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Easy Language Content on the Web: A Multilingual Perspective

Abstract: Access to information is a fundamental right and represents one of the essential pillars that the democratic functioning of societies and the well-being of every individual are based on. Since the late 2000, the international community has rightly launched multiple campaigns to promote the development and implementation of policies and guidelines on this subject. However, while multilingualism and information accessibility –understood as affordability, interoperability and availability of content for all, including people with disabilities– are often two key priorities in international and national communication initiatives, until very recently research and practice in both areas used to take separate paths. This chapter seeks to shed light on the pertinence of jointly studying Web accessibility (WA) and Easy Language (EL), which can be considered forms of intralingual and intersemiotic translation also requiring or allowing for interlingual translation. More specifically, we review existing recommendations and laws with regard to these communicative inclusion practices, to then discuss them from a multilingual perspective. Drawing upon a selected number of European websites containing information in EL, we present the different solutions identified to publish

monolingual and multilingual EL content on the Web, as well as the existing challenges that deserve further attention among researchers and practitioners in the fields of localisation and accessibility. All in all, the review of the literature and the findings from our observation exercise seem to suggest a generalised lack of standardization in websites featuring EL content. In particular, we have observed a considerable degree of heterogeneity regarding web design, the type of information available in this language variety and the localisation strategy adopted.

Keywords: accessibility, easy language, inclusion, multilingual web, web localisation.

Resumen: El acceso a la información es un derecho fundamental y representa uno de los pilares esenciales en los que se basa el funcionamiento democrático de la sociedad y el bienestar de cada individuo. Desde finales de los 2000, la comunidad internacional ha lanzado, con razón, múltiples campañas para promover el desarrollo y la aplicación de políticas y directrices en esta materia. Sin embargo, aunque el multilingüismo y la accesibilidad de la información -entendida como la asequibilidad, la interoperabilidad y la disponibilidad de la información para todos, incluidas las personas con discapacidad – suelen ser dos aspectos clave en las iniciativas de comunicación internacionales y nacionales, hasta hace muy poco la investigación y la práctica en ambos ámbitos solían tomar caminos separados. El presente capítulo pretende arrojar luz sobre la pertinencia de estudiar conjuntamente la accesibilidad web y la lectura fácil (LF): dos modalidades de traducción intralingüística e intersemiótica que también requieren o permiten la traducción interlingüística. Revisaremos las recomendaciones y leyes existentes en relación con estas prácticas de inclusión comunicativa, para luego abordarlas desde una perspectiva multilingüe. Asimismo, tomando como punto de partida una muestra de sitios webs europeos con información en LF, presentaremos las diferentes soluciones que hemos identificado para publicar contenidos monolingües y multilingües en LF en la web, así como los retos existentes que deberían recibir una mayor atención por parte de investigadores y profesionales en los campos de la localización y la accesibilidad. De manera general, la revisión de la bibliografía y los resultados de nuestro estudio parecen indicar una falta de estandarización en los sitios webs con contenidos en LF. En concreto, hemos observado un nivel de heterogeneidad considerable en cuanto al diseño web empleado, el tipo de información disponible en LF y la estrategia de localización adoptada.

Palabras clave: accesibilidad, inclusión, lectura fácil, localización web, web multilingüe.

1. INTRODUCTION

Access to information on the Web for all has become crucial in today's digitalised society. In fact, UNESCO's Information for All Programme¹ has emphasised once again that it is a universal right. Making it available for everyone, including people with functional, cultural, and linguistic diversity (FUNCALD), in Rodríguez Vázquez and Torres-del-Rey's terms (2020), implies providing, translating, and simultaneously releasing content in standard and alternative formats by default, not only by special request or law. In recent times, Easy Language (EL) has turned into a powerful linguistic tool increasingly used to achieve that goal.

Easy Language can be considered a controlled language² variety that aims at improving the readability, legibility and comprehensibility of texts. While it was initially designed to target people with intellectual disabilities (ID) and learning difficulties, research has proved that it can be beneficial for other population groups, such as people with dementia, hearing impairments or second language users, among others (Tronbacke, 1993, p. 3; Nomura et al., 2010, pp. 5–9; Inclusion Europe, 2009, p. 6; Associació Lectura Fàcil, in García Muñoz, 2012, p. 13; AENOR, 2018b, pp. 7–8; Hansen-Schirra & Maaß, 2020a, p. 25). Over the last years, scholars have investigated different aspects related to the *intralingual* translation of texts from their “standard” into their corresponding EL versions, including studies on tools and processes (Hansen-Schirra & Maaß, 2020b). What remains unclear, to the best of our knowledge, is to what extent current best practices on the creation of EL texts take into account the particularities of *web* content publishing and human-computer interaction. Furthermore, little is known about the strategies used to localise EL content in *multilingual* contexts.

The goal of the present chapter is two-fold: (a) to review existing EL standards and web accessibility (WA) recommendations to understand whether and which strategies exist for the creation of EL content for the Web (Sections 2 and 3); and (b) to discuss how they fit in the web localisation landscape (Section 4). By primarily focusing on the European, and particularly, Spanish and Swiss national contexts – characterised by their multilingual nature, we will provide examples of monolingual and multilingual websites to illustrate current

1 Retrieved January 28, 2022, from <https://en.unesco.org/programme/ifap>

2 A controlled language is a “constructed language that is based on a certain natural language, being more restrictive concerning lexicon, syntax, and/or semantics, while preserving most of its natural properties” (Kuhn, 2014, p. 123).

practices in this field and explain why future research in EL localisation should be promoted.

2. UNDERSTANDING EASY LANGUAGE

According to existing literature, EL is now used as an umbrella term for all variants of this language variety,³ whether it concerns the written channel with easy-to-read (also known as “easy read”) writing, the multimodal channel with easy-to-read-and-understand or even oral communication (Hansen-Schirra, Bisang et al., 2020, p. 197). In our work, we will also refer to this language variety as EL, both when reviewing existing recommendations at a national and international level, and when talking about its translation, including in the context of the Web.

2.1. International Echoes on Easy Language

Since the late 2000s, the international community has launched multiple campaigns to encourage the development and implementation of policies and guidelines to promote the accessibility of information and knowledge. Traditionally, the overarching reference regarding inclusion and access matters has been – and still is – the United Nations Convention on the Rights of Persons with Disabilities (CRPD) (United Nations, 2006). This fundamental document refers to plain and easy languages as accessible alternative forms in which certain information (see Section 3.4) should be communicated.

Similarly, easy-to-read has been proposed by different international non-profit organisations as a suitable format to facilitate communication in crisis scenarios (Rodríguez Vázquez & Torres-del-Rey, 2020, p. 95; Rodríguez Vázquez, 2023). For example, the World Health Organisation (WHO) recommended to “convert public materials into ‘Easy Read’ format so that they are accessible for people with intellectual disability or cognitive impairment” (WHO, 2020). Similarly, OCHA and UNICEF (2020) strongly encouraged the use of written, audio, and easy-to-read formats, a list to which the well-known pan-disability organisation International Disability Alliance (IDA) (2020) added plain language. At a European level, the most recent version of the European Directive on the accessibility requirements for products and

3 In contrast, according to Hansen-Schirra et al. (2020, p. 197), Plain Language (PL) “is situated on a continuum between Easy Language and standard language,” and the target people of PL “consists of people with low domain knowledge or little reading experience”.

services – known as the European Accessibility Act – (European Union, 2019) uses the expression “in a language that is easily understood” when promoting the notion of text accessibility. The recommendations and policies published by all the above international bodies, however, do not provide indications on how to produce such accessible content or how to measure its degree of accessibility.

One of the set of guidelines that acquired more popularity over time was the European standard for making information easy-to-read (EtR) and understand, published by Inclusion Europe (2009) with the support of the European Commission (EC). The document, available in 16 out of the 24 official languages of the European Union (EU), provides general language guidelines on how to reduce complexity on the morphological, phrasal, syntactic, and textual layers during the content creation phase. The rules are organised according to the format in which the information will be published (written, electronic, video and audio), but there is also a set of general rules applicable to all four groups. As shown in the recently published book about EL in Europe (Lindholm & Vanhatalo, 2022), each country has then transposed, interpreted, and adapted one or more of these key documents to their corresponding social, economic and political contexts – some more successfully than others.

Finally, yet importantly, it is worth highlighting that an ISO standard (ISO/IEC DIS 23859-1) was under development by Technical Committee ISO/IEC JTC1/SC35 (User Interfaces) at the time of writing, April 2022. Its scope is to provide guidance to create, adapt and evaluate written text so it can become easy to read and understand (ISO forthcoming). This standard puts forward the use of the encompassing term “Easy-to-understand language” as “any language variety which enhances comprehensibility” (ibid.).

For the purposes of this chapter, we will now examine the normative landscape regarding EL in Europe, and particularly in Spain and Switzerland, the countries where the authors live and work.

2.2. Laws and Standards about Easy Language in Spain and Switzerland

In Spain, an amendment to previous legislation on the rights of persons with disabilities was ratified in 2022 (*Ley 6/2022, de 31 de marzo, de modificación del Texto Refundido de la Ley General de derechos de las personas con discapacidad y de su inclusión social*.) This amendment acknowledges the importance of cognitive accessibility in the framework of universal accessibility, and it incorporates easy-to-read language and pictograms within the group of supporting communication mechanisms requiring regulatory provisions, such

as braille, sign language, easy-access multimedia, tactile, oral, or augmentative and alternative communication systems.

Spain has also been a worldwide pioneer (García Muñoz & Matamala, 2022, p. 503) in the publication of an “experimental” technical standard for the composition of easy-to-read documents (AENOR, 2018b) and an easy-to-read guide for validators (AENOR, 2018a). This standard covers guidelines and recommendations for the phases of adaptation or creation (depending on the existence or inexistence, respectively, of a previous document to be adapted) and validation (which also depends on the nature of the document to be validated as a new creation or an adaptation). There are guidelines for the writing and for the graphical design of the document. The former are specified at the levels of typographical syntax, vocabulary, sentence, style and structure, whereas the latter include the following aspects: presentation (layout and graphical style), images, and other textual and iconic paratextual complements.

In Switzerland, the legal and normative framework for accessibility has also evolved positively in recent times. The rights of people with disabilities are protected by the Swiss Constitution,⁴ but also by the specific Federal Act on the Elimination of Discrimination against People with Disabilities (Disability Discrimination Act, DDA) that was approved in 2002.⁵

In what concerns EL, progress has been made in this geographical context over the last few years (Parpan-Blaser et al., 2022). Whilst there is not a specific national norm and current professional practices seem to follow EL guidelines published in neighbouring countries (ibid., p. 589), the new version of the national standard for digital accessibility eCH-0059 requires and regulates the use of EL in websites and mobile applications, as we will further discuss in Section 3.3.

2.3. Easy Language and Translation

Whereas in contexts outside the Translation Studies (TS) discipline, the production of easy-to-read content has traditionally been considered as something different from “translation” (Tronbacke, 1993, p. 7; García Muñoz, 2012, pp. 24–25), TS have been quick to embrace EL as an act of translation. References to Jakobson’s mentions of the three types of translation, and particularly, of intralingual and intersemiotic translation have been brought to bear for this (e.g., Hansen-Schirra, Bisang et al., 2020, p. 200).

4 Retrieved February 10, 2022, from <https://www.fedlex.admin.ch/eli/cc/1999/404/en>

5 Retrieved February 10, 2022, from https://www.fedlex.admin.ch/eli/cc/2003/667/en#art_1

Recently, research on EL has gained momentum thanks to the efforts of the TS community, particularly from German research teams and cooperation between various European universities and advocacy groups, which crystalised, for example, in the “Easy Plain Accessible” internet platform,⁶ spawning a book series and research projects like EASIT.⁷ These joint efforts are contributing methods, concepts, tools, and knowledge about competencies from interlingual translation into EL, while intralingual and intersemiotic translation practices such as EL, audio description, subtitling for the deaf and hard of hearing, and so on, have also been helping broaden the scope of traditional translational activities.

In researching intralingual “Easy Language Translation” (ELT), for instance, attention has been paid to TS operational concepts such as a *adequacy* – as “a more flexible and function-oriented framework” – rather than (just) equivalence (Hansen-Schirra, Bisang et al., 2020, p. 199), or to *acceptability* and *action-enabling* potential – besides comprehensibility, perceptibility and other traditional accessibility features (Maaß, 2020, pp. 44–48). From cognitive studies and information processing methods already influential in TS, ELT has been conceptualised as seeking to gather the needs of the different target users according to their background and presupposed knowledge about language, the world but also text types, and to the situational context of using the texts (Hansen-Schirra & Rink, 2020). In trying to fulfil the central functions of EL (participation, learning, bridge building), linguistic, conceptual and medial strategies are examined in TS-based ELT, including less conventional “interactions to render the content in a way that adheres to the users’ capacities and needs” (ibid., p. 51).

However, scarce attention is paid to whether and how these considerations and strategies could be applied in an interlingual translation context or in different media forms (television, radio, web). Here, the work of Felici and Griebel (2019) is worth mentioning. They conducted a comparative evaluation of the degree of language clarity of Swiss insurance leaflets in French, German and Italian. Although they focused on current recommendations on how to write plain language instead of EL guidelines, they carried out one of the few studies examining translation issues in simplified text across different languages.

6 Retrieved February 10, 2022, from <https://www.easy-plain-accessible.com/>

7 Retrieved February 10, 2022, from <https://transmediacatalonia.uab.cat/easit/>

As regards technology and ELT, it is undeniable that the body of knowledge dealing with automated or controlled text simplification, processing and authoring keeps growing.⁸ However, few scholars have engaged in discussions about the potential of translation technologies – such as machine translation (MT), terminology management or translation memory (TM) – for the production of EL content. This might be due, in part, to the technical issues that may arise during the alignment of standard and EL texts to train MT systems for intralingual translation, or to the multilingual leaning of tools such as terminology management tools or TMs (Hansen-Schirra, Nitzke et al., 2020).

When discussing technology related to *interlingual* translation for accessibility, the research community has traditionally focused on the use of MT for humanitarian purposes, in health emergency settings or for minority languages (Nurminen & Koponen, 2020). For example, Rossetti (2019) explored the usability of machine translated plain language summaries of health-related content among lay readers with different language backgrounds, but reference to the use of MT output for people with disabilities (PwD) remains scarce in the scientific literature.

It was not until very recently that the community started to explore the capabilities of Neural Machine Translation (NMT) to generate EL content in a multilingual context. A series of studies have demonstrated that, while generic NMT systems like DeepL⁹ cannot yet generate fully accessible EL content, the level of comprehensibility achieved for people with reading difficulties is considerably high (Rodríguez Vázquez et al., 2022; Rodríguez Vázquez & Bouillon, 2021). To date, however, only non-interactive texts have been used in this type of studies, and there seems to be no evidence of prior work covering any of the key aspects of the interlingual translation of EL for the Web.

3. EASY LANGUAGE FOR (AND ON) THE WEB

Maaß (2020, pp. 26–48) uses a text- and user- oriented perspective to establish the following central features that an accessible text must have in order to grant access to their users: it must be easily retrievable, perceptible, comprehensible, linkable to previous knowledge to ensure recall, acceptable, and action-enabling. Such functionalities become even more relevant in the

8 See, for instance, Hansen-Schirra, Nitzke et al. (2020) and Rodríguez Vázquez et al. (2022, sec. 3) for a concise but complete review of the work done on this field up to this date.

9 Retrieved February 10, 2022, from <https://www.deepl.com/translator>

context of the Web, which is primarily interactive and has become one of our main sources of knowledge over the years. In the following sections, we review current recommendations on how to render web content accessible and explore whether there are specific guidelines about the use of EL on the Web.

3.1. W3C Guidelines and Recommendations

Easy-to-understand recommendations are, in fact, part and parcel of the guidelines published by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C) since the very beginning. Version 1.0 of Web Content Accessibility Guidelines (WCAG) (Chisholm et al., 1999) included “Guideline 14. Ensure that documents are clear and simple”, with three checkpoints (“14.1 Use the clearest and simplest language appropriate for a site’s content”, “14.2 Supplement text with graphic or auditory presentations where they will facilitate comprehension of the page”, and “14.3 Create a style of presentation that is consistent across pages”), the first of which was “Priority 1”, that is, compulsory.

WCAG 2.0 (Caldwell et al., 2008), 2.1 (Kirkpatrick et al., 2018) and the working draft of version 2.2 (Adams et al., 2021) include Guideline 3.1 “Readable: Make text content readable and understandable” under principle 3 (Understandable). However, all relevant success criteria (3.1.2 Unusual Words, 3.1.4 Abbreviations, 3.1.5 Reading Level, and 3.1.5 Pronunciation) are “Conformance Level AAA”, meaning that either the criterion is not essential, or it is not satisfiable for all websites and content types, or it requires skills beyond those reasonably achievable by content creators, or following it might impose limits on the “look and feel” or function of the web page, or there may be other workarounds if it is not met (Kirkpatrick et al., 2018, pt. /Understanding/conformance#levels). So, even inside W3C, “Easy to Read on the Web is often seen secondary to more technical questions of accessibility” and only “general recommendations” are provided (WAI, 2014).

It is important to understand that WCAG 2.x criteria within Guideline 3.1 do not completely discourage the use of unusual words, abbreviations, high reading-level language, or words that are difficult to pronounce. Instead, they advocate possible “mechanisms”, “supplemental content”, or an alternative version to make up for those features that are difficult to understand or read. Criterion 3.1.5 (Reading Level) does suggest, as a solution, Technique G153 (“Making the text easier to read”), which is then described as encompassing many of the linguistic procedures recommended to “reduce the complexity of the text” in easy-to-read guidelines (Campbell et al., 2021b). However, other

specific techniques are likewise deemed “sufficient” (Campbell et al., 2021a) individually to meet criterion 3.1.5: to wit, providing a simplified text summary (G86), complementing the text with images (G103), providing a spoken version of the text (G79), and providing sign language versions of key information (G160).

In 2013, the COGA Task Force¹⁰ of the WAI set out to address the lack of clear, focused guidelines and measurable criteria and techniques for people with cognitive and learning disabilities in the WCAG 2.0. Among their key research findings is a gap analysis that identified “user needs and challenges that are not fully included in WCAG” (Seeman & Cooper, 2017). Since then, the COGA have been very active and produced two key documents, which are being frequently updated: *Making Content Usable for People with Cognitive and Learning Disabilities* (Seeman-Horwitz et al., 2018) and the *Techniques for the The (sic) Cognitive and Learning Disabilities Accessibility Task Force* (Seeman & Cooper, 2019).

The former of the two COGA documents includes eight objectives with associated persona-based user stories and needs, as well as design patterns. Objective 3 is “Use Clear and Understandable Language” and covers most if not all concerns of easy-to-read recommendations. The latter has put together seven techniques so far. Some of these techniques or their sub-techniques are oriented towards automatic processing, for instance by text-to-speech engines. Of those targeting human reading of web content, several match easy-to-read guidelines: 1 Provide a clear structure, 3 Writing style, and 5 Help meaning.

Besides readability and legibility guidelines, as suggested for linear documents, COGA objectives, techniques, and patterns account for the specific structures, uses, as well as the dynamic and multimodal elements and events of web pages and sites. In these, (verbal and non-verbal) language and other semiotic and textual resources (layout, fonts, and so on) must convey meaning that is easy to perceive, read, understand, recall, but also use – since the “action

10 COGA is the Cognitive and Learning Disabilities Accessibility Task Force (retrieved February 10, 2022, from <https://www.w3.org/WAI/GL/task-forces/coga/>), which is a joint task force of the Accessible Platform Architectures (APA) Working Group and the Web Content Accessibility Guidelines Working Group (AG WG).

orientation” (Hansen-Schirra & Maaß, 2020b, p. 9; Keller, 2020) of web texts as interactive documents is key. For example, without being exhaustive, some design patterns in Seeman-Horwitz et al. (2018) are:

- In Objective 1 (“Help Users Understand What Things are and How to Use Them”):
 - o Make the purpose of your page clear (through page titles, headings, and other signposts), including helpful icons.
 - o Use a familiar hierarchy and design (though common designs, order, size, etc.)
 - o Use a consistent visual design.
 - o Make the relationship clear between controls and the content they affect.
- In Objective 2 (“Help Users Find What They Need”):
 - o Make it easy to find the most important actions, information, tasks and features of the site.
 - o Make the site hierarchy easy to understand and navigate.
 - o Use a clear and understandable page structure.
- In Objective 4 (“Help Users Avoid Mistakes and Know How to Correct Them”):
 - o Design forms to prevent mistakes (by clearly indicating required fields, providing the user with known suggestions and corrections, etc.).
 - o User clear visible labels.
 - o Use clear step-by-step instructions and rapid feedback.
- In Objective 5 (“Help Users Focus”):
 - o Avoid too much content.
 - o Provide information so a user can complete and prepare for a task.
- In Objective 6 (“Ensure Processes Do Not Rely on Memory”):
 - o Provide a login alternative with less words.
 - o Do not rely on users’ calculations or memorizing information.
- In Objective 7 (“Provide Help and Support”):
 - o Provide alternative content for complex information and tasks.
 - o Clearly state the results and disadvantages of actions, options, and selections.
 - o Provide help with directions and navigation.

- In Objective 8 (“Support Adaptation and Personalization”):
 - o Support simplification.
 - o Support a personalized and familiar interface.

The Personalization Task Force of the WAI¹¹ started working in 2017 on “Personalization Semantics”, which target, among others, users such as those easily distracted or overwhelmed, or with difficulty understanding numbers, mild-moderate or severe language impairments or learning disabilities, or working-memory or short-term memory impairments (Seeman et al., 2021). Some of the modules in this specification include support for simplification; standardised semantic annotation of actions, link destination, symbols, web page element purposes, and distraction triggers; description of types of help and support that can be added to the text, like easy-to-read versions, simplified vocabulary, fewer selection options, or realistic rather than symbolic images; and description of properties of key steps and messages.

3.2. Other European Guidelines on Easy Language for the Web

The Spanish standard (AENOR, 2018b) clearly states that easy-to-read documents are technical aids for people with reading comprehension difficulties, although it also aims to benefit all readers. However, its emphasis on reading for understanding and on a traditional concept of document, as well as the scarce mention of extra-textual purposes and needs, sets the standard away from certain concerns regarding computer (code-based, interactive, purpose- and action- oriented) media such as websites and mobile applications.

For example, alternative texts for images are not mentioned in the standards, even if people with reading comprehension difficulties may benefit from such short description both if images in a web document fail to load, or if a text-to-speech synthesizer is used. Not taking alternative text in consideration, on the other hand, would exclude blind people who use a screen reader to access an easy-to-read document, in PDF or other formats. The exact same thing can be said about not coding headings or lists in documents using the appropriate HTML elements, or not making the purpose of links clear by means of the linked text on its own or in context.

11 The Personalization Accessibility Task Force (also known as the Personalization Semantics Task Force) is part of the Accessible Platform Architectures (APA) Working Group (retrieved February 10, 2022, from <https://www.w3.org/WAI/APA/task-forces/personalization/>).

Other difficulties can arise from taking certain layout decisions (non-standard line breaks, unstructured tables or sections) that do not consider internal reading order or the use of proper coding structures, headings and labels.

Finally, the standard does not include the possibility of semantically coding key parts and concepts, along the lines of the COGA and Personalization task forces of the WAI. Establishing certain semantics may help with labelling basic concepts in documents that could then be translated in a personalised manner to easier to read versions, automatically generate glossaries, complementary icons or images, and so on, by assistive technologies.

The Spanish guidelines stands in contrast with the aforementioned European standard by Inclusion Europe (2009), which includes a full section on electronic information, mainly devoted to websites. The latter's focus is on the findability, operability and understandability of web information, and on in-built mechanisms (rather than on semantic coding, adaptability, distinguishability, manageability, compatibility, or other universal design and user-agent-oriented features advocated by WCAG 2), but it covers key aspects such as the following: the size and clarity of navigation bars and buttons; consistent design and comprehensibility of links; clear site-wide orientation and easy return to the homepage; the use of meta tags indicating easy-to-read language used in the website; the integration of text-to-speech, search and text-resizing tools; a homepage clearly stating the purpose of the website and contact details; or avoiding page clutter, animations, popups or interfering applets. One of the missing aspects of the European standard, however, is a recommendation on how best to include references or links to explanations of words or expressions, and how to go back to the specific point of the text if the mechanism involves a change of page or context. This, again, should be done in ways that are accessible for all and taking into account assistive technologies.

In the Swiss context, the Easy Surfing project¹² issued a guide (insieme et al., 2015) with a set of 14 recommendations on how to create accessible websites for people with cognitive impairment. The use of "Easy read" language is, in fact, the first recommendation of the guide. The recommendations on the topics of navigation and clear content are similar to those included in the previously mentioned European standard created by Inclusion Europe (2009). The Swiss guide also provides accessibility best practices on other aspects such as

12 See Einfachs surfen, retrieved February 10, 2022, from <http://einfachs surfen.ch/>

interactive elements, audiovisual content, data protection, or responsive design (insieme et al., 2015).

3.3. Eligibility of Specific Web Content for Easy Language

Very few international norms promulgate the use of easy-to-read language on websites. In fact, the WAI (2014) acknowledges that there is “agreement that the complexity of Easy to Read and in particular the orientation towards individualization of translations in many aspects goes beyond what can be expected from mainstream”, and that guidelines should “include or develop concepts like Plain Language to maximise understandability and usability for all users and point to the need of such individualised services.” Along the same lines, Eraslan et al. (2017) contend that “elements related to cognitive disability are given lower priority in web accessibility guidelines due to limited understanding of the requirements of neurodiverse web users.”

Yet, we can find indications in national and international norms about certain areas of activity where maximum understandability may be crucial for all. Those areas may be deemed as primary candidates to enforce easy-to-read language in related websites. For example, the CRPD (United Nations, 2006) establishes that States must ensure that “voting procedures, facilities and materials are appropriate, accessible and easy to understand and use”. The European Accessibility Act (European Union, 2019) explicitly mentions that the information in websites for “consumer banking services” should be understandable “without exceeding a level of complexity superior to level B2” of the Common European Framework of Reference for Languages (CEFR). Similarly, it indicates that the instructions for use, installation, maintenance and disposal of technological products (including its accessibility functions and interoperability with assistive technology), or the information of functioning of technological services, when available through a website, should be “presented in an understandable way”.

The amendment incorporating cognitive accessibility and easy-to-read to the Spanish legislation on the rights of persons with disabilities (*Ley 6/2022, de 31 de marzo*) added participation in public life and electoral processes, as well as information on social benefits and administrative resolutions, to the areas where universal accessibility is deemed fundamental. These already included ICT services, relations with justice and public administration, the use of public goods, services, buildings and spaces, or cultural heritage, among other areas.

In Switzerland, the new version (3.0) of the eCH-0059 Accessibility Standard (Riesch et al., 2020) has recently been published. This national standard is

intended for organisations that provide public services, and it establishes that their websites and mobile applications should follow level AA of the aforementioned WCAG 2.1. Furthermore, the standard includes three additional rules (Riesch et al., 2020, p. 7), the first two of which have also been in the European standard for digital accessibility since 2014 (European Union, 2019):

- (a) Websites and mobile applications should include an accessibility declaration.
- (b) Websites and mobile applications should provide a feedback mechanism.
- (c) Information related to the most important life areas¹³ should be available in “alternative means of communication”, specifically EL text and sign language (SL) videos.

Interestingly, this norm clearly defines that the *most important* life areas – thus, requiring EL and SL videos – are those areas that: (a) can have an impact on life and health; (b) are related to political and individual rights; (c) are related to the prevention of violence, illness and injuries; (d) are related to civil rights and duties; or (e) are addressed to people with disabilities. Besides, the Swiss standard also stipulates that information related to *other* life areas¹⁴ (those related to education, work, family, housing, leisure, or public services) should also be *proportionally* available in these two “alternative means of communication.” (Riesch et al., 2020, p. 10). These recommendations are already being implemented in certain contexts. For instance, we have witnessed how some institutional websites have recently integrated content in EL and SL videos (see example shown in Section 4.1). Furthermore, a new Swiss interuniversity research project has been recently approved to promote the use of EL and SL in the educational landscape.¹⁵

13 “Informations relatives aux domaines centraux de la vie” as in the French version of the standard. At the time of writing, the eCH-0059 standard is only available in French and German. In the original text they used the terms “langue facile à lire” and “Leichter Sprache” to refer to Easy Language. For a discussion on the terms used to refer to Easy Language in the Swiss context, we refer interested readers to Parpan-Blaser et al. (2022).

14 “Informations relatives aux autres domaines de la vie”, as in the French version of the standard.

15 See, for example the UNI-ACCESS project (retrieved February 10, 2022, from https://www.swissuniversities.ch/fileadmin/swissuniversities/Dokumente/Forschung/Chancengleichheit/P-7_Chancengleichheit_2021-2024/P7_Resumes_2-Call_2021-2024.pdf#page=6)

3.4. Easy Language Content Publication Strategies

Despite all the international and national efforts devoted to the publication of standards, norms and legislation, EL content is still scarce, and it is very often limited to isolated documents published by governmental institutions or independent organisations serving the needs of very specific population groups. In addition, as noted by Parpan-Blaser et al. (2022, p. 590), “information in EL is not easily found and target groups are often not aware that it exists.”

The trend appears to be similar in the case of the Web, as there seems not to be clear guidelines indicating how to integrate EL content in the overall website design – except for the aforementioned ones by Inclusion Europe (2009, p. 24), who advocate linking to easy-to-read pages from the homepage when the whole website cannot be made easy to read – let alone how it should be localised (see Section 4.1).

For the purposes of this work, we have searched the Web for examples of sites containing EL content. This observation exercise, conducted between October and December 2021, led us to compile a limited but enlightening sample of nine websites (see Annex A) that we will refer to throughout the following sections to illustrate different strategies used to provide information in EL.

In general terms, we can state that the heterogeneity regarding the design and content selection of our web sample supports the conclusions drawn from our review of the literature: standardisation of best practices in those areas is still missing. In particular, during the exploration of the sample, the following key themes emerged on how EL content is adapted and presented on the Web:

- (a) *File formats.* While the most popular format to publish information in EL appears to be PDF (see, for instance, the documents shown in Figure 1), we could also find examples of websites with EL content in HTML, audio, and MS Power Point. From an accessibility perspective, it is worth highlighting that opting for PDF could be regarded as ineffective if the goal is to reach the widest audience possible and if the files contravene the Techniques for rendering PDF accessible as per the WCAG 2.1 (Campbell et al., 2021a).¹⁶
- (b) *Location of content in the web page/site.* The information available in EL is not systematically located in the same place across websites. Concretely, we have identified the following strategies in monolingual websites:

16 Some of these techniques are reviewed in Rodríguez Vázquez (2023) in relation to the accessibility of informational materials about COVID-19 provided by the Spanish Ministry of Health.

1. *Standalone website*. This is the case of the Plena Inclusión portal (see Figure 2), the lead organisation in Spain supporting people with ID. Considered as the most inclusive solution, this strategy implies providing all content in this language variety, as advocated by Inclusion Europe (2009, p. 24). Ideally, the super and macrostructure of the website (Jiménez Crespo, 2013, pp. 92–94), as well as any other complementary content (e.g., audiovisual information) should also be presented in a way that is understandable and usable for, at least, EL target groups.
2. *Main navigation menu*.¹⁷ Inclusion Europe, in contrast to their recommendations for a standalone website, offers a link on the main or global navigation menu to all the easy-to-read pages. It is easily findable (under the Discover option in the main menu or directly in the footer list of main pages), but the page containing the links with the blurbs and main images of all the easy-to-read pages (accessible two clicks away from the homepage) is too cluttered (Figure 3). Additionally, it has no clear internal navigation or search mechanisms, with overall insufficient colour contrast. We contend that a highlighted section on the homepage linking to those pages would have been a better strategy.
3. *Local navigation menu*. As illustrated in Figure 4, specific EL content can also be found directly as a link in a local navigation menu within a specific section (accessible within two-three clicks). For instance, in Discapnet website, an EL user looking for information about COVID-19 in EL would need to select “Áreas temáticas” > “Salud” from the main top menu and then click on “Enfermedades” (left side navigation menu) to get to the desired content, which is available in HTML format and in an easy-to-read version. When the content publication strategy dictates that only certain information (for instance the most recent or sensitive information) will be translated into EL, this solution could be regarded as acceptable, although the user cannot predict which pages are available in easy-to-read language unless a specific link or directory is placed on the homepage.
4. *Complementary information (associative navigation in inside pages)*: In line with Parpan-Blaser et al.’s (2022) remarks, we consider this to be the least recommendable solution, as EL users would most likely find

17 In the context of our research, we use the navigation types defined in Kalbach (2007). Retrieved. February 10, 2022, from <https://www.oreilly.com/library/view/designing-web-navigation/9780596528102/ch04.html>

it hard to locate the information they are looking for. In the example shown in Figure 1, EL content is available, in PDF format, under the 5th level of navigation as “complementary information”, which contravenes the general usability principles of keeping a medium level of granularity and using descriptive labels in web navigation menus (Nielsen & Li, 2017).

- (c) *Compliance with WCAG and COGA guidelines.* Finally, we have also observed that very often EL pages do not comply with fundamental web accessibility best practices (Adams et al., 2021), such as the proper use of headings and titles, meaningful links or text alternatives for images, or insufficient contrast. This is essential for users who may access EL content through assistive technology, may suffer from a temporary impairment or simply might not be able to access the website in favourable conditions. In many cases, COGA guidelines are not always complied with either, for example, in terms of clear visual presentation and navigation mechanisms, as seen above.



Figure 1. List of PDF documents in EL – Website of the Health Department of the Autonomous Region of Castilla y León, Spain.



Figure 2. Standalone website in EL – Plena inclusión, Spain.

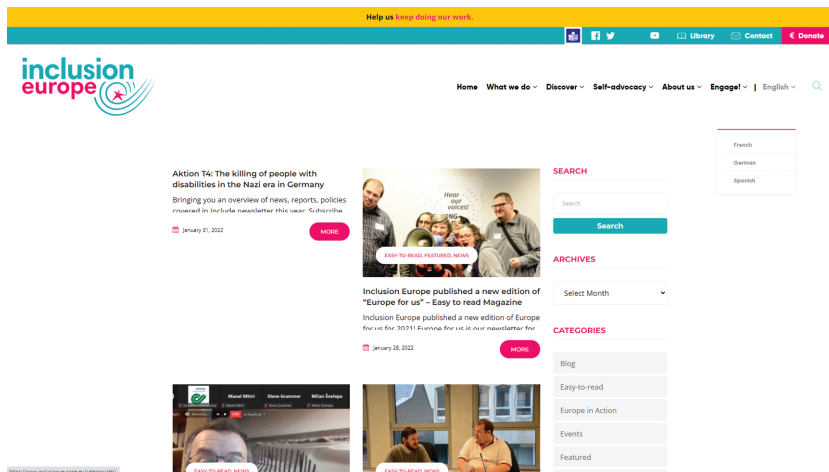


Figure 3. Inclusion Europe website – Internal page with the blurbs of easy-to-read articles in four languages.



Figure 4. EL content in a submenu under left local navigation menu – Discapnet, Spain.

4. EASY LANGUAGE IN MULTILINGUAL WEBSITES

4.1. Multilingual Web Accessibility

Over the last decade, a considerable amount of literature has grown up around the theme of accessibility and web localisation – generally understood as the cultural, technical and linguistic adaptation of a web page or website to render it multilingual. In particular, since its inception, the Cod.eX Research Group¹⁸ has fiercely advocated for the consideration of accessibility features in localisation standards and tools (Rodríguez Vázquez, 2015; Torres-del-Rey & Morado Vázquez, 2019); the inclusion of HCI-related competences in localisers' training (Torres-del-Rey & Rodríguez Vázquez, 2016; Torres-del-Rey, 2019); and the cooperation between all stakeholders involved in the

18 Retrieved February 10, 2022, from <https://diarium.usal.es/codex/en/>.

localisation process to guarantee an acceptable level of accessibility across the different language versions of multilingual websites (Rodríguez Vázquez, 2016; Rodríguez Vázquez & O'Brien, 2017).

Nonetheless, to date, the integration of EL content in such websites has remained largely unexplored. In what follows, we make what we believe is the first attempt to examine current practices in the publication of multilingual EL content on the Web.

4.2. Multilingual Easy Language Content: Publication Strategies

By the time of writing, we have been unable to find any specific guidelines on how to localise EL content in any of the relevant documents we have reviewed. We have therefore used our web sample to look for existing solutions currently followed to publish EL content online in different languages.

When commenting on the strategies observed, we will consider EL versions as potential target languages, translated either intralingually from the “standard” main language of the website (ELT) or interlingually from the EL version of the website’s main language (translated EL). In this sense, we could hypothesise that the localisation strategy used could depend on the localisation level of the website, as per the instructions of the commissioner, the knowledge and know-how on EL and accessibility of the different localisation stakeholders, or the availability of time or financial resources, to name but a few. Jiménez-Crespo (2013, pp. 35–36) proposed one of the most recent classifications of localisation levels, ranging from non- or partially localised websites, where not all the content is adapted to a given language and culture, to fully localised websites (also known as “mirror” sites). We briefly define each level below so that we can later discuss how they could be transposed in the case of the localisation of web content in EL:

- Level 0: Websites that offer third-party MT services or translated PDF documents.
- Level 1: Translated content is limited to a couple of paragraphs, a document or a single page in the target language.
- Level 2: A few pages have been translated into the target language, but the navigation menus are left in the source language.
- Level 3: Apart from translated pages, at least one main navigation menu is presented in the target language.
- Level 4: All web content is available in each of the languages proposed in the website.

In our web sample, we identified six multilingual EL content publication strategies, which are presented below in order from the lowest to the highest level of localisation:

- (a) *Solution 1 – Automated ELT simplification*: This, for example, was the solution adopted by the official website of the Portuguese General Health Directorate on COVID-19 throughout 2020 and 2021 by means of a widget – with a comparable solution adopted for translation into English through a Google Translate widget (ELT localisation level 0). However, the simplification was only at the level of layout and it was not combined with machine translated EL (Morado Vázquez & Torres-del-Rey, 2023).
- (b) *Solution 2 – Production and translation of EL documents in PDF format*: the website of the Spanish Ministry of Health listed a few infographics for citizens about Covid-19 in PDF format using some features of EL and PL. The infographics are a simplification of main documents on the website (ELT localisation level 0/1) and they are accessible in different languages (English, French, Arabic, Romanian, Chinese, Russian, Bulgarian, German and Urdu) through an ad-hoc navigation menu, and also, within a single page, in different sections (translated EL localisation level 1/2).
- (c) *Solution 3 – Lists of documents*: Inclusion Europe's website presents three sources of EL content. One of them is a feed of articles in EL, some of which are translated into French, German or Spanish (localisation level 2), including the language selector, which goes against localisation best practices.¹⁹ The second is the easy-to-read guidelines (Inclusion Europe, 2009) in 16 languages in PDF format, all of them linked from the same web page (translated EL level 0/1). There is also a more simplified version only in English. The third source of EL content (see Figure 5) is a page with explanations of words in easy-to-read language, including an in-page index of words. This page is localised into the other three languages from English, and the language selector allows to move from one language to another, although not from the anchors at each word. Besides, because top level pages are only available in English (with the language selector inactive), the explanations in the other three languages are only available through the English page. This matches the category of, at best, a partially localised website at level 2, although level 1 (unlocalised website, only a translated page) might be a better description.

19 See, for example, W3C indications. Retrieved February 10, 2022, from <https://www.w3.org/International/questions/qa-navigation-select#translate>.

- (d) *Solution 4 – Dedicated section under main site:* As shown in Figure 6, the Federal Bureau for the Equality of People with Disabilities in Switzerland integrates in its multilingual website an Easy Language section – accessible via the local menu to the left – with several web pages in EL covering, amongst other topics: legal and political information, health information or a list of terms explained in Easy Language. The Swiss context is particularly interesting in our research due to its multilingual nature. For example, the aforementioned institution provides its webpages in EL in three of the four national Swiss languages: French (*langue facile à lire*), German (*Leichter Sprache*) and Italian (*lingua facile*). The main language selector (at the top, to the right, see Figure 6) is used to navigate between these versions. Since not all the website content is available in EL, this solution could correspond to a localisation level 3.
- (e) *Solution 5 – Subsite under main site:* On the website of the Federal Office of Public Health in Switzerland, the information about COVID-19 pandemic is offered in four “standard” languages (i.e. German, English, Italian and French), their corresponding EL variants and also in the respective sign languages. The navigation across language versions here differs from the previous solution in that the user needs first to select the standard language (e.g., English) and then click on the “Easy-to-read language” selector at the top, or the other way around, that is, first the EL or sign language “modality” and then the geographical or interlingual version of that modality (see Figure 7), which we consider a wise strategy. In this sense, the localisation level reached is higher than solution 4, but not enough to meet the criteria defined under localisation level 4. Although in theory the same strategy as in solution 4 should be used for consistency purposes across all Swiss government sites, it seems that, at the time of writing, they were still testing out different strategies, very likely due to the publication of the most recent version of the digital accessibility norm. Content is mainly offered in PDF and web formats, but in this case, it is worth highlighting the fact that sometimes fundamental WA recommendations are not followed, such as the use of meaningful links. As illustrated in Figure 7, the link “Find out more here” is repeated, which could be problematic for screen reading users accessing a list of links in the page.
- (f) *Solution 6 – Fully multilingual EL site:* The EASIT project website²⁰ is the best example we could find of a standalone website in EL fully localised

20 Due to a cyberattack, the EASIT website and platform were down at the time of writing of this chapter. The screenshot used for this work was taken from a legacy website stored in the Internet Archive that dates from July 2021. The website might have undergone changes since that date.

(level 4) into eight languages (see Figure 8). Apart from the text in web format, each page also includes an audio rendering of the main content. We could also observe that a number of usability and localisation best practices were implemented, such as the use of breadcrumbs or target language names in the language selector. On the other hand, we have also identified a small number of potential challenges for people with cognitive or other types of disabilities – which we believe could be temporary –; e.g. the presence of untranslated content and the noncompliance with certain WA recommendations, such as the aforementioned one regarding the use of meaningful links. It was interesting to note as well that the disclaimer page was not available in EL and that all translations can be accessed through the same page. It is very likely that this was deliberately done for legal reasons, but it would be interesting to study how this could affect the navigation experience of different target population groups.

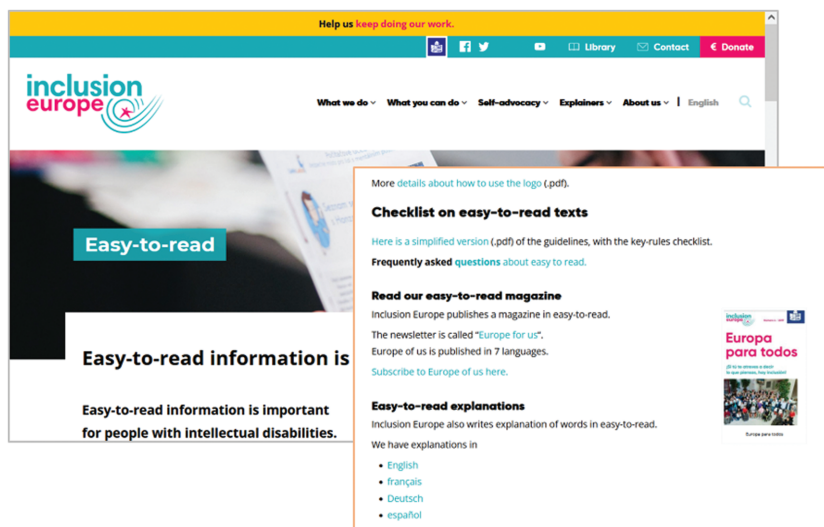


Figure 5. Inclusion Europe website – Home page (background image) showing a language selector to the right of the header. Page about EL (foreground image, with thicker border outline) with a list of translated documents in different languages.

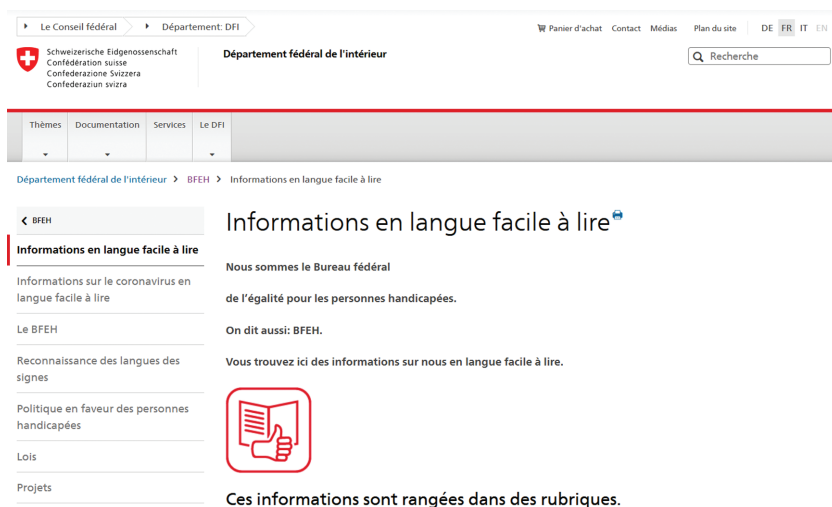


Figure 6. Dedicated section to information in EL, available in German, French and Italian – Federal Bureau for the Equality of People with Disabilities, Switzerland.

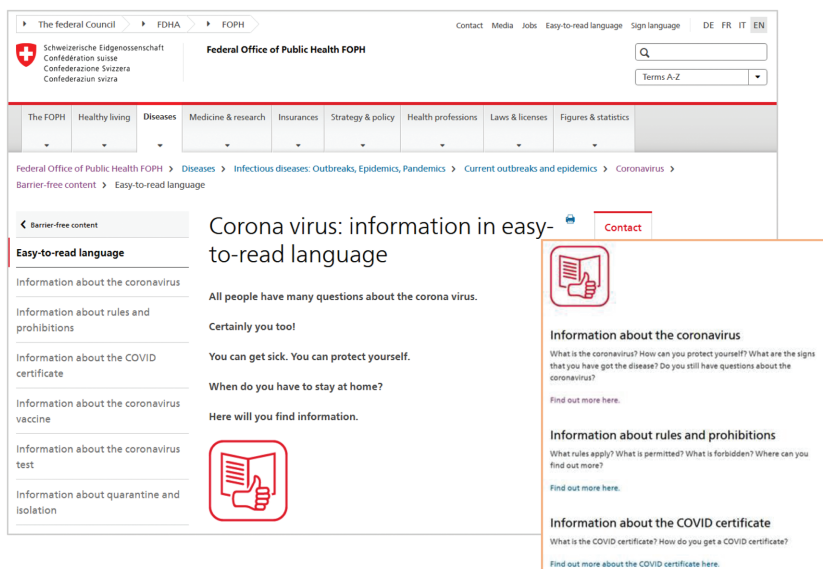


Figure 7. Easy-to-read language as part of the main language selector (background image); EL page with non meaningful link titles (foreground image, with thicker border outline) – Federal Office of Public Health (FOPH), Switzerland.

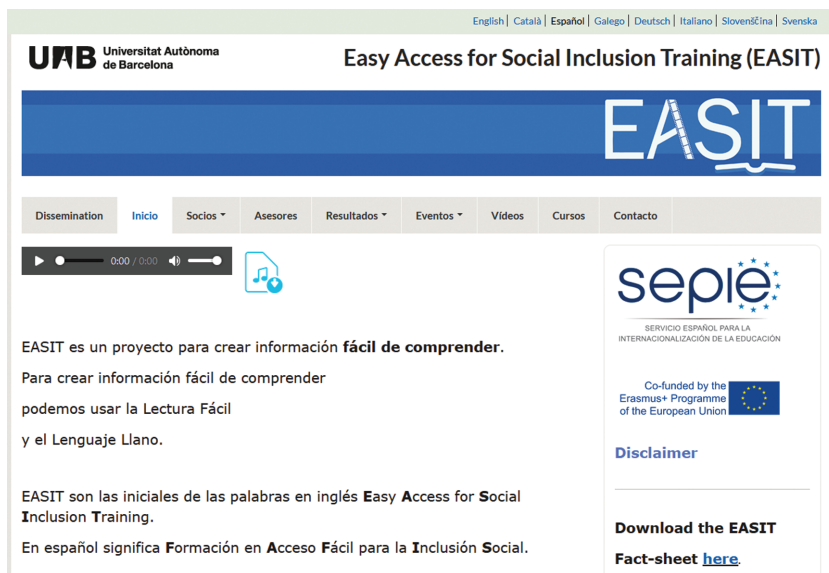


Figure 8. EASIT project website.

5. THE ROAD SO FAR AND THE ROAD AHEAD

The examination of the existing resources that support the creation of EL for the Web in the international, European, and, particularly, Spanish and Swiss contexts has led us to identify a number of limitations. First, very few indications are given regarding the use of EL on the web. We only know that there is a preference for a limited number of knowledge areas, which means that, in the end, what is translated into EL and what is not remains discretionary: there are no monitoring or control mechanisms in place. Similarly, different formats are mentioned and used, but we lack evidence-based recommendations about which ones are more effective. In addition, and related to the latter, little is said about how people with ID perceive, understand, and are able to operate other web elements that structure and are connected to the main EL content. Are “traditional” accessibility and web design best practices in terms of web structure and navigation (as advocated in the WCAG 2) applicable for this population, or should easy-to-read standards be translated into new web designs? Last but not least, all the recommendations we identified are not legally binding and, as demonstrated through our web sample, they do not seem to be well known among web content creators.

We believe that, to bridge some of those gaps, it is necessary to have clearer EL recommendations for the Web. A combination of technical and linguistic guidelines would be crucial. These should ideally be built upon evidence-based research, including usability, accessibility and web design studies. Do's and don'ts are important, but so are guidelines to create a clear narrative of information and navigation options for users, and possibly to personalise the level of complexity, from basic features to progressive enhancement. In this sense, a flexible, dynamic evaluation and scoring approach, such as the one that is being developed as part of WCAG 3.0 (Spellman et al., 2021), could be adapted to the needs of the target audience.

When it comes to web localisation, we found that existing literature includes no reference to multilingualism or interlingual translation mechanisms. Our observation exercise showed that no clear patterns exist and that it is yet to be determined which is the best approach to be followed in the localisation of websites with content in EL. While the answer might not be straightforward, more research should be conducted on how to integrate EL versions alongside other language versions, and where and how to access them. Similarly, in future work, it might be interesting to define new EL-oriented localisation levels, as we have experienced some difficulties when trying to map pre-existing classification proposals, such as Jimenez-Crespo's (2013), to the EL reality.

Finally, after awareness is raised among localisers and other stakeholders – since, as Maaß and Rink (2020, p. 50) point out, creating EL content requires the cooperation between professionals from different areas – a good avenue for progress could be to produce web-oriented EL localisation training materials, along the lines of the EASIT project for ELT.

6. ANNEX A – LIST OF EXAMINED WEBSITES

Our analysis is based on the websites' versions that were online between October and December 2021. Similarly, the web screenshots included in this chapter have all been taken during that period. We are aware that, upon publication of this book, the sites' look and feel, as well as their content, might have changed. The websites we examined for the purposes of this chapter should be consulted again if they were to be used again in the future to illustrate some of the points raised in our work.

Table 1. List of examined websites with Easy Language content.

Website	URL of the page(s) discussed	Figure(s)
Health Department of Castilla y León, Spain	▪ https://www.saludcastillayleon.es/AulaPacientes/en/guias-aula-pacientes/guias-lectura-facil	1
Plena Inclusión, Spain	▪ https://www.plenainclusion.org/	2
Inclusion Europe	▪ https://www.inclusion-europe.eu/easy-to-read/ ▪ https://www.inclusion-europe.eu/easy-to-read-term/ ▪ https://www.inclusion-europe.eu/easy-to-read-standards-guidelines/ ▪ https://www.inclusion-europe.eu/category/etr/	3, 5
Discapnet, Spain	▪ https://www.discapnet.es/ ▪ https://www.discapnet.es/informacion-sobre-el-coronavirus-en-lectura-facil	4
COVID-19 information, General Health Directorate, Portugal	▪ https://web.archive.org/web/20211201015129/https://covid19.min-saude.pt/	n/a
Ministry of Health, Spain	▪ https://web.archive.org/web/20210930094756/https://www.mscbs.gob.es/en/profesionales/saludPublica/ccayes/alertasActual/nCov/ciudadania.htm ▪ http://web.archive.org/web/20220124082811/https://www.sanidad.gob.es/profesionales/saludPublica/ccayes/alertasActual/nCov/ciudadania/otrosIdiomas.htm	n/a
Federal Bureau for the Equality of People with Disabilities, Switzerland	▪ https://www.edi.admin.ch/edi/fr/home/fachstellen/bfeh/informationen-in-leichter-sprache.html	6
Federal Office of Public Health, Switzerland	▪ https://www.bag.admin.ch/bag/en/home/krankheiten/ausbrueche-epidemien-pandemien/aktuelle-ausbrueche-epidemien/novel-cov/barrierefreie-inhalte.html	7
EASIT Project	▪ https://pagines.uab.cat/easit/	8

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- AENOR, C. técnico C. 153 P. de apoyo para personas con discapacidad. (2018a). *Guía en lectura fácil para validadores de documentos (norma española UNE 153102 EX)*. AENOR. Retrieved March 1, 2022, from <https://www.une.org/encuentra-tu-norma/busca-tu-norma/norma/?c=N0061282>
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