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Bridging the digital divide - Digital services in legal migration procedures for accessibility and inclusion

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Explanatory note

This inform was prepared on the basis of national contributions from 25 EMN NCPs (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, PL, SE, SI, SK, and NO and UA) collected via an AHQ developed by the EMN NCPs to ensure, to the extent possible, comparability. The information contained in this inform refers to the situation in the abovementioned EMN Member and Observer Countries up to November 2025.

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1. KEY POINTS TO NOTE

- Most responding European Migration Network (EMN) Member and Observer Countries¹ have adapted their digital services in legal migration procedures in accordance with the accessibility requirements of Directive (EU) 2016/2102 (the Web Accessibility Directive, WAD), the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), and corresponding national legislation to varying extents.
- Ten countries reported taking steps beyond the legal obligations by integrating accessibility into digital service design or offering measures such as text-to-speech tools, video relay services (VRS), or easy-to-read formats.
- Mechanisms for communicating special support needs vary. Common digital channels include contact forms and email. In some countries, applicants can/may raise support needs in person or through representatives.
- Countries highlighted that interactions with authorities are often hybrid and in-person assistance is often possible.
- In countries where applicants can indicate disability-related support needs, Regulation (EU) 2016/679 (the General Data Protection Regulation, GDPR) imposes safeguards by limiting the data collected, restricting access to authorised staff, and avoiding systematic storage of sensitive information.
- Measures supporting digitally disadvantaged applicants are generally broad and not necessarily targeted at legal migration procedures.
- The degree of digitalisation of legal migration procedures varies widely. Some countries have not replaced any in-person steps with digital procedures, while others offer certain migration procedures fully digitally. Most still require some in-person steps, such as biometric data entry or collection, identity verification, or submission of original documents.
- There is limited target group user involvement in developing digital services in legal migration procedures. Most countries rely on indirect feedback channels, with only a small number involving people with disabilities or digitally disadvantaged applicants directly.
- Countries identified challenges such as technical constraints affecting accessibility, difficulties involving users with disabilities in testing, procurement limitations, data protection considerations, and limited digital literacy among applicants.
- Good practices reported include accessibility-by-design approaches, practical accessibility tools, hybrid support models, and regular accessibility reviews to improve usability and inclusion.



2. INTRODUCTION

2.1. Context and rationale

Public administrations across the European Union (EU) have increased their use² of digital public services in recent years, a trend accelerated by the COVID-19 pandemic.³ Migration authorities in EMN Member and Observer Countries have followed suit by moving some stages of legal migration procedures⁴ online, such as applications, document uploads, booking and attendance at appointments, communication and information exchange, and case-tracking.

Recent EMN outputs have examined different aspects of this transformation. The 2022 EMN-Organisation for Economic Co-operation and Development (OECD) inform, *The use of digitalisation and artificial intelligence in migration management*,⁵ showed an increasing trend among EU Member States towards digitalising their services, with the COVID-19 pandemic a catalyst for introducing such systems in some cases. It highlighted that nearly half of

EMN Member and Observer Countries used digital services, including for online applications and remote case-tracking. The 2021 EMN study, *Accurate, timely, interoperable? Data management in the asylum procedure*,⁶ showed that a small number of EMN Member Countries and Norway relied on online self-registration systems to collect applicants' data in asylum procedures. The 2021 EMN inform, *Digitalisation of identity documents and residence permits issued to third-country nationals*,⁷ reported concerns that a fully digital or digital-first approach might exclude users with insufficient skills or resources.

While this digital shift applies broadly and can improve efficiency, transparency and user experience, it raises questions about accessibility and inclusion. The target group of this inform – applicants with disabilities and/or other digitally disadvantaged applicants making applications in legal migration procedures – may be affected in distinct ways.

Applicants with disabilities⁸ may encounter visual, auditory, motor, speech or cognitive barriers when using online

1 The key points/executive summary section provides a summary of the main information contained in the inform or study. For ease of reading, key points do not contain footnotes. Please note that EMN Member and Observer Countries referred to in the key points or executive summary are listed in the relevant sections.

2 European Commission, *Digital Decade 2024: eGovernment Benchmark - Shaping Europe's digital future*, 2024, accessed 14 November 2025.

3 European Foundation for the Improvement of Living and Working Conditions (Eurofound), *COVID-19 and digitalisation*, 2021, accessed 14 November 2025; United Nations (UN), *COVID-19 pushes more government activities online despite persisting digital divide*, 2020, accessed 14 November 2025.

4 For the purpose of this inform, legal migration procedures cover third-country nationals applying for an authorisation to stay through legal migration channels, including labour and student migration (and their families), and EU-law based categories (e.g. EU Blue Card, intra-corporate transfers, researchers, long-term residents), as well as national long-stay visas (D-visas), irrespective of duration. Asylum applicants, beneficiaries of international protection (BIP) (and their families) and beneficiaries of temporary protection (BoTP) were excluded from the scope of the study. For a full definition of terms see Annex 1.

5 European Migration Network (EMN), *The use of digitalisation and artificial intelligence in migration management - EMN-OECD inform*, 2022, accessed 14 November 2025.

6 European Migration Network (EMN), *Accurate, timely, interoperable? Data management in the asylum procedure - EMN study*, 2021, accessed 14 November 2025.

7 European Migration Network (EMN), *Digitalisation of identity documents and residence permits issued to third-country nationals - EMN inform*, 2024, accessed 14 November 2025.

8 See definitions of terms in Annex 1.

services. Other applicants may be digitally disadvantaged⁹ due to factors such as age, gender, language proficiency, literacy, and education level. These challenges may be compounded by structural factors in their countries of origin, such as internet connectivity and speed, with the cost of mobile data and internet devices increasing the risk of exclusion. Accordingly, digital services within legal migration procedures must be designed and implemented to be both accessible and inclusive, ensuring equal access, in line with EU and international legal frameworks.

2.2. Aim and scope of the inform

This inform focuses on accessibility for applicants with disabilities and the inclusion of digitally disadvantaged applicants in their use of digital services in legal migration procedures in EMN Member and Observer Countries.

It covers third-country nationals applying for an authorisation to stay through legal migration channels, including labour and student migration (and their families), and EU-law based categories (e.g. EU Blue Card, intra-corporate transfers, researchers, long-term residents), as well as national long-stay visas (D-visas), irrespective of duration. Procedures linked to international protection and temporary protection are excluded from the scope of the inform.

This inform explores how EMN Member and Observer Countries design and deliver digital services¹⁰ such as applications, document uploads, booking/attendance at appointments, communication and information exchange, and case-tracking within legal migration procedures, for accessibility for applicants with disabilities and for the inclusion of digitally disadvantaged applicants. It outlines the extent to which authorities adapt their systems to the

needs of these two groups and the frameworks guiding those efforts. The inform:

Analyses how digital services are adapted in line with the WAD¹¹ on the accessibility of websites and mobile applications (apps), the UNCRPD, and relevant national legislation;

- Identifies additional adaptations or measures beyond legal requirements that facilitate access for applicants with disabilities and digitally disadvantaged applicants;
- Examines how authorities collect and process sensitive personal data related to applicants' special needs, in compliance with the GDPR¹² and any national legislation;
- Assesses whether and how applicants' feedback and experiences are gathered and used to improve digital accessibility and inclusion;
- Reviews the extent to which in-person interactions have been replaced by digital channels and associated support mechanisms provided to assist users, particularly those who have difficulty accessing or using digital services;
- Highlights key challenges and good practices identified by countries in developing and delivering accessible and inclusive digital services.

Of the responding countries, Italy reported no relevant adaptations for the target groups in legal migration procedures, as the country provides no digital services in this policy area. Slovenia reported no digital services in legal migration procedures, aside from information websites, which are not covered by this inform. Poland only offers adapted digital services to applicants for international protection, which are not examined in this inform.



3. FRAMEWORKS FOR DIGITAL ACCESSIBILITY AND INCLUSION

3.1. EU and international frameworks

Digital accessibility and inclusion in public services are underpinned by EU and international law. Migration authorities are subject to the same requirements as other public bodies when providing digital services within legal migration procedures.

The WAD establishes common requirements to make public sector websites and mobile apps accessible, particularly for persons with disabilities. It requires Member States to ensure that public bodies design and maintain digital interfaces that meet key accessibility principles set out in the harmonised European standard EN 301 549,¹³ which sets out technical requirements to make information and communication technology (ICT) products and services accessible to persons with disabilities and, which builds

on the international Web Content Accessibility Guidelines (WCAG).¹⁴

The GDPR establishes safeguards for the collection and processing of personal data by public authorities, including data that may relate to an applicant's disability or special needs. The GDPR requires that such data be processed lawfully, fairly and transparently, respecting the principles of purpose limitation and data minimisation. Health-related information is classified as a special category of personal data and is subject to particular safeguards.

At international level, the UNCRPD¹⁵ has been ratified by the EU and all EMN Member and Observer Countries¹⁶ and reinforces the obligation to ensure accessibility. Article 9 of the UNCRPD calls on countries to take appropriate measures to provide persons with disabilities with equal access to information and communication technologies, including

⁹ See definitions of terms in Annex 1.

¹⁰ See definitions of terms in Annex 1.

¹¹ Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies, accessed 14 November 2025.

¹² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), accessed 14 November 2025.

¹³ European Telecommunications Standards Institute (ETSI), 'ETSI - EN 301 549 V3 the harmonised European Standard for ICT Accessibility', n.d., accessed 14 November 2025.

¹⁴ World Wide Web Consortium, 'Web Content Accessibility Guidelines (WCAG) 2.1', 2025, accessed 14 November 2025.

¹⁵ United Nations (UN), 'Convention on the Rights of Persons with Disabilities', 2006, accessed 14 November 2025.

¹⁶ United Nations, 'List of signatories to the Convention on the Rights of Persons with Disabilities', 2006, accessed 23 January 2026.

the internet, and to remove barriers preventing their participation in all aspects of life.

3.2. National legislation and policy measures

Nineteen EMN Member Countries¹⁷ and Norway reported applying the accessibility requirements set out in the WAD, the UNCRPD, and corresponding national legislation in providing digital services in their legal migration procedures. These frameworks generally apply horizontally to all public bodies, including migration authorities, requiring them to ensure that websites and online portals comply with the accessibility criteria defined in the harmonised European standard EN 301 549 (see above).

Italy has not adapted their digital services in legal migration procedures in accordance with these provisions, as they have no digital services in this field. Slovenia provides information websites but does not offer digital services within legal migration procedures (as defined for the purpose of this inform). Poland only offers adapted digital services to applicants for international protections, which are not examined in this inform.

Six countries¹⁸ provided more detail on overall implementation in the specific context of migration services. Progress remains partial, largely because while national legislation is in place, not all components of migration-related services fully comply with the WAD yet and specific adaptations are still outstanding. The responses illustrate that partial compliance can reflect technical implementation gaps and how digital services function in practice, rather than an absence of legal frameworks.¹⁹



4. ADAPTING DIGITAL SERVICES FOR APPLICANTS WITH DISABILITIES

4.1. Additional measures beyond legal obligations

Ten EMN Member Countries²¹ reported adaptations to digital services in legal migration procedures beyond those required by legislation.

Examples include enhanced design systems,²² text-to-speech tools,²³ video relay services (VRS) or sign-language interpreting services,²⁴ easy-to-read content,²⁵ and the option to request information in alternative formats.²⁶ In the Netherlands, applicants can request support via the Immigration and Naturalisation Service (*Immigratie- en Naturalisatiedienst*, IND) chatbot Sofia, which can refer them to assistance via live chat. Similarly, France plans to introduce an artificial intelligence (AI)-based chatbot

Box 1. Examples of technical accessibility barriers

Ireland and Finland noted visual accessibility issues in some procedures, such as insufficient colour contrast and the use of colour-dependent cues, which can somewhat obscure content for users with low vision or colour-blindness, with Finland also noting limited support for resizing text without loss of information.

Ireland and Finland reported some examples of technical and accessibility gaps, such as interactive elements (pop-ups, tooltips, navigation components) that cannot be operated using a keyboard alone. Other examples listed by Finland include missing semantic markup in forms and navigation, and situations where screen-reader users are not informed about changes in the interface (e.g. when files are uploaded, errors occur or sessions time out).

Ireland, Finland, Sweden and Luxembourg highlighted examples of content-related issues in their descriptions of partial compliance or in accessibility statements. These included inaccessible PDF documents and video content without accurate text transcripts, as well as legacy content that has not been updated to meet current accessibility standards.

Apart from the transposition of the WAD, 19 EMN Member Countries,²⁰ Norway and Ukraine reported other national legislation on accessibility, equality or non-discrimination that also applies to digital services used in legal migration procedures.

to assist users in navigating the digital administration for foreign nationals in France (*Administration numérique pour les étrangers en France*, ANEF) platform.

Box 2. Cyprus' accessibility-by-design approach

Cyprus applies an accessibility-by-design approach when developing digital public services, including those used in legal migration procedures. Through the Digital Services Factory and its Service Standard, accessibility requirements are systematically integrated into new services. The national design system provides common templates and interface components that support consistent and user-friendly service design. This framework helps to ensure that accessibility considerations are applied from the outset, rather than added later.

17 BE, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, LT, LU, LV, NL, SE, SK.

18 DE, FI, IE, LT, LU, NL.

19 See Section 8 for a discussion of underlying challenges identified by countries.

20 AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, IE, IT, LT, LU, LV, NL, SE, SK.

21 CY, CZ, DE, EL, ES, FR, LU, LV, NL, SE.

22 CY, LU.

23 LU, LV, SE.

24 CZ, LV (as a video), NL, SE.

25 CZ, EL, LU, LV.

26 CY, CZ, ES, LU, SE.

4.2. Mechanisms for communicating special needs and ensuring data protection

Applicants with disabilities can inform authorities of their special support needs in 16 EMN Member Countries and Ukraine.²⁷ However, the mechanisms to do so and subsequent assistance options vary. In most instances, the channels to ask for support are primarily digital.²⁸ Applicants can communicate needs directly through generic accessibility feedback tools²⁹ including national portals, dedicated contact forms,³⁰ email-based systems,³¹ or free-text fields within electronic application forms.³² Six EMN Member Countries³³ provide telephone contact points or helplines for users experiencing difficulties.

Eight countries³⁴ explicitly enable applicants to communicate their support needs in person, either during appointments at migration offices where the legal migration process allows (e.g. at embassies) or through contact with frontline staff. In Estonia, applicants may inform the Police and Border Guard Board (PBGB) of special support needs, but the authority does not provide disability-specific assistance and applicants may instead bring their own support persons or interpreters. In Germany, applicants can indicate special support needs (sign language, Braille, mobility assistance) both in advance and during the appointments at the responsible authorities or embassies. In the Netherlands, applicants with disabilities may receive customised support at IND information desks, where staff can assist with completing application forms or arrange adapted communication (e.g. sign language interpreters for deaf applicants). In the Czech Republic, applicants can communicate special needs through the Information Portal for Foreigners, including via web forms or contact lines, or by approaching migration offices in person. In Belgium, Finland, Ireland, and Sweden, applicants may also communicate special needs through representatives or support persons. In Sweden, applications can be submitted online by the support person on behalf of the applicant, who adds a power of attorney to finalise and submit the request.

Croatia, Lithuania, and Ukraine report that home visits are possible in exceptional cases. In Croatia, police officers may visit applicants unable to present themselves in person, while in Lithuania biometric data can be collected at the applicant's home for those with severe health conditions or disabilities. Similarly, Ukraine reports that migration authorities may conduct home or hospital visits to complete

applications and collect biometric data for applicants with long-term health disorders.

Box 3. Assistance for special support needs in digital migration procedures in Ireland and Latvia

In Ireland's Department of Justice, Home Affairs and Migration, a designated Access Officer and Access Team coordinate assistance for applicants who indicate special support needs. The Digital Contact Centre (DCC) provides a central channel through which applicants, or their authorised representatives, can communicate such needs when using most digital migration services in the Department of Justice, Home Affairs and Migration. There is a similar queries function on the employment permits online portal run by the Department of Enterprise, Tourism and Employment. Applicants who encounter difficulties may also request assistance by telephone or email, with queries directed to the appropriate contact point, where relevant.

Latvia has introduced a range of practical accessibility measures to support applicants with differing needs when using digital services. These include text-to-speech tools, video relay services (VRS), sign language videos, easy-to-read content, and options to adjust font size and contrast. Additional tools such as page masks and keyboard-only navigation further support users with visual or motor impairments.

From those countries where applicants can indicate disability-related or special support needs, 15 EMN Member Countries³⁵ reported how the information is handled to ensure compliance with the GDPR and applicable national privacy legislation.

Disability-related information is related to health which is a special category of personal data. Ten³⁶ EMN Member Countries mentioned data minimisation or restricted access to the data as a specific safeguard. Seven countries³⁷ reported retention and storage limitation as safeguards. Luxembourg and Sweden highlighted that these data are never stored systematically. Luxembourg reported that support-related enquiries are anonymised, while Sweden explained that disability-related information entered voluntarily in free-text fields cannot be indexed or extracted as structured data.



5. INCLUSION OF DIGITALLY DISADVANTAGED APPLICANTS

Seventeen³⁸ responding EMN Member Countries and Norway reported measures to support digitally

disadvantaged applicants in some legal migration procedures, including those with limited internet access, low

27 CY, CZ, DE, EE, EL, ES, FI, FR, HR, IE, IT, LU, LV, NL, SE and UA.

28 CY, EE, EL, ES, FI, FR, IE, LU, NL, SE.

29 ES, FR, IE, LU, NL, SE.

30 DE, FR, NL, SE.

31 CY, DE, EE, EL, ES, DE, FR, IE, LU.

32 SE.

33 DE, EE, ES, IE, NL, SE.

34 CZ, DE, EE, HR, IE, LV, NL, SE.

35 CY, CZ, DE, EE, EL, ES, FI, FR, HR, IE, LU, LV, NL, SE.

36 CY, CZ, DE, EE, ES, FI, FR, IE, NL.

37 CY, CZ, EL, ES, FI, IE.

38 BE, CY, CZ, DE, EE, EL (international protection and asylum), ES, FI, FR, HR, LU, LV, NL, SE and NO.

digital literacy, or difficulties navigating online systems. The most common approach is to maintain hybrid models that allow parts of the procedure to be completed in person or on paper,³⁹ including via assistance by staff at migration offices or police units.⁴⁰ In Spain and Sweden, in-person assistance can be provided via dedicated service centres. Eight countries highlighted broader public digital skills initiatives⁴¹ including Cyprus's Digital Skills Promotion Project and national digital skills training or computer literacy programmes.

Several countries have adapted their general digital services to be easier to use, for example through simplified navigation,⁴² plain language content,⁴³ mobile-friendly layouts,⁴⁴ and reduced data requirements.⁴⁵ Sweden operates tools to improve language accessibility, such as glossaries, translation functions and text-to-speech options. Norway has optimised application forms for mobile devices and low-bandwidth environments, allowing applicants with poor internet access to complete the necessary steps even in areas with weak connectivity. Notably, most accessibility and inclusion initiatives apply horizontally across public services.

Box 4. Supporting digitally disadvantaged applicants via in-person Service Centres

Spain supports digitally disadvantaged applicants through its network of Citizen Service Offices (*Oficinas de Asistencia en Materia de Registros*). These offices offer in-person assistance to help applicants to navigate digital steps, including in legal migration procedures. This includes completing online forms, uploading documents, and resolving basic technical issues. The support provided covers both access to the necessary digital tools and basic procedural and technical guidance, though not legal advice. This model ensures that applicants with limited digital literacy or internet access are not excluded from essential services.

Sweden provides similar in-person support through the Government Service Centres (*Statens servicecenter, SSC*) across the country. In cooperation with the Swedish Migration Agency, the SSC offers information and guidance on migration-related services, including assistance with applications, help in navigating the Swedish Migration Agency's website and access to public computers.



6. USER ENGAGEMENT IN DEVELOPING DIGITAL SERVICES

Eight EMN Member Countries⁴⁶ reported involving people with disabilities (e.g. employees, applicants) at least occasionally in developing or updating digital migration services. In Cyprus and France, accessibility testing and user feedback form part of broader public sector digital-service design standards. Latvia and Germany reported cooperation with non-governmental organisations (NGOs) representing persons with disabilities. Ireland carries out limited internal testing with staff using assistive technologies and commissions limited external accessibility audits. Sweden has explored involving migrants with disabilities in usability research, but participation remains limited because the target group is small and difficult to reach.

Accessibility feedback mechanisms are legally required under the WAD,⁴⁷ including through accessibility declarations and associated feedback forms. This allows users, including those with disabilities, to report accessibility barriers. Some countries reported broader voluntary feedback channels, including general website contact forms or helpdesks.⁴⁸ These mechanisms can indirectly inform the usability of migration services but are not specifically designed to engage applicants with disabilities or digitally disadvantaged applicants.

Nine EMN Member Countries, Norway and Ukraine have yet to involve potential users (applicants or employees) with disabilities in the development or testing of digital migration services.⁴⁹



7. DEGREE OF DIGITALISATION AND SUPPORT MEASURES

7.1. Replacement of in-person procedures

The introduction of digital channels in legal migration procedures generally reflects mainstream service development for all applicants rather than a measure

specifically targeting applicants with disabilities or those who are digitally disadvantaged.

In-person interactions in legal migration procedures have not been fully replaced by digital services in most responding EMN Member Countries and Ukraine.⁵⁰ Fourteen countries⁵¹ reported that they have partially digitalised

39 CY, CZ, DE, EE, ES, FI, FR, HR, IE (some processes), LT, LV, NL, SE, and NO.

40 EE, ES, DE, FI, HR, LV, SE.

41 BE, CY, CZ, DE, EE, ES, FR, LV.

42 DE, LU, NL, SE and NO.

43 FI, IE, LU, NL, SE and NO.

44 CY, DE, EE, FI, LU, LV, NL, SE and NO.

45 CY, EE, FI, LU, LV, NL, SE and NO.

46 CY, DE, EL, FR, IE, LU, LV, SE.

47 Article 7, WAD, accessed 10 March 2026.

48 CZ, EE, EL, FI, IE, NL.

49 BE, EE, ES (but has plans for future usability testing), FI, HU, IT, LT, SI, SK and NO, UA.

50 AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, IE, LT, LU, LV, NL, SE, SI, SK and UA.

51 CY, CZ, DE, EE, ES, FI, FR, HR, IE, LT, LV, NL, SK.

procedures, allowing applications, document uploads, or communication with authorities to take place online.

Seven EMN Member Countries⁵² highlighted that certain key in-person interactions in legal migration services have not been replaced by digital services, including the submission of applications, biometrics, or interviews at the diplomatic post.

Eight countries⁵³ indicated that certain permit types can be applied for and processed fully digitally. In Croatia, Estonia, Sweden and Norway, some residence permit renewals can be completed without any physical appointment when pre-defined conditions are met, such as when biometric data is already on file or when the applicant's personal, family or employment circumstances have not changed and do not require re-verification. Likewise in Greece, applications for the initial granting and renewal of residence permits across all categories of the Migration Code can be submitted electronically when certain steps are not needed, such as biometrics submission, interviews, or the presentation of original documents that would require physical attendance. Ireland processes most residence permit renewals fully online through the Immigration Service online portal and offers additional fully digital pathways for specific procedures such as the Atypical Working Scheme or the Start-Up Entrepreneur Programme. In Spain, applications for certain residence permits (e.g. highly qualified professionals, researchers, intra-corporate transfers) are processed fully online and must be submitted electronically. Other residence permit applications may be submitted either electronically or in person, depending on the procedure.

Two countries highlighted alternative options for the submission of biometrics. Sweden offers digital passport checks. In Greece, mobile teams may collect biometric data where a third-country national is unable to appear in person before the service responsible for the collection of biometric data, due to permanent disability or long-term illness.

In the Czech Republic, Estonia, Hungary, Latvia, the Netherlands, Luxembourg, Sweden and Finland, fully non-digital channels remain legally and practically available for people with disabilities or digitally disadvantaged individuals.

Box 5. Sweden's digital passport checks

Sweden offers digital passport checks as an alternative to in-person passport verification. These are available to applicants of certain nationalities who have applied for a residence permit online and hold an e-passport with chip-stored information.

Applicants receive an email within a few days of submitting their application with a personal link to the digital passport check e-service. To proceed, the applicant needs access to a device with a working camera, a near-field communication (NFC) reader, and the free Freja app. This mobile e-identification app, approved by the Swedish authorities, allows the

applicant to scan their passport and share it digitally with the Swedish Migration Agency.

This option enables identity verification without travelling to a Swedish mission abroad, which may reduce barriers for applicants who have difficulties travelling due to disability or distance. Some categories of applicants still need to present themselves at a Swedish mission abroad to submit biometric data and/or to conduct a personal interview.

7.2. Support mechanisms and equal access

The support mechanisms and rules on equal treatment in digital and non-digital procedures described here largely apply to all applicants rather than specifically targeting applicants with disabilities or those who are digitally disadvantaged.

The EMN Member and Observer Countries that have digitalised certain processes most often provide general support to applicants using these digital services.⁵⁴ This includes online helpdesks, FAQs, telephone contact points, and email support. These channels are intended for all users and are not specifically designed for applicants with disabilities or digitally disadvantaged applicants.

France, Ireland, and Sweden operate more targeted or accessible support structures. Examples include France's dedicated telephone helpline, in-person digital assistance points and an alternative solution for users who have not been able to submit their application via the online service, Ireland's support via online portals and step-by-step online guidance, and Sweden's detailed technical support tools and multiple contact channels for users experiencing difficulties.

In 12 EMN Member Countries, Norway and Ukraine, applications are treated equally regardless of whether applicants use digital or non-digital channels, with the same fees and statutory processing times generally applying across submission channels.⁵⁵ Five EMN Member Countries⁵⁶ indicated differences depending on the mode of submission or the procedure concerned. In Estonia, state fees are lower when the application is submitted through the self-service portal, while in Finland, online applications benefit from lower fees and may move more quickly through internal processing. In the Slovak Republic, fees for certain residence renewal applications submitted electronically are reduced under national legislation. In Ireland, access to a paper-based alternative can be available to the general population or only reserved for people with disabilities. Equal treatment depends on the procedure: some paper-based submissions, such as certain EU Treaty rights cases, take longer to process or provide fewer status updates, and some procedures do not offer a non-digital option. In Sweden, digital submissions enter the case management system automatically, while paper applications require manual handling. Statutory deadlines remain the same.

52 AT, BE, CZ, FI, IE, LT, SK.

53 EE, EL, ES, FI, HR, IE, SE and NO.

54 CZ, EE, EL, ES, FI, FR, HR, IE, SE and NO.

55 AT, BE, CY, CZ, DE, ES, HR, HU, LT, LV, NL, SI and NO, UA.

56 EE, FI, IE, SE, SK.



8. CHALLENGES AND GOOD PRACTICES

8.1. Challenges identified

Twelve responding EMN Member and Observer Countries⁵⁷ identified specific challenges in developing or providing digital services in legal migration procedures for applicants with disabilities or digitally disadvantaged applicants.

These include technical limitations⁵⁸ in ensuring full accessibility of existing platforms (e.g. legacy PDFs or software; documents and features supplied by external providers that migration authorities cannot modify directly) and difficulties involving applicants with disabilities in user testing⁵⁹ due to the limited availability of participants or a restriction in the ability to approach them for privacy reasons. There can also be constraints in procurement or system development, and accessibility requirements cannot always be imposed on external suppliers.⁶⁰ France highlighted difficulties affecting certain vulnerable groups when using the ANEF system, namely limitations and malfunctions affecting the submission and processing of residence permit applications. For example, those responsible for supporting vulnerable groups complain that the same person cannot manage procedures on the ANEF platform on behalf of several foreign nationals from the same email address, even though many people do not have an email address and would not be able to check it themselves. Finland reported challenges linked to legacy digital systems, noting that accessibility shortcomings in the *Enter Finland*⁶¹ service are difficult and costly to address outside of major system renewals, which can delay improvements.

Balancing GDPR obligations with the need to collect information on applicants' special needs is another challenge,⁶² as is the limited digital literacy among some applicants.⁶³ The Czech Republic highlighted challenges in balancing accessibility and personalised support with data protection and GDPR requirements. Ireland reported uneven awareness of accessibility responsibilities within administrations, as well as cybersecurity constraints that can temporarily restrict users access to digital systems. Germany highlighted challenges linked to the harmonisation of federal information technology (IT) systems.

Several EMN Member Countries have not identified any challenges yet.⁶⁴ This may be partly due to limited digitalisation of legal migration procedures or the possibility for applicants to use non-digital alternatives.

8.2. Good practices and innovative solutions

In response to the challenges identified above, countries reported a range of practices to improve accessibility and inclusion in digital migration services. The

examples below illustrate selected approaches taken by EMN Member and Observer Countries.⁶⁵

Cyprus, Finland, France and Sweden emphasised system-level approaches to different degrees. In Cyprus, accessibility is integrated into service development through the Digital Services Factory, the national design system, and the Service Standard, ensuring that new digital services follow accessibility-by-design principles. France referred to broader national digital inclusion initiatives that also benefit migrants, including digital mediation and support structures within the ANEF system. Sweden similarly embeds accessibility into some internal processes by integrating accessibility requirements into procurement, applying accessibility-related review questions and instructions at key decision points in projects and assignments, and providing staff training on inclusive digital design. Finland noted an ongoing shift towards a more modular system architecture. This will make it easier to update or replace individual components of the online immigration services, allowing accessibility improvements to be introduced incrementally as specific parts of the system are renewed.

Two countries illustrated practical, user-facing solutions. Latvia has introduced a wide range of accessibility features, including text-to-speech tools, VRS, sign language videos, easy-to-read content, and options to adjust font and contrast settings, alongside digital skills training initiatives. Norway optimises application forms for mobile devices and low-bandwidth environments, enabling applicants with weak connectivity to complete online procedures more easily.

Other countries focus on support and hybrid approaches. Germany reported a hybrid approach that combines digital services with analogue alternatives. This includes multilingual and mobile-friendly online services, alongside physical points of contact and personal support provided by local authorities and non-profit organisations. The Czech Republic maintains flexible access through a hybrid model combining online services with in-person support and targeted digital skills initiatives for migrants.

Initiatives to improve digital skills and access to online public services for disadvantaged users more broadly are in place in eight EMN Member Countries.⁶⁶ In Ireland, the Department of Justice, Home Affairs and Migration reported ongoing accessibility audits of its digital platforms, complemented by the work of an internal Access Team and the development of accessibility guidance and checklists through its Service Design Playbook. The Netherlands highlighted the importance of frequent accessibility research, which informs updates to digital platforms and strengthens future procurement and design decisions. Accordingly, accessibility standards will be embedded in future framework agreements with external software suppliers.

57 BE, CY, CZ, DE, FI, FR, IE, LV, NL, SE and NO.

58 CZ, DE, FI, FR, LV, NL, SE. See examples in section 3.2.

59 NL, SE.

60 CZ, NL, SE.

61 *Enter Finland* is the official digital platform managed by the Finnish Immigration Service where applicants can apply for a residence permit or Finnish citizenship, or request registration of the right of residence of an EU citizen.

62 CZ, SE.

63 CZ, DE, IE, LV, and NO.

64 BG, EE, ES, HR, IT, LT, LU, SI, SK and UA.

65 BE, CY, CZ, FI, FR, IE, LV, NL, SE and NO.

66 BE, CZ, CY, DE, EE, ES, FR, LV.

9. ANNEX 1: DEFINITIONS

Term	Definition
Digital accessibility for applicants with disabilities	For the purposes of this inform, 'digital accessibility for applicants with disabilities' refers to government measures targeting this group in their use of digital services in legal migration procedures. Interactive Terminology for Europe (IATE) uses the term 'digital accessibility', which is defined as "[i]nitiatives taken to ensure that everyone, including those users who have visual, auditory, motor or cognitive disabilities, has equal access to ICT and online services, in particular by making websites, mobile applications, electronic documents, etc. easy to navigate and understand (includes web accessibility plus the accessibility of anything digital such as video, audio, electronic documents, animations, kiosks, and mobile apps)." ⁶⁷
Digitally disadvantaged applicant	For the purposes of this inform, a 'digitally disadvantaged applicant' is a third-country national who experiences challenges in managing the internet and digital services because of individual challenges (e.g. age, level of education including illiteracy, digital literacy, language skills) and/or structural challenges (e.g. socioeconomic, political, cultural factors, including lower level of internet adoption in their country of origin, challenges with connectivity and affordability of internet access, and with equipment to use it including mobile handsets/smartphones). ⁶⁸ Digitally disadvantaged is not a legal term and governments are not generally required by the WAD to facilitate the inclusion of such applicants in using their websites and digital services. This condition distinguishes digitally disadvantaged applicants from applicants with disabilities, for whom governments are required, by legislation, to adapt the websites/digital services they provide.
Digital divide	Gap between individuals, households, businesses and geographical areas at different socioeconomic levels with regard to both their opportunities to access ICT and to their use of the internet for a wide variety of activities. ⁶⁹
Digital exclusion	Inability to access online products or services or to use simple forms of digital technology. ⁷⁰
Digital inclusion	For the purposes of this inform, 'digital inclusion' refers to government measures aimed at the inclusion of digitally disadvantaged applicants in their use of digital services in legal migration procedures. IATE defines the term as "[a]ctivities necessary to ensure that all individuals and communities, including the most disadvantaged, have access to and use of information and communication technologies. (Digital inclusion is often defined in terms of – Digital skills – being able to use computers and the internet. This is important, but a lack of digital skills is not necessarily the only, or biggest, barrier people face. Connectivity – and access to the internet. People need the right infrastructure but that is only the start. Accessibility – services should be designed to meet all users' needs, including those dependent on assistive technology to access digital services. Accessibility is a barrier for many people, but inclusion is broader)." ⁷¹
Digital literacy	Ability to use digital technologies effectively and to understand the implications of operations performed. ⁷²
Digital services	Developed by EMN for the purposes of this inform, 'digital services' refers to making an online application, including: uploading supporting documents for the application; managing online payment of application fees; digital interaction with the competent authority, including making appointments for online personal interviews, participating in online interviews, etc., sending/receiving information concerning the application; and taking advantage of any remote tracking services offered. The term also includes obtaining and using e-identification, as necessary. It may also include any support aimed at applicants with disabilities or digitally disadvantaged applicants, either integrated in digital services or provided by the migration authority or separate from that authority, and intended to support applicants in managing the procedures. The inform includes digital services whether provided by the government (agency) or an external service provider. The terms 'digital services' and 'online services' are used interchangeably in this inform.

⁶⁷ Interactive Terminology for Europe (IATE), 'Digital accessibility', n.d., accessed 28 January 2026.

⁶⁸ 'Digitally disadvantaged' in digital transformation is used in research and by some stakeholders (e.g. Ofcom, 'Exploring digital disadvantage research', 2025, last accessed 26 June 2025), but there does not seem to be an EU definition of the term. 'Digital exclusion' is a term used in the EU context. However, for the purpose of this inform it seems relevant as a more nuanced term to describe applicants' ability and conditions (including challenges connected to structural circumstances) to use digital services.

⁶⁹ Interactive Terminology for Europe (IATE), 'Digital divide', n.d., accessed 28 January 2026.

⁷⁰ Interactive Terminology for Europe (IATE), 'Digital exclusion', accessed 28 January 2026.

⁷¹ Interactive Terminology for Europe (IATE), 'Digital inclusion', n.d., accessed 28 January 2026.

⁷² Interactive Terminology for Europe (IATE), 'Digital literacy', n.d., accessed 28 January 2026.

Term	Definition
Disability/ applicant with disability	For the purposes of this inform, ‘applicant with disability’ is a third-country national who experiences challenges in managing the internet and digital services because of visual, auditory, motor, speech or cognitive disabilities. ⁷³ The WAD requires governments to adapt their websites/digital services for persons with disabilities in particular. This condition distinguishes applicants with disabilities from digitally disadvantaged applicants, for whom governments are not generally required by law to facilitate inclusion. IATE defines disability as an “[u]mbrella term for impairments, activity limitations and participation restrictions, which denotes the negative aspects of the interaction between an individual (with a health condition) and that individual’s context factors (environmental and personal factors). ⁷⁴
Legal migration procedures	Legal migration is defined in the EMN Asylum and Migration Glossary as migration in accordance with the applicable legal framework. ⁷⁵ For the purposes of this inform, ‘legal migration procedures’ includes any type of legal migration irrespective of its purpose. This includes migration based on national legislation in the areas of family reunification, labour migration (high skill, low skill, seasonal) and student migration (all levels of studies), as well as other kinds of legal migration according to national legislation. Migration based on common EU law is also included, such as intra-corporate transfers, EU Blue Card, guest researchers, long-term residents, family members of EU/European Economic Area (EEA) citizens. It includes all legal migration irrespective of its duration, meaning that both temporary and permanent residence permits and renewals are included. This also includes national visas (D-visas).
Web accessibility	Practice of removing barriers so that everyone, including people with disabilities, can perceive, understand, navigate and interact with content on the world wide web. ⁷⁶

73 The challenges included in the definition developed for this EMN inform draw extensively on the World Wide Web Consortium, ‘[Web Content Accessibility Guidelines \(WCAG\): Accessibility, Usability, and Inclusion](#)’, 2025, accessed 26 June 2025.

74 Interactive Terminology for Europe (IATE), ‘[Disability](#)’, n.d., accessed 28 January 2026.

75 European Migration Network (EMN), [EMN Asylum and Migration Glossary](#), v.10.0, 2025, accessed 28 January 2026.

76 Interactive Terminology for Europe (IATE), ‘[Web accessibility](#)’, n.d., accessed 28 January 2026.



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FOR MORE INFORMATION

EMN website: <http://ec.europa.eu/emn>

EMN LinkedIn page: <https://www.linkedin.com/company/european-migration-network>

EMN X account: <https://x.com/emnmigration>

EMN YouTube channel: <https://www.youtube.com/@EMNMigration>

EMN NATIONAL CONTACT POINTS

Austria www.emn.at/en/

Belgium www.emnbelgium.be/

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Cyprus www.moi.gov.cy/moi/crmd/emnncpc.nsf/home/home?opendocument

The Czech Republic www.emncz.eu/

Estonia www.emn.ee/

Finland emn.fi/en/

France www.immigration.interieur.gouv.fr/Europe-et-International/Le-reseau-europeen-des-migrations-REM3/Le-reseau-europeen-des-migrations-REM2

Germany www.bamf.de/EN/Themen/EMN/emn-node.html

Greece <https://migration.gov.gr/emn/>

Hungary www.emnhungary.hu/en

Ireland www.emn.ie/

Italy www.emnitalyncp.it/

Latvia www.emn.lv

Lithuania www.emn.lt/

Luxembourg emnluxembourg.uni.lu/

Malta emn.gov.mt/

The Netherlands www.emnnetherlands.nl/

Poland www.gov.pl/web/european-migration-network

Portugal rem.sef.pt/en/

Romania www.mai.gov.ro/

Spain www.emnspain.gob.es/en/home

The Slovak Republic www.emn.sk/en

Slovenia emnslovenia.si

Sweden www.emnsweden.se/

Norway www.udi.no/en/statistics-and-analysis/european-migration-network---norway#

Georgia migration.commission.ge/

The Republic of Moldova bma.gov.md/en

Ukraine dmsu.gov.ua/en-home.html

Montenegro www.gov.me/mup

Armenia migration.am/?lang=en

Serbia kirs.gov.rs/eng

The Republic of North Macedonia <https://mvr.gov.mk/>

Albania