

## Guest of the day, François Engels, 100.7, 25/08/2025

CHRISTIANE KLEER

And this morning, we have François Engels, Director of OSAPS. That's the Office for the Supervision of Accessibility of Products and Services. Good morning, Mr. Engels.

FRANÇOIS ENGELS

Good morning, Ms Kleer.

CHRISTIANE KLEER

Your organisation has a long name, but its history is very recent. OSAPS has only been in existence since June of this year. The accessibility of products and services is not a completely new topic. But why does it only exist today?

FRANÇOIS ENGELS

You should know that we are actually based on a European directive, the European Accessibility Act, which came into force throughout Europe on 28 June. That is when we began our work and started monitoring. Previously, we were a department within the Ministry, and we put everything in place, in particular by carrying out numerous awareness-raising and information campaigns. But on 28 June, the situation became more serious and we began to closely monitor the accessibility of products and services within our remit.

CHRISTIANE KLEER

What products and services are we talking about exactly?

FRANÇOIS ENGELS

Yes, there are indeed many digital-related products and services, such as smartphones, laptops, tablets, but also cash machines, kiosks, e-readers, and then in terms of services, many important services such as e-commerce, banking, electronic communications, many in the audiovisual sector, in the media, so you are also affected, and then another service, which is also very important, even if we don't like to use it, is 112 and 113.

CHRISTIANE KLEER

This means that all the services and objects found there are truly accessible to all citizens, regardless of any disabilities they may have.

FRANÇOIS ENGELS

Yes, it's really about improving accessibility. That doesn't mean we'll achieve 100% accessibility, but simply that our directive and our law set out requirements that

products and services must meet in order to be more accessible to everyone, whether or not, as you said, they are disabled or have a cognitive impairment.

CHRISTIANE KLEER

How many people do you estimate need greater accessibility or currently encounter products or services that are not fully accessible to them?

FRANÇOIS ENGELS

It's relatively difficult to say, because no one likes to say, "I have a problem" or "I don't have a problem." However, in the last census, for the first time, we asked how many people were facing a disability. Fifteen per cent of respondents answered, "Yes, I have a disability or am facing a disability." There are also a lot of elderly people, whom I know very well, who say, "Yes, my hearing isn't as good, my eyesight isn't as good, I don't walk as well, but that's not a disability, it's just because I'm old." " But as I said, that's already the case. If we look abroad, the proportions are the same, but between 15 and 20% of people are actually living with a disability.

CHRISTIANE KLEER

Digitalisation is advancing by leaps and bounds. This is nothing new. Online banking has become the norm for most of us. Banks also promise intuitive and easy-to-use services. But does that mean they are already understandable to everyone today, considering the effectiveness of online banking? Yes, does it work perfectly for a blind person, for example?

FRANÇOIS ENGELS

That everything should work perfectly. Of course, we are not naive and know that on 28 June, from a purely legal point of view, all services will have to be compliant. However, this is not the case. As I said, we have carried out several awareness-raising campaigns and have seen a certain degree of understanding on the part of businesses. So there are new obligations. No one is happy about new obligations. However, businesses have understood, first of all, that they do not want to lose customers. Secondly, that it is also important. We are currently very busy with businesses, which of course have a responsibility, but we are of course there as a point of contact, as a point of information, and we are seeking to move this issue forward a little more in the coming months and years, perhaps more than in the past.

CHRISTIANE KLEER

So businesses must comply, but again, well, it may be unfair to single out banks here, but nevertheless, we can indeed say that today, or as of today, at the end of June, not all banking services were accessible to people who, for example, are blind or have other difficulties.

FRANÇOIS ENGELS

That's right: we have a whole series of requirements to meet, and these products and services did not become accessible overnight. But as I said, we are working with federations and companies on the whole project, and I am convinced that we will move in the right direction.

CHRISTIANE KLEER

Is it possible to rank Luxembourg in terms of compliance compared to other European countries? Do we have good results in terms of accessibility?

FRANÇOIS ENGELS

So there is still progress to be made. If that were not the case, we would not have needed this directive. I would say that there are not necessarily any international statistics. It is clear that the Scandinavian countries are perhaps a little more aware. However, I would say that we are neither the last nor, unfortunately, the first. Let's say we are somewhere in between. Luxembourg's advantage is its relatively small size. This means that we have relatively good access to businesses, not only businesses, but also economic operators, as public bodies are also involved. We have good contacts with them and they are relatively aware. The problem they naturally encounter, especially small businesses, is that they tell us they would like to comply, but do not know how. This is where we come in, as OSAPS, by providing a number of tools, instruments and information so that small businesses can also comply.

CHRISTIANE KLEER

Complying with these rules also has a cost, especially when offering online or other services, and additional features must be provided, which costs money. Is there any support available for this?

FRANÇOIS ENGELS

It works as follows. The economic operator is responsible: if they take accessibility into account from the outset, the total cost will of course be lower than if they complete their project in its entirety and then decide, "We need to take action on accessibility," and have to start all over again from scratch. There is therefore a certain amount of digital support for small businesses, offered by the Department for Business. Such as the "Digital Services Package", which I don't want to talk about now, as I'm not an expert. I would simply advise businesses to seek information from their chambers of commerce or the Department, which will provide them with support. There are also a number of regional aids, particularly those granted by certain municipalities, which help to accelerate digitisation. And as I said, for small businesses, but again, I recommend thinking about accessibility from the outset in your projects, as it will be much less expensive. And as I said, on the other hand, don't forget that this is not an expense, but

an investment, because you will have more customers coming to you later. If you are not accessible, the customer will go to someone else and you will lose them.

CHRISTIANE KLEER

What about government services? I'm thinking, for example, of the one-stop shop, where many administrative procedures can be carried out and make your life easier if you accept it. But does everyone accept it, or is the one-stop shop, for example, now fully accessible?

FRANÇOIS ENGELS

So [unintelligible], I would say no, but there is a distinction to be made here: there are in fact two laws and two directives. The first concerns public service websites and applications, which means that we, the OSAPS, are not affected. On the other hand, there are products and services that can be offered in the public or private sector, and that is our area of expertise. But now we have actually addressed the issue with the Guichet. We have also put our own procedures in place. And we are in constant contact with them, with the administration that manages this area, namely the CTIE. And we have reached a very good agreement with the CTIE. I think the CTIE was not always aware of everything. We are currently working with them on a project to make their website or certain parts of their website more accessible. But it should be noted that the CTE is actually responsible for a platform. On this platform, information does not come from the CTE, but from other administrations, or is based on the law. This means that individual administrations must also provide assistance. But I am also optimistic, especially as a state administration, because you have a certain responsibility towards voters and citizens. And as I said, we have fairly good contacts with all these administrations. And I am also optimistic that we are moving towards greater accessibility in the future.

CHRISTIANE KLEER

You currently have few employees, yet your mission seems relatively broad. How do you manage this? How do you also ensure the success of your supervisory mission, given the multitude of companies, practices and issues that may arise?

FRANÇOIS ENGELS

So I explained that we have a full range of products and services. Most of the products that fall within our remit are, I would say, manufactured abroad, where the first test is already carried out by the competent authority abroad.

CHRISTIANE KLEER

A smartphone, for example.

FRANÇOIS ENGELS

Let's take the example of a smartphone. I know relatively few companies in Luxembourg that manufacture smartphones – in fact, none at all. This means that they are already tested for the first time abroad, but that doesn't prevent us from carrying out checks on them. As for services, we have set ourselves priorities. We offer many services, but we have focused on the areas where we think people need them most in their daily lives.

CHRISTIANE KLEER

What does that mean?

FRANÇOIS ENGELS

It's e-commerce, banking and audiovisual services, which are also very important. And then, as I said, this fourth service I mentioned is not something we use every day. Nor is it something we want to use. But it's about the 112 and 113 numbers: if we have to use them, we're glad they're accessible.

CHRISTIANE KLEER

To what extent could 112 and 113 be unavailable?

FRANÇOIS ENGELS

Let me give you an example. For example, if you have poor hearing or cannot hear at all, there is no point in calling 113 or 112 to communicate with someone, because you will not understand what they are saying. But we are also in contact with the two authorities in charge, the CGDIS and the police, and they are working on a solution that will allow text messages to be sent in real time. In other words, you just need to call someone, without a specific application. You can then write a kind of text message on your smartphone during the call. As I said, we are currently working with both administrations. We still need some intermediary operators. We have also discussed this with the Regulatory Institute and we are going to meet with them to ensure that they also implement these features.

CHRISTIANE KLEER

In other words, citizens can also contact you if they notice something. Your administration is still very young and perhaps not yet well known outside, but how do you approach someone who wants to file a report?

FRANÇOIS ENGELS

We have tried to be relatively broad, which means that if you visit our website, you will find everything. You can send us an official request via MyGuichet, visit our website and fill out an online form, write to us by e-mail, WhatsApp, call us or even write to us by post. As I said, we don't want to leave anyone out. The only thing we really need is the name or contact details of a person to contact, and we need to know what product or

service is involved and what the problem is. That's why it's so important to have their contact details. If someone tells us they have an accessibility issue in a shop and that's not enough for us, we need to be able to ask what the problem is.

CHRISTIANE KLEER

Today's guest in the studio was François Engels, Director of OSAPS (Office for the Supervision of Accessibility of Products and Services). Thank you very much for visiting the studio.

FRANÇOIS ENGELS

Thank you for inviting me.