility. To this end, in addition to the reference to standard UNE 139803, the UNE standards that provide the standards of cognitive accessibility, clear language and easy reading referred to above must be applied: standard UNE-EN ISO 21801-1 on cognitive accessibility; standard UNE-ISO 24495-1, clear language and standard UNE 153101: 2018 EX, easy to read. Similarly, administrations should make regular reports on the implementation and evaluation of these measures and inform groups or social groups particularly in need of this implementation, such as older people and others with special needs.</p>	References to standards are limited to what is included in the definition section.
99	Senior and Pensionist Platform	TEXT	<p>— Article 7 (4).</p> <p>‘4. The media and channels of public attention shall consider the diversity of expression and, in particular, augmentative and alternative systems of communication and audio description.”</p> <p>Motivation</p> <p>Technical improvement in relation to accessible and targeted means and channels of care, targeting people with visual disabilities.</p>	<p>Not acceptable.</p> <p>Audio description can already be considered as an alternative system.</p>
100	Senior and Pensionist Platform	TEXT	<p>— Article 7.5</p> <p>‘5. The use of other cognitive accessibility elements, such as easy reading, simple and clear communication, the use of accessible explanatory videos, or the use of cative identifi images or key pictograms for common aspects such as perfil, help, economic data, invoices, payment gateway, forms of contact or complaints, among others, shall be promoted. In addition, in order to ensure full accessibility, various formats will be considered, such as</p>	<p>Not acceptable.</p> <p>Concepts and tools are defined throughout the text and there are no examples.</p>

			<p>audio or macro characters, among others.”</p> <p>Motivation</p> <p>Technical improvement in relation to the incorporation of certain elements that promote full accessibility for groups or social groups with special needs such as the elderly and the visually impaired.</p>	
101	Senior and Pensionist Platform	TEXT	<p>FIVE. Article 8. Urbanised public spaces, infrastructure and edifi</p> <p>It is proposed to incorporate and amend Article 8 of the legislative text. To this end, it is suggested that some content be incorporated and replaced (in bold text proposed to be inserted and deleted):</p> <p>I. Article 8 (2). Section (a)</p> <p><i>“(a) Deambulation: it goes back to physical accessibility in the light of the legislation in force and to which is added the possibility of understanding the full path or elements of the installation adapted to the person.”</i></p> <p>Motivation</p> <p>The specific reference to the need to understand the entire journey is suggested, given that, quite often, it occurs among older people and other social or collective groups, who, after the correct initial indication, no longer have the indication and a choice must be made between several options (think in a hospital to address us to a desk or a cure room where there is a single signage and, when you arrive at a certain bifurcation, several corridors are opened and there are no longer signs).</p> <p>In order to substantiate this necessary inclusion, reference is made in bold to the provisions of Article 40 (2) on ‘General conditions of communication and signalling’ of Order TMA/851/2021 of 23 July, which develops the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces. . [...]2. On every accessible pedestrian route, people must have access to the information necessary to guide themselves in a manner and throughout the journey and be able to locate the various spaces and equipment of interest.</p>	Finding accepted.
102	Senior and Pensionist	TEXT		Not acceptable.

	Platform		<p>II. Article 8.2. Paragraph (d) <i>“(D) Communication: it refers to all processes of issuing, exchanging and receiving information regardless of the channel through which it is carried out. It covers all aspects of safety signalling, public attention and use of facilities, ensuring compliance with UNE standards that provide the necessary guidelines: UNE-EN ISO 21801-1, UNE-ISO 24495-1 and UNE 153101: 2018 EX.”</i></p> <p>Motivation Technical improvement.</p>	References to standards are limited to what is included in the definition section.
103	Senior and Pensionist Platform	TEXT	<p>III. Article 8.2. Paragraph (h) <i>“(h) Haptic or tactile resources: thepresence of signage on haptic resources, i.e. tactile resources, especially in areas of special consideration and use by persons in need of such resources, such as access, lifts, handrails, and general plans to which gráfi plans and sensory touch plans must be added, will be welcomed.”</i></p> <p>Motivation In our view, these types of resources should not be given an optional or voluntary nature, but should be incorporated into the standard as a minimum specification of the principle of universal accessibility and, therefore, the implementation of the essential measures in which this principle must be implemented is essential in order to advance the inspiring objective of this standard, at least as regards the fundamental measures to be taken that are absolutely necessary.</p>	Finding accepted.
104	Senior and Pensionist Platform	TEXT	<p>IV. Article 8 (2) (i) <i>“(I) Control of sensory stimuli: designs shall be promoted to allow the customisation of the impact of sensory stimuli, such as light, contrast, sound or movement, or to anticipate information on environmental conditions so that users can use their own support resources.”</i></p> <p>Motivation Technical improvement to ensure cognitive accessibility for</p>	Not acceptable. Contrast is understood within the light (<i>the contrast can occur either by the combination of different colours, intensity of lights and shadows, differences in size, texture, or any other visual element</i>).

			elderly and visually impaired people.	
105	Senior and Pensionist Platform	TEXT	<p>SIX. Article 9. Transports — Article 9 (1). <i>‘1. All signals and warnings in access to and use of modes of transport must be accessible cognitively, in accordance with the rules laid down in Royal Decree 1544/2007 of 23 November 2011 regulating the basic conditions of accessibility and non-discrimination for access to and use of modes of transport for persons with disabilities. These signs and warnings must be informed by the guidelines contained in the UNE standards: standard UNE-EN ISO 21801-1 on cognitive accessibility; standard UNE-ISO 24495-1, clear language; and standard UNE 153101: 2018 EX, easy to read.’</i></p> <p>Motivation Technical improvement.</p>	<p>Not acceptable.</p> <p>References to standards are limited to what is included in the definition section.</p>
106	Senior and Pensionist Platform	TEXT	<p>— Article 9 (2) (b) (ii). <i>‘II. Attention to cognitive accessibility by establishing augmentative and alternative communication and signalling systems of good quality and enabling, without effort, to understand what is being communicated, such as written and audio formats or tactile signalling in means of transport.’</i></p> <p>Motivation This addition is proposed, given that, in a standardised situation and without any special needs, the audio explanations normally provided on public transport; they are often difficult to understand. Therefore, in our view, it would not be sufficient to indicate the mere existence of audio and other formats, provided that they are of insufficient quality to be perceived without particular effort or difficulty.</p>	<p>Not acceptable.</p> <p>This is not considered necessary.</p>
107	Senior and Pensionist Platform	TEXT	<p>SEVEN. Article 10. Goods and services available to the public. — Article 10.2 <i>‘2. With a view to ensuring cognitive accessibility in the context of goods and services, all operators are required to comply with the following obligations relating to the protection of vulnerable consumers and users orwithcognitive beliefs:</i> <i>(a) Transparency and clarity in business information: suppliers of</i></p>	<p>Not acceptable.</p> <p>References to standards are limited to what is included in the definition section. Easy reading already presupposes ease of understanding.</p>

			<p>goods and services shall provide the consumer with basic information in plain language and, where possible, pictograms and other visual supports. Such information shall also be provided in other formats such as audio media and braille. In any case, the guidelines laid down shall apply in order to guarantee the simple communications referred to in UNE-ISO 24495-1 and UNE 153101: 2018 EX, which are clear language and easy to read respectively.</p> <p>Basic information means the following: [...] (b) ensuring that a complaint sheet is available in easy-to-read format and through easy to understand communication.</p> <p>Motivation Technical improvement.</p>	
108	Senior and Pensionist Platform	TEXT	<p>— Article 10.4 '4. With regard to health goods and services and health promotion and protection services, meaning those which are made available to the public in facilities, premises and other physical spaces dedicated to health services and health promotion and protection services of health centres or establishments referred to in Royal Decree 1277/2003 of 10 October laying down the general rules on the authorisation of health centres, services and establishments, and in veterinary centres, the following requirements are laid down: (a) The dissemination of information on all services and instructions offered to you, in cognitively accessible formats and media, both general and specifically targeted at people with cognitive beliefs, will be promoted. In order to achieve the effectiveness of this information, the guidelines set out in the rules must be followed: UNE-EN ISO 21801-1, cognitive accessibility; UNE-ISO 24495-1, clear language, and UNE 153101: 2018 EX, easy to read. [...] (c) Mechanical, electronic, assistive products and assistive technologies shall be available, as well as appropriate and suitable support staff, which are necessary to enable people</p>	<p>Accepted in part.</p> <p>References to standards are limited to what is included in the definition section.</p> <p>The inclusion of other types of difficulties is accepted.</p>

			<p>with cognitive failings to access these goods and services on an equal basis with other citizens and receive appropriate attention. Account shall be taken of the fact that the support offered must be adapted if cognitive failings are carried out with another type of physical or sensory custom.</p> <p>[...]</p> <p>(e) Health institutions and veterinary centres shall enable the use of augmentative and alternative systems and other cognitively accessible formats and means of communication to ensure that people can make full and appropriate use of facilities, goods and services to their needs.</p> <p>Motivation Technical improvement.</p>	
109	Senior and Pensionist Platform	TEXT	<p>EIGHT. Article 11. Relations with public administrations, including access to public benefits and their administrative decisions — Article 11.2</p> <p>‘2. In order to ensure cognitive accessibility within relations between public administrations and citizens and irrespective of the channel through which they occur, the following requirements must be ensured:</p> <p>(a) The documentation shall be presented in a clear and simple manner. This will entail the availability, in easy reading, of both forms and/or applications, as well as guides to the completion of procedures. In order to ensure this simplicity and ease, both for the purposes of this point (a) and (b), (c) and (d) below, the guidelines contained in the rules will be followed: UNE-EN ISO 21801-1, cognitive accessibility; UNE-ISO 24495-1, clear language, and UNE 153101: 2018 EX, easy to read.</p> <p>(b) the use of audio or visual support for understanding, communication and interaction in different areas:</p> <p>[...]</p> <p>Motivation Bearing in mind that availability must mean not only the easy-to-read format of the various media specially designed for</p>	<p>Accepted in part.</p> <p>References to standards are limited to what is included in the definition section.</p>

			intellectual disability, but also in a way that takes into account all citizens, which means communicating in a simple and clear way. To this end, it is again suggested that both the reference to simple and clear communication and the reference to the relevant and previously cited UNE standards be mentioned.	
110	Senior and Pensionist Platform	TEXT	<p>— Article 11.4</p> <p><i>‘4. At any time, the person concerned or, as the case may be, the person chosen by him or her to represent him, may request that the procedure, at the remaining stages thereafter, be conducted with cognitive accessibility measures. At least the following shall be ensured:</i></p> <p><i>(a) All oral or written communications with persons with cognitive beliefs shall be made in plain and cognitively accessible language, taking into account their personal characteristics and needs, using means such as easy reading, pictograms for plain and clear communication, braille, audio or other alternative and augmentative communication systems where necessary. In order to ensure this simplicity and ease, both for the purposes of this point (a) and (b), (c) and (d) below, the guidelines contained in the rules will be followed: UNE-EN ISO 21801-1, cognitive accessibility; UNE-ISO 24495-1, clear language, and UNE 153101: 2018 EX, easy to read.</i></p> <p>[...]</p> <p>Motivation</p> <p>Similarly to the previous observation, it is suggested to add the reference to the media such as simple and clear communication, after referring to easy reading, with an indication of the guidelines that inform it.</p>	<p>Not acceptable.</p> <p>References to standards are limited to what is included in the definition section.</p> <p>The current wording is sufficiently explanatory.</p>
111	Senior and Pensionist Platform	TEXT	<p>— Article 11.5</p> <p><i>‘5. Information relating to calls for public employment, both open access and internal promotion, and in particular those which include places reserved for persons with intellectual disabilities, shall be communicated in an easy-to-read version and always with clear and simple communication. Where requested, the</i></p>	<p>Not accepted, the current wording is clear and secure.</p>

			<p><i>tests, practices and examinations shall also have a cognitively accessible version.'</i></p> <p>Motivation Technical improvement in order to ensure the accessibility of calls for public employment to all citizens.</p>	
112	Senior and Pensionist Platform	TEXT	<p>NINE. Article 12. Administration of Justice — Article 12.1</p> <p><i>'1. The provisions of Article 27 (1) of Royal Decree 193/2023 of 21 March and the provisions of the procedural rules on prosecution that specify the appropriate measures shall apply.'</i></p> <p>Motivation By way of example, Article 7a of the Code of Civil Procedure provides: '<i>Accommodation for persons with disabilities and the elderly</i>'. Special references are made to these two groups or social groups. Thus, in the case of older people, there are specific references to adaptations, specifically aimed at those aged 65 and over, which are divided between adjustments for both the 65-80 age group and 80 years old. We therefore believe that the reference to any procedural law that covers the case of older persons by the Justice Administration in these terms (and other groups referred to) should be added. (See Art. 7a cited in: https://www.boe.es/buscar/act.php?id=BOE-A-2000-323). In our view, if this addition is not envisaged, each adjustment in those procedural laws should be added, but we believe that this reference may be sufficient, at the very least, since, to a greater extent, reference could also be made to the specific provisions of procedural laws. This reference to specific provisions would contribute to transparency, localisation and accessibility to the specific adjustments.</p>	As the article has been simplified, the proposal is rejected.
113	Senior and Pensionist Platform	TEXT	<p>— Article 12.3 <i>'3. All decisions and communications of the court or tribunal notified, whatever legal form they take, must be drafted and presented in a comprehensible format when the intervener so requests. The following aspects are included in the accessible format:</i></p>	Not accepted, the appropriate terms are decisions and notifications. The terms defined in this standard should also be used.

			<p>(a) Referral in easy-to-read format or clear language–</p> <p>(b) The content of obligations, time limits, dates, appearances and procedural acts which are scheduled in a clear, simple and prominent manner.</p> <p>(c) the possibility of requesting decisions and other documents indicated in an alternative format to the letter.’</p> <p>Motivation</p> <p>It is proposed that the adjective ‘judicial’ be replaced by the proposed wording, given that this would include all decisions of judges, magistrates and judicial clerks, without exclusion. All of this, bearing in mind that the court decision itself refers to the one issued by a judge or a court (source: https://dpej.rae.es/lema/resoluci%C3%B3n-judicial).</p> <p>On the other hand, under the term service, only one reference would be made to one of the possible communications from courts and tribunals, thus excluding others such as: summonses, injunctions, locations, etc.; accordingly, with the word ‘communications’, we consider that all types of communications would be understood regardless of their purpose. It should also be noted that this word is used in paragraph 5 (c) (i) of that article.</p>	
114	Senior and Pensionist Platform	TEXT	<p>— Article 12.5</p> <p>‘5. In proceedings involving people with cognitive beliefs, the necessary adaptations and adjustments shall be made to ensure their participation on an equal footing, taking into account the following considerations:</p> <p>[...]</p> <p>(c) People with cognitive failings have the right to understand and be understood and understood and to receive understandable decisions and communications in any action to be carried out. To such a Fin:</p> <p>I. All communications, whether oral or written, addressed to persons with cognitive beliefs who have requested it shall be made in plain and accessible language, in a way that takes into account their personal characteristics and needs, using means such as easy reading, pictograms for communication, braille, audio or</p>	The wording has been simplified and will therefore be regulated in another legislation.

other alternative and augmentative communication systems where necessary.

[...]

*The facilitator is not a procedural representative of the disabled person. However, if it is necessary for a better guarantee of fundamental rights in the proceedings of a person with cognitive beliefs, he or she shall be notified of any decisions **and communications** of which knowledge is appropriate in order to be able to perform his or her role of assistance properly.*

Motivation

As regards people with cognitive difficulties and their right to understand and be understood, it is pointed out that the wording may entail ambiguity and not specific when assistance should be given to a person who may have cognitive difficulties but who does not manifest it, with particular reference to the social group of older people. On the other hand, it is suggested that reference be made to the right to understand and be understood, given the difference in terminology between the two concepts.

In that regard, account should be taken of the fact that the nature of that right has not been dealt with in practice either in legal literature or in case-law. The proposed wording would in any event refer to a right of result and subjectively dependent on each person. The focus is thus being placed on a possibility that will depend on the instruction or preparation and training of each individual. If it is considered that the so-called right to understand or understand remains in the text, “and to receive understandable decisions and communications” should be added. This addition would create not only a possible right for receivers but also an obligation for senders to ensure that receivers have the best possible conditions to understand any message.

Similarly, in our view, we consider that two aspects arising from the **Organic Law on the Law of Defence** should be taken into account, which we believe are relevant to the group of older people (in the aforementioned provision called ‘elderly persons’) and which could either be implemented or referred to by reference:

			<p>Article 6, ‘Right of information’, states: <i>‘In the judicial sphere, the Ministry with competence in the area of justice, the Autonomous Communities with competence in this matter and the General Council of the Judiciary shall ensure that the use of technical or IT means in judicial proceedings does not constitute a faithful act to guarantee the effectiveness and certainty of the right to information, especially in the case of older people or persons with disabilities, ensuring that the digital divide does not affect the effectiveness of this right’.</i></p> <p>In the Second Additional Provision. As regards the ‘Legal Guidance Service’, it is stated:</p> <p><i>‘1. Legal guidance services organised by bar associations shall be provided with all information concerning the provision of legal aid to individuals, in particular the requirements for access to the legal aid system, in a universally accessible manner and taking into account the most deprived persons in society.</i></p> <p><i>2. Public authorities shall promote and support the services set up by the bar associations, in particular where they are aimed at paying attention to groups in vulnerable situations, including women who are victims of gender-based violence, minors, persons with disabilities, the elderly, foreigners, or persons without financial resources or deprived of liberty.’</i></p>	
115	Senior and Pensionist Platform	TEXT	<p>TEN. Article 13. Participation in public life and electoral processes</p> <p>It is proposed to incorporate and amend Article 13 of the legislative text. To this end, it is suggested that some content be incorporated and replaced (in bold text which it is proposed to incorporate and delete text which it is proposed to delete):</p> <p>— Article 13.1</p> <p><i>‘1. The provisions of Royal Decree 422/2011 of 25 March 2015 approving the Regulation on the basic conditions for the participation of persons with disabilities in political life and electoral processes and Royal Decree 1612/2007 of 7 December 2007 regulating an accessible voting procedure that makes it easier for visually impaired persons to exercise their right to vote</i></p>	It is not accepted as we are regulating cognitive accessibility measures and universal non-accessibility in the broad sense.

			<p><i>shall apply.</i>'</p> <p>Motivation</p> <p>Technical improvement to ensure cognitive accessibility of visually impaired people in electoral processes.</p>	
116	Senior and Pensionist Platform	TEXT	<p>— Article 13.3</p> <p><i>'3. With regard to electoral processes, the guarantee of cognitive accessibility entails the obligation to implement the following measures:</i></p> <p>[...]</p> <p><i>(c) accessible voting materials carried out in accordance with the parameters of easy to read and simple, clear and affordable communication shall be used both on ballot papers and in the instructions for their completion, and throughout the electoral process, where applicable.</i></p> <p>[...]</p> <p><i>(g) In addition, a cognitively accessible guide shall be developed explaining the steps to be taken in the vote, following the guidelines contained in the rules: UNE-EN ISO 21801-1, cognitive accessibility; UNE-ISO 24495-1, clear language, and UNE 153101: 2018 EX, easy to read.</i></p> <p>Motivation</p> <p>Similarly to previous comments, it is suggested to add the reference to the media such as simple and clear communication, after referring to easy reading, with an indication of the guidelines that inform it.</p>	<p>Not acceptable.</p> <p>References to standards are limited to what is included in the definition section.</p> <p>The current wording is considered appropriate.</p>
117	Senior and Pensionist Platform	TEXT	<p>ELEVEN. Article 14. Cultural heritage and historical heritage</p> <p>— Article 14.3</p> <p><i>'3. In the spaces referred to in the previous paragraph, all signs relating to safety, monitoring and order of visits to understand the enclave and orientation shall be made by means of accessible signage in a simple, clear format using pictograms, symbols, and any cognitively accessible graphic element that makes it possible to distinguish parts of the exhibition, visit or tour. Efforts shall be made to provide advance information on environmental</i></p>	<p>Not accepted, no list of resources is given in each article.</p>

			<p>conditions and the possibility of customisation and control of sensory stimuli. In addition, routings and plans in relief shall be used for the same Fin.</p> <p>Motivation Technical improvement to ensure cognitive accessibility for visually impaired persons.</p>	
118	Senior and Pensionist Platform	TEXT	<p>12. Article 15. Employment — Article 15.2</p> <p><i>‘2. In the context of occupational health and safety conditions, the documentation used during training in the prevention of occupational risks, as well as the documentation containing the guidelines for action and protocols for emergencies, shall be drawn up in clear language and shall have an easy-to-read version, incorporating, where possible, visual supports or other alternative formats such as audio or braille.’</i></p> <p>Reasoning. Technical improvement to ensure cognitive accessibility for visually impaired persons.</p>	Not acceptable. This project focuses on cognitive accessibility tools.
119	Senior and Pensionist Platform	TEXT	<p>— Article 15.6</p> <p><i>‘6. Workers may request communication by means of augmentative and alternative systems or other formats and the adaptation of documents necessary for the tasks entrusted to them and the meetings in which they participate. (...)’</i></p> <p>Reasoning. Technical improvement to ensure cognitive accessibility for visually impaired persons.</p>	Not acceptable. The wording is unclear, the other formats are unknown.
120	Senior and Pensionist Platform	TEXT	<p>— Article 15.9</p> <p><i>‘9. Private and public contracting entities shall promote the development of easy-to-read, braille, audio or other read-only guides and manuals, as well as a person assigned to provide support to the worker during his period of employment and adaptation to the job, and may rely on the collaboration of social organisations.’</i></p> <p>Reasoning. Technical improvement to ensure cognitive accessibility for visually impaired persons.</p>	Not acceptable. This project focuses on cognitive accessibility tools.

121	Senior and Pensionist Platform	TEXT	<p>THIRTEEN. Article 18. Information activities, awareness raising campaigns and training actions <i>‘The public administrations, within the scope of their competences, with the advice of the Spanish Centre for Cognitive Accessibility (CEAGOG), shall develop information activities, awareness-raising campaigns and training actions and all other activities necessary to promote cognitive accessibility and to raise awareness of the large number of people who are involved in its implementation. Similarly, the State Centre for Personal Autonomy and Technical Aid (CEAPAT), which is attached to the Institute of Senior Citizens and Social Services (IMSERS), will assist in the activities set out above.’</i></p> <p>Motivation We would point out that it would be appropriate for the General State Administration to be designated as advisory centres, in addition to the Spanish Cognitive Accessibility Centre, the State Centre for Personal Autonomy and Technical Aid of the Institute of Elderly and Social Services. CEAPAT is the State Reference Centre for Universal Accessibility and Supporting Products. Therefore, its collaboration with CEACOG is an institutional coherence and enables complementary aspects to be covered from the perspective of universal accessibility and design for all people and assistive products and technologies.</p>	Not acceptable. Collaboration can take place without the need to translate it into this point.
122	Senior and Pensionist Platform	TEXT	<p>FOURTEEN. Article 20. Promotion of research, development and innovation <i>‘Within their respective competences, the Ministries, with the advice, where appropriate, of the Spanish Cognitive Accessibility Centre (CEACOG) and the State Centre for Personal Autonomy and Technical Aid (CEAPAT), shall promote research, development and innovation projects in the field of cognitive accessibility, using public-private partnerships wherever possible. Interdisciplinary research networks and collaborative environments will also be promoted, enabling the creation of innovative solutions at European and international level, encouraging the participation of people with cognitive faiths in such networks.’</i></p>	Not acceptable. CEAPAT has not been proposed for this task after revision of the text.

			Motivation Similarly to the previous observation, it is suggested that CEAPAT be incorporated as a consultancy centre.	
123	Raquel del Barrio Diaz	TEXT	I would like to see cognitive accessibility on the public transport network (nearby, metro, airport) reviewed in particular, donating several lines and there is a lot of movement from citizens to diary. Architectural barriers are highly integrated as society, but cognitive barriers do not. And if a ramp is an element that people need for their daily lives, they ultimately benefit everyone. The same applies to cognitive accessibility. Including access to public administrations and administrative procedures in all its areas.	Accepted, already regulated in Article 9.
124	Federación Autismo Castilla-La Mancha	TEXT	<i>Second final provision Financing of the planned measures. The Royal Decree does not entail any increase in appropriations or salaries, staff costs or any other appropriations for the public sector. In addition, there will be a reduction in revenue for the State Treasury and will be carried out using the available resources. existing budget. It should include a budget to carry out the necessary adaptations and ensure their implementation,</i>	Not acceptable. An article is already foreseen for aid.
125	Federación Autismo Castilla-La Mancha	TEXT	<i>Article 8 (I) control to encourage: designs shall be promoted to allow the customisation of the impact of sensory stimuli, such as light, sound or movement, or to anticipate information on environmental conditions so that users can use their own support resources. Include “whenever possible natural light shall be used, strong odours neutralised and excess noise controlled”.</i>	Not accepted, the current name is clearer.
126	Federación Autismo Castilla-La Mancha	TEXT	<i>Article 9. 2 (c) the access and travel of the accompanying or supporting person, where a percentage of disability equal to or greater than 33 per one intellectual disability by means of the certificate referred to in paragraph 1 of the first additional provision of Royal Decree 888/2022 of 18 October establishing the procedure for the recognition, declaration and qualification of the degree of</i>	Not accepted, a generic wording has been left to include all persons with a degree of disability of 33 % or more, no enumerations can be made because there is a risk of leaving situations uncovered.

			<p>disability shall be free of charge.</p> <p>Include people with brain paralysis, supervening brain damage and autistic spectrum disorder at least or as elsewhere cited a cognitive disability.</p>	
127	Federación Autismo Castilla-La Mancha	TEXT	<p>Article 11. 2. (C)... Training and training in cognitive accessibility for staff in public administrations shall be ensured for face-to-face care in procedures that ensure the understanding, communication and interaction of people with cognitive difficulties.</p> <p>Include mandatory minimum content, duration and accreditation.</p> <p>D) The information and procedures of all digital formalities of public administrations must be designed in a cognitively accessible manner so that they can be carried out by anyone, and must comply with the accessibility guidelines laid down in Royal Decree 1112/2018 of 7 September 2007 on the accessibility of public sector websites and mobile applications.</p> <p>Include: Those already designed must be adapted.</p>	<p>Not acceptable.</p> <p>In relation to Article 11 (2) (c), the current wording is broad and secure.</p> <p>The second observation would not be necessary because it refers to all the procedures, which means that the existing procedures have been adapted.</p>
128	Federación Autismo Castilla-La Mancha	TEXT	<p>Article 12. Administration of justice. The entire text involves the training of legal practitioners. At least the training guarantee for professionals should be included.</p>	<p>In Article 11. 2 there is already a reference to the training of public authorities' workers.</p>
129	Eduardo Torroja Building Sciences Institute – CSIC	TEXT	<p>Contributions</p> <p>Please find below our comments on the text of the draft Royal Decree.</p> <p>In relation to Article 8 (1):</p> <p>— The basic conditions of accessibility in urbanised public environments and buildings are not regulated solely by Order TMA/851/2021. The competence to regulate buildings is the Technical Building Code (CTE). Visual and acoustic signalling of accessibility is regulated in several sections of the Basic Documents of the ETC: DB SUA and DB SI. In this Article 8, as is done in the following articles of this draft Royal Decree, reference should be made to the regulations in force.</p>	<p>Finding accepted.</p>

			<p>The current wording seems to mean that Article 41 will apply not only to ‘built-up public spaces’ but also to ‘buildings’. It must be understood that the issues developed for urbanised public spaces may be different, and even in some cases incompatible, with those that may be required of buildings. For example, issues developed to limit the risk of impact with glazed areas are already regulated within the ETC with some difference from that set out in Article 41 and, therefore, differences correspond to the particularities of each area.</p> <p>If we consider that the issues applicable to buildings should be extended, it is necessary to analyse them specifically in this area and to propose an amendment to the Technical Building Code to incorporate them, so that the various building agents can submit their contributions.</p> <p>In summary, the wording of Article 8 (1) should only refer to the current regulations and delete the reference to Article 41 of the TMA Order of 23 July, for example as follows: “1. With regard to visual and acoustic signs, the provisions of Order TMA/851/2021 of 23 July 2007 for urbanised public spaces and the Technical Building Code, approved by Royal Decree 314/2006 of 17 March 2007 for buildings, shall apply.”</p>	
130	The Supreme Council of the Associations of Architects of Spain (CSCAE)	TEXT	<p>‘We would like to specify, as specific with regard to urbanisation, within the articles, and not just in the preamble, which type of buildings (understood as public) fall within the scope of this Regulation. It is considered that Article 8 would be the most appropriate for this.’</p>	They are defined in the legislation in force and in Article 8 (3).
131	David López Blanco	TEXT	<p>Contributions</p> <p>We currently have the following standards for the development of cognitive accessibility in environments and buildings:</p> <ul style="list-style-type: none"> — Standard UNE-EN ISO 21801-1, Cognitive accessibility. Part 1 of general guidelines. — Standard UNE 170002, Accessibility requirements for signalling elements in buildings. — ISO Standard 9186-1, Graphical Symbols. Test methods. Part 1: Method of verification for comprehensibility. — ISO Standard 9186-2, Graphical Symbols. Test methods. Part 	It is not accepted, but the proposal is assessed so that, where appropriate, it is forwarded to the competent ministry, the Ministry of Housing and the Urban Agenda.

			<p>2: Method of verification for perceptive quality. — Standard UNE-ISO 9186-3, Graphical Symbols. Assessment methods. Part 3: Method for assessing the association of the symbol with the comparator. And the upcoming Spanish UNE standards currently being developed for the design and validation of pictograms, through the UNE group CTN 170 GT6. These standards are a support to implement cognitive accessibility actions in buildings and environments but are not sufficient in themselves. to ensure cognitive accessibility, each building and environment needs an analysis of barriers to guidance and communication in which involve people with difficulties in understanding and guidance; it is also necessary in all cases to develop an improvement project in the guidance and communication taking into account different cognitive accessibility strategies such as the organisation of space; information hierarchy, understandable or easy-to-read information, bridging resolution, structuring of a building with elements or with colour, routings and other strategies for guidance and wayfinding compatible and aligned with other universal accessibility measures. These projects should be developed and implemented by cognitive accessibility professionals and their effectiveness assessed by people with difficulties in coaching and understanding, such as people with intellectual disabilities, autism, brain damage, etc.; formed for the performance of this function.</p>	
132	Confederation Asperger Spain	TEXT	JUSTIFICATION FOR THE INCLUSION OF THE TERM ASPERGER SYNDROME IN LEGISLATION ON COGNITIVE ACCESSIBILITY [...]	It is not accepted, it is not the subject of this rule, and the contribution is linked to Royal Decree 888/2022 of 18 October 2007.

				<p>In short, we would like to draw the attention of this committee to the Congress of Deputies urging INSERSO to recognise psychosocial disability, following the path of the Parliament of Andalusia, the Generalitat de Catalunya, Parlament Balear, the Cortes de Aragón, and other representative institutions that have already approved, and all of them unanimously, institutional statements in favour of recognition of psychosocial disability, for all people on the autistic spectrum, whether or not they are cognitive delayed or intellectual disability, including in addition the category of Asperger Syndrome in the development of the new Cognitive Accessibility Act.</p>	
133	Confederation Spain	Autism	TEXT	<p>[...] CONTRIBUTIONS TO THE STANDARD On cognitive accessibility advice: 1.1. Include an amendment in paragraph III of the Explanatory Memorandum: This Royal Decree consists of a single article, six additional provisions, one derogatory provision and three final provisions. The Sole Rule approves the Regulation on basic cognitive accessibility conditions. The first additional provision regulates the processing of information, the additional provision second, the call for tenders for public tenders, the third additional provision regulates the role of advisory centres on cognitive accessibility, including the Spanish Centre for Cognitiva Accessibility (CEACOG) or the Spanish Autism Spectrum Trastoral Centre, the fourth provides for an agreed catalogue of pictograms, while the fifth additional provision provides for a report on the technical adaptation of airport and railway facilities. The sixth additional provision and the single derogation respond to the need to update and simplify Royal Decree 1414/2006 of 1 December 2014 determining that persons with disabilities are considered to be persons with disabilities. effects of Law 51/2003 of 2 December 2003 on equal opportunities, non-discrimination and universal accessibility for</p>	<p>It is not accepted that only the relevant centre of reference, i.e. the CEACOG, will have to be referred to in this standard.</p>

persons with disabilities, compliance with Article 4 (3) of the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion. For its part, the first final provision regulates the applicable title of competence, the second final provision regulates the financing of the planned measures and the third final provision the entry into force.

The single article consists of three chapters. Chapter I contains the general provisions, Chapter II regulates accessibility requirements in the different areas and Chapter III refers to positive action measures and other complementary support. These chapters are rolled out over 20 articles.

1.2. Include an amendment in the Third Additional Provision: Third additional provision. **The centres of reference for cognitive accessibility El Centro Español de Accescesibility Cognitiva. The advisory centres of the Royal Disability Trustee whose duties include work on cognitive accessibility are: centres El Centro Español de Accessibility Cognitiva – CEACOG – is an advisory centre for the Royal Disability Trustee, a reference centre for validating and monitoring the quality of cognitive accessibility services, as well as for advising public administrations. These centres are the Spanish Cognitiva Accessibility Centre (CEACOG) and the Spanish Autism Spectrum Treatment Centre (Centro de autismo).**

1.3. Include an amendment in the Fourth Additional Provision: Fourth supplementary provision. Catalogue of symbols, signs and pictograms for signalling
The Royal Disability Trustee, through the Spanish Cognitiva Accessibility Centre and the Spanish Autism Spectrum Treatment Centre, will create a technical and specialised working group with the aim of drawing up, within 1 year of publication of the regulation, a catalogue of

			<p>symbols, signs and pictograms for signs to be used in the fields covered by this regulation. The catalogue shall be public and free of charge and shall aim at the widespread use of agreed symbols, signs and pictograms for signage by the operators bound by this Royal Decree.</p> <p>JUSTIFICATION: Given the current wording of Article 35 of Royal Decree 193/2023 of 21 March 2007 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public and Article 6 of Law 11/2023 of 8 May transposing European Union Directives on the accessibility of certain products and services, migration of highly qualified persons, taxation and digitalisation of notarial and registration activities; and amending Law 12/2011, of 27 May on civil liability for nuclear damage or damage caused by radioactive materials, the advisory centres of the Royal Disability Trustee are state focal points in on accessibility with regard to the provisions included in these standards.</p> <p>Thus, and bearing in mind that, beyond the central role and competences of the Spanish Centre on Cognitive Accessibility, there are other advisory centres that are also competent for cognitive accessibility for their purpose of work, such as the Spanish Autism Spectrum Trastortion Centre, it would be advisable that the role of reference centre for the monitoring of the standard and of all projects carried out in its development be shared between the advisory centres of the Royal Disability Trustee.</p>		
134	Confederation Spain	Autism	TEXT	<p>For pictograms for signalling:</p> <p>2.1. Include an amendment in paragraph III of the Explanatory Memorandum:</p> <p>This Royal Decree consists of a single article, six additional provisions, one derogatory provision and three final provisions. The Sole Rule approves the</p>	It is not accepted in line with the above justification and for adding “signage” it is preferable to keep a broad wording.

			<p>Regulation on basic cognitive accessibility conditions. The first additional provision regulates the processing of information, the additional provision second, the call for tenders for public tenders, the third additional provision regulates the role of advisory centres on cognitive accessibility, including the Spanish Centre for Cognitiva Accessibility (CEACOG) or the Centre. Spanish on Autism Spectrum Trastorno, the fourth provides for an agreed catalogue of signage pictograms, while the fifth additional provision provides for a report on the technical adaptation of airport and railway facilities. The sixth additional provision and the single repeal respond to the need to update and simplify Royal Decree 1414/2006 of 1 December 2014 determining the status of a person with a disability for the purposes of Law 51/2003 of 2 December 2015 on Equal Equality. opportunities, non-discrimination and universal accessibility for persons with disabilities, in accordance with Article 4 (3) of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion. For their part, the first final provision regulates the applicable title of competence, the second final provision regulates the financing of the planned measures and the third final provision the entry into force. The single article consists of three chapters. Chapter I contains the general provisions, Chapter II regulates accessibility requirements in the different scopes and Chapter III concerns positive action measures. and other complementary supports. These chapters are rolled out over 20 articles.</p>		
135	Confederation Spain	Autism	TEXT	<p>2.2. Include an addition in the Fourth Additional Provision: Fourth supplementary provision. Catalogue of symbols, signs and pictograms for signalling The Royal Disability Trustee, through the Spanish Cognitiva Accessibility Centre and the Spanish Autism Spectrum Treatment Centre, will set up a technical and specialised working group with the aim of drawing up, within 1 year of publication of the regulation, a catalogue of symbols, signs and</p>	<p>It is not accepted on the basis of the above justifications for both the reference centres and the UNE/ISO standards and the standardisation of pictograms.</p>

pictograms for signage to be used in the fields covered by this Regulation. The catalogue shall be public and free of charge and shall aim at the widespread use of symbols, signs and pictograms for signs.

agreed by the operators bound by this Royal Decree. **The technical regulations included in the relevant ISO-UNE Standards shall be used as a reference for the creation of this catalogue.**

2.3. Include an addition in Article 3):

(o) Pictograms: visual representation of an actual or abstract comparator, such as an object, space, action or activity. The main uses of pictograms in cognitive accessibility include, but are not limited to, signposting of public or public spaces, codes for augmentative and alternative communication or iconography on websites to facilitate navigability and usability. Pictograms for communication and signalling are in place. Pictograms for communication are an alternative and augmentative system of customisable communication that is adapted to the communication codes and capabilities of each user. Pictograms for signage can be standardised and generally provided following the procedures indicated in the reference technical standards.

These **include ISO 7001: 2023: registered public information symbols; ISO 22727 Graphical symbols – Creation and design of public information symbols – Requirements; UNE-ISO 9186- 1 Graphical symbols – Assessment methods – Part 1: Method for assessing comprehensibility; UNE-ISO 9186-2 Graphical Symbols – Methods of evaluation – Part 2: Method for assessing perceptive quality; o Standard UNEISO 9186-3 Graphical symbols – Assessment methods – Part 3: Method for assess the association of the symbol with the comparator.**

2.4. Include an addition in Article 14 (3):

3. In the spaces referred to in the previous paragraph, all signs relating to safety, monitoring and order of visits for the

			<p>understanding of the enclave and orientation shall be made by means of accessible signage in a simple, clear format using standardised pictograms, symbols and any other a cognitively accessible graphic element that makes it possible to differentiate parts of the exhibition, visit or tour. Efforts shall be made to provide information in advance on environmental conditions and the possibility of customisation and control of sensory stimuli.</p> <p>JUSTIFICATION: We highly appreciate the inclusion of our previous contributions in on signage pictograms, but we believe it is important to include more explicit provisions that strengthen the role of technical standards for the creation and use of signage pictograms. These addition proposals therefore respond to the need to bring the Regulation into line with the applicable rules on the use of signage pictograms. In this Article 41 (1) (e) of Order TMA/851/2021 of 23 July, laying down the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces (hereinafter Order TMA/851/2021), lays down the obligation to use ‘standardised pictograms’ in the indication. It is therefore important that the Regulation is clear and supports progress in the design of signalling pictograms in the current technical regulations included in ISO Standard 7001: 2023: registered public information symbols; ISO 22727 Graphical symbols – Creation and design of public information symbols – Requirements; UNE-ISO 9186-1 Graphical symbols – Assessment methods – Part 1: Method for assessing comprehensibility; UNE-ISO 9186-2 Graphical symbols – Assessment methods – Part 2: Method for assessing perceptive quality; o Standard UNE-ISO 9186-3 Graphical symbols – Assessment methods – Part 3: Method for assessing the association of the symbol with the comparator.</p> <p>In addition to taking into account the specific emergency and safety pictograms forecasts included in EN ISO 7010: Safety pictograms, and the specific provisions for road safety pictograms</p>	
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			included in the General Traffic Regulation.	
136	Confederation Autism Spain	TEXT	<p>On communication pictograms and visual supports:</p> <p>3.1. Include an amendment in Article 7 (5):</p> <p>5. The use of other cognitive accessibility elements, such as easy reading, the use of accessible explanatory videos or the use of identification images or pictograms key visual supports for customary aspects such as: profile, help, economic data, invoices, payment gateway, forms of contact or complaints, among others.</p> <p>3.2. Include an amendment in Article 10 (2) (a):</p> <p>(a) Transparency and clarity in business information: suppliers of goods and services shall provide the consumer with basic information in plain language and, where possible, pictograms and other visual supports.</p> <p>JUSTIFICATION: The wording of the current Regulation recognises that it is customisable. without a universal understanding of pictogram systems for communication, it is important to use the concept of visual support when seeking to improve understanding through graphic symbols, thus making a difference between communication pictograms as customisable and non-standardised SAAC and visual supports, as non-standardised support resources that can help understand information in certain contexts.</p>	<p>Not acceptable.</p> <p>No resources are available so that they are not regarded as closed or exhaustive lists.</p> <p>Pictograms are visual supports.</p>
137	CEADAC	TEXT	<p>Article 8. <i>Urbanised public spaces, infrastructure and buildings.</i></p> <p>[...]</p> <p>2. Basic cognitive accessibility criteria will be mandatory in town planning memories. The competent public administrations shall regulate the inclusion of cognitive accessibility measures in their urban planning policies. They shall take into account the following criteria:</p> <p>[...]</p> <p>(f) Location and design: frames or orlas shall not be used in the signalling pictograms and shall be designed in positive or negative terms by clearly identifying correct and wrong behaviour. The pictogram shall be located on the left of</p>	<p>Is rejected. After consultation with specialised technicians, it is not considered necessary.</p>

			<p>written text characters and horizontally aligned. In addition, contrasting colours between background and pictogram and between text and background will have to be followed. Wherever possible, it would be advisable to include a red line to the left to enable people with left Heminegdain to know in which part of the sheet the information starts.</p>	
138	Autism Centre	TEXT	<p>II This Royal Decree consists of a single article, six additional provisions, one derogatory provision and three final provisions. The Sole Article adopts the basic cognitive accessibility conditions regulation. The first additional provision regulates the processing of information, the second additional provision concerns the call for tenders for public tenders, the third additional provision regulates the role of advisory centres in cognitive accessibility, including the Spanish Cognitiva Accessibility Centre (CEACOG) or the Spanish Autism Spectrum Treatment Centre, the fourth provision provides for an agreed catalogue of pictograms and other visual signage supports, while the fifth additional provision provides for the production of a report on the technical adaptation of airport and railway installations. The sixth additional provision and the single repeal respond to the need to update and simplify Royal Decree 1414/2006 of 1 December determining the status of a person with disabilities for the purposes of Law 51/2003 of 2 December on equal opportunities, non-discrimination and universal accessibility for persons with disabilities, in accordance with Article 4 (3) of the recast General Law on the rights of persons with disabilities and their social inclusion. For its part, the first final provision regulates the applicable title of competence, the second final provision regulates the financing of the planned measures and the third final provision the entry into force. [...]</p> <p>JUSTIFICATION: This amendment proposal, as well as that</p>	<p>Accepted in part. It is considered appropriate to make only a generic reference to the Royal Disability Trustee and its advisory centres. The concept of visual supports is broader than that of signalling, which would be included. Replacement is rejected so that the guide can accommodate signage but also other supports.</p>

			<p>included in the third additional provision itself and in the fourth additional provision, responds to the need to bring the content of the Regulation into line with the other legislation in force on accessibility. Given the current wording of Article 35 of Royal Decree 193/2023 of 21 March 2007 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public and Article 6 of Law 11/2023 of 8 May transposing European Union Directives on the accessibility of certain products and services, migration of highly qualified persons, taxation and the digitalisation of notarial and registration activities; and amending Law 12/2011 of 27 May 2003 on civil liability for nuclear damage or damage caused by radioactive materials, the advisory centres of the Royal Disability Trustee are state reference centres on accessibility with regard to the provisions included in the aforementioned rules.</p> <p>Thus, and bearing in mind that, beyond the central role and competences of the Spanish Centre on Cognitive Accessibility, there are other advisory centres that are also competent for cognitive accessibility for their purpose of work, such as the Spanish Autism Spectrum Trastortion Centre, it would be advisable that the role of reference centre for the monitoring of the standard and of all projects carried out in its development be shared between the advisory centres of the Royal Disability Trustee.</p> <p>This amendment proposal responds to the need to update the information contained here with the current wording of the fourth additional provision.</p> <p>Third additional provision. The centres of reference for cognitive accessibility El Centro Español de Accescesibility Cegnitiva.</p>	
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139	Autism Centre	TEXT	<p>Fourth supplementary provision. <i>Catalogue of symbols, signs and pictograms for signalling.</i></p> <p>The Royal Disability Trustee, through the Spanish Cognitiva Accessibility Centre and the Spanish Autism Spectrum Treatment Centre, shall set up a technical and specialised working group with the aim of drawing up, within one year of publication of the regulation, a catalogue of symbols, signs and pictograms for signs to be used in the areas covered by this Regulation. The catalogue shall be public and free of charge and shall aim at the widespread use of agreed symbols, signs and pictograms for signage by the operators bound by this Royal Decree. The technical regulations included in the relevant ISO-UNE Standards shall be used as a reference for the creation of this catalogue.</p> <p>JUSTIFICATION: This addition proposal, as well as that developed in Article 3) and 14.3, responds to the need to bring the Regulation into line with the applicable rules on the use of signage pictograms. In this regard, Article 41 (1) (e) of Order TMA/851/2021 of 23 July, laying down the technical document on basic conditions of accessibility and non-discrimination for access to and use of urbanised public spaces (hereinafter Order TMA/851/2021), lays down the obligation to use ‘standardised pictograms’ in the indication.</p>	<p>The reference to the ISO-UNE standard is rejected as it will be voluntary and in that case it does not need to be mentioned.</p>

			<p>It is therefore important that the Regulation is clear and supports progress in the design of signalling pictograms in the current technical regulations included in <i>ISO Standard 7001: 2023: registered public information symbols</i>; <i>ISO 22727 Graphical symbols – Creation and design of public information symbols – Requirements</i>; <i>UNE-ISO 9186-1 Graphical symbols – Assessment methods – Part 1: Method for assessing comprehensibility</i>; <i>UNE-ISO 9186-2 Graphical symbols – Assessment methods – Part 2: Method for assessing perceptive quality</i>; o <i>Standard UNE-ISO 9186-3 Graphical symbols – Assessment methods – Part 3: Method for assessing the association of the symbol with the comparator</i>. In addition to taking into account the specific emergency and safety pictograms forecasts included in <i>EN ISO 7010: Road safety pictograms included in the General Traffic Regulation</i>.</p>	
140	Autism Centre	TEXT	<p>Article 3. <i>Definitions</i></p> <p>For the purposes of this Royal Decree: [...]</p> <p>(o) Pictograms: visual representation of an actual or abstract comparator, such as an object, space, action or activity. The main uses of pictograms in cognitive accessibility include, but are not limited to, signposting of public or public spaces, codes for augmentative and alternative communication or iconography on websites to facilitate navigability and usability. Pictograms for communication and signalling are in place. Pictograms for communication are an alternative and augmentative system of customisable communication that is adapted to the communication codes and capabilities of each user. Pictograms for signage can be standardised and generally provided following the procedures indicated in the reference technical standards. These include <i>ISO 7001: 2023: registered public information symbols</i>; <i>ISO 22727 Graphical symbols – Creation and design of public information</i></p>	<p>Is rejected. It is considered that a regulatory standard such as this does not require an exhaustive reference to the reference technical standards. This catalogue should specify the implementing technical standards, as it will be a document that is more focused on professional persons in the field, and not this rule that should be understandable to all citizens.</p>

			<p>symbols – Requirements; UNE-ISO 9186-1 Graphical symbols – Assessment methods – Part 1: Method for assessing comprehensibility; UNE-ISO 9186-2 Graphical symbols – Assessment methods – Part 2: Method for assessing perceptive quality; o Standard UNE-ISO 9186-3 Graphical symbols – Assessment methods – Part 3: Method for assessing the association of the symbol with the comparator.</p>	
141	Autism Centre	TEXT	<p>Article 7. <i>Telecommunications and the information society.</i> [...] 5. The use of other cognitive accessibility elements, such as easy reading, the use of accessible explanatory videos or the use of identification images or pictogramskey visual supports for customary aspects such as profile, help, economic data, invoices, payment gateway, forms of contact or complaints, among others, shall be promoted.</p> <p>JUSTIFICATION: It is important to emphasise the difference between communication pictograms (specific and highly customisable SAAC) and visual supports (complementary resource to facilitate understanding of the message).</p> <p>Article 8. <i>Urbanised public spaces, infrastructure and buildings.</i> [...] (e) Gender equality: in the use of pictograms and signs, the images, signs and symbols used must treat the gender equally. The use of standardised and universalised pictograms shall be promoted.</p> <p>JUSTIFICATION: It is good to insist on this idea but there is no need for it to appear at this point of the new rule.</p> <p>Article 10. <i>Goods and services available to the public.</i> [...]</p>	<p>The proposal for Articles 7 and 10 is accepted. The term visual supports appears in the definition article and includes pictograms. The proposal in Article 8 is accepted. The definition of the term pictogram already refers to standardisation so it seems reasonable not to repeat it here.</p>

			<p>2. With a view to ensuring cognitive accessibility in the context of goods and services, all operators are required to comply with the following obligations relating to the protection of vulnerable consumers and users or users with cognitive difficulties:</p> <p>a) Transparency and clarity in business information: suppliers of goods and services shall provide the consumer with basic information in plain language and, where possible, pictograms and other visual supports.</p> <p>JUSTIFICATION: It is important to emphasise the difference between communication pictograms (specific and highly customisable SAAC) and visual supports (complementary resource to facilitate understanding of the message).</p>	
142	CEAPAT	TEXT	Grammatical errors are indicated	Correction of grammatical errors is accepted.
143	CEAPAT	TEXT	<p>As a result, Law 6/2022 of 31 March 2010 amending the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2015, was adopted to establish and regulate cognitive accessibility and its conditions for requiring and implementing it, with the aim of effectively ensuring cognitive accessibility for all persons with cognitive difficulties and communication of the physical environment, transport, information and communication, including information and communications systems and technologies, and to other services and facilities available or for public use, both in urban and rural areas.</p> <p>JUSTIFICATION:</p>	The amendment is accepted in order to bring it into line with the provisions of Law 6/2022.

			<p>Law 6/2022 of 31 March 2009 amending the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2007, to establish and regulate cognitive accessibility and its conditions for requiring and applying it, although it includes in its preamble a text similar to that included in the draft regulation, which states:</p> <p>It is therefore necessary to address the reform of Royal Legislative Decree 1/2013 of 29 November 2015 approving the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, in order to effectively ensure cognitive accessibility for all persons with difficulties in understanding and communicating the physical environment, transport, information and communication, including information and communications technology and systems, and to other services and facilities available or for public use, both in urban and rural areas.</p> <p>He went on to add that the benefits of cognitive accessibility extend to:</p> <p>other segments of the community such as the elderly, visitors or residents of the country who do not have sufficient knowledge of the official languages and people with a low level of literacy, among others</p> <p>Therefore, with a view to making the regulation more open, which does not contradict the provisions of the legislation or detract from its meaning, it is proposed that the following words be deleted from this paragraph: “of all those with cognitive difficulties and communication”.</p>	
144	CEAPAT	TEXT	<p>In particular, the principles of necessity and effectiveness are justified by a matter of general interest, given that the regulation of cognitive accessibility involves implementing policies and measures that promote cognitively accessible environments, products and services that can be understood and accessible to all, regardless of their</p>	Finding accepted.

			<p>cognitive abilities, and comply with the legal mandate imposed by the second additional provision of Law 6/2022 of 31 March.</p> <p>JUSTIFICATION: The use of these two adjectives 'understandable' and 'accessible' seems to refer to two different dimensions which, in reality, converge on cognitive accessibility. In other words, if an environment, product and service is 'understandable', it must be 'accessible', otherwise it would not guarantee its comprehensibility. In other words, if an environment, product and service are designed to be 'accessible', because of the universality of the concept, cognitive accessibility is integrated with it and its comprehensibility.</p>	
145	CEAPAT	TEXT	<p>Fifth additional provision <i>Adaptation of infrastructure and means of transport.</i></p> <p>Withintwo years of the entry into force of this Royal Decree, the Ministry with responsibility for transport shall draw up a report on the cognitive accessibility of airport and railway facilities, paying particular attention to the built environment, including signage and oral and written information to and other available support. The report shall include concrete recommendations for improvement and a proposal for unification of technical specifications for vehicles and installations.</p> <p>JUSTIFICATION: It improves the wording and broadens the information gathered in the above-mentioned report.</p>	Finding accepted.
146	CEAPAT	TEXT	<p>Article 1. <i>Purpose.</i></p> <p>The purpose of this regulation is to establish and regulate cognitive accessibility and its requirements and</p>	Accepted in part. It is understood that age does not in itself imply cognitive impairment. This, if any, is already stated in the causes. Age-isolated inclusion could have an impact on gender stereotypes. However, its inclusion is

			<p>implementation, in order to contribute to the exercise of the rights and duties of citizens, and to ensure equal opportunities and non-discrimination, for all persons and, in particular, persons with difficulties in understanding, communicating and interacting as a result of, inter alia, age, intellectual disability, mental disorder, brain damage, cerebral paralysis, autism spectrum disorder, cognitive impairment or socio-economic and educational situations such as immigration or illiteracy.</p> <p>JUSTIFICATION: Number matching “difficulties... arising”. Limiting target persons by listing them may leave aside other groups that are not named, such as people with rare diseases or people with language specific disorders, to name a few. By adding “age”, older people are integrated. It would be more appropriate to use “mental disorder” and not just “mental”. In the paragraph, its proximity to the word ‘disability’ would result in the expression ‘mental disability’, which is confusing. As written, it presupposes that migrants have a low level of education, which does not correspond to reality and can denote a stereotypical idea.</p>	<p>accepted because it is not so important for older people – whose need for accessibility arises from deterioration processes, many of them as a result of age – but for children who have not reached reading skills. In addition, the reference to mental disorder has been ruled out at earlier stages of the project, since the term mental disability is preferred by analogy to the (intellectual and) mental impairments to which the LGD refers. There is no need to refer to education. As regards the reference to migrants, the wording has been changed to ‘lack of knowledge of the language’.</p>
147	CEAPAT	TEXT	<p>Article 3. <i>Definitions</i> [...] j) ii. Guidance resources: it refers to tools such as wayfinding design, which includes the design of the urban environment, building, such as signage pictograms, etc., taking into account and—guidance processes using environmental information.</p> <p>IV. Universal design resources: ensuring that products and services are understood by the highest possible range of people with different cognitive abilities;</p>	<p>Accepted in part. The wording of sub-section ii. has been improved in order to simplify it and avoid anglicisms. The inclusion of universally designed resources is rejected as the heading refers to cognitive accessibility tools.</p>

			<p>JUSTIFICATION: Relevance of incorporating the definition of wayfinding and brief explanation</p>	
148	CEAPAT	TEXT	<p>All cognitive accessibility tools, regardless of their classification, aim to facilitate communication; generate meaningful and reciprocal social interactions; establish the conditions for efficient monitoring of each other's conduct; providing permanent information in advance as well as information on what has been done; present an environment that offers opportunities and respects diversity; promoting a positive social emotional climate; enable participation in a context free from situations involving undue personal threat or risk; maintain and increase self-esteem; promoting independence and autonomy; create environments of all kinds, where people feel comfortable, safe and independent; and to ensure the conditions for everyone to have access to their universal basic rights.</p> <p>JUSTIFICATION: To clarify meaning, it seems contrary to a person's freedom to act independently. In line with the definition of universal accessibility.</p>	<p>This is accepted, deleting "the conditions for efficient monitoring of the behaviour of others" and accepting addition with the following wording: create environments where people feel comfortable, safe and independent.</p>
149	CEAPAT	TEXT	<p>(m) Clear language — is the communication which, transmitted orally, in written form or in combination, puts the reader first and considers what they want and need to know; the level of interest, their experience and language proficiency; as well as the context in which such communication is made, the document will be used. It ensures that women farmersean find what they need, understand and use it. The monitoring of UNE-ISO 24495-1 guidelines and</p>	<p>Is rejected. Clear language, as a concept, refers to a form of wording and therefore the proposed amendment is not appropriate. However, the concept of plain language, to which the rule refers on several occasions, has been incorporated into the definition section, making use of the suggestions contained in the comment.</p>

			<p>recommendations, or its most up-to-date version, will be promoted.</p> <p>JUSTIFICATION: Section 24495 of UNE-ISO 1-2024: 1 provides that the standard does not intentionally cover all types of communication, meaning that the standard is only applicable in the case of written information, whether printed or digital.</p> <p>This clarification in the standard responds to the fact that clear language also includes oral communication, which is essential in cognitive accessibility, as it facilitates the auditory understanding of the received message and ensures effective communication.</p>	
150	CEAPAT	TEXT	<p>(o) Pictograms: visual representation of an actual or abstract comparator, such as an object, space, action, or activity or a person. The main uses of pictograms in cognitive accessibility are, inter alia, as a communicative code in augmentative and alternative communication, in signposting of public spaces or for public use, codes for augmentative and alternative communication or as iconography on websites to facilitate navigability and usability. As a communication code, there are pictograms for communication and signalling. Pictograms for communication are an alternative and augmentative system of customisable communication adapted to each user's codes and cognitive and linguistic communicative skills. £, while pictograms for signalling should be standardised taking into account and generally provided following the procedures indicated in the technical standards for design and assessment of their comprehensibility and perception, and provided in a general manner.</p> <p>JUSTIFICATION:</p>	Accepted with some editorial changes compared to the proposal.

			Pictograms used in Augmentative Communication – Alternative represent the communication code used by people who either have not learned to read and write, are in the process of teaching – learning or have lost their reading skills. It is very important in the regulation that the use of these pictograms as a communication code is understood, so that cognitively accessible designs always incorporate the possibility for this group of people to use their communicative code to interact and participate on an equal basis with those communicating orally, in writing or in sign language.	
151	CEAPAT	TEXT	(R) Accessible marking: signalling system consisting of a set of text elements, pictograms, arrows and routings with the function of informing, identifying, guiding, directing or regulating the understanding and use of a space. These signalling elements should be visible and understandable to as many people as possible , regardless of their skills or disabilities. JUSTIFICATION: Improvement to the wording.	It is accepted with the following wording: <i>these signalling elements must be perceivable and understandable to all persons.</i>
152	CEAPAT	TEXT	(V) Design wayfinding: refers to the design of resources and systems that enable and facilitate wayfinding processes or navigation and guidance processes in the environment. People use these guidance processes for the purpose of moving from one point to another in an efficient and secure way. A well-implemented environment design is one that helps people easily reach their destinations.	Accepted in part. The use of anglicisms is excluded as there is already a definition of guidance in the articles.
153	CEAPAT	TEXT	Article 4. <i>Principles</i> a) [...] Principles of use derived from universal design: i. Fair use: useful for people with different abilities by providing the same or equivalent means of use for all, ensuring that it is attractive to all and without	Finding accepted.

			<p>compromising non-discrimination, autonomy and security, as well as without stigmatising.</p> <p>JUSTIFICATION: Complete the wording.</p>	
154	CEAPAT	TEXT	<p>III. Intuitive and simple use: it refers to the fact that, regardless of knowledge, age, previous experiences, language skills or concentration levels, the design of products, environments and services, as well as processes and procedures, is easy to understand by organising information according to its relevance, giving warnings and comments, establishing guides and patterns of use or help, and allowing the individual to use it autonomously.</p> <p>JUSTIFICATION: It provides more inclusive wording, from boys and girls to older people. It is aligned with the expression used throughout the Regulation.</p>	The incorporation of the age variable is accepted.
155	CEAPAT	TEXT	<p>IV. Perceptible information: design facilitates sensory access regardless of people's abilities, presenting information in different formats, optimising contrast, readability, differentiation between fundamentals and secondary and in a manner compatible with assistive products.</p> <p>JUSTIFICATION: Improved wording is implicit in the regulation</p>	Finding accepted.
156	CEAPAT	TEXT	<p>VI. Effort reduction: it is used with a minimum of mental and mental and physical fatigue allowing natural and ergonomic use.</p> <p>JUSTIFICATION: For many people with disabilities and mobility difficulties, a design that does not take into account the physical effort</p>	Finding accepted.

			required in access means that, when embarking on access, there is fatigue which, in continuous interaction, has an impact on attention and concentration, thus potentially increasing the number of errors.	
157	CEAPAT	TEXT	<p>(B) Guidance: in the context of cognitive accessibility, guidance has the meaning of guidance and support, since it involves the establishment of guidelines for action and the possibility of tracking what has been done to be able to repeat it or find the error. While there is an approach based on external orientation through supportive people, cognitive accessibility allows orientation in space or products and services directly, ensuring people's autonomy and safety and not making them dependent on others.</p> <p>JUSTIFICATION: Completes the wording and aligns with the definition of universal accessibility.</p>	Finding accepted.
158	CEAPAT	TEXT	<p>(G) Validation: the measures contained herein will be subject to processes of participation, verification and monitoring of their implementation and operation by people with cognitive difficulties. All groups of people with difficulties in understanding, communicating and interacting, including the elderly, people who do not master the language, etc. should be involved in these processes.</p> <p>JUSTIFICATION: Complete the wording</p>	Is rejected. The generic use of persons with cognitive difficulties was agreed in the previous procedure. It is understood that there is no need to sign it – with the resulting risk of omitting groups or of having this list as the only one.
159	CEAPAT	TEXT	<p>Article 5. <i>General measures on information and communication.</i> Cognitively accessible information must meet the following requirements: (A) Thecontent of which is easy to understand, provided in</p>	Is rejected. The current wording is clearly preferred.

			<p>visual – written, visual form – images, such as photographs, pictograms or iconography, in auditory format – spoken, by means of visual supports or written visual technologies, pictographic visual format, sound, visual supports or accessible information and communication technologies. In the context of information relating to the safety and protection of the physical integrity and health of persons, as well as in situations of emergency, such information shall be easily and rapidly perceptible and identifiable by all persons irrespective of their cognitive abilities.</p> <p>JUSTIFICATION: Photographs and pictograms are elements that form part of the communicative code in Augmentative Communication – Alternative, through which information is transmitted. Iconography are pictograms that report navigation and related content in digital environments.</p>	
160	CEAPAT	TEXT	<p>2. In cases where, according to this Royal Decree, easy reading is not an obligation, where possible, the information must be provided at least in clear language.</p> <p>JUSTIFICATION: It must always be provided in understandable (clear) language, otherwise cognitive accessibility would not be complied with and would run counter to the regulation itself.</p>	The text will be revised to circumscribe cases where clear language is needed and where simple language will suffice.
161	CEAPAT	TEXT	<p>Article 7. <i>Telecommunications and the information society.</i> [...] 3. Where the services in question are provided via a website or mobile application, compliance with criteria A and AA of standard UNE 139803: 2012 Accessibility requirements for web content, or its most up-to-date version, must be ensured.</p>	It is accepted by adding “in its most up-to-date version”.

			<p>JUSTIFICATION: Improve the wording and ensure compliance with the current standard.</p>	
162	CEAPAT	TEXT	<p>The media and channels of public attention shall consider the diversity of accessible modes, media and formats of communication, in particular augmentative and alternative communication, diversity of expression and, in particular, augmentative and alternative communication systems. -</p> <p>JUSTIFICATION: The change is in line with Article 2, definitions, of the Convention on the Rights of Persons with Disabilities, which includes 'communication', and also referred to in Article 21 of the Convention on the Rights of Persons with Disabilities, which reads as follows: (b) Accept and facilitate the use of the sign language, Braille, augmentative and alternative modes, media and formats of communication and all other accessible means, means and formats of communication chosen by persons with disabilities in their official relations; In turn, the last proposed change is in line with the term in Article 3 of this Regulation.</p>	Finding accepted.
163	CEAPAT	TEXT	<p>4. The use of other cognitive accessibility elements, such as easy reading, the use of accessible explanatory videos or the use of identity images or iconography for regular aspects such as profile, help, economic data, invoices, payment gateway, forms of contact or complaints, among others, shall be promoted.</p> <p>JUSTIFICATION: Adding this term reinforces its role as an informative pictogram in digital environments, where payment gateways or forms of contact would be included. Removing the term 'pictograms' will avoid confusion with those used in</p>	Partially accepted: 'identifying images and other visual supports'.

			communication. The use of visual supports is included in the term 'identifying images'.	
164	CEAPAT	TEXT	<p>Article 8. <i>Urbanised public spaces, infrastructure and buildings.</i> [...] 2. Basic cognitive accessibility criteria, wayfinding design, will be mandatory in town planning memories. The competent public administrations shall regulate the inclusion of cognitive accessibility measures in their urban planning policies.</p> <p>JUSTIFICATION: Technical improvement</p>	Rejected as wayfinding design is a basic condition of cognitive accessibility, in accordance with Article 3 (f)
165	CEAPAT	TEXT	<p>Article 9. <i>Transport.</i> [...] (B) The necessary measures to facilitate spatial orientation shall be implemented in accordance with the following criteria: I. Considering sensory needs in relation to lighting, acoustics and adequate ventilation. II. To promote cognitive accessibility by facilitating the understanding of information, accessible communication and in particular augmentative and alternative communication, as well as interaction in the environment, including tactile signalling, in all modes of transport by establishing augmentative and alternative communication and signalling systems, such as written and audio formats or tactile signalling in means of transport;</p> <p>JUSTIFICATION: Improve and align the wording with the terminology used in the Regulation.</p>	It is partially accepted, simplifying the wording and aligning it with the concepts of the regulation.
166	CEAPAT	TEXT	<p>Article 10. <i>Goods and services available to the public.</i> [...] 2. With a view to ensuring cognitive accessibility in the</p>	Is rejected. A clear language requirement for all goods and services would have a considerable economic impact on SMEs. So that, in this sector, there is a need for plain

			<p>context of goods and services, all operators are required to comply with the following obligations relating to the protection of vulnerable consumers and users or users with cognitive difficulties:</p> <p>(A) Transparency and clarity in business information: suppliers of goods and services shall provide the consumer with basic information in clear plain language and, where possible, with pictograms and other visual supports.</p> <p>JUSTIFICATION: Technical improvement</p>	language and, where possible, other support.
167	CEAPAT	TEXT	<p>3. The application of clear language or easy reading to procurement, consent, labelling and instructions issues shall be promoted.</p>	Is rejected. The obligation is set in plain language, so both easy reading and clear language will be promoted.
168	CEAPAT	TEXT	<p>Article 11. <i>Relations with public administrations, including access to public benefits and their administrative decisions.</i> [...]</p> <p>(C) Facilitating communication through the use of cognitively accessible communication options. In the digital environment, it will be possible to implement with live chat or artificial intelligence guiding the process in written, voice and visual support. It will make it easier for people to interact with their usual means of augmentative and alternative communication, and ensure training and empowerment in cognitive accessibility for staff in public administrations for face-to-face care in procedures that ensure the understanding, communication and interaction of people with cognitive difficulties.</p> <p>JUSTIFICATION: Technical improvement</p>	Is rejected. It is understood that among the accessible communication options, the choice of the person with cognitive difficulties will be facilitated, so it is not considered necessary to make it explicit. The problem here is not so much choice but availability.

169	CEAPAT	TEXT	<p>4. At any time, the person concerned or, as the case may be, the person chosen by him or her to represent him, may request that the procedure, at the remaining stages thereafter, be conducted with cognitive accessibility measures. At least the following shall be ensured:</p> <p>(A) All oral or written communications with persons with cognitive difficulties shall be made in clear and cognitively accessible plain language, taking into account their personal characteristics and needs, using means such as easy reading, and enabling the use of augmentative and alternative means of communication, and other means of support for communication which are cognitively accessible, pictograms for communication or other alternative and augmentative communication systems where necessary.</p> <p>JUSTIFICATION: Technical improvement</p>	Accepted in part. The administration will not be prepared in the short or medium term for all its decisions to be drafted in clear language. The use of plain language is more realistic.
170	CEAPAT	TEXT	<p>(B) The person with cognitive difficulties shall be provided with the professional assistance or material support necessary to be understood with their usual means of augmentative and alternative communication so that they can be understood through augmentative and alternative communication systems.</p> <p>JUSTIFICATION: it is specific to the individual's right to be understood by the environment, rather than to attribute that it is the person who must be understood.</p>	Accepted with editorial changes.
171	CEAPAT	TEXT	<p>Article 12. <i>Administration of justice.</i> [...] 3. All judgments and judicial notifications, whatever their legal form, shall be drawn up and presented in a</p>	The meaning of the proposal is understood to be included in the current wording. The court's appeals should also be taken into account so that they have some leeway to issue decisions in a format that is effectively available to

			<p>comprehensible format when the intervener so requests. The following aspects are included in the accessible format: (A)Referral in plain language, and where requested by the intervener, in easy reading. Referrals in easy-to-read format or clear language. JUSTIFICATION: Judicial documents should be drafted in clear language, which would ensure greater comprehensibility. If an application is added, it could be reserved for easy-to-read formats, where clear language may be insufficient.</p>	them.
172	CEAPAT	TEXT	<p>(C) People with cognitive difficulties have the right to understand and be understood in any action to be taken. To this end: (I) All communications, whether oral or written, addressed to persons with cognitive difficulties who have requested it, shall be made in clear and accessible plain language, or in easy reading if requested in a way that takes into account their personal characteristics and needs and enables the use of augmentative and alternative means of communication or other cognitively accessible means of communication using means such as easy reading, communication pictograms or other alternative and augmentative communication systems where necessary. JUSTIFICATION: Technical improvement</p>	Simple language is kept in line with the above comments.
173	CEAPAT	TEXT	<p>The person with cognitive difficulties shall be provided with the assistance (s) necessary to enable him or her to be understood, including the use of his or her usual means of augmentative and alternative communication and, where appropriate, the professional intervention of a facilitator, so that he or she can be understood, including the use of augmentative and alternative communication systems and, where appropriate, the support of the facilitator.</p>	Accepted in part. The wording of Article 11 (4) (b) is reproduced.

			<p>JUSTIFICATION: In the area of justice, it is not possible to implement an augmentative and alternative means of communication, but to enable the person to be heard with the media that he or she normally uses in his or her social relations. Finally, it is specified that the facilitator is a professional figure.</p>	
174	CEAPAT	TEXT	<p>The facilitator is not a legal representative of the disabled person. However, if necessary in order to ensure a better guarantee of fundamental rights in the proceedings of a person with cognitive difficulties, he or she shall be notified of any decisions the knowledge of which is appropriate in order to be able to perform his or her facilitating assistance function properly.</p> <p>The facilitator cannot be a call to or testify to, the content of the conversations he or she has with the person he or she assists. Like the other parties to the proceedings, it assumes the duties of secrecy and confidentiality laid down in the rules of procedure.</p> <p>Costs arising from the intervention of the person designated as facilitator expert appointed as facilitator shall be borne by the relevant administration and may not be passed on through legal costs either to the assisted person or to the other parties to the proceedings.</p> <p>JUSTIFICATION: Alignment with Article 13 of the Convention on the Rights of Persons with Disabilities and with the International Principles and Guidelines on Access to Justice for Persons with Disabilities (UN, 2020). Improvement to the wording.</p> <p>(D) cognitive accessibility tools shall be implemented in the courtrooms and in the videoconferencing system, which shall include, inter alia, the possibility for sub-tenants of interventions automatically, the intervention of the</p>	<p>Finding accepted. We suggest the following wording: “Costs arising from the intervention of the person designated as facilitator (...)”.</p>

			<p>facilitator, the use by the person of his or her usual means of augmentative and facilitative alternative communication, the use by the person of his or her augmentative and alternative communication medium or system, and the instant availability of visual support, especially in the context of statements, whether as a reported person, as a person accused, investigated or accused, in criminal proceedings and in testimonial statements belonging to any jurisdiction.</p> <p>JUSTIFICATION: In accordance with the definition in Article 3 and the terminology used throughout the drafting of the Regulation.</p>	
175	CEAPAT	TEXT	<p>Article 13. <i>Participation in public life and electoral processes.</i> [...] B) The use of a visual support system will be promoted to enable all voters to understand the proposals put forward by parties and candidates visually. Such content shall be available, in compliance with Article 5, of general information and communication measures, in an audio or tactile format and with the possibility of using assistive technologies to facilitate understanding and expression. (C) Accessible voting materials made in accordance with the guidelines and recommendations shall be used for easily readable parameters both on ballot papers and in the instructions for their completion, where applicable.</p> <p>JUSTIFICATION: Technical improvement</p> <p>(f) accessible signposting of polling stations will be promoted to ensure understanding of the environment and the steps to be taken during the voting process.</p> <p>JUSTIFICATION:</p>	<p>Accepted in part. The proposed amendment to paragraph (f) is accepted because it is considered to be more secure than the current one. However, the reference to Article 5 is rejected, since, in accordance with the Regulatory Technical Guidelines, the proliferation of referrals must be avoided. The amendment to paragraph (c) is accepted, since it is preferable to talk about guidelines and recommendations as the easy-to-read UNE standard is not mandatory.</p>

			Improvement	
176	CEAPAT	TEXT	<p>4. In relation to standard-setting procedures, prior public consultation, as well as hearing and public information procedures, should publish their documentation in clear plain language and in an alternative format to written submissions, such as audio, visual support and the use of accessible information and communication technologies. The publication of such documents in an easy-to-read manner shall be promoted wherever possible.</p> <p>JUSTIFICATION: Improvement</p>	It is considered too ambitious in the short to medium term as standard-setting technicians will not have general access to clear language training. The use of plain language is considered more feasible.
177	CEAPAT	TEXT	<p>Article 14. <i>Cultural heritage and historical heritage.</i> 2. Brochures and information panels of museums, libraries, archives, auditories, theatres, projection rooms of the Spanish Filmoteca, exhibition rooms and, in general, all cultural centres and services available to the public and owned and managed by the General State Administration or the Autonomous Communities, as well as their related or attached public bodies, shall be drawn up in clear language and shall be easily readable. In addition, their audio, including the audio of easy-to-read adaptation, such as audio of the easy-to-read format, such as visual support or accessible information and communication technologies, shall be made available in an alternative format to the writing.</p> <p>JUSTIFICATION: Technical improvement</p>	Partially accepted with editorial changes. The requirement of clear language – in addition to reading – is considered to be too ambitious.
178	CEAPAT	TEXT	<p>Article 15. <i>Employment</i> [...] 5. The registration and authentication systems on the business website shall follow the following accessibility</p>	It is not accepted as it is considered redundant. The obligation contained in Article 5 with regard to information and communication is reiterated.

			<p>parameters: [...] (C) Ensure the possibility of remote assistance and indication and follow-up of the steps taken on the platform by ensuring that the information provided is understandable and provided through cognitively accessible communication channels.</p> <p>JUSTIFICATION: Remote assistance should be provided by ensuring accessible two-way communication, while the information transmitted is understood.</p>	
179	CEAPAT	TEXT	<p>6. Workers will be facilitated to communicate with their usual means of augmentative and alternative communication if this is the case, and have workers able to request communication by means of augmentative and alternative systems and the adaptation of documents necessary for the tasks assigned to them and the meetings in which they participate. The undertaking shall be obliged to make such adaptation unless there are duly substantiated reasons, which must be communicated in writing and in a cognitively accessible form.</p> <p>JUSTIFICATION: (Does not affect English version.)</p>	Finding accepted.
180	CEAPAT	TEXT	<p>8. Trade unions shall develop handbooks of good practice in clear language that will be in the public domain to ensure knowledge transfer and better dissemination of cognitive accessibility measures in the field of industrial relations.</p> <p>JUSTIFICATION: Technical improvement</p>	Accepted in part. It is suggested that these manuals use plain language wherever possible.

181	Consumer and User Council	TEXT	No comment	—
182	State Council of Non-Governmental Social Action Organisations	TEXT/MAIN	No comment	—
183	CREATE	TEXT	Proposes spelling and grammatical changes It is proposed to amend Article 12 (5) (c) (iii) by changing [...] The facilitator is not a procedural representative of persons with cognitive difficulties person with disabilities Justification: Not all have disabilities (illiteracy, etc.)	Linguistic improvement. Although Law 8/2021 refers to persons with disabilities, the project generally speaks of persons with cognitive difficulties.
184	CEACOG	TEXT	1. GENERAL COMMENTS 1.1. In order to avoid incompatibilities or ambiguities, it is considered necessary to maintain the definition and functions of the CEACOG as described in the fourth additional provision of Law 6/2022 of 31 March 2015 amending the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2015, in order to establish and regulate cognitive accessibility and its requirements and application conditions.	Finding accepted.
185	CEACOG/Full Inclusion	TEXT	1.2. Subsequent developments contributing to the deployment of the measures contained in this Regulation should be incorporated into this Regulation. It may be a mandate from the Spanish Cognitiva Accessibility Centre in collaboration with the Third Social Acquisition Sector and professional groups that have been challenged in each	Is rejected. It is recalled that the mandate stipulates that basic conditions must be regulated. There is nothing to prevent the DPO and his advisory centres from drawing up manuals, reference guides, etc. They do not need to be included in such a project. Moreover, the distribution of competences limits

			<p>case.</p> <p>These subsequent developments include:</p> <ul style="list-style-type: none"> — Guides for the deployment of such measures in the different areas, based on previous experiences, consensus and with clear and transferable examples. — Establishment of common minimum criteria on cognitive accessibility assessment systems in relation to the use of spaces. 	
186	CEACOG/Full Inclusion	TEXT	<p>1.3. It is also considered essential to include cognitive accessibility equipment, trained by professionals with and without disabilities, to ensure that cognitive accessibility plans and concrete measures are designed, evaluated and tested.</p>	<p>the State's regulatory power in this respect once the minimum criteria have been established. Finding accepted. A paragraph is added to Article 5.1 (new subparagraph (d))</p>
187	CEACOG/Full Inclusion	TEXT	<p>1.4. While calling for definitions of universal and cognitive accessibility, it is important to include them in this same regulation explicitly, with emphasis on the profiles to ensure this is given. Similarly, and so that it is not misleading, we consider it particularly important to frame the target audience of cognitive accessibility measures so as not to defeat it or to understand intermediate measures that do not guarantee the understanding of environments, information, etc. of genuinely vulnerable groups as adjustments.</p>	<p>Is rejected. The definition of universal accessibility is already found in the law and therefore does not need to be repeated.</p> <p>Articles 1 and 3 (i) are amended as follows: Article 1. The purpose of this regulation is to establish and regulate cognitive accessibility and its requirements and implementation, in order to contribute to the exercise of the rights and duties of citizens, and to ensure equal opportunities and non-discrimination for all persons and, in particular, persons with cognitive difficulties. Article 3 (i): Cognitive difficulties: barriers a person encounters in understanding, communicating and interacting with others and their environment due to impairments, health situations, age or socio-economic causes, such as poverty or illiteracy or contextual factors such as lack of language knowledge, which limit the performance of activities or restrict participation.</p>
188	CEACOG	TEXT	<p>2. INCORPORATION OF PARAGRAPHS AND ARTICLES.</p> <p>2.1. Addition of a new additional provision: Additional provision X. Development of guides for the deployment of measures in the different areas of application</p>	<p>Is rejected. The drafting of guides should not be the subject of a regulation, but rather of the work plan of the advisory centre.</p>

			<p>of this Regulation:</p> <p>The Royal Disability Trustee, through the Spanish Cognitiva Accessibility Centre, will set up different technical and specialised working groups with the aim of drawing up guides for the correct deployment of cognitive accessibility measures in the different areas of application of this Regulation.</p> <p>These working groups will include cognitive accessibility professionals, experts from the different fields of application and people with comprehension difficulties, the target audience of this Regulation.</p> <p>The guides shall be drawn up no later than 3 years after the publication of this Regulation. Access to them shall be public and free of charge.</p> <p>JUSTIFICATION: The creation and transfer of knowledge, as well as the promotion of technical aspects and promotion of cognitive accessibility, is the task of the Spanish Cognitiva Accessibility Centre. In this regard, it is particularly important to include, under the terms of the Regulation and in order to facilitate the deployment of such measures, the creation of working groups that can agree on and provide guidance for the application of basic cognitive accessibility conditions in the different areas.</p>	
189	CEACOG/Full Inclusion	TEXT	<p>2.2. Inclusion of a definition of development disability in Article 3:</p> <p>Developmental disability: these are those disabilities arising from development time, usually the first 22 years of a person's life. Indicates that there are limitations in relevant areas of life such as language, mobility, learning, self-care and independent living.</p> <p>JUSTIFICATION: Generally speaking of people with intellectual disabilities and development, it is therefore appropriate to include this definition in the relevant section.</p>	According to Article 4.1 TRLGD, developmental disability falls under intellectual disability. The disabilities provided for by law are physical, mental, intellectual or sensory disabilities.
190	CEACOG/Full Inclusion	TEXT	<p>2.3 incorporation of the definition of Wayfinding and Design wayfinding in Article 3:</p> <p>Wayfinding: Wayfinding refers to the process of</p>	Accepted in part. The use of anglicisms is excluded as there is already a definition of guidance in the articles.

			<p><i>guidance in space carried out by people on a daily basis.</i></p> <p><i>Wayfinding design: refers to the design of resources and systems that enable and facilitate Wayfinding processes or navigation and guidance processes in the environment.</i></p> <p><i>People use these guidance processes for the purpose of moving from one point to another in an efficient and secure way. A well-implemented environment design is one that helps people easily reach their destinations.</i></p> <p>JUSTIFICATION: It is relevant to include these definitions (extracted from CEAPAT: Design of information systems for spatial orientation Wayfinding design) as they are closely related to cognitive accessibility in relation to physical environments.</p>	
191	CEACOG/Full Inclusion	TEXT	<p>2.4 incorporation of the definition of web or cognitively accessible digital environment in Article 3. Definitions:</p> <p><i>Cognitively accessible digital environment: it is understood as meeting the recommendations set out by the W3C consortium on cognitive accessibility and web environment. In this regard:</i></p> <ul style="list-style-type: none"> <i>— Make it easier to understand what each thing is and how it should be used.</i> <i>— Helps users find what they need.</i> <i>— Uses clear, understandable and accessible content.</i> <i>— Helps to avoid or correct errors.</i> <i>— Helps users to maintain attention.</i> <i>— Processes do not depend on memorisation or other complex skills.</i> <p><i>— Provides support and assistance.</i></p> <p><i>— Support customisation and adaptation.</i></p> <p><i>— It has people who have difficulties in understanding cognitive accessibility measures.</i></p> <p>JUSTIFICATION: It is considered necessary to establish what is a cognitively accessible digital environment based</p>	<p>Is rejected. This is a rule for the general public, so it is not appropriate to decrease to this level of detail. This is without prejudice to its further development. At the same time, only the digital environment is referred to in Article 11 (2) (c). The tools specific to cognitive accessibility include technological accessibility resources. Furthermore, the recommendations of the W3C consortium cannot be included as official references.</p>

			on the web cognitive accessibility patterns established by the W3C consortium. Web accessibility has so far been established on the basis of purely physical and sensory access criteria, and it is therefore considered relevant and necessary to establish minimum conditions already proposed by the consortium with regard to the accessibility of digital environments.	
192	CEACOG/Full Inclusion	TEXT	<p>2.5 incorporation of the definition of inclusive design in Article 3. Definitions:</p> <p><i>Inclusive design: Inclusive design refers to the practice of creating products, services, environments and systems that are accessible and usable by as many people as possible, regardless of their individual skills, characteristics or circumstances.</i></p> <p>JUSTIFICATION: When we refer to accessibility, we do so in the context of universal accessibility and design standards or for everyone. In this regard, it is considered necessary to establish what inclusive design is.</p>	Is rejected. The inclusion of this new concept of <i>inclusive design</i> far from being clarified would create confusion and consequently legal uncertainty. Article 2 (l) TRLGD already <i>regulates universal design or design for all individuals</i> .
193	CEACOG/Full Inclusion	TEXT	<p>2.6 addition of paragraph (j) to Article 8 (2):</p> <p><i>(j) Evaluation: cognitive accessibility equipment with people with intellectual and developmental disabilities and other groups with difficulties in understanding will be available for the design, evaluation of the cognitive accessibility measures needed, as well as for the temptation of their implementation.</i></p> <p>JUSTIFICATION: The environment assessment methodology incorporates cognitive accessibility expert teams for the assessment, design and tester of such measures. The exclusion of this criterion could lead to a misunderstanding of the criteria of cognitive accessibility and misuse of tools, since the affixing of pictograms or arrows does not in themselves guarantee the understanding of the spaces.</p>	It is partially accepted, with the inclusion of a new subparagraph in Article 5.1.
194	CEACOG/Full Inclusion	TEXT	<p>2.7. Insertion of paragraph (k) in Article 8 (2):</p> <p><i>(K) Liability: The spaces created and the elements of these spaces should be user-friendly and take into</i></p>	Is rejected. Usability is understood as a principle – therefore not applicable only to Article 8 on urban public spaces – and, as such, is already included in the ‘intuitive

			<p>account the easy-to-understand chain for this purpose.</p> <p>JUSTIFICATION: The methodology for assessing cognitive accessibility of spaces and wayfinding talk about usability to make spaces accessible at cognitive accessibility level as well as the easy comprehension chain, understood as: A set of elements which, in the process of user interaction with a given environment, enables the understanding of the information necessary for the access, movement, use and enjoyment of any space or enclosure, in a convenient, secure and seamless manner.</p>	and simple use' and 'guidance' principles of the RD project.
195	CEACOG/Full Inclusion	TEXT	<p>2.8. Insertion of paragraph (l) in Article 8 (2): (L) Access to buildings for persons with disabilities shall be ensured where necessary to enable them to access a service or right.</p> <p>JUSTIFICATION: It is considered necessary to be able to make this point explicit in Article 8 so that those supported by other persons can access the different spaces, without restriction for the accompanying person.</p>	Is rejected. Criteria and not rights are regulated. Similarly, personal care is already regulated by Article 11 of Royal Decree 193/2023 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public.
196	CEACOG/Full Inclusion	TEXT	<p>2.9. Insertion of paragraph (m) in Article 8 (2): (m) Visual noise, understood as accumulation of posters, distractors or interfering with information and signalling elements, shall be avoided as far as possible.</p> <p>JUSTIFICATION: The availability of information and signalling elements transits because they are not in spaces with "visual noise", it is considered necessary to include this criterion and define it in order for cognitive accessibility measures to be properly implemented.</p>	Is rejected. This point regulates criteria. In addition, it is considered that the elimination of visual noise can already be included under (i) on the control of sensory stimuli.
197	CEACOG/Full Inclusion	TEXT	<p>2.10 insertion of point (3) in Article 8: 3. The cognitive accessibility measures proposed in this article will be widely used in urbanised public spaces, natural public spaces, infrastructure and buildings.</p> <p>(a) Specific visual and acoustic signalling measures: (l) Any signalling and communication system available to persons in areas of public use of buildings, urbanised public spaces and natural public spaces</p>	Is rejected. The rules on the criteria in Article 8 (2) already include the issues identified. In addition, there is already a specific regulation in this area, namely Order TMA/851/2021 of 23 July. It is also recalled that it is a basic condition regulation. The reduction to the proposed level of detail may jeopardise the constitutionality of the rule due to encroachment of powers (the state falls under the basic legislation, while the Autonomous Communities are

covered by this Regulation shall incorporate cognitive accessibility criteria in order to ensure access to and understanding of basic and essential information and communication for all persons; (ii) on every accessible route, persons shall have access to the information necessary to guide themselves effectively throughout the journey and be able to locate, understand and use the various spaces and services available to the public. (III) Non-interactive communication must be visual, acoustic and tactile, combining them where appropriate, so as to enable the user to obtain and understand all the information necessary for the use of the environment, regardless of his cognitive abilities. The information shall be transmitted in a clear, simple and unambiguous manner. Where pictograms are used, they shall correspond to standardised, universally recognised and easily interpretable signalling pictograms complying with: Une 170002: 2009, ISO 9186-1: 2014 and ISO 9186-2: 2008, whenever possible. Where the means of providing the information are to be manipulated through pushers, buttons, keyboards, card or coin insertion slots and similar devices, these should be identified by tactile systems, differentiated colours and placed at an accessible height. Elements for information such as panel signals or other graphic and written means of communication, audio-visual media, light, acoustic and tactile signals shall comply with the following requirements:

- They shall be positioned in places that are well lit at any time, avoiding shades and reflections.**
- Obstacles, crystals or other elements which hinder approximation or prevent easy reading shall be avoided.**
- They should be located in such a way that these elements can be accessed by anyone regardless of**

responsible for its development. Such detail could leave them no room for development and could therefore call into question the constitutionality of the rule). Hence, as the CEACOG itself points out in its observation, some Autonomous Communities already have specific regulations.

their characteristics, taking into account: height, use of supporting elements, width and inclination.

— When signs containing signs in braille and altorrelief are provided in vertical planes, they must be located in the ergonomic scanning area between 0.90 m and 1.75 m measured from the ground. In order to facilitate the understanding of written information, easy-to-read guidelines will always be incorporated.

— The graphic representation specific to a plane shall be made by relief and contrast of textures.

(IV) If the communication is verbal, the distance relating to the listeners targeted by the information and the existing environmental noise should be taken into account. The message should be as clear and short as possible, avoiding the insertion of elements that would make it difficult to read labial or listening to it.

(v) The characteristics of hotspots and accessible call points shall be as follows: They shall comply with the requirements regarding the accessibility of buildings to accessible points of attention and accessible call points, and shall be extended to all areas of this Royal Decree.

Buildings and service establishments of public administrations shall have accessible, duly signalled and identified points of attention, with an alternative hearing support system (magnetic loop or similar) and means of written communication, understood as printed documents available on accessible websites, incorporating the easily readable criteria and the web accessibility criteria described in this Royal Decree.

These points will have trained support staff to facilitate the understanding and interaction of people with cognitive difficulties.

In addition, the inclusion of downloading elements of information using mobile telephony or similar technology in easily understandable audio or visual

		<p><i>formats shall be encouraged.</i></p> <p><i>(VI) Signalling shall be clear and concise, avoiding excessive accumulation of symbols and indications on the same element or area. As a general rule, no more than five pictograms per element shall be allowed. (vii) Prior to be placed in spaces likely to be complex or difficult to guide, such as intersections, forks or points where a decision is required. (viii) Signalling shall transmit the information through a system of signs, signs and indicators, distributed in a systematised manner on accessible routes and spaces, installed and designed to ensure easy reading and understanding at all times.</i></p> <p><i>(IX) care shall be taken to use the colour of such signs for the differentiation of spaces and services, so that signs referring to the same space or service use the same colours, irrespective of whether it is a different building or space. With the aim of systematising the use of colour as an identifier. (x) It will be sought to standardise the classifications of areas, urban and natural spaces, buildings, services and destinations, in order to display them in a consistent, understandable and homogeneous manner across all graphic applications referring to the same environment, building, establishment, urban or natural space for public use. Abbreviations shall be avoided and the easy-to-read standard for the standardisation of such classifications shall be applied. (xi) The distance between information items for guidance and orientation, and the space or service to which they direct, or between the information elements guiding up to the same space or service, shall be such that, at all times, any of the elements are within the field of vision in such a way that disorientation is avoided and the information provided is easy to remember for persons with cognitive difficulties. (xii) If there is a long journey</i></p>	
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between the directional signalling elements and the destination, the information shall be reinforced by repeating the signalling element every 25 metres. It is advisable to indicate the distance or time needed to reach the destination.

(XIII) Signalling elements shall be isolated from visual noise and shall be aimed at the removal of unnecessary elements to prevent it; (v) Space identification elements shall be positioned with preference to the right of the door, provided that their opening is not covered or impeded. If this is not possible, care shall be taken to match the element on the left-hand side and the side on which the spray is situated. The last option, which is not appropriate, shall be located at the rear of the door.

(b) Specific visual and tactile signalling measures:

(I) Characteristics used in the labelling of signs, posters, totems, plans and any other tools specific to the marking of spaces shall have the following characteristics:

— The typography for signalling applications shall include easily identified and readable sources, type Sans Serif or dry pallet.

— The size of the sources shall be determined by the distance at which the observer may be located, in accordance with the following table:

(table attached)

The thick of the characters in the texts will be around 14 % of their height.

— The sign must contrast chromatically with the surface on which it is located.

— The characters or pictograms used shall contrast with the background. The basic colour shall be smooth and the material used will not produce reflections.

(II) The size of these elements shall be large enough to comply with the requirements of size, distance and character free space, braille, use of pictograms and

			<p>other symbols.</p> <p>JUSTIFICATION: It is considered necessary to specify how elements promoting cognitive accessibility in spaces should be incorporated, in this case signalling and marking elements. These contributions are set out in Decree 135/2018 of 1 August 2015 approving the Regulation governing universal accessibility standards in buildings, urbanised public spaces, natural public spaces and transport in the Autonomous Community of Extremadura, which, together with the Catalan plan and the technical standards described, are the most precise and specific, in addition to those used as a reference in the various cognitive accessibility services.</p> <p>It is therefore considered appropriate that, although not all its criteria are set out in this Regulation, it should include the most relevant criteria and which are considered not only as guidance but as a precise guide for the application of cognitive accessibility measures in these spaces, leaving no room for free interpretation.</p>	
198	CEACOG/Full Inclusion	TEXT	<p>2.11. Insertion of point 4 in Article 8:</p> <p><i>4. In the context of private bodies, the obligations arising from cognitive accessibility should be extended to all spaces aimed at carrying out activities that form part of people's daily lives such as leisure, trade, culture, sport, education, recreation and transport. Must: a. Apply the criteria and measures specified in this Article to ensure the safe and equal use of spaces. b. Complete a facility accessibility protocol for companies with a total number of workers in excess of ten or with a daily transit per installation of more than 500 persons.</i></p> <p>JUSTIFICATION: Due to the scarcity of regulations or lack of specific criteria for private entities, in order to guarantee the rights of the persons for whom this regulation is intended and minimum cognitive accessibility conditions for</p>	<p>Rejected as this is a mandatory standard for the general public, thus linking both the public sector and the private sector.</p>

			them, it is considered of the utmost importance to generate minimum recommendations in this area.	
199	CEACOG/Full Inclusion	TEXT	<p>2.12. Addition of the following sub-paragraphs to Article 9 (2) on Transport:</p> <p><i>(e) The accessibility conditions offered in the transport fleet, the way in which passages are purchased, the regular timetables of the service and the various contact channels for acquiring information, buying passages and making complaints shall be made easily available on the websites, mobile applications, markers and points of attention of transport undertakings in whatever form.</i></p> <p><i>(f) accessible information shall be ensured, using clear and simple language and ensuring that the message reaches the recipients, on any incident and alteration of the route or timetables of the transport service.</i></p> <p><i>(g) cognitive accessibility at points of sale of virtual passages, face-to-face and electronic terminals shall be ensured.</i></p> <p>JUSTIFICATION: Cognitive accessibility of transport information is essential to ensure autonomy and safety in transport. In the original text, it is necessary to make explicit the spaces and situations where more attention is needed.</p>	<p>It is rejected, since the information and communication obligations are already regulated both in Article 5 of the project itself and in Article 14 of Royal Decree 193/2023 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public. Moreover, if an explicit list of spaces and situations is made, there is a risk of leaving some of them out of them, so it is preferable not to list them.</p>
200	CEACOG/Full Inclusion	TEXT	<p>2.13. Insertion of a new paragraph (5) in Article 10 on Goods and Services:</p> <p><i>4. Goods and services of an educational nature shall be considered to be all those distributed in establishments having the status recognised by law, irrespective of the level or degree of education at which they are provided and of their public or private status. In relation to such goods and services:</i></p> <p><i>l. The learning barriers related to cognitive difficulties will be addressed through methodological, curricular and social adaptations specific to universal design, with the aim of promoting inclusive education in</i></p>	<p>It is rejected in so far as the accessibility of educational goods and services is already regulated by Article 21 of Royal Decree 193/2023, which regulates the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public.</p> <p>With regard to the different methodologies proposed, they can be included in the further development, as the inclusion of concrete methodologies in a regulatory standard risks rapidly becoming obsolete and the regulatory text needs to be continuously updated.</p>

			<p><i>accordance with the provisions of Organic Law 3/2020 of 29 December 2015 amending Organic Law 2/2006 of 3 May 2006 on Education.</i></p> <p><i>II. Different teaching methodologies will be used in the classroom when requested by learners by ensuring that curriculum adaptations include multilevel teaching, collaborative learning, project-based learning, service-learning, gamification and other active learning methodologies by promoting the full participation of learners with cognitive difficulties in the educational process. A comprehensive perspective will be adopted in the development of curriculum adjustments taking into account reasonable accommodation whenever necessary and the concept of lifelong learning included in Organic Law 3/2020 of 29 December 2015 amending Organic Law 2/2006 of 3 May 2006 on Education.</i></p> <p><i>IV. The development of all languages and modes of perception that are specific and adapted to age ranges will be promoted in order to develop all the potential of the individual in line with the aim of the full development of the personality given to education in Organic Law 3/2020 of 29 December 2015 amending Organic Law 2/2006 of 3 May 2003 on education. This will include programmes for personalised support for pupils with cognitive difficulties to be carried out with the participation of students; family in the case of minors and support person designated by the pupil in the case of adults; technical staff of the centre and management.</i></p> <p><i>VI. All teaching staff shall be informed of the adaptations made and shall be provided with specific training and support in carrying out them, including the adaptation of teaching and assessment materials from the Centre's budget.</i></p> <p><i>VII. Within spaces where the provision of these services takes place, all signage shall be indicated using</i></p>	
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			<p><i>pictograms and in clear format. simple. Similarly, all documentation, forms, authorisations and any other information documents relating to the course, including timetables and material listings, shall be provided in easy-to-read format when requested by the students of the family.</i></p> <p>JUSTIFICATION: In line with SDG target 4 (to ensure inclusive, equitable and quality education and to promote lifelong learning opportunities for all, as well as the demands of the associative movement of people with intellectual disabilities and development and the need to move towards real inclusive education, it is considered essential to establish minimum cognitive accessibility criteria in this area, which, with specific commitments and general obligations, move towards compliance with all of the above.</p>	
201	CEACOG	TEXT	<p>2.14. Include the following amendment in the fourth additional provision on catalogue of symbols, signs and pictograms for signalling.</p> <p>The Royal Disability Trustee, through the Spanish Cognitiva Accessibility Centre, shall set up a technical and specialised working group with the aim of drawing up, within a year of publication of the regulation, a catalogue of symbols, signs and pictograms for signs to be used in the areas covered by this Regulation. The catalogue shall be public and free of charge and shall aim at the widespread use of agreed signs and pictograms for signage by operators bound by this Royal Decree.</p> <p>JUSTIFICATION: We consider that the deadline for carrying out this work is not sufficient, since it involves a review of all existing pictograms in the different areas and of the procedures carried out for their implementation and, if they are not carried out and are relevant, the design and validation in accordance with specific regulations. As well as having to set up a technical and interdisciplinary working group to agree on this catalogue.</p>	Accepted in part. The deadline should be extended to 2 years.

			It is also considered appropriate to talk about pictograms, as signs and symbols are too broad and ambiguous terms.	
202	CEACOG	TEXT	<p>3. AMENDMENT TO THE WORDING OF ARTICLES.</p> <p>3.1. Include the following amendment to the third additional provision on El Centro Español de Accessibilidad Cognitiva: <i>The Spanish Centre for Accessibility Cognitiva – CEACOG – is an advisory centre for the Royal Disability Trustee, which is a reference centre in this area and is conceived as an instrument of the General State Administration for validating and monitoring the quality of services: study, research, generation and transfer of knowledge, training and qualification, registration and extension of good practices, promotion of technical regulations, observation of reality and trends, foresight actions, monitoring and evaluation, and in general the promotion and promotion of all matters relating to cognitive accessibility in Spain of cognitive accessibility, as well as advice to public administrations. It will be the responsibility of the Autonomous Communities to set up centres or offices for cognitive or universal accessibility that can monitor the development of cognitive accessibility plans and measures, coordinated with the State Centre.</i></p> <p>JUSTIFICATION: In order to avoid contradictions between the Regulation and Law 6/2022 of 31 March, we consider it appropriate and necessary to consider the same definition as set out in the Fourth Additional Provision. Furthermore, as defined in the proposal for a regulation, the functions would be similar to those of certification and quality control, as well as a broader picture not limited to the General State Administration, which may conflict with the development or operation of centres and services in other territories. It is also considered appropriate to maintain the Centre's current scope for action in the area of General State Administration, not extending it to the general public administration, both in order to maintain its capacity to respond and operate, and</p>	Is rejected. The third additional provision has been deleted as it repeats the provisions of Law 6/2022. The establishment of similar Autonomous Community centres is ruled out.

			for the reason set out above.	
203	CEACOG/Full Inclusion	TEXT	<p>3.2. Include the following amendment in the fifth additional provision on Adaptation of infrastructure and means of transport.</p> <p><i>Within two years of the entry into force of this Royal Decree, the Ministry with responsibility for transport shall draw up a report on the cognitive accessibility of airport and railway facilities, paying particular attention to facilities in terms of physical, signalling, easy reading and guidance, as well as other available support, as well as digital spaces: platforms, applications or resources that have processes, uses and information for public use necessary for the selection and enjoyment of such means of transport.</i></p> <p><i>The report shall include concrete recommendations for improvement and a proposal for unification of technical specifications for vehicles and installations.</i></p> <p>JUSTIFICATION: Both physical and digital spaces should be understood. Because of the easy comprehension chain, people need to be able to move around spaces, but also access them through the available digital platforms. Transport services are increasingly equipped with digital platforms to offer information or sell tickets, among other things, and many people with difficulties in understanding who do not access those services or rely on others to do so due to these difficulties. It is therefore particularly relevant that the assessment is not only carried out in relation to physical spaces.</p>	Accepted in part. The study would be limited to facilities that have particularities if compared to other sites. Digital spaces are still web pages and their accessibility is not assessed on the basis of criteria different from those of other pages or apps, so their assessment is not as complex as physical facilities.
204	CEACOG/Full Inclusion	TEXT	<p>3.3. Include the following amendment to paragraph 2 of the sixth additional provision on Accreditation:</p> <p>2. In cases where accreditation of an equal degree of disability is required or the degree of disability greater than 33 per cent, this shall be attested by a decision or certificate issued by the IMSERSO or the competent body of the Autonomous Community concerned. In these cases, Royal Decree 888/2022 of 18 October 2015 laying down the</p>	Is rejected. This provision is a consequence of the single repealing provision and does not relate to the purpose of this regulation.

			<p><i>procedure for the recognition, declaration and qualification of the degree of disability shall apply.</i></p> <p>JUSTIFICATION: The target audience of this Regulation is people who have difficulty understanding as a whole, whether or not they have a recognised disability. Not all persons with disabilities have the administrative recognition of it, often achieving this accreditation involves waiting for long periods of time. Establishing this paragraph in a general way without qualifying that it will be only in cases where proof of disability needs to be submitted can lead to confusion and, therefore, to a situation of legal uncertainty, where the measures introduced by this Regulation can be considered to apply only to persons with recognised disabilities.</p>	
205	CEACOG/Full Inclusion	TEXT	<p>3.4. Include the following amendment in Article 3 (h) on Intellectual Disability:</p> <p><i>(h) Intellectual disability: it entails a number of limitations on intellectual performance and adaptive behaviour, i.e. the functions of a person's daily life, such as learning, understanding, reasoning and skills, which enable them to respond to different situations and places. Intellectual disability is expressed in relation to the environment. It therefore depends both on the individual himself and on the barriers or obstacles they have around them. Intellectual disability originates before the age of 22 and is generally permanent, i.e. for the whole life, and has a major impact on the life of the person and his/her family.</i></p> <p>JUSTIFICATION: According to the definition agreed by the associative movement of people with intellectual and development disabilities and their families: Full inclusion: https://www.plenainclusion.org/noticias/la-discapacidad-intelectual-tiene-una-nueva-definicion-y-la-explicamos/</p>	Accepted in part. Age is not mentioned because there is no consensus on this point.
206	CEACOG/Full Inclusion	TEXT	<p>3.5. Include the following amendment in Article 3 (j) on cognitive accessibility tools:</p> <p><i>(j) cognitive accessibility tools: these are cross-cutting elements that need to be present to ensure cognitive</i></p>	Accepted in part. Orientation and testum issues are reflected in other parts of the text.

accessibility. They are divided into several categories:

I. Information and communication accessibility resources: it refers to tools such as clear language, easy reading, ~~augmentative and alternative communication means and systems~~, to facilitate reading understanding and communicative interaction by providing cognitively accessible alternatives to communication and oral and written information.

*II. **Guidance** resources: **refers to the set of resources and systems that enable and facilitate guidance and navigation processes in the environment, with the aim of enabling people to:***

- Move from one point to another in an efficient and secure way, facilitating decision-making.*
- Promote the perception, selection and understanding of information even in new environments.*
- Understand the spatial features of the environments.*

These include:

- Signs: posters, directories, tootles or other supporting elements of the information.*
- Maps and plans.*
- Logical organisation of the spaces themselves.*
- Signage pictograms*
- Use of colours and environmental elements such as lighting or other.*

They are all designed with cognitive accessibility criteria. The use of resources for the guidance or understanding of space does not guarantee its understanding by itself, should be part of a guidance and signalling system that follows cognitive accessibility and wayfinding criteria.

~~*tools such as signage pictograms and guidance processes using environmental information.*~~

III. Technological accessibility resources: it refers to technology support products and services that enable better communication, guidance, and performance of tasks, as well as the possibility of using and consuming technological tools, products and services by the highest possible range of people regardless of their cognitive abilities. Technological resources include artificial intelligence.

All cognitive accessibility tools, regardless of their classification, aim to facilitate communication; generate meaningful and reciprocal social interactions; ~~establish the conditions for efficient monitoring of each other's conduct~~; providing permanent information in advance as well as information on what has been done; present an environment that offers opportunities and respects diversity; ~~promoting a positive social emotional climate~~; enable participation in a context free from situations involving undue personal threat or risk; ~~maintain and increase self-esteem~~; promoting independence and autonomy; and to ensure the conditions for everyone to have access to their universal basic rights. **In addition, the use of these tools should be validated or evaluated by people with difficulties in: understanding, which is targeted by cognitive accessibility.**

JUSTIFICATION: It is considered appropriate to maintain consistency in the appointment of other tools. For example, ACWS in the field of communication, eliminating splitting between media and systems.

With regard to point ii, it is recommended that this paragraph be redrafted in order to broaden and specify the resources used for guidance on the basis of specific cognitive accessibility criteria.

With regard to point iii, the contributions made are online for a better understanding of this paragraph, as well as for unifying the vocabulary used in the Regulation.

			With regard to the last paragraph, it is proposed to leave only those issues that relate to cognitive accessibility and which are considered not to relate to: monitoring behaviour, increasing self-esteem or improving the social climate in emotional terms. Finally, it is considered important to emphasise the need to design comprehensive systems that are validated and assessed by people with comprehension difficulties, as indicated by standards and methodologies, in order to ensure both processes and understanding of the measures.	
207	CEACOG/Full Inclusion	TEXT	<p>3.6. Include the following amendment in Article 7 on Telecommunications and Information Society in paragraph 2 (d): <i>(D) Interaction systems and mechanisms, including forms of consent provision, identification, authentication, signature and payment processes and any form or digital tools linked to the procurement of services, the purchase of products, compliance with tax or public obligations, application for aid, participation in civil and political proceedings, complaints and complaints, completion of formalities and acceptance of terms and conditions or assimilation of conditions.</i></p> <p>JUSTIFICATION: Cognitive accessibility in all these situations is important for the full participation in society of people with intellectual and development disabilities and other groups with difficulties in understanding, as well as for access to information, facilitating autonomy and non-infringement of their rights.</p>	Is rejected. The areas listed are already developed in the text.
208	CEACOG/Full Inclusion	TEXT	<p>3.7. Incorporate the following amendment in Article 7(3):</p> <p><i>3. Where the services in question are provided via a website or mobile application, it must be ensured that this is a cognitively accessible digital environment. In this regard:</i></p> <p>(a) comply with the definition set out in this Regulation and the minimum criteria set out therein.</p> <p>(b) AND compliance with criteria A and AA of standard UNE 139803.</p>	Is rejected. Article 7 (2) already provides that cognitive accessibility measures consist of applying the principles contained in Article 4 (2) and the requirements of Article 5 (1) applied to most (if not all) content.

			<p>JUSTIFICATION: It is considered necessary to establish what is a cognitively accessible digital environment based on the web cognitive accessibility patterns established by the W3C consortium. Web accessibility has so far been established on the basis of purely sensory accessibility criteria. It is therefore considered relevant and necessary to establish minimum conditions already proposed by the consortium with regard to the accessibility of digital environments.</p>	
209	CEACOG/Full Inclusion	TEXT	<p>3.8. Include the following amendment to Article 8 (1): <i>1. As regards the visual and acoustic signalling of built-up public spaces, infrastructure and buildings, the provisions of Article 41 of Order TMA/851/2021 of 23 July shall apply, as well as the accessibility requirements for signalling elements in buildings laid down in UNE 17002: 2022 and those in force. Similarly, the measures contained here will be taken into account to ensure cognitive accessibility of natural public spaces. It will be for the municipalities to regulate the basic cognitive accessibility conditions for parks and gardens located in urbanised public spaces.</i></p> <p>JUSTIFICATION: It is relevant to include the technical standard related to signalling elements in buildings that is in force. In addition, it is appropriate to include technical standards referring to accessibility requirements for signalling elements in buildings, in order to meet minimum cognitive accessibility criteria for infrastructure and building. Only by including Article 41 of Order TMA/851/2021 of 23 July, we would leave cognitive accessibility to a single criterion for the use of posters and panels. Finally, it is considered appropriate to include natural public spaces, which, under the current wording, would be excluded from the legislation, and are also spaces of particular interest and relevance to all people.</p>	<p>Is rejected. Order TMA/851/2021 of 23 July 2007 applies to urbanised public spaces, including all pedestrian and vehicular spaces of passage or stay, which form part of the public domain or are intended for public use. Places of stay include squares, parks and gardens, so Article 41 already applies to them. Environmental and natural goods and services are already required to be accessible under Royal Decree 193/2023.</p>
210	CEACOG/Full Inclusion	TEXT	<p>3.9. Add the following amendment to Article 8 (2) (g): Symbolism: the symbol used shall be used using</p>	<p>Is rejected. The symbology according to the RAE is a set of symbols. Mandatory implementation of UNE standards</p>

			<p><i>internationally recognised symbols or, if they do not exist, those that meet recognised standards (UNE 170002: 2009, ISO 9186-1: 2014 and ISO 9186-2: 2008) or those that update them. These symbols shall be used to encourage being inspired by basic graphic concepts of easy interpretation and rapid orientation and location in a given space. These symbols also include the use of arrows as set out in standard UNE 170002: 2022.</i></p> <p>JUSTIFICATION: Reference should be made to the rules that call for questions of labelling, use of pictograms, etc., so as not to leave free interpretation what it is and what is not an accessible symbol. This includes standard UNE 170002: 2009 on accessibility requirements for labelling and ISO standards for the validation of understanding and perception. In addition, the use of standardised symbols should be ensured so as not to encourage the creation of other signs that may create confusion.</p>	<p>is considered to be undesirable as these quality standards emanate from private institutions and are not available to the general public. In addition, the catalogue of pictograms will also serve for this standardisation.</p>
211	CEACOG/Full Inclusion	TEXT	<p>3.9 it is proposed to include a new paragraph (j) to Article 8 (2) on urbanised public spaces, infrastructure and buildings: <i>(K) Access to urbanised public spaces, infrastructure and buildings shall be guaranteed free of charge. persons accompanying or supporting persons with disabilities recognised as having a percentage equal to or greater than 33 % and an intellectual disability by means of the certificate referred to in paragraph 1 of the first additional provision of Royal Decree 888/2022 of 18 October establishing the procedure for the recognition, declaration and qualification of the degree of disability.</i></p> <p>JUSTIFICATION: In line with the draft proposed regulation in the field of transport, it is important that the person accompanying or supporting persons with disabilities can enter without creating an additional cost to the economy of the person with disabilities, as well as boosting autonomy and ensuring equality for persons with disabilities. There are numerous initiatives that demonstrate that this measure does not generate any economic loss but, on the contrary,</p>	<p>Not acceptable. In the field of transport, reference is made to the fact that it is free of charge because it is a service. Urbanised public spaces, infrastructure and buildings may or may not contain services. It therefore makes no sense to refer in this case to the fact that it is free of charge.</p>

			encourages people with disabilities to go to many more places as they have the necessary support.	
212	CEACOG/Full Inclusion	TEXT	<p>3.10. Include the following amendment to Article 8 (2) (h): <i>(h) Harmful or tactile sensory resources; the presence of signage on haptic resources, i.e. tactile resources, will be welcomed. Guidance and routing systems should be provided especially in areas of special consideration and use by persons in need of such resources, such as access, lifts, handrails, and general plans to which graphic and sensory plans must be added.</i> <i>The above systems should provide visual, auditory and tactile detectable textures.</i> <i>Elements used to guide users need to foresee visual information, using high chromatic contrast, and combine it with acoustic resources, surface texture changes detectable with the shoe sole and mobility stick or other type of auditory or tactile information. All these elements should provide reference points for guidance.</i> JUSTIFICATION: The use of ‘sensory touch’ is requested to describe this type of resource and to bring together, for example, haptic plans and routings, among others. In addition, it is proposed to add concrete and minimum criteria to guide the use of these resources to ensure cognitive accessibility and not to restrict it to the use of drawings, if it does not include: visual information, contrasting use of colour, altorelief, textures, and those issues already described and referred to by different regulations.</p>	Accepted in part. Obligations are imposed without going into detail on how these resources are to be developed.
213	CEACOG/Full Inclusion	TEXT	<p>3.10 include in Article 9 (2) (a) on Transport: 1. All signals and warnings in access to and use of modes of transport must be accessible cognitively, in accordance with the rules laid down in Royal Decree 1544/2007 of 23 November 2011 regulating the basic conditions of accessibility and non-discrimination for access to and use of</p>	Is rejected. Web accessibility to these sites is regulated by RD 1112/2018, RD 193/2023 and Law 11/2023.

			<p>modes of transport for persons with disabilities. <i>This should be ensured especially in the digital field (web pages, virtual passages outlets, electronic terminals, mobile applications, etc.).</i></p> <p>JUSTIFICATION: Ensuring cognitive accessibility in the information of means of transport is essential for the autonomy of persons with disabilities, therefore it is necessary to explicitly mention spaces and situations where more attention needs to be paid, such as digital spaces.</p>	
214	CEACOG/Full Inclusion	TEXT	<p>3.11. Include the following amendment to Article 9 (2) (b): <i>(b) The necessary measures to facilitate spatial and temporal orientation shall be implemented in accordance with the following criteria:</i></p> <p><i>I. Considering sensory needs in relation to lighting and adequate ventilation.</i></p> <p><i>ii. Attention to cognitive accessibility by establishing augmentative and alternative communication and signalling systems, such as written and audio formats or tactile signalling in means of transport. A criterion for the use of multiple formats (textual, visual, auditory) in the transmission of information for spatial and temporal orientation.</i></p> <p><i>II. Attention to sensory needs in relation to illumination and adequate ventilation and sound elements.</i></p> <p>JUSTIFICATION: In addition to spatial orientation, emphasis should also be placed on timeliness. We propose a justified change in the prioritisation of measures specific to cognitive accessibility, followed by care for environmental issues that favour comfort and conditions for good understanding, we consider in a second place.</p> <p>In addition, alternative and augmentative communication systems should not be generalised, nor should pictograms be used for the communication of co-elements of signalling. These are different pictograms with different vocations and naturalities.</p>	Accepted in part. Signposting is limited to spatial orientation and a new sub-section is added for service in offices or information services, where SAACs are established as support.

			<p>In the case of communication pictograms (specific to SAACs), there is no standardised system for their use, according to Confederación Autismo España in its report Pictograms of Signalling: regulatory analysis report “seems to be counterproductive to aim for full standardisation, as this support needs to be adapted to the specific communication needs of people with very different needs and diverse socio-cultural environments and contexts”.</p> <p>Moreover, there is a clear difference between the signage pictograms and pictograms used in SAACs and would be confusing, counterproductive and contrary to what has been developed and trying for years if they are included as a generalised cognitive accessibility measure and, above all, if it is linked to signage issues.</p> <p>Communication pictograms shall only be used for such purposes: facilitate communication. Its use in other environments would not be correct. Moreover, they should not be generalised, as each person employs their own and each system should be personalised and tailored to each person.</p>	
215	CEACOG/Full Inclusion	TEXT	<p>3.12. Include the following amendment to Article 10. Transparency and clarity of business information, in point (a) (2):</p> <p><i>(a) Transparency and clarity in business information: suppliers of goods and services shall provide, in a general manner to the consumer, basic information in plain language, clear language and an easy-to-read format, where possible, with pictograms and other visual supports. Where a document cannot be replaced by an easily readable document, due to compliance issues, an easy-to-read informative document shall be provided.</i></p> <p>JUSTIFICATION: Clear language is a methodology supported by UNE-ISO 24495-1: 2024 which sets out the principles and guidelines for producing clear language documents, which is referred to in the definitions in the regulation itself, while plain language is a subjective term,</p>	The obligation is set in plain language, so both easy reading and clear language will be promoted.

			which remains open to interpretation. It should also be made mandatory so that this information is easy to read, so as not to leave it to good will, and an intermediate step with explanatory documents may be established.	
216	CEACOG/Full Inclusion	TEXT	<p>3.14. Include the following amendment in Article 10 on procurement, consent and labelling issues and instructions. Point 3:</p> <p>3. Compliance will be mandatory to promote the application of clear language or easy reading to procurement, consent, labelling and instructions issues, which in addition and generally for the rest of the public will be presented in clear language.</p> <p>JUSTIFICATION: While clear language is a form of drafting and communication that helps to understand citizens' information in general, ensuring this easy-to-read information ensures that people with comprehension difficulties, such as intellectual disabilities, can understand it. If it is a cognitive accessibility regulation, it must understand its own accessibility tools.</p>	The obligation is set in plain language, so both easy reading and clear language will be promoted.
217	CEACOG/Full Inclusion	TEXT	<p>3.15. Include the following amendment in Article 10 on procurement, consent and labelling issues and instructions. Point 3:</p> <p><i>4. With regard to health goods and services and health promotion and protection services, meaning those which are made available to the public in facilities, premises and other physical spaces dedicated to health services and health promotion and protection services of health centres or establishments referred to in Royal Decree 1277/2003 of 10 October laying down the general rules on the authorisation of health centres, services and establishments, and in veterinary centres, the following requirements are laid down:</i></p> <p>(a) It shall be mandatory to promote the dissemination of information on all services offered, in cognitively accessible formats and media, both general and specifically aimed at persons with cognitive difficulties.</p>	Is rejected. This paragraph is almost the same as Article 19 (4) of Royal Decree 193/2023 of 21 March, so it would not be repeated and if maintained, the current wording would be left in order to strengthen regulatory consistency.

			<p>JUSTIFICATION: A clear mandatory criterion for compliance with cognitive accessibility requirements should be established in order to guarantee the rights of those for whom it makes a substantial difference between whether or not they have access to their rights.</p>	
218	CEACOG/Full Inclusion	TEXT	<p>3.16. Include the following amendment to Article 11 (2) (d) on relations with general government.</p> <p><i>D) The information and procedures of all digital formalities of public administrations must be designed in a cognitively accessible manner so that they can be carried out by anyone, and must comply with the accessibility guidelines laid down in Royal Decree Decreto1112/2018 of 7 September on the accessibility of public sector websites and mobile applications.</i></p> <p><i>In order for these digital formalities to be cognitively accessible, the following must be complied with, in accordance with the W3C recommendations developed through the WAI (Web Accessibility Initiative) and the COGA Working Group, and any standards or recommendations that update them:</i></p> <ul style="list-style-type: none"> <i>— Ensure a clear design, which helps users understand each paragraph and how to use it.</i> <i>— The content shall be clear and understandable: by initiating drafting guidelines for Facil Reading, clear images, accessible videos and as many complementary elements as possible.</i> <i>— Offer different ways of understanding the content: use of images and graphics, easy-to-read documents and easy-to-read summaries on long and complex documents, use of icons in titles and links.</i> <i>— Avoid errors and, if committed by the user, provide support and support options to correct them: chats, video calls, contact phone.</i> <i>— Help keep the spotlight: avoid distractions and generate anchors so that the user or user can re-orientate. For this purpose, titles should be used to</i> 	Is rejected. The recommendations of the W3C consortium cannot be included as official references.

			<p><i>promote orientation on the page, web browsing by bread mills. Do not rely on memorisation for the conduct of processes or part of the processes.</i></p> <p><i>— Ensure adaptation and customisation: digital formalities shall be compatible with assistive technologies and products.</i></p> <p><i>— Design the procedures and processes taking into account people with intellectual and developmental disabilities and other groups with difficulties of understanding.</i></p> <p><i>— Validate procedures and processes with people with intellectual and developmental disabilities and other groups with difficulties in understanding.</i></p> <p>JUSTIFICATION: There is no current regulation or pattern that states how a digitally accessible process should be cognitively accessible, which may give rise to free interpretations, with COGA (W3C) recommendations being the most relevant for this area. Minimum conditions should be laid down to guide administrations in making the website accessible or to work on a guide for the administration that would explain how to do so. It is also important to highlight the importance of validation in order to teach audiences with difficulties in understanding if this process is easy to understand and perform, or, on the contrary, it is not.</p>	
219	CEACOG/Full Inclusion	TEXT	<p>3.17. Include the following amendment to Article 11(5):</p> <p><i>5. Information relating to calls for public employment, both open access and internal promotion, and in particular those involving places reserved for persons with intellectual disabilities, shall be communicated in an easy-to-read version. On request, items, tests, practices, examinations and documents of a general nature shall also have a cognitively accessible version.</i></p> <p>JUSTIFICATION: <i>To ensure equal opportunities in tests and exams, the items should also be easily readable. What is important is that the entire process of these calls is cognitively understandable, from their call to their resolution;</i></p>	<p>Is rejected. The administration does not draw up topics. It is not known what the observation refers to with “documents of a general nature”. In the case of information on calls, as referred to in paragraph, it is already foreseen to communicate them through easy-to-read documents.</p>

			<i>this means that public documents are cognitively understandable.</i>	
220	CEACOG/Full Inclusion	TEXT	<p>3.18. Include the following amendment to Article 12 (3) (a) on Administration of Justice <i>(3) all judicial decisions and notifications, whatever their legal form, shall be drafted and presented in clear language, in a simple and comprehensible manner, without prejudice to the need to use technical and legal language to ensure the accuracy and quality of such decisions and service, in accordance with Article 9. The right to clear language in procedural acts, decisions and communications under Organic Law 5/2024 of 11 November 1992 on the Law of Defence. In addition, and whenever requested, they should be provided in a comprehensible format. The following aspects are included in the accessible format:</i></p> <p><i>(a) Referral in easy-to-read format or in clear language.</i></p> <p><i>(b) identification of obligations, time limits, dates, appearances and procedural acts that are scheduled in a clear, simple and prominent manner.</i></p> <p><i>(c) the possibility of requesting decisions and other documents indicated in an alternative format to the letter.</i></p> <p>JUSTIFICATION: Article 9 of Organic Law 5/2024 of 11 November on the Law of Defence already provides: ‘Procedural documents and communications shall be drafted in clear language, in a simple and universally accessible manner, in such a way as to make it possible to ascertain to their addressees the subject matter and consequences of the procedural act communicated’. In the same way as clear language is referred to in the case of court decisions in the case of ‘those of the Public Prosecutor’s Office and those issued by judicial counsellors’ (Article 9 (1) and (9.2)). Moreover, clear and easy-to-read language does not serve the same and should not be used interchangeably, so it should be clear that they are two</p>	Is rejected. It does not seem contradictory to the draft RD, which requires either clear language or easy reading. The aforementioned organic law is referred to in Article 12(1).

			forms of communication/drafting with distinct objectives and audiences, with easy reading being suitable for people with reading difficulties and clear language for citizens' common.	
221	CEACOG/Full Inclusion	TEXT	<p>3.18 include the following amendment to Article 12 (5) (c) (i) on the Administration of Justice:</p> <p>(c) People with cognitive difficulties have the right to understand and be understood in any action to be taken. To this end:</p> <p>I. All communications, whether oral or written, addressed to persons with cognitive difficulties who have requested it shall be in plain and accessible language in such a way that they can be understood by the recipient, in a manner that takes into account their personal characteristics and <i>specific</i> needs, using the <i>necessary means</i> such as easy reading, communication pictograms or other alternative and augmentative communication systems where necessary.</p> <p>This <i>should be ensured, in particular, in</i> decisions laying down obligations, duties and rights, those ending the proceedings and those restricting rights, as well as information on the date and place of the hearings and the procedural acts scheduled. They shall be presented in a clear, simple and accessible manner.</p> <p>JUSTIFICATION: In advance, the document lays down an obligation for communications to be made in clear, plain and accessible language. Leaving the wording proposed by the draft would be redundant. It is important that, in the case of persons with cognitive difficulties, all communications take into account their personal characteristics and specific needs, so as to be able to ensure that they can be understood by the person to whom they are addressed. Plain and accessible language does not always mean that it is understood by its addressee, often specific adaptations are needed in the field of communication, taking into account specific support needs.</p> <p>In order to be able to guarantee access to justice for all</p>	Accepted in part. This project maintains consistency so that simple language is generally used as a way of simplifying communication, while clear and easy-to-read language is used in the way it is understood to be covered by a technical standard, even if it is not mandatory. The technical standard may in any case serve as a reference.

			persons with comprehension difficulties, it is essential that the personal characteristics of each individual case be taken into account.	
222	CEACOG/Full Inclusion	TEXT	<p>3.19 include the following amendment to Article 12 (5) (c) (ii) and (iii) on Administration of Justice:</p> <p>II. The person with cognitive difficulties shall be provided with the assistance (s) necessary to enable them to understand, including the use of augmentative and alternative communication systems and, where appropriate, the support of the facilitator.</p> <p>III. The participation of an expert professional who, as a facilitator, carries out adaptation and adjustment tasks necessary to enable the person with cognitive difficulties to understand and be understood shall be allowed. <i>The facilitator's action shall not be restricted solely to the judicial sphere, since the first contact of the person with cognitive difficulties with the justice system must take place, including the State Security Forces and Corps, and propose to the court, the Public Prosecutor's Office or the Police any adjustments that it considers appropriate.</i></p> <p>The designated facilitator has an obligation to use the procedural steps to which he or she is summoned in order to assist the person with cognitive difficulties. The facilitator is not a procedural representative of the disabled person. However, if necessary for a better guarantee of fundamental rights in the proceedings of a person with cognitive difficulties, he or she shall be notified of any decisions the knowledge of which is appropriate in order to be able to perform his or her role of assistance properly.</p> <p>The facilitator cannot be called upon to testify about the content of the conversations he or she has with the assisting person. Like the other parties to the proceedings, it assumes the duties of secrecy and confidentiality laid down in the rules of procedure.</p>	Is rejected. Without prejudice to the development of the figure in another legislative instrument, the figure is already included in the legal system and must therefore be mentioned in an article of this nature (on cognitive accessibility to justice). The facilitator is limited, until the legislation has been developed, to the judicial sphere, so it is not generally possible to speak of the CyFSE, but only of the police (judicial, clarified in the text so as not to give rise to confusion).

			<p>The costs arising from the intervention of the person designated as facilitator shall be borne by the relevant administration and may not be passed on through legal costs either to the assisted person or to the other parties to the proceedings.</p> <p>JUSTIFICATION: While the participation of the facilitator is essential to ensure that the person with cognitive difficulties can participate in the procedure, the professional development of the figure itself goes beyond the possibilities of a Royal Decree. We believe that it would be more appropriate for the figure to be developed through a legislative process by the Ministry responsible for organising the administration of justice.</p>	
223	CEACOG/Full Inclusion	TEXT	<p>3.19 include the following in Article 12 (d) on Administration of Justice:</p> <p><i>D) In the case of persons with cognitive difficulties, in particular persons with intellectual and developmental disabilities, in order to preserve all procedural guarantees and the person's participation in the proceedings, attendance shall be ensured, unless the need for a hearing by videoconference is demonstrated as a procedural adjustment for the specific case. Where this is the case, cognitive accessibility tools shall be implemented in the courtrooms and in the system of hearing by videoconference, which shall include, inter alia, the possibility of subtitling interventions automatically, the intervention of the facilitator, the use by the person of his or her means or augmentative and alternative communication system, and the instant availability of visual supports, especially in the context of statements, whether as a person reported, filled, investigated or charged, in criminal proceedings and in testimonial statements specific to any jurisdiction.</i></p> <p>JUSTIFICATION: The Constitutional Court requires that acts of judicial communication with a person with a disability who is involved as a party to judicial proceedings (in</p>	Is rejected. The procedural rules must define this.

particular when acting as an accused person or a lawsuit) ensure that the person is aware and aware of their scope and significance. It can therefore be said that the involvement of a disabled person via videoconference – without a direct assessment by the court – will not allow the court to ensure that his or her right to the defence is guaranteed, nor will it be able to (fully) assess that the person is fully aware of the questions put to him or her or of their scope or consequences; this means that it is not possible to guarantee their fundamental right to an effective remedy.

The Supreme Court, in its judgment 3144/2021 of 22 July 2013, echoed the doctrine established by the ECtHR on the possibility of conducting criminal trials in which the accused person intervenes by videoconference, stating that it may take place only in exceptional cases and in order to safeguard a justified relevant public interest, **provided that the effective participation of the accused in the trial is guaranteed.**

'The case-law of the ECtHR unequivocally points to the need for the accused person to participate in the trial as predominant and preferable. That methodology reinforces the guarantees of the right to a fair hearing. At the same time, it makes it possible to verify the defendant's statements and compare them with those of witnesses who testify against him. Although not expressly mentioned, Article 6.1 of the European Convention on Human Rights assumes such physical presence at the hearing. In fact, subparagraphs (c), (d) and (e) of paragraph 3 guarantee the right to defend himself, to question or to have witnesses examined and to be assisted by an interpreter, where appropriate. It is difficult, but not impossible, to realise such rights without the defendant's participation (judgment of 5 October 2006).

However, the right to be present at the trial does not always and in any event imply physical presence in the courtroom.

The current legislation allows for virtual presence in cases of penalties of less than two years. And the immediately preceding rule allowed it for all non-serious offences. Constitutionally, there is no penological level beyond which this face-to-face form would be prohibited. That is a provision which the legislator may set for the future. This is your decision. Where there are exceptional reasons for doing so, remote intervention (e.g. videoconferencing) shall be compatible with the requirements of the fair trial if it is agreed in the interests of safeguarding a justified relevant public interest and the effective participation of the person in the trial is guaranteed.

[...]

Next, the judgment on appeal refers, on the one hand, to the judgment of the Supreme Court of the European Union (STS) 676/2005 ("Therefore, since it is not possible to affirm the integrity of the observance of the usual procedural guarantees, the decision on the holding of a court hearing with the presence by videoconference of the accused persons requires the inexcusable attention to be paid to proportionality criteria that link the sacrifice of those rights to the relevance of the grounds for such a measure.

There is no doubt that people with difficulties in understanding, such as those with intellectual or developmental disabilities, are, as a general rule, faced with a situation of particular risk for the exercise of their rights on an equal basis. However, it is clear that this risk increases exponentially when means such as videoconferencing are used, since it will first be particularly difficult for the judicial authority to determine whether or not the person is in need of support without being present, which is the case even when there is a witness, since, according to the 'A each side' study of Plenum inclusion (2020) on the situation of detainees and former prisoners with intellectual disabilities in Spain, only 3.3 % of cases detected the presence of disability during the judicial proceedings. In addition, in the

			<p><i>second place, there is no doubt that the sacrifice of direct communication has the result that it is impossible to achieve the same level of respect for that person's procedural guarantees and his effective participation in the procedure, which is why additional guarantees must be put in place and such mechanisms should not be used unless it is absolutely impossible for the person to take part in the proceedings. As a result of the pandemic, events by videoconference are now becoming more widespread, creating situations of helplessness in relation to persons with disabilities. As a factor to be taken into account, according to the aforementioned 'On each side' Report (Full Inclusion, 2020), among the persons with intellectual disabilities who serve sentences (90 % involving deprivation of liberty), there is a very significant proportion of people who do not have basic daily life skills that allow them a certain degree of autonomy and still less to face criminal proceedings without adequate support (22.1 % do not know what they read and, although they know, 50.8 % of people do not understand what they read; 24.3 % do not know to write; 50.94 % of people do not know to fill in a questionnaire; 69.66 % of people do not know to use problem-solving strategies, 46.44 % do not know to avoid risks to their health and safety, or 44.19 % do not know to make choices or make decisions).</i></p>	
224	CEACOG/Full Inclusion	TEXT	<p>3.20. Include the following amendment in Article 13 (2) (e): (e) Financial controllers shall receive training on cognitive accessibility and persons with intellectual and developmental disabilities and other cognitive difficulties in order to ensure that the explanations of the supporting persons are only related to the process; and a complaint mechanism shall be made available in the event that the person with cognitive difficulties is coerced. JUSTIFICATION: Those who have to ensure that rights are guaranteed during that process should be aware of both cognitive accessibility, communication patterns or</p>	<p>Is rejected. The Electoral Commission shall determine how financial controllers receive training or information necessary for the performance of this task.</p>

			characteristics specific to the groups to which it relates.	
225	CEACOG/Full Inclusion	TEXT	<p>3.21 include the following amendment to Article 13 (4):</p> <p><i>4. In relation to standard-setting procedures, prior public consultation, as well as hearing and public information procedures, should publish their documentation in plain language and in an alternative format to written submissions, such as audio, visual support and the use of accessible information and communication technologies. It shall be promoted, where possible, in addition to ensuring the publication of such documents in easy reading.</i></p> <p>JUSTIFICATION: People with difficulties of understanding should be guaranteed access to the same documentation as others and participate in the processes, so all information should be easily readable and other accessible formats. In case there is some difficulty in providing these formats due to compliance issues, it should be ensured that this information and the procedure to be followed are explained.</p>	Accepted in part. This project maintains consistency so that simple language is generally used as a way of simplifying communication, while clear and easy-to-read language is used in the way it is understood to be covered by a technical standard, even if it is not mandatory. The technical standard may in any case serve as a reference.
226	CEACOG/Full Inclusion	TEXT	<p>3.22 to include the following amendment to Article 14. Employment Point 3:</p> <p><i>3. Article 8 of this Regulation shall be taken into account in the areas referred to in the previous paragraph. Tall signs relating to safety, monitoring and order of visits for the understanding of the enclave and orientation shall be carried out by means of accessible signage in a simple, clear format using signage pictograms, symbols, and any cognitively accessible graphic elements that make it possible to differentiate parts of the exhibition, visit or journey. Efforts shall be made to provide advance information on environmental conditions.</i></p> <p>JUSTIFICATION: Differentiation of pictograms is important, with emphasis on the use of signage pictograms for this purpose.</p> <p>Furthermore, it is appropriate to address the requirements set out in Article 8 (proposed in this contribution document).</p>	Is rejected. Article 8 already applies to all urbanised public spaces, infrastructure and buildings and, in accordance with the Regulatory Technical Guidelines, the proliferation of referrals must be avoided. Moreover, it is not necessary for these to be signage pictograms, since it is talking precisely about signage.
227	CEACOG/Full Inclusion	TEXT	3.23. Include the following amendment to Article 15.	The inclusion of public administrations is accepted.

			<p>Employment Point 3:</p> <p>3. Training to be promoted by private, public and public authorities for taking ambassadors, whenever requested, and irrespective of funding, shall be carried out in accordance with cognitive accessibility recommendations, providing easy-to-read documentation and alternative formats to written, such as audio of the easy-to-read format, visual support or accessible information and communication technologies.</p> <p>JUSTIFICATION: Government and SOEs have to comply with a 2 % recruitment quota of persons with intellectual disabilities in their workforce. It is essential that the training of these workers is also adapted and follows the recommendations of cognitive accessibility.</p>	
228	CEACOG/Full Inclusion	TEXT	<p>3.24. Include the following amendment to Article 15. Employment Point 4:</p> <p>4. In the selection procedures for staff of private, public and public authorities, offers, conditions and requirements shall be published in an accessible manner and in any case in clear language. Furthermore, by meeting the qualifications and experience specifications required for the post, in order to make them cognitively accessible, any candidate may request, at no cost, an adjustment in the conduct of the job interview, without this being a ground for exclusion from the selection procedure. In addition, in conducting the interview or selection procedure, the person shall be allowed to be accompanied by his/her supporting job or professional coach.</p> <p>JUSTIFICATION: Government and SOEs have to comply with a 2 % recruitment quota of persons with intellectual disabilities in their workforce. It is essential that selection procedures are adapted. The job preparer is key to ensuring that the individual can understand the selection process and the tests that take place there, interviews, written tests, etc.</p>	Is rejected. Article 37 (3) of the LGD provides that access to public employment is governed by the provisions of the relevant legislation, and therefore does not fall within the scope of the law of which this Royal Decree is regulatory development.
229	CEACOG/Full Inclusion	TEXT	<p>3.25. Include the following amendment to Article 15.</p>	It is accepted to include public administrations.

			<p>Employment Point 7: 7. Private companies, public undertakings and public administrations shall have the obligation to implement and provide a system of support and reasonable accommodation in relation to working hours, allocated times and workload and the possibility to use assistive technologies on request and with the involvement of the worker concerned. These support schemes shall be reviewed on a regular basis. Support schemes include the job preparer.</p> <p>JUSTIFICATION: The government and SOEs have to comply with a 2 % recruitment quota of persons with intellectual disabilities in their workforce and should therefore also provide the necessary reasonable accommodation and accommodation. The concept of job preparer is already included in Royal Decree 870/2007 of 2 July 2015 regulating the supported employment programme as a measure to promote the employment of people with disabilities in the ordinary labour market. It is essential to ensure that the person with an intellectual disability has the necessary accommodation or reasonable accommodation to perform his or her job.</p>	
230	CEAFA	TEXT	<p>That said, CEAFA has a duty and obligation to report that, despite the various paragraphs of the revised text, the regulation discriminates against and excludes from its application the entire group of people affected by Alzheimer or other dementia. We argue this in view of some paragraph of the project that seems particularly relevant to us.</p> <p>[...]</p> <p>It is clear that special attention should be paid to rural areas in view of the points made in this paragraph. But it would be good to indicate the challenges these environments face for people with dementia (not just those with disabilities). For example, aggravation of stigma, difficulty in accessing specific (pharmacological and non-pharmacological) treatments and treatments, need (dependence) to always</p>	<p>Is rejected. The evaluation responds to the need to evaluate these infrastructures, not the entire transport network. The transport article (9) will generally have cognitive accessibility to transport.</p>

			<p>go with yourself (affecting the family environment), etc. In other words, what is collected is very good for people with disabilities, from which we welcome, but people with dementia are still excluded.</p> <p>[...]</p> <p>The gender conditions indicated apply to people with dementia, to which should be added, inter alia: the disease has a stronger impact on women than men; it is women who care and must make adjustments of all kinds (personal, social, cultural, employment, etc.) to devote themselves to care; dementia is a new form of violence and ill-treatment, marginalisation and poverty that particularly affects women. These are aspects that are not covered and continue to exclude or ignore the needs of people with dementia.</p> <p>[...]</p> <p>People with dementia are not seeking social inclusion, but not exclusion. They have been an active part of society throughout their life, and the diagnosis of Alzheimer cannot exclude them from the environment to which they have contributed. This is an important conceptual issue that should be taken into account.</p> <p>[...]</p> <p><i>"(...) report on cognitive accessibility of airport and railway facilities (...)"</i></p> <p>Bus stations, taxi services including PHV, or municipal transport (bus, metro, tram, etc.) must be added. Despite the decentralisation of competences in the latter areas, it would be important to make recommendations at least on the basis of the common basis defined by the competent ministry.</p> <p>[...]</p> <p>Given the characteristics of dementia, this recognition should be given to people at the time of diagnosis and not wait for the disease to evolve.</p>	
231	CEAFA	MAIN	CEAFA would like to highlight a paragraph which seems particularly significant to us.	Is rejected. The aim of the rule is to provide care for people with cognitive difficulties due to various causes, for

'In accordance with Article 1, the direct beneficiaries of this regulation shall be the groups with the greatest cognitive accessibility needs, i.e. persons with intellectual disabilities, development, brain paralysis, autism spectrum disorder, brain damage, mental health problems, Down syndrome, older people and other realities with difficulties in understanding, learning and interaction with the environment or diseases associated with cognitive impairment.'

It could well be argued that people with Alzheimer would be represented under the latter name as 'diseases associated with cognitive impairment'. In this respect, to say that cognitive impairment is a very early stage that often leads to dementia, but not always. While it is true that people diagnosed at very early stages (even prodromic) could be considered here, **it leaves out of this category 90 % of cases with dementia at more advanced stages**, for whom the bulk of the regulation is quite distant or distant from their real needs.

As a conclusion, the project seems to us to be a remarkable initiative for the recognition of the rights of persons with disabilities described in the text. However, we deeply regret that, once again, people with Alzheimer or any other type of dementia have been excluded and marginalised from this excellent initiative. Let's not forget that we are talking about 1.2 million people with the disease who also require facilities and guarantees of compliance with their rights and care for their needs. The latest initiatives promoted by the Ministry of Social Rights, Consumer Affairs and Agenda 2030 (this project or the recently approved Care Model) do not cater for 70 % of the beneficiaries of the Law on the Promotion of Autonomy and Care for Persons in Dependency.

It is therefore the responsibility and obligation of the Spanish Confederation of Alzheimer and other claims to

example health situations, such as alzheimer's disease.

			claim and demand specific attention to this group. To do so, as it could not be otherwise, we are making available to the Ministry itself and related bodies to share the information that underpins this petition. Because people with dementia remain people and cannot be excluded from the benefits that articulate to others.	
232	STATE CERMI (PRESIDENCY)	TEXT	<p>Specifically, this report refers only to the sixth additional provision of the draft Royal Decree on 'Accreditation', for which CERMI proposes the following editorial changes (indicated in red on the original text):</p> <p>'Sixth additional provision. <i>Official status as a person with a disability and proof of the degree of disability of 33 per cent by virtue of legally established equivalence.</i></p> <p>1. In accordance with Article 4(2) of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, persons with disabilities shall be deemed to be persons with disabilities who have been recognised as having a degree of disability equal to or greater than 33 %.</p> <p>2. For the purposes of the second paragraph of Article 4 (2) and the second paragraph of Article 35 (1) of the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, the following shall also be considered, by virtue of legally established equivalence, as having a disability equal to 33 per cent:</p> <p>(a) Social security pensioners who have been granted a permanent incapacity pension in the degree of total, absolute or severe invalidity.</p> <p>(b) pensioners of Classes Pasivas who have been granted a retirement or retirement pension because of permanent incapacity for service or invalidity.</p> <p>3. The degree of disability corresponding to the consideration set out in paragraph 1 of this additional provision shall be attested by a decision or certificate issued</p>	Accepted in part. A new wording has been included. It is not considered necessary to reproduce the wording of Article 4 (2) set out in paragraphs 1 and 2 of the proposal. Nor is the paragraph on validity throughout the territory of the State referred to in Articles 9 and 11 of Royal Decree 888/2022.

by the Instituto de Mayores y Servicios Social (IMSERSO) or the competent body of the relevant Autonomous Community. In these cases, Royal Decree 888/2022 of 18 October 2015 laying down the procedure for the recognition, declaration and qualification of the degree of disability shall apply.

4. The degree of disability corresponding to the consideration set out in paragraph 2 of this Additional Provision with regard to situations of legal equivalence shall be attested by the following means:

(a) Resolution of the National Institute of Social Security (INSS) recognising the status of pensioner for permanent incapacity in full, absolute or severe invalidity.

(b) Resolution of the Ministry of Inclusion, Social Security and Migration, or of the Ministry or public body previously vested with these powers, recognising a retirement or retirement pension for permanent incapacity for service or useless.

The decisions referred to in points (a) and (b) above shall expressly state that such pensioners are legally treated as disabled persons with a grade equal to 33 per cent.

In these cases of legal equivalence, under no circumstances will a decision or certificate from the IMSERSO or the competent body of the Autonomous Community concerned be required to prove the degree of disability equal to 33 per cent.

However, these pensioners may apply to the IMSERSO or competent body of the Autonomous Community concerned for recognition of a degree of disability of more than 33 per cent. In these cases, Royal Decree 888/2022 of 18 October 2014 laying down the procedure for the recognition, declaration and qualification of the degree of disability shall

apply.

Where, as a result of the provisions of the previous paragraph, a degree of disability equal to or greater than 33 per cent is not achieved, the relevant decision or certificate shall be limited to declaring this.

(Alternative TO THE ANTERIOR PARAGRAPH) The equalisation for the purposes provided for in the TRLGD shall be maintained in cases where the person included in one of the cases referred to in paragraph 2, having been subject to the assessment of the degree of disability, has not reached 33 per cent.

5. In accordance with Article 4(3) of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, proof of the degree of disability under the terms set out in this Additional Provision shall be valid throughout the national territory.'

Motivation

CERMI welcomes the intention of the Ministry proposing the draft Royal Decree to regulate this matter again, as the current regulatory provisions (Royal Decree 1414/2006 of 1 December) have become non-current and obsolete since 2013, with amendments in 2023, new legal rules on the status of persons with disabilities for official purposes and the situations legally equivalent to them, and therefore this update is absolutely necessary.

Welcoming this aim, the alternative wording of the provision proposed by CERMI seeks only to establish a more systematic and precise regulation, in the interests of legal certainty and predictability of procedures, both for citizens in general, and in particular for persons with disabilities and

			<p>their families, and for the administrations and operators of those administrations (civil servants) who are required to apply them. From experience of the social basis of disability, we know that these matters generate undesirable controversies and disputes in practice in relation to disabled citizens with administrations, which should be avoided by means of more detailed regulations. This is why CERMI is encouraged by these proposals.</p> <p>It is therefore proposed to distinguish two domains in the regulatory framework. The first concerns the differentiated definition of the two officially recognised situations of disability, namely: the first, direct, by application of the official scale, established for that purpose, and the second, that resulting from the legal equalisation of certain pensioners from the social security system and from the system of 'Clases Pasivas'. Once this has been clarified, the issues of accreditation of various situations are transferred to the specific channels and mechanisms of each. This follows more faithfully the scheme of Royal Decree 1414/2006, which would now be repealed, which has functioned in an acceptable manner in its years of validity, but updated in line with the legal changes since 2006, and extended in certain aspects that we consider to bring improvements.</p>	
233	With ELA	TEXT	<p>[...] Proposal to amend the text of the Regulation We propose that the text be amended to explicitly include the Lateral Amyotrophic Sclerosis (ALS) as follows: "Intellectual disability, developmental disability, cerebral paralysis, autism spectrum disorder, brain Article 3, mental health problems, Down syndrome, elderly and other people with difficulties in understanding, learning and interaction with the environment,</p>	Is rejected. People with cognitive difficulties due to health-related causes are already incorporated.

			<p>diseases associated with cognitive deterioration, such as, among others, Lateral Amiotrophic Sclerosis (ALS).’ The explicit inclusion of Lateral Amiotrophic Sclerosis (ALS) in the text of the Regulation will contribute to:</p> <ul style="list-style-type: none"> • Ensure a more inclusive regulatory framework, which makes the specific needs of the people concerned visible. • Promote the design of more accessible environments, tools and services, responding to the particular challenges faced by this group. • Strengthen the regulation’s commitment to the 2030 Agenda, ensuring that no one is left behind, especially people with rare diseases such as ALS, whose complexity and heterogeneity require specific attention. 	
234	Once Foundation	TEXT	<p>PRELIMINARY NOTE: where a proposal includes references to other articles, it will refer to the new wording proposed in this document. Royal decree 1. There is no additional provision indicating a deadline for compliance with the Regulation, as was done with RDL 1/2013. A deadline is currently envisaged in the fifth additional provision limited to transport and infrastructure. PROPOSAL: It is proposed to include an additional provision for all sectors between 1 and 2 years to facilitate compliance.</p>	Accepted in part. It will be worth postponing the entry into force of the regulation.
235	Once Foundation	TEXT	<p>Regulation Article 3 2. Article 3.k. in the definition of easy reading, it is recommended to mention its validity even in versions that update the current one. Proposal (in red, the addition): ‘Documents drawn up in easy reading shall follow the guidelines and recommendations set out in standard UNE 153101: 2018 EX, their most up-to-date version or the analogous version in force’.</p>	Accepted by slightly redrafting.
236	Once Foundation	TEXT	<p>3. Article 3 (m) of the definition of clear language includes a</p>	Accepted in part. The wording is clarified to make it clear

			<p>reference to standard UNE-ISO 24495-1, on which its application 'shall be promoted', as opposed to the easy-to-read UNE 153101 EX standard, which is mandatory for the production of such texts. It is proposed to align the requirements for both standards, i.e. that the wording of Article 3 should replace "The monitoring of the guidelines and recommendations of UNE-ISO 24495-1, in its most up-to-date version, shall be promoted" with a following wording mentioning their mandatory nature, any similar rules arising and the successive parts of the standard that are produced. By indicating 'or the analogous in force', a provision is made as to whether a specific Spanish rule arises.</p> <p>By adding "as well as the successive parts of the standard produced", provision is made for parts 2, 3 and 4 that ISO 24495 will have in the coming years for the legal, scientific and organisational fields respectively.</p> <p>Proposal (in red, the addition): "Clear language: it is the communication that puts the readers first and considers what they want and need to know; the level of interest, their experience and literacy; and the context in which they will use the document.</p> <p>It ensures that readers can find what they need, understand and use it. Clear language documents should follow the guidelines and recommendations identified by UNE-ISO 24495-1, its most up-to-date version or the analogous version in force, as well as the successive parts of the standard that are produced.</p>	<p>that both clear and easy-to-read language can be used as a reference to their technical standards. They will be mandatory for the cases set out in the text.</p>
237	Once Foundation	TEXT	<p>4. Article 3.r. exists standard UNE 170002: 2022 Accessibility requirements for signalling elements in buildings. This standard includes all criteria (including cognitive accessibility) related to signage and a reference should be included in this definition.</p> <p>Proposal (in red, the addition): Accessible signage: signalling system consisting of a set of text elements, pictograms, arrows and routings with the function of informing, identifying, guiding, directing or regulating the</p>	<p>We reject this UNE standard referring only to buildings and built public spaces. It is understood that the catalogue of signalling pictograms referred to in the third additional provision will fulfil this function.</p>

			<p>understanding and use of a space These signalling elements are understandable to all persons, regardless of their skills or disabilities. The signage of buildings and built public spaces shall follow standard UNE 170002: 2022, its most version updated or analogous in force.</p>	
238	Once Foundation	TEXT	<p>5. Article 3. there are ISO 9186 standards (in three parts) for the assessment of pictograms to check their understanding, association with reference and correct display. It should be indicated that the production of pictograms for signs of public spaces should be follow these procedures to ensure that designs are understandable. In addition, in the event that the Pictograms Bank referred to in the fourth additional provision does not have some that needed to be implemented, a guide for stakeholders would be provided in order to avoid the proliferation of incomprehensible designs. It is suggested that ISO 9186 or similar standards in force may be applied in anticipation of the publication of a Spanish standard on which work is ongoing in UNE.</p> <p>Proposal (in red, the addition): Pictograms: visual representation of an actual or abstract comparator, such as an object, space, action or activity. The main uses of pictograms in cognitive accessibility are, among others, signposting of public or public spaces, codes for augmentative and alternative communication or website iconography to facilitate navigability and usability. Pictograms for communication and signalling are in place. Pictograms for communication are an alternative and augmentative system of customisable communication that is adapted to the communication codes and capabilities of each user. Pictograms for signage can be standardised and generally provided following the procedures indicated in the reference</p>	<p>We reject this UNE standard referring only to buildings and built public spaces. It is understood that the catalogue of signalling pictograms referred to in the third additional provision will fulfil this function.</p>

			technical standards. Pictograms applying for the marking of public spaces or spaces for public use shall comply with ISO standard 9186 (Parts 1, 2 and 3) in its most up-to-date or similar version in force for confirm your correct understanding, partnership and visualisation.	
239	Once Foundation	TEXT	6. Article 3.u. mental disorder. To refer to people with mental health problems, the term being used is psychosocial disability. On the other hand, this draft refers to mental disorder 'very broad term that brings together a range of disorders that cause unrest or disability in some areas of operation, whose symptoms and their influence on the lives of each person depend on the interaction of multiple people. factors' PROPOSAL: Indicate psychosocial disability Based on the following references: [...] In many cases, there are inconsistencies and the law should use the term with which associations or organisations work so that there is unanimity in terms of terminology.	Is rejected. Article 4.1 TRLGD does not refer to psychosocial disability. That provision establishes a list of types of disability according to the following shortcomings: physical, mental, intellectual or sensory impairments, so this standard should be consistent with the law.
240	Once Foundation	TEXT	Article 5 7. The wording of Article 5 (2) should be more demanding in order to promote the introduction of clearer written communication. Proposal (new wording): Article 5.2. Public communications or communications of general interest must, by default, be made in clear language. Easy to read shall be mandatory in the areas required by this Royal Decree and, by extension, as a version. complementary to clear language in public communications or communications of general interest.	Is rejected. The current wording is clear and covers more information and communication scenarios than those proposed by leaving a broad wording.
241	Once Foundation	TEXT	Article 7 8. The AA's requirement on websites and mobile phones already exists in the legislation. Some criteria for cognitive	Accepted in part. The enforceability of criteria A and AA is consistent with the Royal Decree for goods and services. However, UNE-EN 301 549 goes beyond UNE 139803,

			<p>web or mobile accessibility are only at AAA level. Therefore, AA does not ensures full cognitive accessibility. Furthermore, standard UNE 139803 is cited, but standard UNE-EN 301549 Accessibility requirements for ICT products and services is not cited. Therefore, this reference should also be included.</p> <p>Proposal (in red, the addition): Article 7.3. Where the services in question are provided via a website or mobile application, compliance with criteria A and AA of standard UNE 139803 and the criteria of standard UNE-EN 301549 must be ensured. To ensure compliance with full cognitive accessibility, web and mobile services should comply with AAA level.</p>	so it will be worth changing the reference.
242	Once Foundation	TEXT	<p>Article 8 9. Article 8 (2) is imprecise and does not make clear the degree of requirement. Even in paragraph h, there is a reference to 'appreciating' (which is redundancy, the assessment is always positive, see the definition in the RAE), a concept that has no legal meaning to the time to enforce any compliance. This Article does not link the content to some of the definitions in Article 3, namely (j) (ii), (o) and (r). This paragraph does not mention an essential concept within cognitive accessibility, which is the concept of use; and it should be mentioned.</p> <p>Proposal (new wording): Article 8.2. Basic cognitive accessibility criteria will be mandatory in town planning memories. The competent public administrations shall regulate the inclusion of cognitive accessibility measures in their urban planning policies. In particular, the minimum requirements are:</p> <p>(a) The design shall provide guidance solutions that are not limited to signalling. In particular, the uses of spaces should be differentiated and clear guidance mechanisms should be established at the decision-making points.</p> <p>(b) Signalling shall take into account the elements and</p>	Is rejected. It is recalled that use is part of Article 4, which deals with principles and therefore applies throughout the legislation.

			<p>technical standards referred to in Article 3 (r) of this Regulation.</p> <p>(c) Signalling pictograms shall take into account the definition and evaluation standard referred to in Article 3 of this Regulation and the catalogue of symbols, signs and pictograms for signs set out in the fourth additional provision of this Royal Decree, as soon as it becomes available: public form.</p> <p>(D) Haptic and tactile resources shall consider cognitive accessibility in the way they present the information. They shall be applied in large spaces and shall be located at entry points or guidance decision points.</p> <p>(e) If the competent public authorities require compliance with standard UNE 170001-1: 2007. Universal accessibility. Part 1: DALCO criteria to facilitate accessibility to the environment, these criteria should consider cognitive accessibility in deambulation, seizure of elements, location and communication in the space where it is applied.</p>	
243	Once Foundation	TEXT	<p>10. Article 8 makes no specific reference to buildings. Specifically, reference should be made to what application of this Regulation may entail in the Technical Building Code, basic document SUA, SUA 9 Accessibility. In particular, it should be make a reference to paragraph 2 of SUA 9 on conditions and characteristics of information and signage for accessibility.</p> <p>Proposal (new paragraph in Article): Article 8.3. The content of section 2, SUA 9 Accessibility of the basic SUA document in the Technical Building Code must be interpreted, in the cognitive accessibility dimension, as detailed in Article 8 (2) (a) to (e) of this Regulation.</p>	Finding accepted. The provisions of Article 41 of Order TMA/851/2021 of 23 July 2003 and the Technical Building Code shall apply.
244	Once Foundation	TEXT	<p>Article 9</p> <p>11. Article 9 does not lay down prescriptions 2 (a) in relation to the contents of guidance, signage and pictograms.</p> <p>Proposal (in red, the addition): Article 9 (2) (a) stations,</p>	Is rejected. This is a basic rule, which must lay down general requirements, so as not to encroach upon the powers of other administrations.

			stops, journeys and vehicles, as well as indications on entries, arrivals, departures and journeys must be user-friendly, intuitive and easy to understand. To this end, the design shall provide guidance solutions that are not limited to signalling. In particular, the uses of spaces should be differentiated and clear guidance mechanisms should be established at the decision-making points. In addition, the definitions, elements and technical standards referred to in Article 3 (r) and (3) of this Regulation shall apply.	
245	Once Foundation	TEXT	Article 10 12. Article 10 does not mention the European Product and Services Accessibility Directive (Law 11/2023 of 8 May). Proposal (in red, the addition): Article 10.1. The provisions of this Article are without prejudice to the obligations laid down in Royal Decree 193/2023 of 21 March regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public; law 11/2023 of 8 May on the transposition of European Union Directives in accessibility of certain products and services; and Royal Decree XX/XXXX of XX of XXXX regulating the accessible labelling of consumer products.	Finding accepted.
246	Once Foundation	TEXT	13. Article 10 (2) (a) introduces the concept of plain language, which does not appear in Article 3 of definitions and adds confusion in the nomenclature. It is proposed to replace it with the terms in Article 3 which are relevant to this case. Proposal (in red, amendment): (a) Transparency and clarity in business information: suppliers of goods and services shall provide the consumer with the information basic according to clear language patterns and, where possible, easy to read and with pictograms and other visual supports.	Finding accepted. It has been included following the assessment of the comments received in the procedure.
247	Once Foundation	TEXT	14. Article 10 (3) should include a more precise limitation, linked to Royal Legislative Decree 1/2007 approving the	Is rejected. The aim of this standard is to lay down basic conditions of accessibility by defining the concepts (easy

recast text of the General Law for the Protecting consumers and users and other complementary laws. In particular, the Royal Legislative Decree indicates the need for information to be clear and understandable on the following issues:

[...] As commercial information is already covered by Article 10 (2) of the draft Regulation, a wording is proposed stating that the instrument for making the information clear and understandable in the above-mentioned articles of Royal Legislative Decree 1/2007 is clear language, with a complementary, easy-to-read version. Such a requirement must be mandatory in the areas which are normally required.

contract by means of accession contracts with terms not individually negotiated: transport, supplies (energy, telecommunications, water), insurance and banking.

Proposal (new wording): Article 10.3. The terms of clear and comprehensible language laid down in Royal Legislative Decree 1/2007 approving the recast text of the General Law for the Protection of Consumers and Users and other complementary laws shall be linked to the application of clear language, in accordance with Article 3 (m) of this Regulation, which shall be mandatory. In particular, the following shall be mandatory in the terms of this Royal Legislative Decree:

- Commercial information (Article 20 (2)).
- Pre-contract information (Article 60 (1)).
- Additional payments (Article 60a (1)).
- Right of withdrawal (Article 69 (1)).
- Requirements for the drafting of non-individually negotiated terms (Article 80 (1)).
- Pre-contractual information on distance contracts (Articles 97.1 and 97a.1).
- Distance and off-premises contracts (Articles 98.1 and 99.1) as well as amendments (Article 126).
- Guarantees (Article 127 (2)).

to read, clear language and plain language) and imposing its obligation in the different areas, without prejudice to the rules laid down in other standards.

			<ul style="list-style-type: none"> • Travel contracts (Title 2, Chapter 1). <p>In addition, the undertakings bound by this provision must have supplementary wording in easy reading, in accordance with Article 3 (1) of this Regulation, for persons with greater reading difficulties.</p> <p>The obligations under this paragraph are essential for transport, supply (energy, telecommunications, water), insurance, banking and real estate companies.</p> <p>In the case of the banking sector, the interpretation of the concepts of plain and intelligible language in the Bank of Spain Circular 5/2012, the Order EHA/2899/2011 of 28 October 2013 on the transparency and protection of clients of banking services, and in any legislation affecting the banking sector in its relationship with customers and containing these terms shall entail the application of clear language, in accordance with Article 3 of this Regulation. In addition, they must have supplementary wording in easy reading, as referred to in Article 3 (k.) of this Regulation, for people with greater reading difficulties.</p>	
248	Once Foundation	TEXT	<p>15. Article 10 (4) (a) does not make any reference to the content of the regulation.</p> <p>Proposal (in red, the addition): (a) The dissemination of information on all services offered in cognitively accessible formats and media described in Article 3 (j) (i) and 3 (j) iii. of this Regulation, both general and targeted, shall be promoted.</p> <p>specifically for people with cognitive difficulties.</p>	Is rejected. The general provisions of the Regulation apply throughout the text.
249	Once Foundation	TEXT	<p>Article 11</p> <p>16. Article 11 (1) refers to Royal Decree 366/2007, in which there are provisions that may be contradictory or doubtful in relation to this regulation. For this reason, it would be necessary to consider an interpretation of the 2007 rule based on this regulation.</p> <p>Proposal (in red, the addition): The provisions of Royal Decree 366/2007 of 16 March 2015 establishing the</p>	Is rejected. In the event of a contradiction, regard must be had to the principle of hierarchy of norms. In this case, they are rules with the same level of hierarchy, so in the event of contradiction the principle of the most favourable rule will prevail. The speciality rule will also prevail, i.e. the special rule prevails over the general rule.

			conditions of accessibility and non-discrimination of persons with disabilities in their relations with the General State Administration shall apply. The interpretation of the requirements relating to cognitive accessibility shall always be linked to the provisions of this Regulation, which shall prevail in the event of a contradiction between the two rules.	
250	Once Foundation	TEXT	17. The indication in Article 11 (2) (a) should be linked to the existing definitions in this Regulation. Proposal (in red, amendment): (a) The documentation shall be presented in clear language, in accordance with Article 3 of this Regulation. In addition, complementary, easy-to-read versions shall be available, as provided for in Article 3.k., both of forms or applications, such as guides to the completion of procedures.	Is rejected. Easy to read is mandatory for forms, applications and procedure completion guides.
251	Once Foundation	TEXT	18. Article 11 (2) (c) has two provisions which should be separate: one on facilitation in communications and one on training. Proposal (new paragraph): (c) Facilitating communication through the use of cognitively accessible communication options. In the digital environment it will be possible to implement with live chat or artificial intelligence guiding the process in a way written, by voice and by visual support. D) Training and capacity building in cognitive accessibility for public administration staff shall be ensured for face-to-face care in procedures that ensure the understanding, communication and interaction of people with cognitive difficulties.	Finding accepted.
252	Once Foundation	TEXT	Article 14 19. Article 14 (2), intermixtures of different types of cultural and heritage spaces. There should be a differentiation of facilities to indicate the requirements related to the content to be provided. Proposal (new wording): Article 14.2. Information and dissemination content addressed to the public in all cultural	Is rejected. The wording reproduces the wording introduced in the Royal Decree, which is guaranteed by the competent Ministry. It is specified that easy-to-read will reach brochures and information panels and care will be taken to ensure that all other information is in easy-to-read format.

			<p>centres and services available to the public, owned and managed by the General State Administration or the Autonomous Communities, as well as by their related or affiliated public bodies, must be drafted in clear language, as referred to in Article 3 (m), with complementary versions in easy reading, as referred to in Article 3 (1). In particular, this obligation must be fulfilled:</p> <ul style="list-style-type: none"> • Museums and showrooms: general information, information on main works displayed. • Heritage areas: general information, information on space and its cultural aspects. • Theatres, auditories, cinemas: information on works, concerts and films. • Libraries and archives: general information, user registration and loan information. <p>Alternative formats, such as augmentative and alternative systems of communication, audio in easy-to-read format, other visual and video formats, or through accessible information and communication technologies.</p>	
253	Once Foundation	TEXT	<p>20. Article 14 (3) should refer to tools referred to in the Article related to the definitions, as proposed for Article 9.</p> <p>Proposal (new wording): Article 14.3. In the spaces referred to in paragraph the requirements set out in Article 8 (2) and (8.3) must be taken into account.</p> <p>Regulation, in particular on security, monitoring and order of visits, organisation of the exhibition, visit or tour. Efforts will be made to provide information in a form advance on environmental conditions and the possibility of personalisation and control of sensory stimuli.</p>	<p>Is rejected. Article 8 regulates the criteria required in town planning reports, so that the same subject matter is not being regulated.</p> <p>All the provisions of the articles are applicable. In addition, in accordance with the Regulatory Technical Guidelines, the proliferation of referrals must be avoided.</p>
254	State Cerebral	TEXT	<p><u>21. Proposal: Article 3. Definitions</u></p>	<p>21.Rejected. The current definition of Daño Cerebral</p>

	Damage		<p>(g) Daño Cerebral acquired: <i>it refers to the set of after-effects following a sudden brain injury to a previously developed brain regardless of the causal origin: stroke, cranioencephalic trauma, tumours, infections, anoxias, etc.</i> The most frequent consequences are motor, sensory and neurocognitive deficits, with a wide variety of manifestations in each person, which may be of only one or more of these types of deficit. <i>Stroke is the leading cause of disability in the developed world and the leading cause of death in women.</i></p> <p><u>22. Proposal: Article 3. Definitions</u></p> <p>Inclusion of the concept of Afasia in the definitions as it is directly related to cognitive accessibility: Disorder of language that makes it difficult to read, write and express what is meant. Sometimes it is also difficult to understand what others are saying. Afasia is not a condition. It is a symptom of harm to parts of the brain that control language. This is the loss of ability to produce or understand language, due to injuries in brain areas specialised in these functions.</p> <p><u>23. Proposal: Article 9. Transports</u></p> <p>Inclusion of the possibility of accompanying person for persons with acquired Daño Cerebral (DAC) who need to do so by accredited forensic report. People with DAC do not have intellectual disabilities, but in many cases have severe cognitive consequences and need to be accompanied by problems of orientation, memory, difficult pulse control, etc.</p> <p><u>24. Proposal: Article 8. Urbanised public spaces, infrastructure and buildings.</u></p>	<p>acquired is considered sufficiently clear.</p> <p>22. The inclusion of the concept of afasia is rejected. No other language alteration is included (only the prevalent causes of cognitive difficulties).</p> <p>23. The inclusion of accompanying person for persons with acquired brain damage is rejected. Personal care is already regulated by Article 11 of Royal Decree 193/2023 of 21 March 2015 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public.</p> <p>24. Not acceptable. The inclusion of resting and escape points should be set out in the corresponding technical code document.</p> <p>25. Is rejected. Preferential care is already regulated by Article 12 of Royal Decree 193/2023 of 21 March 2015 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public.</p>
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			<p>In addition to reserving the most accessible places, the spaces will have resting and escape points for persons with BCDs who, due to their consequences, need it at some point in the activity. One of the most recurrent sequelae in the DAC is fatigue and hyperacusia, which means that they need rest and exit spaces if needed.</p> <p><u>25. Proposal: Article 10. Goods and services available to the public</u></p> <p>In the case of access to health services or other services requiring waiting time, persons with BCD and cognitive problems shall have preferential access, whenever possible.</p>	
255	Driving Equality	TEXT	<p>26. With regard to the Second Additional Provision 'Invitation to tender for public contracts', the following wording is sought:</p> <p><i>'Public administrations which publish calls for tenders for public tenders must comply with the provisions of the legislation in force on public procurement in order to ensure the quality of cognitive accessibility in such a way as to ensure access to and understanding of information and interaction with the physical and digital environment for all, and in particular for those with cognitive difficulties.</i></p> <p><i>These public administrations shall govern their actions in accordance with the remaining legislation on cognitive accessibility, in particular those contained in the International Convention on the Rights of Persons with Disabilities and Royal Legislative Decree 1/2013 of 29 November 2015 approving the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion'.</i></p>	<p>26. Is rejected. It is considered that the express reference to those rules, which are already mentioned in the preamble to the standard and are fully in force, is not appropriate and may therefore be repeated.</p>

It is important to recall that the rules on LGD apply fully to public authorities' actions in the field of tendering, which requires them to incorporate principles of universal accessibility and non-discrimination in all public procurement procedures. The LCSP reinforces this obligation by integrating these principles into the award criteria and the conditions for the performance of public contracts.

In this regard, we enclose Article 7.2 of the LGD:

'2. In order to give effect to this right to equality, public administrations shall promote the necessary measures to ensure that the equal exercise of the rights of persons with disabilities is real and effective in all areas of life.'

As well as Article 49a, which explicitly states that the principle of cognitive accessibility is mandatory;

'Article 29a basic cognitive accessibility conditions.'

1. Basic cognitive accessibility conditions are the systematic, comprehensive and consistent set of requirements, requirements, standards, parameters and guidelines that are considered necessary to ensure understanding, communication and interaction of all people with all environments, products, goods and services, as well as processes and procedures.

2. These basic conditions, which will be the subject of specific legislation, shall be extended to all the areas referred to in Article 5 of this Law, as they are necessary to promote human development and the maximum individual autonomy of all persons.

3. These basic conditions shall be enforceable within the time limits and terms laid down by law.

4. These basic conditions of cognitive accessibility fall within

			<p><i>the framework of universal accessibility, in accordance with Article 2(k) of this Law.'</i></p> <p>Finally, the Convention on the Rights of Persons With disabilities, cognitive accessibility is included in its Article 9. It is recalled that this Convention was transposed into national law and is therefore mandatory.</p>	
256	F.a (National Expert)	TEXT	<p>The document on contributions made by the National Expert on Change Control has been inserted with the assessments made by this management body.</p>	<p>Accepted in part. Due to the format in which these comments have been submitted (checking changes to a document containing the text), it is not possible to provide an individual response to each proposal. Therefore, the comments are generally answered and grouped together. Editorial changes are made, accepting several of the contributions.</p> <p>The text is in line with the regulatory technical guidelines. It is recalled that cognitive accessibility also reaches people who have difficulties in understanding, communicating and interacting due to socio-economic reasons (e.g. migrants). However, under the rules on infringements and penalties, only those with legitimacy can lodge a corresponding complaint in the event of non-compliance.</p> <p>Validation of accessibility in public contracts could be considered an evaluation criterion in the award, and as such does not need to be mentioned in the text.</p> <p>It is recalled that representative organisations of people with cognitive difficulties have been actively involved in the drafting of the text.</p> <p>It is recalled that the areas to which this regulatory development extends are those listed in Article 5 of the LGD, in accordance with its Article 29a.2 (2). These basic conditions, which will be the subject of specific legislation, shall be extended to all the areas referred to in Article 5 of this Law, as they are necessary to promote human</p>

				development and the maximum individual autonomy of all persons). The details referred to in the proposals are rejected because they have a scope that goes beyond the basic legislation, the constitutional competence conferred on the State.
257	Confederation of Mental Health Spain		<p>28: With regard to the Sixth Additional Provision: 'Accreditation'</p> <p>We propose to modify what we highlight in red:</p> <p>'The degree of disability equal to or greater than 33 per cent may be attested by a decision or certificate issued by the IMSERSO or the competent body of the Autonomous Community concerned. In these cases, Royal Decree 888/2022 of 18 October 2015 laying down the procedure for the recognition, declaration and qualification of the degree of disability shall apply. In other cases, accreditation shall be carried out on the basis of a medical, psychological or social report.'</p> <p><u>Justification:</u></p> <p>Eliminating the direct link between the beneficiary as accredited and obtaining a percentage in the disability certificate. For people with mental health problems, this purely administrative recognition can be counterproductive and often difficult to obtain due to the barriers they encounter in accessing this type of recognition of their mental health problems. In addition, mental health problems evolve and need to be seen beyond a purely medical perspective, hence the importance of decoupling it and regulating the addressing of these situations from a human rights perspective, i.e. on a case-by-case basis in line with the social model of disability.</p>	<p>28. partially accepted. Proof of recognition of the degree of disability equal to or greater than 33 per cent shall be attested by a decision of the IMSERSO or the competent body of the Autonomous Community.</p> <p>29. Rejected. The definition section is not an exhaustive glossary of terms, but is aimed at clarifying the meaning of those concepts that are necessary for the proper understanding of a rule addressed to the general public. The specific concept of 'psychosocial disability' is not in line with the terminology used by the TRLGP.</p> <p>30. Accepted.</p> <p>31. Rejected for the reasons set out in paragraph 1.</p> <p>32. Is rejected. Special reference to persons with intellectual disabilities following the recent implementation of specific selection processes in the field of public employment is considered relevant.</p> <p>33. Rejected for the reasons set out in paragraph 1.</p>

29: With regard to Article 3 ‘Definitions’

It is proposed to incorporate what is highlighted in red.

- Point (J), category ii, concerning the following:

‘Guidance resources: it refers to tools such as signage pictograms and guidance processes using information from the environment, **emphasising the adaptation required by some environments, such as socio-health, to ensure cognitive accessibility, focusing on reducing sensory stimuli such as sirens and lights, among others, and on the provision of visual supports in the absence of access to plain language”.**

- Point (J), add a category iv, referring to the following:

“Training related to cognitive accessibility to people working in socio-health, educational, law enforcement or similar resources”.

Justification:

The low or no awareness of the barriers affecting people with mental health problems, coupled with a lack of awareness of the need to overthrow them, leads to a wide range of rights violations that mainly affect this population group.

- Point (q) on mental health: “Mental health: a welfare state in which an individual is aware of his or her own abilities, can face the normal lives of life, can work productively and fruitfully and is able to make a contribution to society. **This definition emphasises not only the absence of a health**

problem, but also the presence of positive psychological attributes and functioning. Stresses the importance of resilience, coping skills, productivity and social commitment to maintain mental health”.

— **Add a new letter containing the following definition:**

“Human rights approach to mental health: Maintaining a human rights-based approach to mental health implies the adoption of legal and policy frameworks that contribute to promoting mental health, as well as the implementation of practices, which are compatible with States’ obligations under international human rights law’.

— Amend the definition in subsection (u) related to **mental disorder**. We suggest the following definition:

“Mental health problem: It is a very broad term that encompasses various health problems, which may affect an individual’s thoughts, feelings, behaviour or mood and which cause psychological unrest and impact on the daily activities of those who suffer it.”

— Include in this Article 3 the following definitions:

● **“Mutual Support Agent:** It is a person who helps others in their process of recovery, growth and personal development, through having transited through the same experiences.”

● **‘Emotional Intelligence:** It is a protective variable formed by the set of intra- and interpersonal skills that enable the individual to know and understand their own and outside emotions, facilitating problem-solving, recognition of strengths and weaknesses and stress management in difficult and critical situations.”

• **“psychosocial disability:** it includes people who have received a mental health-related diagnosis or who self-identify with this term. The use of the word “disability” is important in this context because it highlights the important attitudinal and environmental barriers that hinder the full and effective participation in society of people with mental health problems and the fact that they are protected by the Convention on the Rights of Persons with Disabilities”.

30: In relation to Article 4 ‘Principles’

- In paragraph 2 (a) on ‘Principles of use derived from universal design’, specifically in paragraph i, concerning ‘Fairuse’, the following wording is proposed: “useful for people with different abilities by providing the same or equivalent means of use for all, ensuring that it is attractive for all and without compromising non-discrimination and security, as well as without stigmatising”.

31: As regards Article 9: “Transport”

Letter (C): ‘The access and travel of the accompanying or supporting person, where a disability percentage of 33 % or more or a ~~medical, psychological or social report showing the need for this measure, and a disability is proven by means of the certificate referred to in paragraph 1 of the first additional provision of Royal Decree 888/2022 of 18 October establishing the procedure for the recognition, declaration and qualification of the degree of disability, shall be free of charge~~’.

Justification:

As stated above, from a human rights approach, it is essential to decouple the benefit of this support with obtaining a disability certificate and, even more so, to confine it to a specific disability. People with mental health problems have difficulties in guiding, deambulating and using public transport on many occasions due to the pharmacological effects of their treatments, making the figure of a mutually supportive person essential in the performance of these daily activities. We therefore propose universal free travel so that these support or accompanying persons can use transport free of charge, without people affected by a mental health problem having to have a certain degree of disability recognised, since in many cases these difficulties of deambulation and orientation are overlooked in the assessments, but are known to those who regularly treat them and can therefore be attested by the corresponding report.

32: In relation to Article 11 'Relations with public administrations, including access to public benefits and their administrative decisions'.

In paragraph 5 concerning calls for public employment, the following amendment is proposed:

'Information relating to open and internal promotion notices for public employment and, in particular, those involving places reserved for persons with **intellectual** disabilities, shall be communicated in an easy-to-read version. Where requested, the tests, practices and examinations shall also have a cognitively accessible version.'

Justification:

It is important that this possibility, which we consider very positive, is not limited to a single typology of persons with

disabilities in particular, but is open to all persons with disabilities who need it. It is essential to ensure access to public employment for persons with disabilities from the start of the process, such as, in this case, information on calls, by means of adjustments that are necessary regardless of the type of disability, in line with the principle of equity referred to in Article 4 of this Royal Decree.

The system needs to be adapted to the individual and not to the system by providing the necessary material resources and means.

33: In relation to Article 15 “Employment”

In paragraph 1, we propose the following:

‘The obligations laid down in this Article shall apply where workers demonstrate a disability percentage of 33 % or more ~~and a cognitive disability~~ by means of the certificate referred to in paragraph 1 of the first additional provision of Royal Decree 888/2022 of 18 October or a need for **cognitive support attested by a medical, psychological or social report**’.

Justification:

The application of this Article is again linked to the accreditation of a disability percentage of 33 % or more. We therefore again propose that this not be the case, since every person with disabilities is unique and has specific circumstances that must be considered individually when providing support. Any exclusion in this respect will run counter to a human rights approach and can only contribute to increasing discrimination.

258	Confederation Asperger Spain	TEXT	<p>34. With regard to CHAPTER I. Article 3. Definitions:</p> <p>[...]</p> <p>This is why, given the specificity of Asperger Syndrome that differentiates with other autistic spectrum disorders, we call for our diagnostic category to be included in the proposed articles.</p>	<p>34. Is rejected. The generic use of persons with cognitive difficulties was agreed in the previous procedure. It is understood that there is no need to sign it – with the resulting risk of omitting groups or of having this list as the only one.</p>
259	Down Spain	TEXT	<p>35. Amendment of the wording of the fifth additional provision, with the following additions:</p> <p><i>Fifth additional provision Adaptation of infrastructure and means of transport.</i></p> <p>Within two years of the entry into force of this Royal Decree, the Ministry with responsibility for transport shall draw up a report on the universal cognitive accessibility of airport and railway facilities, paying particular attention to facilities in terms of physical, signalling, clear communication and easy reading and guidance, as well as other available support. The report shall include concrete recommendations for improvement and a proposal for unification of technical specifications for vehicles and installations.</p> <p>36. Amendment of the wording of Article 3. <i>Definitions</i>, with the following additions:</p> <p>(new f) (f) Clear communication: communication that</p>	<p>35.Rejected. Physical terms are considered to be included within the built environment.</p> <p>36. Is rejected. The inclusion of the definition of ‘clear communication’ is rejected as it is covered by the definition in clear language. The assimilation between clear and plain language is rejected, since, although similar, they are different concepts. Clear language is linked to UNE-ISO 24495-1, while plain language is not associated with any technical standard.</p> <p>37.Accepted.</p> <p>38.Rejected. Cognitive accessibility is covered through easy reading, which is also subject to higher standards than clear language.</p> <p>39.Rejected. Cognitive accessibility is covered through easy reading, which is also subject to higher standards than clear language.</p>

conveys easily, directly, transparently, simple and effective information relevant to citizens. It is adapted to the different current channels (paper, mobile, computers and other devices) and their specificities.

(m) Clear language or plain language: it is the communication that puts the readers first and considers what they want and need to know; the level of interest, their experience and literacy; and the context in which they will use the document. It ensures that readers can find what they need, understand and use it. The monitoring of the guidelines and recommendations of UNE-ISO 24495-1, in its most up-to-date version, will be promoted.

There are numerous references in the text establishing a primacy of language (or easy reading) over clear language (or clear communication). To prioritise cognitive UNIVERSAL accessibility, it is more logical to prioritise clear language rather than specific adaptations that would be complementary support if clear language is not sufficient (easy reading, pictograms, etc.) whenever possible. We therefore propose that the following changes be made to the text in a readily readable form:

37. Amendment of the wording of Article 7. *Telecommunications and the Information Society*, with the following additions:
5. The use of other cognitive accessibility elements, such as clear language, easy reading, the use of accessible explanatory videos or the use of identification images or key pictograms for common aspects such as profile, help, economic data, invoices, payment gateway, forms of contact or complaints, among others, shall be promoted.

38. Amendment of the wording of Article 10. *Goods and services available to the public*, with the following additions:

40. Partially accepted, slightly redrafting.
41. Rejected. Cognitive accessibility is covered through easy reading, which is also subject to higher standards than clear language.
42. This paragraph has been deleted from the project.
43. This paragraph has been deleted from the project.
44. Is rejected. Cognitive accessibility is covered through easy reading, which is also subject to higher standards than clear language.
45. Is rejected. Cognitive accessibility is covered through easy reading, which is also subject to higher standards than clear language. In addition, care shall be taken to ensure that all information is available in plain language.
46. Is rejected. Cognitive accessibility is covered through easy reading, which is also subject to higher standards than clear language.

2 (b) ensuring that a complaint sheet is available in easy-to-read format or in clear language.

39. Amendment of the wording of Article 11. *Relations with public administrations, including access to public benefits and their administrative decisions*, with the following additions:

2 (a) the documentation shall be presented in a clear and simple manner. This will involve the availability, in clear language or easy to read, of both forms or requests, as well as guides to the completion of procedures.

40. Amendment of the wording of Article 11. *Relations with public administrations, including access to public benefits and their administrative decisions*, with the following additions:

2 (a) all oral or written communications with persons with cognitive difficulties shall be made in plain and cognitively accessible language, taking into account their personal characteristics and needs, using means such as clear or easy-to-read language, communication pictograms or other alternative and augmentative communication systems.

41. Amendment of the wording of Article 11. *Relations with public administrations, including access to public benefits and their administrative decisions*, with the following additions:

5.) information relating to open and internal promotion notices for public employment and, in particular, those including places reserved for persons with intellectual disabilities, shall be communicated in a clear or easy-to-read language version.

42. Amendment of Article 12. *Administration of justice*, with the following additions:

5.c.i.) all communications, whether oral or written, addressed to persons with cognitive difficulties who have requested it shall be made in plain and accessible language, in a way that takes into account their personal characteristics and needs, using means such as clear language, easy reading, both forms or requests, and guides to the completion of procedures.

43. Amendment of the wording of Article 12. *Administration of justice*, with the following additions:

9.) in legal aid applications and when requested by a person with cognitive difficulties, all information on this application process shall be provided in plain language or easy-to-read format.

44. Amendments to the wording of Article 13. *Participation in public life and electoral processes*. With the following additions:

3a) clear language or easy reading shall be used...
3.c.) accessible voting materials shall be used using clear or easy-to-read language parameters...
4.) in relation to standard-setting procedures, prior public consultation, as well as hearing and public information procedures, shall publish their documentation in plain language and in an alternative format to written submissions, such as audio, visual support and the use of accessible information and communication technologies. The publication of such documents in plain or easy-to-read language shall be promoted wherever possible.

45. Amendment of the wording of Article 14. *Cultural*

heritage and historical heritage. With the following additions:

2.) leaflets and information panels of museums, libraries, archives, auditories, theatres, projection rooms of the Spanish Filmoteca, exhibition rooms and in general all cultural centres and services available to the public and owned and managed by the General State Administration or the Autonomous Communities, as well as by their related or affiliated public bodies, shall be available in plain language formats or in easy reading. They shall also be available in an alternative format to written as audio from the easy-to-read format, such as visual supports or accessible information and communication technologies.

46. Amendment of the wording of Article 15. *Employment*, with the following deletion and modifications:

2.) within the framework of occupational safety and hygiene conditions, documentation used during training in the prevention of occupational risks, as well as documentation containing action guidelines and protocols for emergencies, shall be drawn up in clear language and shall have an easy-to-read version, incorporating, where possible, visual supports.

3.) training promoted by undertakings for their workers, whenever requested, and irrespective of funding, shall be carried out respecting cognitive accessibility recommendations, providing clear or easy-to-read documentation and alternative formats to written, such as audio of the easy-to-read format, visual support or accessible information and communication technologies.

9.) private and public contracting entities shall promote the development of plain language or easy-to-read guides and manuals, as well as a person assigned to provide support to the worker during their period of employment and adaptation to the job, and may rely on the collaboration of

			social organisations.	
260	State Confederation of Sorbian People (CNSE)	TEXT	<p>[...]</p> <p>47. Subject matter of the Regulation (Article 1): Incorporate the reference to language deprivation as one of the situations that create difficulties in understanding, communicating and interacting. It now reads as follows:</p> <p>'Article 1. Object</p> <p>The purpose of this regulation is to establish and regulate cognitive accessibility and its requirements and implementation, in order to contribute to the exercise of the rights and duties of citizens, and to ensure equal opportunities and non-discrimination, for all persons and, in particular, persons with difficulties in understanding, communicating and interacting as a result of intellectual, mental, brain damage, cerebral paralysis, autism spectrum disorder, cognitive impairment, language deprivation or socio-economic situations such as immigration or illiteracy.'</p> <p>48. Definitions (Article 3):</p> <ul style="list-style-type: none"> o Broaden the definition of “cognitive difficulties” to include barriers related to language deprivation. o Add a specific indent to define “Language privacy”. <p>It now reads as follows:</p> <p>Article 3. Definitions (g) cognitive difficulties: barriers encountered by a person in understanding and relationships with the environment resulting from deficiencies, health situations, language</p>	<p>47. Is rejected. The generic use of persons with cognitive difficulties was agreed in the previous procedure. It is understood that it is not necessary to list the various factors giving rise to such cognitive difficulties – with the consequent risk of omitting causes or of having that list as the only one.</p> <p>48. Is rejected. It is understood that it is not necessary to list the various factors giving rise to such cognitive difficulties – with the consequent risk of omitting causes or of having that list as the only one. Communication mediation is already defined in Article 4 (e) of Royal Decree 674/2023.</p> <p>49. The inclusion of sign language is rejected, since this Royal Decree aims to regulate cognitive accessibility, which, in accordance with Article 2 (k) of the TRLGD, is deployed and made effective through easy reading, alternative and augmentative communication systems, pictograms and other human and technological means available for that purpose.</p> <p>50. Rejected. Personal care is already regulated in Article 11 of Royal Decree 193/2023 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public. In addition, the proposal is already it falls within the scope of this legislation but of Royal Decree 674/2023 of 18 July 2007.</p>

deprivation, age or socio-economic causes, such as poverty or illiteracy or contextual factors such as immigration.

Add a point “x”) in Article 3 with the definition of language deprivation:

(X) Language privacy: syndrome that denotes the negative psychosocial consequences of an individual’s lack of communication because he or she has not been exposed to the natural development of a first language (or L-1) before the end of the critical period, with implications for cognitive development and literacy skills.

- o Incorporate the definition of ‘Communication Mediation’ according to Regulation 674/2013:

(XX) "Communication Mediation: It is the set of interventions for deaf, deaf and hearing impaired people who are users of Spanish sign language or have communication, language and speech difficulties to enable the development of a communication system and communication strategies, as well as communication interaction with their environment and their promotion and social participation.'

49. Incorporation of the sign language in the following articles:

- o Article 3 (j) (I): Add sign language as an example within alternative and augmentative communication systems. It reads as follows:

o

'1. Information and communication accessibility resources: refers to tools such as clear language, easy reading, **sign**

language and media and augmentative and alternative communication systems, to facilitate reading understanding and communicative interaction by providing cognitively accessible alternatives to communication and oral and written information.”

- o Article 10 (4) (e) and (f): Include sign language as an essential means of ensuring cognitive accessibility in health goods and services. It reads as follows:
 - o “(e) Health institutions and veterinary centres shall enable the use of augmentative and alternative systems, **sign language**, and cognitively accessible means of communication to ensure that people can make full and appropriate use of the facilities, goods and services to their needs.
 - f) Within the health and veterinary emergency services, the person shall be able to interact with his or her usual means of augmentative and alternative communication, **in sign language**, in addition to having cognitively accessible means of supporting communication so that the person can communicate and identify his or her problem or need.’
- o Article 11 (2) (c) and (11.4) (a): Mention sign language as a communication vehicle in relations with public administrations. Write it as follows:

“(c) Facilitating communication through the use of cognitively accessible communication options. In the digital environment, it will be possible to implement with live chat or artificial intelligence guiding the process in written, voice, visual **and sign language support**. Training and capacity building in cognitive accessibility for staff in public administrations shall be ensured for face-to-face care in procedures that ensure the understanding, communication and interaction of people with cognitive difficulties.”

‘(a) All oral or written communications with persons with cognitive difficulties shall be made in plain and cognitively accessible language, taking into account their personal characteristics and needs, using means such as easy reading, **sign language**, communication pictograms or other alternative and augmentative communication systems where necessary.’

- o Article 12 (5) (c) (i): Consider sign language as part of the necessary adjustments to ensure cognitive accessibility in the administration of justice. It reads as follows:
 - ‘1. All communications, whether oral or written, addressed to persons with cognitive difficulties who have requested it shall be made in plain and accessible language, in a way that takes into account their personal characteristics and needs, using means such as easy reading, **sign language**,

communication pictograms or other alternative and augmentary communication systems where necessary.

- o Article 13 (3) (a) and (13.4): Include sign language in cognitive accessibility measures for electoral processes.
- o Article 15 (2) and (15.3): Incorporate sign language as part of measures to ensure accessibility in the working environment.

50. Accompanying right:

- o Ensure that all persons with disabilities can access goods and services accompanied by a person of their choice, without excluding the presence of a support professional, such as a sign language interpreter or a facilitator.

For example, people who are sometimes deaf cannot access health services with both, affecting their right to emotional and communicative support. This is particularly important to avoid situations where the right of deaf people to receive emotional support is unnecessarily limited.

JUSTIFICATION

We consider that the specific needs of the deaf people in the area of cognitive accessibility and of the beneficiaries of the standard should be incorporated in this way.

In many cases, the presence of sign language interpreters tends to be considered sufficient to ensure accessibility to information and communication. However, this may leave aside the cognitive difficulties faced by deaf people in certain contexts, especially those resulting from language

deprivation and its possible limitations in literacy.

In this regard, it is essential to highlight the role played by **communicative mediation**, as set out in the **Regulation on the conditions of use of Spanish sign language and the means of support for oral communication for deaf, hearing impaired and deaf-blind people** in the definitions in Article 4 thereof.

(e) Communication Mediation: it is the set of interventions for deaf, deaf and hearing impaired people who are users of Spanish sign language or have communication, language and speech difficulties to enable the development of a communication system and communication strategies, as well as communicative interaction with their environment and their promotion and social participation. It is carried out by professionals in communicative mediation and includes programmes to promote deaf and deaf people using Spanish sign language and the means of supporting oral communication, and to raise social awareness, respecting the idiosyncratic nature of users.

On the other hand, when referring to persons benefiting from cognitive accessibility, persons with intellectual disabilities, cognitive impairment or those who do not master the language are often mentioned. Deaf people are rarely mentioned, which reinforces the idea that they can end up excluding other realities with difficulties in understanding, learning and interaction with the environment, such as deaf, hearing impaired and deafblind people.

We therefore hope that these contributions will be taken into account, which comply with the principle **of diversity of cognitive accessibility needs** contained in Article 4 of this Regulation and which should cover the measures

			implemented.	
261	F.T.M (National Expert)	TEXT	<p>51:</p> <p>The deaf group can also be considered a special beneficiary of cognitive accessibility measures. It is proposed that Article 1 should read as follows:</p> <p><i>'The purpose of this regulation is to establish and regulate cognitive accessibility and its requirements and implementation, in order to contribute to the exercise of the rights and duties of citizens, and to ensure equal opportunities and non-discrimination, for all persons and, in particular, for those with difficulties in understanding, communicating and interacting as a result of intellectual, mental, brain damage, cerebral paralysis, disorder of the autism spectrum, cognitive impairment, deafblindness or socio-economic situations such as immigration or illiteracy.'</i></p> <p>Justification:</p> <p>At the collective level, Sordoblind people face unique barriers that combine sensory limitations and sometimes cognitive difficulties arising from barriers in accessing information and communicating with the environment. These barriers not only affect their understanding and interaction with the environment, but severely limit their ability to access essential services, exercise fundamental rights and participate fully in social and community life. Cognitive accessibility, as a tool to ensure everyone's understanding, communication and interaction, is indispensable to fill these gaps and foster their autonomy.</p>	<p>51. Is rejected. The generic use of persons with cognitive difficulties was agreed in the previous procedure. It is understood that it is not necessary to list the various factors giving rise to such cognitive difficulties – with the consequent risk of omitting causes or of having that list as the only one.</p> <p>52. partially accepted. Tactile resources are defined in Article 8 (2) (h) of the project.</p> <p>53. Is rejected. It is understood that it is not necessary to list the various factors giving rise to such cognitive difficulties – with the consequent risk of omitting causes or of having that list as the only one.</p> <p>54. Rejected. It was pointed out that signalling elements should be perceivable and understandable to everyone, including deafblind persons.</p> <p>55. Rejected. Perceptible information is defined as the design that facilitates sensory access, including the sense of touch.</p> <p>56. Is rejected. The generic use of persons with cognitive difficulties was agreed in the previous procedure.</p> <p>57. Accepted.</p> <p>58. Rejected as the paragraph has been simplified and deleted</p> <p>59.</p>

In this regard, the explicit inclusion of deaf people as beneficiaries of this legislation responds to several key aspects, such as:

Compliance with the **International Convention on the Rights of Persons with Disabilities specifically with Article 9** which requires that measures be taken to ensure that persons with disabilities have equal access to physical environments, transportation, information and communication. Not having the group specifically limits the access of the group in all these aspects.

As many deaf people depend on touch as the main sensory channel, it is essential that cognitive accessibility includes elements such as braille texts, haptic supports and inclusive design. **Multi-sensory and individualised adaptations should be taken into account.** These measures should be complemented, in non-accessible environments, by the presence of an interpreter professional who facilitates adaptation and acts as reasonable accommodation, thereby ensuring equal understanding and access.

Recognising deaf persons in Article **1 ensures that cognitive accessibility measures are not limited to typical beneficiaries (such as persons with intellectual disabilities or cognitive impairment), but also address the intersection of sensory and cognitive barriers, broadening their inclusive reach.** In addition, it is important for reasonable accommodation to include specialised human services such as interpreters, which are **uniqueto ensure the accessibility of this group in many**

— In relation to point 1, it is rejected. The purpose of this Royal Decree is to regulate cognitive accessibility, which, in accordance with Article 2 (k) of the TRLGD, is deployed and made effective through easy reading, alternative and augmentative communication systems, pictograms and other human and technological means available for that purpose.

— In relation to point 2, it is rejected. Personal care is already regulated in Article 11 of Royal Decree 193/2023 regulating the basic conditions of accessibility and non-discrimination of persons with disabilities for access to and use of goods and services available to the public.

— In relation to points 3 and 4, it is partially accepted. It was pointed out that signalling elements should be perceivable and understandable to everyone, including deafblind persons. However, these questions of a more technical nature can be taken into account in the catalogue of pictograms for signs, provided for in the first additional provision. It has also been incorporated into Article 8.

In relation to point 5, it is rejected. The generic use of persons with cognitive difficulties was agreed in the previous procedure. It is understood that it is not necessary to list the various factors giving rise to such cognitive difficulties – with the consequent risk of omitting causes or of having that list as the only one.

contexts.

We therefore reiterate the importance of this extension to explicitly mention deaf people as the target group of the measures, aligning the legislation with principles of universal accessibility, design for all and reasonable accommodation including specialised material or human resources.

52:

In Article 3, it would be appropriate to include tactile supports for Sordoblind people, as many of them cannot benefit from visual supports and need the meaning of the touch to access information. It is proposed to include:

*“(c) **Tactile aids:** any element perceived through the sense of touch, such as textures, reliefs, three-dimensional objects or other tactile stimuli, which support understanding, communication and interaction.”*

Justification:

The sense of touch is, in many cases, the main channel of access to information for deaf blind people, making it essential to incorporate **tactile supports** into this legislation. These elements, such as textures, reliefs and three-dimensional objects, enable them to understand and relate to their environment more autonomously, especially when visual or hearing solutions are ineffective.

However, as long as the necessary tactile accessibility measures are not effectively and widely implemented, it is essential to ensure the presence of professional **interpreter guides** as an indispensable reasonable accommodation. His intervention makes it possible to fill the current gaps in accessibility, acting as facilitators in understanding environments and services that are not yet fully accessible to deaf people. This support is particularly crucial in complex situations such as emergencies, public transport or administrative and health environments.

The inclusion of tactile supports in Article 3 should be accompanied by the recognition of the transitional need for such professionals, ensuring that tactile accessibility is not seen as an isolated solution, but as part of a comprehensive approach that includes material or human resources.

53:

In Article 3 (g), include communicative causes as one of the cognitive difficulties:

*“(g) cognitive difficulties: barriers encountered by a person in understanding and relations with the environment arising from deficiencies, **incommunication**, health, age or socio-economic causes, such as poverty or illiteracy or contextual factors such as immigration.”*

Justification:

Incommunication is a significant barrier that directly affects

an individual's functional cognitive abilities, limiting an individual's interaction, understanding and participation in society. For deaf people, this barrier becomes particularly critical due to the combination of sensory and communicative difficulties. These limitations are not always associated with cognitive impairments per se, but arise from isolation and lack of appropriate adaptations in their environment.

Recognising **communicative causes** as a factor of cognitive difficulty in Article 3 makes this issue visible and moving towards inclusive solutions. However, as long as accessible environments with tactile support and alternative communication systems are not implemented, it is crucial to have the presence of interpreter **guides that** can facilitate interaction and understanding in unadapted contexts. These professionals not only act as reasonable accommodation, but are also essential to ensure autonomy and fairness in access to information and services.

Therefore, the proposal to include "incommunication situations" in the definition of cognitive difficulties reinforces the need for specific measures for this group, ensuring that their communication barriers are treated with the same priority as those resulting from physical or intellectual disabilities.

54:

In Article 3 (r), we would like to point out that these signalling elements are not understandable to all persons. For deaf-blind people, it is essential that they are adapted to the touch so that they are accessible to them.

“(R) Accessible marking: signalling system consisting of a set of text elements, pictograms, arrows and routings with the function of informing, identifying, guiding, directing or regulating the understanding and use of a space. These signage elements are understandable to everyone, regardless of their skills or disabilities.’

Justification:

The definition of accessible signage should ensure that guidance and information systems are **truly understandable to everyone, regardless of their sensory or cognitive skills**. However, for the Sordoblind group, accessible signage necessarily requires tactile adaptations, since visual or sound elements alone cannot be perceived or interpreted by this group.

Incorporating tactile resources in signalling, such as differentiated textures, reliefs and haptic systems, not only promotes universal design, but also ensures that deafblind people can access information autonomously and securely. This is particularly important in critical environments such as public buildings, hospitals, transport stations and emergency sites. Order **TMA/851/2021**, which regulates the basic conditions of accessibility in urbanised public spaces, already lays down minimum criteria for accessible signage, but does not specifically address the inclusion of tactile resources. This new regulation therefore represents a key opportunity to fill this gap and broaden the scope of accessibility.

55:

In Article 4 (2) (a) (iv), it is proposed to include textures as a form of sensory accessibility:

*‘IV. Perceptible information: design facilitates sensory access regardless of people’s abilities, presenting information in different formats and **textures**, optimising contrast, readability, differentiation between fundamentals and secondary and in a manner compatible with assistive products.’*

Justification:

Although Order TMA/851/2021 lays down criteria for accessible signage in urban environments, this legislation offers the **opportunity to extend these measures to include textures** as a specific sensory resource. This is particularly relevant in contexts where guidance and rapid information are key, such as in public transport, administrative buildings and emergency situations.

56:

Article 4 (2) (g) requests that the Sordoblind **group be taken into account as a group with cognitive** difficulties, which also requires specific accessibility adaptations.

“(g) Validation: the measures contained herein shall be subject to the processes of participation, verification and monitoring of their implementation and operation by the

group of persons with cognitive difficulties.'

Justification:

The process of validating **cognitive accessibility measures** should be inclusive and **representative of the different needs of the beneficiary groups**. In the case of Sordocid people, their participation is particularly relevant due to the sensory and communicative barriers they face, which may go unnoticed if their specific perspectives are not considered during the design and implementation of these measures.

Recognising it as a group with cognitive difficulties requiring specific adaptations ensures that its needs are addressed in a holistic approach. In addition, their active participation in validation processes ensures that the solutions implemented are effective and in line with the reality of their experiences.

57:

In Article 5 (a), we **call for tactile** accessibility for the deaf community:

*“(a) The content of which is easy to understand, provided in written visual format, pictographic visual format, sound format, by means of visual supports, **tactile** or accessible information and communication technologies. In the context of information relating to the safety and protection of the physical integrity and health of persons and in situations considered to be emergency, such information shall be*

easily and rapidly perceptible and identifiable by all persons irrespective of their cognitive abilities.'

Justification:

We insist that to **create tactile support** within accessibility options, such as relieves, braille or textured surfaces, ensures that critical information, especially in emergency or health protection situations, is identifiable and understandable to all people, regardless of their sensory abilities.

58:

In Article 8 (f), it is requested **that standardised tactile indications should also be included in the positioning and design.**

***“f) Location and design:** Frames or orlas shall not be used in the signalling pictograms and shall be designed in positive or negative terms, clearly identifying correct and wrong behaviour. The pictogram shall be located on the left of written text characters and horizontally aligned. In addition, contrasting colours between background and pictogram and between text and background shall be followed, and **standardised tactile indications** such as deformations, textures and braille shall be added to ensure accessibility for persons with combined sensory disabilities.'*

59:

Cognitive accessibility should ensure a holistic approach that takes into account both general and specific barriers for

groups with complex needs, such as those of deaf blind people. Please find below our general contributions to the legislative text, with the aim of making it more inclusive:

1. **The person with a disability does not have to choose one accessibility option:**

This means that it can benefit from cognitive accessibility and, at the same time, from specific adaptations for other groups, such as adapted sign language, tactile communication systems or other complementary tools.

2. **In the case of deaf persons requiring cognitive accessibility, communication professionals shall accompany those persons:**

Interpreter guides should be recognised as essential reasonable accommodation in non-accessible environments, ensuring the understanding, interaction and autonomy of this group while developing and implementing the necessary measures.

3. **Pictograms have the possibility to be tactile and identifiable for other disabilities such as deafblind persons:**

This means unifying criteria in terms of colour, shape and touch, so that they can be perceived and understood by all groups, including those with combined sensory disabilities.

4. **The catalogue of symbols, signs and pictograms is adapted to as many groups of persons with disabilities as possible:**

This catalogue should consider multi-sensory solutions that include visual, tactile and haptic elements, ensuring the

			<p>universality of their understanding.</p> <p>5. Recognition of the heterogeneity of the population of deaf people:</p> <p>This group is not homogeneous as its needs vary according to the degree of visual and hearing loss, as well as the communication system they use (tactile sign language, braille, etc.). It is imperative that accessibility measures do not fragment the group into categories such as 'signers' and 'non-signatory' among others that may arise. Instead, they should be addressed comprehensively, ensuring that each person receives the necessary adaptations according to their individual characteristics.</p>	
262	Autonomous COMMUNITY ISLAS BALEARES (Territorial Council for Social and Social Services) SAAD)	TEXT	<p>[...]</p> <p>1. General comments on Approach, Scope and Clarity:</p> <ul style="list-style-type: none"> • Need for greater efficiency: The legislation is perceived to be it sets out important concepts (easy to read, clear/plain language), tends to the generality and lack of clear technical specifications and guidelines to facilitate its practical implementation and verification in particular when dealing with public spaces buildings or buildings. • Reach beyond cognitive: It is noted positively that the legislation it addresses aspects that benefit a wider spectrum of disability; approaching universal accessibility (e.g. Article 8.3.j on assistants personal). This reinforces cognitive accessibility as part of the 	<p>Accepted in part.</p> <p>The standard is considered to be sufficiently guaranteed, since it is a basic state standard.</p> <p>With regard to the gender perspective, it has been taken into account in the regulation, so it is not considered necessary to deepen it.</p>

			<p>universal accessibility, therefore cognitive accessibility technicians, they must also be accessible to all, so that their actions are aligned and their proposals do not create new barriers other than those cognitive.</p> <ul style="list-style-type: none"> • Clarity in Transversal Vinculation (Gender): The initial connection raised between cognitive accessibility and a gender perspective clear or forced in its initial wording. Although Article 17 (Women and Girls) it provides slightly more light, more direct exposure is recommended. <p>understandable from the beginning of the document to avoid confusion.</p>	
263	Autonomous COMMUNITY ISLAS BALEARES (Territorial Council for Social and Social Services) SAAD)	TEXT	<p>2. Proposals on Specific Content and Omissions:</p> <ul style="list-style-type: none"> • Integration of Neuroarchitecture and Emotional Accessibility: Is thrown into missing concepts and guidelines on how the physical environment impacts in cognitive processes. It is proposed to incorporate and develop aspects related to neuroarchitecture, emotional accessibility, aligning them universal accessibility and removal of barriers. These approaches are poorly considered in regulations such as Order TMA/851/2021 or CTE DB-SUA, essential for cognitive accessibility in buildings and spaces urbanised public and should not be omitted (Notes 5, 7). 	<p>Not acceptable.</p> <p>As stated in the contribution, the questions of accessibility of the physical environment must be addressed by the specific legislation and, therefore, by the Ministry of Housing and Urban Agenda, without, therefore, being covered by this standard.</p>
264	Autonomous COMMUNITY ISLAS BALEARES (Territorial Council for Social and	TEXT	<p>3. Considerations on the reference to technical standards (UNE):</p> <ul style="list-style-type: none"> • Objection to Payment Standards (Art. 7.3 – UNE-EN 301549): A firm message is expressed 	<p>Not acceptable.</p> <p>Referrals to payment rules are made as suggestions and not as obligations.</p>

	Social Services) SAAD)		disagreement with the reference to UNE payment standards (such as UNE-EN 301549) as a regulatory requirement. A law or regulation should provide the guidelines necessary free of charge and accessible to ensure compliance. The experience shows that the mandatory purchase of payment standards is a significant barrier to its actual application. The specifications are requested necessary techniques are directly integrated into the legislative text or they refer to open access standards.	
265	Autonomous COMMUNITY ISLAS BALEARES (Territorial Council for Social and Social Services) SAAD)	TEXT	4. Comments on Specific Articles: • Article 9.2.d (transport – Accompanying): On the free of charge of the transport for the assistive person of persons with intellectual disabilities (≥ 33 % and proven need), it is considered that it could be more appropriate. fair to establish that the accompanying person is entitled to it reduced rate or discount that the disabled person assists, in place of total free of charge, aligning it with other discount policies in transport.	Not acceptable. The accompanying person is necessary in order for the person with intellectual disabilities to enjoy autonomy, so the tariff must be free of charge and not reduced so as not to create discrimination (payment of a double fee).
266	Autonomous COMMUNITY ISLAS BALEARES (Territorial Council for Social and Social Services) SAAD)	TEXT	5. Suggestion on the Format and Language of the Owner Document: • Application of Cognitive Accessibility Principles to the Text Normative: Since the legislation concerns cognitive accessibility, it is considers it essential that the document itself be an example of good practice; traineeships. It is strongly recommended to revise the text to ensure use be as clear and simple as possible and apply basic	Not acceptable. Unfortunately, the format of official publications (BOE) does not depend on this management body. However, this standard will be translated into the formats covered by it (at least easy to read and clear language). These versions shall be publicly accessible from the website of the DPO.

			<p>principles of easy to read in layout (e.g. left-hand aligned text, appropriate use headings, etc.) to facilitate understanding by all actors involved (Note 11, supported by context note 2).</p> <p>Conclusion: Thank you for the opportunity to provide these contributions and hope that they will be considered to enrich the legislative text</p>	
267	Comunidad VALENCIANA (Territorial Council for Social and Social Services) SAAD)	TEXT	<p>Point two. Report on the draft Royal Decree of the approves regulation on basic cognitive accessibility conditions</p> <p>On this draft Royal Decree, the report is equally positive: Regulation was and is necessary following the adoption of Law 6/2022 of 31 March 2007 on amendment of the recast text of the General Law on the Rights of Persons with disability and their social inclusion, approved by Royal Legislative Decree 1/2013, of 29 November to establish and regulate cognitive accessibility and its requirements and implementation conditions.</p>	Finding accepted.
268	REGION OF MURCIA (Territorial Council for Social Services and the SAAD)	MAIN	<p>Firstly, it should be noted that the mandates set out in the text for the general government entails an additional cost for the Communities Autonomous. However, in the MAIN of the draft text, no provision is made for a specific funding for the measures envisaged, but rather the contrary, as it is points out that they will have to assume their obligations “at the expense of their own budgets”.</p>	<p>Finding accepted.</p> <p>The measures provided for in this Royal Decree may be financed, in whole or in part, by the State Programme for the Promotion of Universal Accessibility in the General State Administration, provided for in the Draft Law amending the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2007 and Law 39/2006 of 14 December on the promotion of personal autonomy and care for people in a situation of dependency, to extend and strengthen the rights of persons with disabilities to inclusion, autonomy and universal accessibility in accordance with Article 49 of</p>

				the Spanish Constitution. As stated in the draft legislation: this programme “aims to support universal accessibility interventions in public environments and services that ensure the inclusion and exercise of the rights and freedoms of persons with disabilities. Actions to improve accessibility financed through the Programme shall include those to be developed by public administrations in order to comply with national legislation.’ Consequently, this legal reform includes the possibility of transferring part of those resources to the administrations responsible for financing, inter alia, cognitive accessibility measures linked to this regulatory development.
269	REGION OF MURCIA (Territorial Council for Social Services and the SAAD)	TEXT	<p>As regards the legislative text, the following is stated:</p> <p>1.-It is proposed to delete the first additional provision on the data protection clause, since the purpose of the draft is to adopt a regulation, a regulatory framework, and therefore its content does not relate to the collection and processing of personal data. A different thing is that, in the implementation of the measures referred to therein, it requires the processing of data in accordance with its rules.</p> <p>2.-It is suggested to delete the second additional provision on the tendering of public contracts, since it does not add anything to the legal system. It merely refers to procurement rules for tenders for public contracts, which do not contain any provisions relating to accessibility, as could not be otherwise.</p> <p>3.-It is suggested to include a provision, aimed at requiring the issuing of a report on accessibility in a field of public management of major importance, such as health, governed by Article 10(4) of the Royal Decree, in terms similar to the fourth additional provision, which provides for a report on cognitive accessibility of airport and railway facilities.</p> <p>4.-It is proposed to delete Article 6 of the Regulation on the system of penalties, in so far as it merely states (without it being necessary) that ‘actions and omissions which</p>	<p>Accepted in part.</p> <ol style="list-style-type: none"> 1. The deletion of the personal data protection clause is not complied with, as it is proposed by the AEPD after having analysed the project. 2. This is not accepted as the wording of the provision responds to a comment by the Ministry of Finance. 3. It is not accepted to include it in the provision, but takes note of the suggestion to raise it in the future (together with other services: education, social services, etc.). 4. Not accepted, it is considered a necessary repetition. 5. It is acceptable to include an express mention. 6. Not accepted. The proposal is already included in Article 10 (1), which refers to all the goods and services regulated in Royal Decree 193/2023 of 21 March. However, its wording is clarified so that there is no doubt as to its application to such services. 7. Finding accepted.

			<p>constitute a violation of the cognitive accessibility conditions laid down in this Royal Decree and which are defined in Title III of the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion shall be sanctioned in accordance with the provisions of that Law’.</p> <p>5.-It is recommended to include specific measures in the field of advertising alongside telecommunications and the information society covered by Article 7 of the Regulation.</p> <p>6.-It is also proposed to include specific measures for the educational field, given the importance of ensuring cognitive accessibility at an early age, as well as in sport, leisure and leisure activities, in addition to the specific cultural and historical heritage measures referred to in Article 14 of the Royal Decree.</p> <p>7.-Finally, it is proposed that the complementary actions on cognitive accessibility in relations with public administrations referred to in Article 11(3), in addition to the development of guides to cognitively accessible administrative procedures, should include explanatory guides on new regulations or regulatory provisions in general (laws or regulations), which would make it easier to understand and understand the rules, in particular those that may affect the rights of persons with disabilities.</p>	
270	<p>AUTONOMOUS COMMUNITY OF ARAGON (Territorial Council for Social Services and the SAAD)</p>	TEXT	<p>[...]</p> <p>It is necessary to examine two preliminary questions relating to Competition and Financing.</p> <p>(A) COMPETITION</p> <p>First of all, a joint examination of the proposed rules; it seems to exceed the State’s competence to lay down basic rules.</p> <p>the Autonomous Communities are responsible for implementing the rules.</p> <p>To substantiate the rejection of various contributions made by entities for include specific measures in the standard, in the Regulatory Impact Assessment Report</p>	<p>Partially Accepted</p> <p>Both Article 4 and 5 set out general principles and criteria to guide cognitive accessibility measures without establishing the concrete form in which they are to be implemented. The text has been revised and amended accordingly so that, in this version, at the discretion of the proposing management body, the basic State competence is not exceeded. The reference to tools, as can be seen from the standard, is not intended to be an exhaustive and closed catalogue, but only to establish categories and, by way of illustration, to present those commonly used without requiring their sole or compulsory</p>

it is reported that “cognitive accessibility measures consist of the implementation of the contained in Article 4 (2) (principles) and the requirements of Article 5 (1) (information) applied to most of its contents’ or specifically in Page 154 ‘Se rejects, this is a basic rule, which must lay down prescriptions. general, so as not to encroach on the competences of other administrations”

It is also stated that “The proposed decrease in detail may put at risk the constitutionality of the rule due to encroachment of powers (the state is responsible for basic legislation, while the Autonomous Communities are responsible for its development. Such detail could leave them no room for development and could therefore call into question the constitutionality of the standard)’ Page 119 of the Report.

Other contributions are also partially accepted (Page 132 of the Memo) "This is partially accepted. Obligations are imposed without going into detail how these resources need to be developed” and this when requested inclusion in Article 8 of the use of tactosensory resources, chromatic contrasts high and acoustic resources.

However, the draft Royal Decree sets out not only the express obligations in cognitive accessibility in all areas, but means, actions and tools to be applied in each area to ensure such accessibility cognitive.

This requires actions as specific as those referred to in Article 8 (2) (f) relating to urbanised public spaces,

use, except where they are necessary to guarantee the exercise of rights.

			<p>infrastructure and buildings, regulating the affixing and design of signage pictograms, or, in the field of health, the requirement in Article 10 (4) (c) to have mechanical, electronic, assistive products and assistive technologies, as well as support staff adapted to the cognitive difficulty facing the user.</p> <p>Finally, Article 19 (on information activities, awareness-raising campaigns and training activities) requires the Autonomous Communities to carry out information activities, awareness-raising campaigns and training activities and as many others as necessary, with the advice of the Spanish Cognitiva Accessibility Centre (CEACOG) and the other centres advising the Royal Patronato on disability, which goes beyond the content of basic legislation and audits the future actions of the Autonomous Communities on information and training on cognitive accessibility.</p>	
271	<p>AUTONOMOUS COMMUNITY OF ARAGON (Territorial Council for Social Services and the SAAD)</p>	TEXT	<p>(B) FUNDING The Sixth Additional Provision states that the Decree does not entail any increase in allocations or salaries, staff costs or any other appropriations for the public sector, and that it will be carried out using the existing budgetary resources and the financing instruments for the accessibility measures provided for in the legislation. The Autonomous Communities and local authorities shall take into account compliance with the principles of fiscal stability and financial sustainability.</p> <p>The contribution process revealed the contradiction between the Sixth Additional Provision and the fact that the compulsory actions and measures set out in the Royal Decree imposed on the Autonomous Communities necessarily involve financing, so that the content of the articles must be provided for in the budget, and that, for its implementation and implementation, it is necessary to allocate budget items for the financing or co-financing of these actions between all public administrations.</p> <p>Contributions in this regard were made by the Autonomous</p>	<p>Finding accepted.</p> <p>The measures provided for in this Royal Decree may be financed, in whole or in part, by the State Programme for the Promotion of Universal Accessibility in the General State Administration, provided for in the Draft Law amending the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2007 and Law 39/2006 of 14 December on the promotion of personal autonomy and care for people in a situation of dependency, to extend and strengthen the rights of persons with disabilities to inclusion, autonomy and universal accessibility in accordance with Article 49 of the Spanish Constitution. As stated in the draft legislation: this programme “aims to support universal accessibility interventions in public environments and services that ensure the inclusion and exercise of the rights and freedoms of persons with disabilities. Actions to improve accessibility financed through the Programme shall</p>

Community of La Rioja, which drew attention to various articles laying down obligations involving financial resources (page 88 of the Report). In response to that submission, it was stated that: "Accepted. The financing of the regulated measures will be reviewed.

Notwithstanding the above, there is no such financing provided for in the version of 31 March 2025 of the draft Royal Decree provided.

Section IV ANALLISIS OF IMPACTS, point 4 of the Report on the Regulatory Impact Assessment. Budgetary impact, analyses the various investments to be made by the State in compliance with the obligations laid down in the Royal Decree. It states that there will be no budgetary impact at State level, since the actions to which it is obliged have already been budgeted or are covered by other budget forecasts.

Therefore, there is no justification for the fact that it does not entail an additional cost, such as the fact that it may be covered by existing allocations for those purposes, or that it may be covered by the fines provided for by the system of penalties, indicating: "The general government shall be charged to the budget for the financial year in question. However, the revenue received from the application of the system of infringements and penalties provided for in the TRLGD and other resources provided for in the legislation may finance any improvements in accessibility to public services of a State nature' (sic) While in relation to the costs to be borne by the State, without any reference to the cost borne by the Autonomous Communities or local authorities, specific figures are set out in the notes on specific actions in different areas, for example: 'It is estimated that there are just over 7.590 SIA formalities in the General State Administration, the easy-to-read version of which becomes necessary. If we estimate the easy-to-read translation of each of them at around EUR 100, the adaptation cost will not exceed 800.000 for all active AGE procedures. With

include those to be developed by public administrations in order to comply with national legislation.' Consequently, this legal reform includes the possibility of transferring part of those resources to the administrations responsible for financing, inter alia, cognitive accessibility measures linked to this regulatory development.

			<p>regard to public sector websites, they are already required to meet the accessibility requirements in accordance with Royal Decree 1112/2018 of 7 September 2011 on the accessibility of public sector websites and mobile applications.”</p> <p>Finally, this contradiction in the report leads to the conclusion in the Report that: ‘In relation to the expenditure to be borne by other public administrations (Autonomous Communities and Local Authorities), they will have to assume their obligations from their own budgets. However, the draft reform of the recast text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion provides for the creation of a fund to finance measures on universal accessibility. It will be proposed that this legal reform should include the possibility of transferring part of this fund to the administrations responsible for financing, inter alia, cognitive accessibility actions linked to this regulatory development.”</p>	
272	<p>AUTONOMOUS COMMUNITY OF ARAGON (Territorial Council for Social Services and the SAAD)</p>	TEXT	<p>(C) CONTRIBUTIONS</p> <p>1.- as a general rule, references to the mandatory nature of specific actions to be financed by the Autonomous Communities should be removed, establishing these measures as possibilities for action to achieve cognitive accessibility, without prejudice to other measures considered to be the most appropriate, and in particular those set out in Article 11 (easy reading, visual support, accessible communication options, use of augmentative and alternative communication, etc.).</p> <p>2.- Article 11.2 Keep references to easy reading in relations with public administrations where this is considered to be the most appropriate means for cognitive accessibility and at the request of the person/user. The current wording implies the obligation to have easy-to-read forms, applications and guides to complete procedures at the date of entry into force, i.e. 2 January 2026. Given the complexity and number of documents that would be affected, while it</p>	<p>Not acceptable.</p> <p>1. There are no references in the legislation to the mandatory nature of specific actions to be financed by the Autonomous Communities. However, as these are basic regulations, the general principles and criteria set out in the standard must be applied by all the actors involved.</p> <p>2. It is accepted to postpone the entry into force of the standard.</p> <p>3. Not acceptable. According to the legislation in question, there is no objection to including accessibility and, in the present case, cognitive accessibility criteria in the training on the basis of citizenship. On the contrary, the inclusion of this subject would lead to a higher quality of public care.</p> <p>4. Accepted in part. The criterion, in this respect, must be the full right to the rights of the person with cognitive difficulties, without any precedence being imposed on</p>

			<p>can be maintained that they will be progressively adapted, it will be more useful than, until such time as it is carried out, the adaptation will be carried out when a specific procedure is required, or another date for entry into force will be laid down for this matter.</p> <p>3.- Article 11.2 d) With regard to the training and training of staff in public administrations for face-to-face care in cognitive accessibility, it will have to be analysed in the light of the legislation on staff of the Administration, as it is an obligation to train staff assigned to public care.</p> <p>4.- Article 11.4. It states that a person with a recognised intellectual disability in a percentage equal to or greater than 33 per cent 'may request that the procedure at the remaining stages be carried out with the cognitive accessibility measures required', so it is not clear whether the measures required by the administration should be taken or the measures deemed appropriate by the administration.</p> <p>In any case, it is stipulated that at least simple and cognitively accessible language, use of augmentative and alternative communication, professional assistance and other means of communication support shall be ensured, without being alternative options in view of the needs of the person with cognitive disabilities.</p>	<p>either party and leaving to act, as is intrinsic to the whole project, in accordance with the concept of reasonable accommodation. Thus, two basic measures are laid down: the information provided and language are cognitively accessible and allowed to be accompanied by a person of their choice. This is without prejudice to the development of this provision by the Autonomous Communities in the light of the constitutional distribution of competences.</p>
273	Autonomous COMMUNITY OF THE RIOJA (Territorial Council for Social and Social Services) SAAD)	TEXT	<p>In the third additional provision. Catalogue of pictograms for signs (page 6) states that 'a technical and specialised working group shall be set up with the aim of drawing up, within two years of publication of the regulation, a catalogue of pictograms'. It is not clear whether it is one or two years.</p>	<p>Accepted, the deadline has been changed to 3 years.</p>
274	Autonomous COMMUNITY OF THE RIOJA (Territorial Council for Social and Social Services) SAAD)	TEXT	<p>In the sixth additional provision. The financing of the planned measures (page 8) states that '<i>The Royal Decree does not entail any increase in appropriations or salaries, staff costs or any other appropriations for the public sector</i>'. It also states that '<i>Within their respective competences, the Autonomous Communities and local authorities shall take</i></p>	<p>Finding accepted.</p> <p>The measures provided for in this Royal Decree may be financed, in whole or in part, by the State Programme for the Promotion of Universal Accessibility in the General State Administration, provided for in the Draft Law</p>

			<p><i>into account compliance with the principles of fiscal stability and financial sustainability.’ The financial envelope is not taken into account, but throughout the enacting terms of the regulation, several points identify the need to provide the budget with the content of the article. They serve as an example:</i></p> <p>[...]</p> <p>For its development and implementation it is necessary to earmark budget items for the financing or co-financing of these actions among all public administrations.</p>	<p>amending the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2007 and Law 39/2006 of 14 December on the promotion of personal autonomy and care for people in a situation of dependency, to extend and strengthen the rights of persons with disabilities to inclusion, autonomy and universal accessibility in accordance with Article 49 of the Spanish Constitution. As stated in the draft legislation: this programme “aims to support universal accessibility interventions in public environments and services that ensure the inclusion and exercise of the rights and freedoms of persons with disabilities. Actions to improve accessibility financed through the Programme shall include those to be developed by public administrations in order to comply with national legislation.’ Consequently, this legal reform includes the possibility of transferring part of those resources to the administrations responsible for financing, inter alia, cognitive accessibility measures linked to this regulatory development.</p>
275	Autonomous COMMUNITY OF THE RIOJA (Territorial Council for Social and Social Services) SAAD)	TEXT	Sole repealing provision of Royal Decree 1414/2006 of 1 December 2007 is repeated. (Page 8)	Accepted and corrected.
276	Autonomous COMMUNITY OF THE RIOJA (Territorial Council for Social and Social Services) SAAD)	TEXT	Article 12. Administration of Justice. 5 (c) iii. As regards the professional support of the facilitator, it is not clear who appoints that person or whether he or she is a professional in the justice system or in another field.	The provision referred to has disappeared since it will be the subject of another specific legislative development.
277	Community OF MADRID (Territorial Council for Social and Social Services)	TEXT	The draft Royal Decree has significant shortcomings, making it a declaration of intent. The definition of cognitive accessibility is ambiguous and not specific to its implementation in key areas such as education, health or	Not acceptable. The text is not a declaration of intent, but a basic rule not to encroach upon regional competences. Therefore, the

	SAAD)		<p>transport. Although tools such as easy reading and pictograms are mentioned, there is no clear guidance for their use and the diversity of needs. Moreover, forecasts for read-to-read adaptation are unrealistic in terms of the cost and administrative burden they would entail.</p> <p>Furthermore, there is no training programme for professionals responsible for implementing these policies. We would like to remind the Ministry that, without specific training, there can be no effective measures.</p> <p>The lack of funding, especially in less resourced areas, hinders the implementation of cognitive accessibility measures. Without the necessary financial support, policies will not be properly implemented, and will limit opportunities for people with cognitive disabilities.</p> <p>A special focus on pictograms does not address all cognitive needs and does not provide a comprehensive and adequate response for persons with disabilities. It is crucial to combine tools such as adapting environments, accessible formats and personalised support, to ensure their full participation and respond appropriately to their needs.</p> <p>Finally, the absence of participation and evaluation mechanisms makes this regulation an empty document. Without the active involvement of those affected and appropriate monitoring, policies will not respond to actual needs or ensure their effectiveness.</p>	<p>shortcomings that arise in the opinion of this AC should be covered by the technical details of the competence attributed to the Autonomous Communities in accordance with the division of powers established by the Constitution.</p> <p>The definition, as well as the areas in which this rule applies, are sufficiently substantive and justified.</p> <p>The measures provided for in this Royal Decree may be financed, in whole or in part, by the State Programme for the Promotion of Universal Accessibility in the General State Administration, provided for in the Draft Law amending the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2007 and Law 39/2006 of 14 December on the promotion of personal autonomy and care for people in a situation of dependency, to extend and strengthen the rights of persons with disabilities to inclusion, autonomy and universal accessibility in accordance with Article 49 of the Spanish Constitution. As stated in the draft legislation: this programme “aims to support universal accessibility interventions in public environments and services that ensure the inclusion and exercise of the rights and freedoms of persons with disabilities. Actions to improve accessibility financed through the Programme shall include those to be developed by public administrations in order to comply with national legislation.’ Consequently, this legal reform includes the possibility of transferring part of those resources to the administrations responsible for financing, inter alia, cognitive accessibility measures linked to this regulatory development.</p> <p>Moreover, this standard does not focus solely on pictograms, but rather highlights the variety of resources</p>
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				<p>needed to ensure cognitive accessibility throughout the enacting terms.</p> <p>Finally, this rule provides for the participation of social partners and entities in the third social action sector in several of its provisions. In addition, throughout the legislative process, citizens have been involved, through prior public consultation, public hearing and information, and a request for a report to the relevant collegiate bodies.</p>
278	ALAVA FORAL DIPUTACION (Territorial Council for Social and Social Services) SAAD)	TEXT	<p>Page 3, paragraph 3: ERRATA</p> <p>Page 6, Third additional provision: ERROR: within UN DOS from publication: what do you want to put? Within two years? One year?</p> <p>Page 8, fifth additional provision, paragraph 3. Recognition of a degree of disability of more than 33 per cent. Should 33 % or more be put?</p> <p>Page 10, Article 3: it is proposed to include the definition of UNIVERSAL ACCESIBILITY</p> <p>Page 11, Article 3 (g) Acquired brain damage: it is proposed to leave cognitive deficits rather than neurocognitive deficits to unify the be called neuro-motors, neurosensory engines.</p> <p>Page 15, Article 3 (e) Mental treatment: it is proposed to use a more clarifying definition. Disorders: it can be a motor, functioning: on posting. In my view, the definition of mental disorder is unclear, it is so ambiguous that any type of disorder can fit.</p> <p>Page 15, Article 4(2) (a) iii. Intuitive and simple use: doubt, does it mean that the person uses it autonomously or independently?</p>	<p>1and 2: corrected</p> <p>3: The wording is correct. The equalisation rate is 33 %, so that if an SUPERIOR percentage is to be obtained, it will have to be assessed accordingly.</p> <p>4: It is not accepted since the definition of universal accessibility is contained in Article 2 (k) of the TRLGD, of which this regulation is developed.</p> <p>5: Finding accepted.</p> <p>6: Not accepted, the current definition of mental disorder is clear.</p> <p>7 and 8: The concepts identified are well defined and regulated.</p> <p>9: Finding accepted.</p> <p>10: The Article has been amended by deleting the above paragraph.</p>

			<p>Page 16, Article 4(2) (b) Guidance: doubt, does it mean “guaranteeing the autonomy or independence of the person?”</p> <p>Page 17, Article 4, paragraph e. Autonomy: it is proposed to remove the basic term and leave only activities in everyday life. Reason: daily life activities have to be understood in the broadest sense, covering not only basic but instrumental and advanced ones.</p> <p>Page 27, Article 12(5), iiiii. 2nd paragraph: ERROR: the designated facilitator... who is named CITADA...</p>	
279	<p>AUTONOMOUS COMMUNITY OF GALICIA (Territorial Council for Social Services and the SAAD)</p>	TEXT	<p>The sixth additional provision of the project states in relation to the financing of the measures provided for in this Royal Decree that this Royal Decree does not entail an increase in appropriations or salaries, staff costs or any other appropriations in the service of the public sector.</p> <p>The implementation of the specific cognitive accessibility requirements provided for in Chapter II, applicable to the various sectors and areas of society, such as those affecting the transport sector (signalling and information), the use of public goods and services, administrative procedures, the administration of justice (extension of the concept of procedural facilitator), participation in public life (brochures and information panels), employment (changes in the systems of fiction and authentication), training and training in cognitive accessibility of staff in public administrations in electoral processes, etc., will cost the various public administrations, who have the skills affected by this new regulation on cognitive accessibility.</p> <p>It is therefore essential that the State Administration make available to the other public authorities (specifically the Autonomous Communities) sufficient funding for the implementation of the measures referred to in this new State legislation.</p>	<p>The measures provided for in this Royal Decree may be financed, in whole or in part, by the State Programme for the Promotion of Universal Accessibility in the General State Administration, provided for in the Draft Law amending the recast General Law on the Rights of Persons with Disabilities and their Social Inclusion, approved by Royal Legislative Decree 1/2013 of 29 November 2007 and Law 39/2006 of 14 December on the promotion of personal autonomy and care for people in a situation of dependency, to extend and strengthen the rights of persons with disabilities to inclusion, autonomy and universal accessibility in accordance with Article 49 of the Spanish Constitution. As stated in the draft legislation: this programme “aims to support universal accessibility interventions in public environments and services that ensure the inclusion and exercise of the rights and freedoms of persons with disabilities. Actions to improve accessibility financed through the Programme shall include those to be developed by public administrations in order to comply with national legislation.’ Consequently, this legal reform includes the possibility of transferring part of those resources to the administrations responsible for financing, inter alia, cognitive accessibility measures linked to this regulatory development.</p>

