Microenterprise Guidelines on the European Accessibility Act (EAA)

Introduction

The European Accessibility Act covers a range of digital products and services. The EAA will become law in Ireland on 28 June 2025.

If you manufacture, import or distribute these products in Ireland, it's important for you to familiarise yourself with the EAA.

These guidelines will help microenterprises understand the EAA. They are not intended to be comprehensive or a definitive guide on the requirements in the EAA. If you are unsure of your legal obligations, you should seek independent legal advice.

What are the main goals of the EAA?

The main goals of the EAA are to:

- increase the availability of accessible products and services across the European Union (EU)
- ensure that accessibility requirements are consistently applied to the manufacturing and sale of products and services across the EU

What are the benefits of the EAA?

Businesses will benefit from:

- reduced costs due to common rules on accessibility in the EU
- easier cross-border trading
- more market opportunities for their accessible products and services

People with disabilities and elderly people will benefit from:

- more accessible products and services in the market
- accessible products and services at more competitive prices
- fewer barriers to transport, education and the labour market
- more jobs available where accessibility expertise is needed

CCPC approach to the EAA

The CCPC will take a proportionate approach to regulating the EAA. We aim to provide support and reassurance to help microenterprises understand and comply with these new obligations.

Getting started

1. Check if your business is considered a **microenterprise** under the EAA. (see page 3 below)
2. Check if your product falls under the EAA. **List of products** covered by the EAA. (see page 4 below)
3. Understand **your obligations as a manufacturer, importer or distributor**. (see page 6 below)
4. Determine which **accessibility requirements** in the EAA apply to your product. (see page 9 below)

Microenterprises

If your business employs fewer than 10 persons **and** has an annual turnover not exceeding €2 million or an annual balance sheet total not exceeding €2 million, it is a microenterprise.

Products covered by the EAA:

- **Computers and operating systems**
  - For example: smartphones, tablets, smartwatches, laptops, desktop PCs and android, windows, macOS and iOS.
- **Self-service payment terminals**
  - For example: CHIP & PIN machines, card readers.
- **Self-service terminals of services covered by the EAA**
  - Automated teller machines (ATMs)
  - Ticketing machines that issue physical tickets
    - For example: travel ticket machines, queue number machines used in banks, restaurants and so on
  - Check-in machines
  - Interactive self-service terminals providing information
    - For example: interactive information screens but not a passive information board
- **Equipment used to access electronic communications services**
  - For example, home routers, modems, and other devices that are part of the service, or provide access to an electronic communications service
- **Equipment used to access audiovisual media services**
  - For example, smart televisions (including accessories such as a remote control), set-top boxes.
- **E-readers**
  - For example: equipment for reading e-books

The products included in the EAA are not limited to what can currently be imagined but would also include future new or innovative products that fit the definitions contained in the EAA.

Example:

The EAA applies to 'Consumer terminal equipment with interactive computing capability, used for electronic communication services.'

Each of these three phrases included in the product terminology has a definition provided in the EAA. You will need to review the definitions and determine if your product falls within these definitions.

The Competition and Consumer Protection Commission is the market surveillance authority for all products covered by the EAA.

A note on accessible services

The compliance authority in respect of services covered by the EAA differs depending on the service. The Competition and Consumer Protection Commission is the compliance authority for the following services:

- E-books and dedicated software
- E-commerce services

Microenterprises providing services

The requirements and obligations of the European Accessibility Act (EAA) do not apply to microenterprises providing services.

Your obligations as a manufacturer, importer or distributor

Manufacturers, importers, and distributors must ensure that, for the products covered by the EAA, only those in compliance with its requirements are placed onto the EU market.

The obligations of manufacturers, importers, and distributors differ slightly, but all have the responsibility to ensure compliance.

Manufacturers

As a manufacturer, you must:

- ensure that a product complies with the applicable accessibility requirements before placing it on the market
- carry out a conformity assessment by
  - Drawing up technical documentation, which should provide at minimum a general description of the product and the extent to which the product complies with harmonised standards and technical specifications (such as EN 17161 or EN 301 549). If you have not applied European standards, you should describe how the product complies with the accessibility requirements.
  - Putting in place procedures to ensure that the manufacturing process and monitoring remains in compliance with the relevant technical documentation and with the accessibility requirements.
- once compliance has been demonstrated by the above process, affix the CE mark and draw up the Declaration of Conformity
- ensure that the product can be identified by consumers in an easily visible and legible way.
  - This includes a type, batch or serial number or any other identifying element.
  - If the size and/or nature of the product does not allow this, the information should be provided on the packaging or in a document accompanying the product.
- indicate on the product – or, where this is not possible, on the packaging or in a document accompanying the product – the manufacturer's name, registered trade name or registered trademark, address and single point of contact in a language consumers can easily understand
- ensure that products are accompanied with clear instructions and safety information in a language consumers can easily understand

Once the product is on the market, you must:

- keep the technical documentation and the EU declaration of conformity for 5 years after the product has been placed on the market
- ensure all information and documentation needed to demonstrate conformity with the relevant accessibility requirements is available in language that can be easily understood by and provided to the relevant market surveillance authority upon request

You must also:

- keep a register of products that do not comply with the accessibility requirements and any related complaints.
- cooperate with the market surveillance authority on any action taken to eliminate non-compliance with the accessibility requirements

If you believe a product is not in conformity with the EAA, you must immediately:

- take the necessary corrective measures to bring the product into conformity, or if appropriate, withdraw the product, and
- inform the relevant market surveillance authorities of the non-compliance and any corrective measures taken

Information about manufacturers' obligations can be found in S.I. 636/2023, Part 4, Regulation 8.

Importers

As an importer, you must:

- ensure the manufacturer has complied with its obligation to draw up technical documentation and carry out the conformity assessment procedure
- ensure the product has a CE mark
- ensure the product is accompanied by all relevant documentation, such as clear instructions and safety information in a language consumers can easily understand
- ensure the manufacturer has complied with the traceability requirements (type, batch or serial number and the manufacturer's name, registered trade name or registered trademark, address and single point of contact in a language consumers can easily understand)
- indicate your name, registered trade name or registered trademark and address on the product or where this is not possible on the packaging.
- not place a product on the market if you believe it does not comply with the relevant accessibility requirements
- not jeopardise the compliance of a product with the accessibility requirements

Once a product has been placed on the market, you must:

- keep a copy of the EU declaration of conformity for a period of 5 years
- ensure that the technical documentation can be made available to the relevant market surveillance authority
- keep a register of products that do not comply with the accessibility requirements and related complaints
- cooperate with the relevant market surveillance authority

If you believe a product is not in compliance with the EAA, you must immediately:

- inform the relevant market surveillance authority of any non-compliance
- take corrective actions to bring the product into compliance, or if appropriate, withdraw the product

Information about importer obligations can be found in S.I. 636/2023, Part 4, Regulation 10.

Distributors

As a distributor, you must:

- verify that the product has a CE mark
- verify that the product is accompanied by all relevant documentation, such as clear instructions and safety information in a language consumers can easily understand
- verify that the manufacturer and importer contact details are present on the product, its packaging or a document accompanying the product, and that the manufacturer has complied with the traceability requirements (product identification and manufacturer contact details)

- not place a product on the market if you believe it does not comply with the relevant accessibility requirements.
- not jeopardise the compliance of a product to the accessibility requirements

Once a product has been placed on the market:

- Immediately inform the relevant market surveillance authority of any non-compliance and take immediate corrective actions to bring the product into compliance, or if appropriate, withdraw the product
- Cooperate with the relevant market surveillance authority

Information about distributor obligations can be found in S.I. 636/2023, Part 4, Regulation 11.

Accessibility requirements

The accessibility requirements outline what companies must do to comply with the EAA, but they do not specify how a company must do this. This allows for innovation in how companies design and manufacture compliant products and services, without prescribing how conformity may be achieved.

Consider the following accessibility requirement: 'when the product uses colour to convey information, indicate an action, require a response or identify elements, it shall provide an alternative to colour.

This requirement does not specify what the alternative must be, simply that an alternative must be provided so that persons with disabilities can access, perceive, operate, understand, and control the product.

The accessibility requirements cover several aspects of the relevant products and services.

There are requirements on the **features**, **elements**, and **functions** of the product, as well as requirements on **user interface** and **functionality design**.

Annex II of the EAA provides useful examples that map onto each accessibility requirement. Below is an example of an accessibility requirement with a corresponding example from Annex II.

When the product uses colour to convey information, indicate an action, require a response or identify elements, it shall provide an alternative to colour.

Example:

If giving a choice to press the green or the red button for selecting an option, you could also add writing on the buttons indicating what the options are, in order to allow a person who is colour blind to make the choice.

There are also requirements on the provision of information and support services related to the products. This is not an exhaustive list of categories. The accessibility requirements can be found in Article 4 and Annex I of the EAA and Part 3, Regulation 5 and Schedule 1 of S.I. 636/2023.

How can you comply with the accessibility requirements?

While the accessibility requirements in the EAA don't tell you how you must satisfy them, you can ensure that you are complying with each requirement by applying European standards and checking the Functional Performance Criteria.

What are European standards?

A standard is a technical specification that can be used to comply with the requirements set out in European laws. These EU standards are often referred to as harmonised standards, and products or services which comply with these standards will be presumed to be in conformity with the accessibility requirements.

Which harmonised standards are relevant to the EAA?

Key existing standards:

- [EN 301 549](): Accessibility Requirements for ICT products and services
- [EN 17161](): Design for All – Accessibility following a design for all approach in products, goods, and services – Extending the range of users.
  - This includes requirements for processes and procedures that address accessibility along the 'end to end' chain and involving users in your design and development process. The upcoming harmonised revision of the standard will also map onto ISO9001, a popular quality management standard that your organisation may already be using.

The list of new relevant standards to be drafted include:

- Harmonised standard setting up requirements on the accessibility of non-digital information related to products.
- Harmonised standard for the accessibility of support services related to products and services (help desks, call centres, technical support, relay services and training services)

Functional Performance Criteria

The European Accessibility Act also includes Functional Performance Criteria alongside its accessibility requirements. These criteria must be used when the accessibility requirements of Annex I do not address one or more functions or features of your product or service, or when applying the criteria results in equivalent or increased accessibility for persons with disabilities.

The following is a list of the criteria covered by the act; each indicate that that a product or service should provide at least one mode of operation that enables:

1. Usage without vision

2. Usage with limited vision

3. Usage without perception of colour

4. Usage without hearing

5. Usage with limited hearing

6. Usage without vocal capability

7. Usage with limited manipulation or strength

8.   Usage with limited reach

9.   Minimizing the risk of triggering photosensitive seizures

10.   Usage with limited cognition

11.   Privacy: at least one mode of operation that maintains privacy is required when using features that are provided for accessibility.

Further details are provided in Annex 1, Section 7 of the EAA and Schedule 1, Part 7 of S.I. 636/2023.

Example:

Consider the following accessibility requirement:

- 'Self-service terminals must provide for text to speech technology.'
- This requirement covers a specific aspect of a self-service terminal that must be addressed to ensure it is accessible.
- However, if there are other aspects of that self-service terminal not specifically called out in the accessibility requirements that would stop a blind person using the terminal, those too must be addressed in order to satisfy the functional performance criteria that covers 'usage without vision: where the product or service provides visual modes of operation, it shall provide at least one mode of operation that does not require vision.'

The principles of accessibility

The EAA aims to grow the range of users for the products and services it regulates by making those products more **accessible**. To start implementing the EAA in your company, you must first understand what it means for something to be accessible.

Below are some basics, principles and approaches you can use to make your products more accessible.

Access, Understand and Use

Access, understand and use is about how people generally interact with a product or service: first, they access it (approach and perceive); secondly, they understand it (comprehend and decide); and thirdly, they use it (act or react).

Example:

Consider how several different users might interact with a touch-screen payment terminal inside a restaurant.

- A wheelchair user may find that they cannot **access** the payment terminal because it is located on a narrow path where there is not sufficient space for their wheelchair.
- A person with an intellectual disability might not be able to **understand** how to use the payment terminal because the instructions for use are not intuitive, in plain language, or accompanied by images.
- A person with a visual impairment might find that there are no alternative options to interact with the payment terminal except through the touch screen, and therefore they cannot **use** it because there is no audio output when the screen is touched.

Accessibility is layered, meaning that **several aspects of the environment** interact and affect the level of accessibility of a product.

Example:

Consider a self-service ticketing machine.

- The machine can read out the text it displays so that blind people can use it.
- However, the self-service ticketing machine is placed in a loud, busy environment in a train station and cannot be used with headphones, making it inaccessible for blind users in peak commuting times.

Universal Design

Universal Design is an approach to promoting accessibility and usability in products and services. Universally designing means designing so that your product or service can be accessed, understood, and used:

1. to the greatest possible extent
2. in the most independent and natural manner possible
3. in the widest possible range of situations

4. without the need for adaption, modification, assistive devices, or specialised solutions

Perceivable, Operable, Understandable, and Robust (P.O.U.R.)

Accessibility in information and communication technology (ICT) is understood as the extent to which an ICT product or service is **perceivable**, **operable**, **understandable**, and **robust**. These are known as the P.O.U.R. principles.

Perceivable: **content is presented in ways that can be perceived by all.**

For example, for content presented on a touch screen tablet to be perceivable by a blind user, the tablet provides a speech to text function. Alternatively, a user with limited vision might need the tablet to provide control of magnification, contrast, and brightness. Including these modes of operation on your product makes them perceivable to both users who can see, who have limited but functional vision, and those who have no usable vision whatsoever. By making these simple design decisions, you will make your product **perceivable**.

Operable: **user interface components and navigation must be operable.**

It is important when designing products to ensure that every component should be operable by people using different ways of doing so.

Consider a remote control used to operate a television. Someone using voice-control may need to activate the buttons on the remote using dictation software. However, another user may not have vocal capability and will also need to be able to operate the remote using limited manipulation or strength. They might need to operate the remote using big buttons that are very sensitive to touch. Making sure that your interface components can be operated in multiple ways, will make it **operable** by everyone.

Understandable: **information and the operation of user interface must be understandable.**

Complex and long-winded text can prevent users from understanding important content. It especially impacts users with intellectual disabilities and those for whom English is not their primary language.

Consider the instructions that accompany a mobile phone. To make the instructions understandable for a diverse range of users, the text should be simple, clear, and concise. You might consider adding explanatory images to guide the user through key functions such as turning the phone on.

Preparing content in this way will make your instructions **understandable.**

Robust: **content is reliable and compatible with assistive technology and standards**.

When you are designing your product, you cannot know the range of users who will use the product or what assistive devices they might use to operate it. It is therefore important that your product can be used by a wide range of users, using a broad array of devices.

For example, consider a self-service payment terminal provided in a restaurant. The terminal has an 'accessibility button' that lowers the display on the touch screen terminal to provide access for those with limited reach (perhaps a wheelchair user or any number of individuals with a range of statures). However, there are no features for visually impaired users that would allow for their use of the terminal: the touch screen does not provide text to speech or allow for use of personal headsets. These are the types of things you need to bear in mind in order that your interface is **robust**.

The European standard EN 301 549 includes requirements under each of the P.O.U.R. principles to ensure accessibility is achieved in your ICT product or service. We will discuss more about European standards and their role in the EAA later in this document.

Involving diverse users

To implement the accessibility requirements in the EAA those designing and developing products and services must understand and meet a **diverse range of users' accessibility needs**.

Each individual user has their own profile of needs, characteristics, capabilities, and preferences. To help improve accessibility for a wider diversity of users, you need to involve a diverse range of users that can inform about their experience with accessibility barriers in the product or service, and their user accessibility needs of that product or service.

> Example:
>
> Consider the requirement that information on products be understandable.
>
> - To make information understandable, you must first understand a diverse range of users' accessibility needs.
> - A user who has an intellectual disability and a user who uses sign language will have different accessibility needs.

More information on involving a diverse range of users in the design and development process can be found in the European standard EN17161.

Links to accessibility toolkits and other resources can be found below and on the website of the National Disability Authority (NDA).

Examples of common issues

Issue 1: Digital interfaces that cannot be handled with a keyboard.

Who does this affect? Among others, this creates a barrier for people who cannot use a mouse or a touch screen.

Issue 2: Unnecessarily complicated or unclear information that is not available in plain language or easy-read formats.

Who does this affect? This affects many people, including people with intellectual disabilities.

Issue 3: Information that is provided only through one format, such as a pdf that is not made accessible.

Who does this affect? Among others, this affects people with visual impairments who may use screen readers that are not compatible with inaccessible pdfs.

Exceptions to compliance

There are two ways that you may be exempt from the accessibility requirements in the EAA. However, you must satisfy certain conditions. It is important to note that exceptions should be applied in exceptional cases, and in all cases the EAA still requires the economic operator to make the product as accessible as possible.

If economic operators rely on either of these exceptions, they must inform the market surveillance authority. However, if you are a microenterprise, you do not need to inform the market surveillance authority, but **you do need** to maintain relevant information on the use of either exception in case it is requested.

Fundamental alteration: Fundamental alteration is a significant change that results in the fundamental alteration of the basic nature of a product or service.

Example: To understand fundamental alteration, consider the product of a speaker that connects with a mobile device to play music. Imposing a change on a speaker to make it convey visual information would be a significant change to the product that would result in a fundamental alteration to its basic nature: to provide audio.

Disproportionate burden: In the context of the EAA, disproportionate burden compares the burden of applying an accessibility requirement with the benefit of applying an accessibility requirement. However, anyone applying disproportionate burden must weigh the cost to the user if the accessibility feature is not present. The cost to the user then must be balanced against the cost (and benefits) of implementing an accessibility requirement to the economic operator. If, after taking account of all these considerations, the burden of applying an accessibility requirement disproportionately outweighs the potential benefits, the economic operator is exempt from that requirement.

Some key features of disproportionate burden economic operators should be aware of:

- Disproportionate burden must be assessed in the application of each accessibility requirement. This means, economic operators must weigh each requirement independently, one by one, and determine the cost and benefit of each individual requirement you will claim disproportionate burden for, before you claim it.
- Disproportionate burden should be understood as measures that would impose an additional excessive organisational or financial burden on the economic operator, while considering the likely resulting benefit for persons with disabilities.
- Economic operators cannot rely on disproportionate burden if they are in receipt of funding to improve accessibility

Information about disproportionate burden and fundamental alteration can be found in Part 6, Regulation 15 of S.I. 636/2023.

The criteria for the assessment of disproportionate burden are laid out in Schedule 4 of S.I. 636/2023. This includes criteria that will need to be relied on when assessing disproportionate burden. Schedule 2 of S.I. 636/2023 includes the conformity assessment procedure that contains the requirement that economic operators must produce technical documentation that demonstrates how the accessibility requirement they did not apply imposed a disproportionate burden.

While microenterprises are not subject to the same documentation requirements for fundamental alteration or disproportionate burden, companies relying on either exemption must still be prepared

to provide information relevant to the criteria outlined in Schedule 4 of S.I. 636/2023 if the market surveillance authority requests it.

Microenterprises providing services

The requirements and obligations of the European Accessibility Act (EAA) do not apply to microenterprises providing services.

Suggested next steps

1. Consider what can be done immediately and address those requirements first. Compare your products against the standards, principles and approaches listed above, and remember that the best way to understand barriers in your product may be to involve users in your design and development process.
2. Use the resources linked below to learn more about the EAA and accessibility.
3. Map your supply chain: the EAA also includes accessibility requirements on support services, information about a product and its packaging, and even requirements on procedures. Check for any accessibility risks and opportunities in your supply chain.
4. Consider the consumer journey from start to finish – can users access and understand information about the product before they buy, any instructions for use, and information on disposal when they're done with the product?
5. Create simple explanations for entire staff on what accessibility requirements are applicable to you and how you intend to meet the accessibility requirements. Consider training for your staff.

Glossary

European Directive: a legislative act that sets out a goal that EU countries must achieve. However, it is up to the individual countries to devise their own laws on how to reach these goals.

Economic Operator: the manufacturer, the authorised representative, the importer, the distributor, or the service provider.

Microenterprise: an enterprise which employs fewer than 10 persons, and which has an annual turnover not exceeding €2 million or an annual balance sheet total not exceeding €2 million. The EAA treats microenterprises differently than other economic operators. It is important that you know whether you qualify as a microenterprise under the EAA.

Small and Medium Enterprises (SMEs): enterprises which employ fewer than 250 persons, and which have an annual turnover not exceeding EUR 50 million, or an annual balance sheet total not exceeding EUR 43 million but excludes microenterprises.

User Accessibility Need: user needs related to features or attributes that are necessary for a system to be accessible.

System: product, service, or built environment or any combination of them with which the user interacts.

Universal Design: the design and composition of an environment so that it may be accessed, understood and used— to the greatest practicable extent, in the most independent and natural manner possible, in the widest possible range of situations, and without the need for adaptation, modification, assistive devices or specialised solutions, by persons of any age or size or having any particular physical, sensory, mental health or intellectual ability or disability, and means, in relation to electronic systems, any electronics-based process of creating products, services or systems so that they may be used by any person.

The law

The European Accessibility Act (EAA) is a European law known [as Directive 2019/882.](#) The EAA is the first European directive of its kind, containing accessibility requirements that regulate certain products and services in both the private and public sector. The EAA's accessibility requirements will be enforced by each EU member state through national legislation in that member state.

Who does the EAA apply to?

The EAA applies to any business that wishes to trade the relevant products and provide the relevant services in the EU, regardless of where that business is based is based.

What does the EAA cover?

The European accessibility act covers products and services that have been identified as being most important for persons with disabilities. All businesses, including microenterprises dealing with products, must apply the accessibility requirements of the EAA, to the extent that they do not fundamentally alter the product or disproportionately burden the business.

How is the EAA implemented in Ireland?

The European Accessibility Act is implemented in Irish law by [S.I. 636/2023](#). S.I. 636/2023 contains the accessibility requirements that are in the EAA, but in addition the S.I. includes information on the six different authorities in Ireland that will be responsible for regulating the products and services.

Enforcement

The Market Surveillance Authority and Compliance Authority have several avenues to enforce compliance with the European Accessibility Act, including fines and imprisonment in exceptional cases.

Resources:

To learn more about the European Accessibility Act:

- Visit the National Disability Authority's webpage on the European Accessibility Act.
- Visit the European Commission's webpage on the European Accessibility Act.
- Visit Accessible EU's website and learn more about its resources on the European Accessibility Act.

To learn more about standards:

Visit the National Standard Authority Ireland's webpage on standards on universal design and inclusion.

To learn more about accessibility:

Review the National Disability Authority's (NDA) resources.

a. The Customer Communications Toolkit: This Toolkit has design guidance on communication under three areas: written, spoken, and signed, and digital.

b. Web Accessibility Techniques: While accessibility guidelines are essential for setting, examining, and referencing a desired level of accessibility, they can be cumbersome to use for anyone other than auditors or other accessibility professionals. The information in this section provides practical advice and direction for anyone involved in web development, design, and content. Topics covered include developing accessible data tables, using colour wisely, writing well-structured content and so on.

c. If you would like to learn more about the P.O.U.R. (Perceivable, Operable, Understandable, and Robust) principles and Web Accessibility, check out Introduction to Web Accessibility.

d. EN17161 'Design for All - Accessibility following a Design for All approach in products, goods, and services - Extending the range of users' is a European process standard about using a Universal Design approach at all levels in organisations to continuously improve and manage the accessibility and usability of the products and services they provide.
   i. For more information about the standard check out the Centre for Excellence in Universal Design's webpage on EN17161
   ii. Visit the National Standard Authority Ireland's EN17161 webpage to purchase the standard.

e. Guidelines on Body Size: Testing: This document discusses user testing and discusses the concept of oversampling. In oversampling, additional individuals with characteristics (for example, leg length, stature, mass) at the minimum and maximum boundaries are recruited. This ensures that multiple individuals represent user needs (for example, body sizes) in this critical portion of the design space.

f. Designing an environment so that it may be accessed, understood, and used to the greatest possible extent, in the most independent and natural manner possible, in the widest range of situations, and without the need for adaption is called Universal Design. Aligning with the principles of Universal design can assist you in optimizing for accessibility in your products and services. To learn more check out:

Use of information:

Personal data

The Commission shall comply with its obligations under the General Data Protection Regulation ("GDPR"), Data Protection Act 2018 and any other applicable data privacy laws and regulations. The Commission is obligated and committed to protecting all personal data submitted. The Commission has an appointed Data Protection Officer who is registered with the Data Protection Commission. Respondents can find out more about how the Commission processes personal information in our data protection and privacy policy available at CCPC - Data Protection and Privacy. For this process, the Commission will collect the name, email address and any other personal information included in responses received. The name of the respondent to the consultation and the response provided may be made publicly available. The Commission will not make publicly available respondents' contact details, such as address, phone number or email. The information collected will be used only for the purposes of this consultation and for no other purpose. Please clearly mark any information considered to be confidential in your response.

Confidential information

The Commission may publish submissions received in response to this consultation. Please provide your response as a non-confidential document, with confidential information contained in a separate annex or submit a redacted non confidential version together with your response.

Freedom of information

Information held by the Commission is subject to its obligations under law, including under the Freedom of Information Act 2014. The Commission will consult you about information you mark as confidential before making a decision on any Freedom of Information request received. If we receive a request for disclosure of the information, we will take full account of your views, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Commission.