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New EMN inform examines digital inclusion and accessibility in legal migration procedures

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Overview

A new European Migration Network (EMN) inform 'Bridging the digital divide - digital services in legal migration procedures for accessibility and inclusion' examines how digital services can enhance accessibility for applicants with disabilities and for those who are digitally disadvantaged. Drawing on contributions from 25 EMN Member and Observer Countries, the inform compares approaches the design and delivery of digital services in legal migration procedures, and highlights common challenges and good practices.

Digitalisation of legal migration procedures

Digital services are playing a growing role across EMN Member and Observer Countries, supporting activities such as application submission, communication with authorities and case tracking. While most countries still require in-person steps for biometric data collection or identity verification, some permit certain procedures to be completed fully online, including residence permit renewals or applications for certain residence permits.

Accessibility and inclusion frameworks

Most EMN Member and Observer Countries align their digital legal migration services with Directive (EU) 2016/2102 (the Web Accessibility Directive, WAD), the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), and national legislation. However, progress towards full accessibility remains partial in many cases. While the legal framework is often in place, not all components of migration-related services fully comply with the WAD, and specific adaptations are still outstanding. The responses suggest that partial compliance more often reflects gaps in technical implementation and how services work in practice, including issues linked to legacy systems, rather than an absence of legislation. Several countries are addressing these gaps by embedding accessibility in newer digital public services, integrating features such as text-to-speech functions, sign-language videos and digital assistants to guide applicants through procedures.

Support requests and data protection

Applicants can typically express support needs through digital channels like contact forms or email, with in-person requests possible in some countries. Support for digitally disadvantaged applicants generally supplements rather than replaces in-person assistance and is not always specific to legal migration processes. Some countries offer face-to-face help through dedicated

service centres, where applicants with limited digital skills or connectivity can get practical support to complete forms, upload documents and navigate online services. Where disability-related or special support needs information is collected, General Data Protection Regulation (GDPR) safeguards apply, including limiting the data collected, restricting access to authorised staff only and avoiding systematic storage of sensitive information.

Challenges and the way forward

Twelve EMN Member and Observer Countries reported difficulties in implementing accessible digital services, citing technical issues with legacy systems, procurement and development hurdles, low digital literacy and difficulties in involving applicants with disabilities in user testing. To address these challenges, countries are pursuing a range of strategies: some are implementing system-level initiatives, while others have introduced user-oriented accessibility tools. Hybrid models combine digital services with in-person support, and ongoing accessibility audits and research are helping to inform future platform development and procurement decisions.

For the full comparative analysis and findings about accessibility and inclusion in legal migration procedures, the complete inform is available [here](#).