

Executive Fact Sheet

Spain's Digital Accessibility Laws



Introduction

Several regulations govern digital accessibility in Spain, impacting both private- and public-sector organizations. Like other European Union (EU) nations, Spain has enacted a transposition of the European Accessibility Act (EAA), which applies to most private-sector organizations that conduct business in Spain. (In the EU, a transposition integrates a higher-level EU directive into a Member State's national laws.)

Additionally, public-sector organizations in Spain must meet specific digital accessibility standards under the country's transposition of the EU Web Accessibility Directive (WAD). Beyond these EU regulations, Spain has a national anti-discrimination law, known as the Spaniards with Disabilities Act. This law is frequently cited when private-sector organizations are held accountable for inaccessible digital content, and many large businesses—such as airlines —have faced penalties for non-compliance.

Navigating the intricacies of Spanish digital accessibility regulations can be complex. This resource is designed to help senior executives understand the essence of these laws and what is required for compliance.



Table of contents

01	<u>Overview of Spanish digital accessibility laws</u>	04
02	<u>Unpacking digital accessibility laws in Spain</u>	05
	<u>Laws impacting public- and private-sector organizations</u>	06
	• <u>Real Decreto Legislativo (“Legal Royal Decree”) 1 / 2013</u>	06
	• <u>Ley (“Law”) 56 / 2007</u>	07
	<u>Laws impacting public-sector and business-to-government (B2G) organizations</u>	08
	• <u>Real Decreto Legislativo (“Legal Royal Decree”) 1112 / 2018</u>	08
	<u>Laws impacting private business</u>	09
	• <u>Ley (“Law”) 11 / 2023</u>	09
03	<u>Start your journey to compliance</u>	10

Overview of Spain's digital accessibility laws

Law	Description	Sectors impacted	Compliance standard
Real Decreto Legislativo ("Legal Royal Decree") 1 / 2013	A law allowing sanctions and penalties for violations of Real Decreto Legislativo 1112/2018 and Ley 56/2007	Both private businesses and public organizations	N / A (Outlines sanctions / penalties for other accessibility laws rather than setting requirements)
Ley ("Law") 56 / 2007	The Spaniards with Disabilities Act, a national civil rights law (refer to Real Decreto 1112 / 2018 for requirements, and Real Decreto Legislativo 1 / 2013for enforcement details)	Both private businesses and public organizations (enforcement has focused on private businesses)	No specific technical standard provided
Real Decreto Legislativo ("Legal Royal Decree") 1112 / 2018	Spain's transposition of the EU WAD	Public organizations (directly covered), private businesses that sell to the public sector (indirectly impacted)	EN 301 549
Ley ("Law") 11 / 2023	Spain's transposition of the EAA	Private businesses	EN 301 549

Unpacking digital accessibility laws in Spain

The following sections of this resource provide more information about the specific digital accessibility laws impacting organizations operating in Spain, including the entities they apply to, the requirements for compliance, and how they're enforced.

Laws impacting both public- and private-sector organizations

Real Decreto Legislativo (“Legal Royal Decree”) 1 / 2013

Summary:

Real Decreto Legislativo 1 / 2013 allows organizations to be held accountable for non-compliance with two other digital accessibility laws in Spain: Ley 56 / 2007 (the Spaniards with Disabilities Act), which covers public and private sector businesses, and Real Decreto Legislativo 1112 / 2018 (Spain’s transposition of the EU WAD), which covers public-sector organizations and directly addresses web accessibility.

Requirements:

Because Real Decreto Legislativo 1 / 2013 is focused on the enforcement of existing laws, it does not introduce any new compliance requirements or reference specific standards. Rather, to avoid sanctions and penalties under this law, organizations must meet the requirements of other applicable laws. (Information about these requirements is provided in the following sections of this resource.)

Enforcement:

Under Real Decreto Legislativo 1 / 2013, organizations that neglect to comply with Ley 56 / 2007 or Real Decreto Legislativo 1112 / 2018 may face:

Fines: The law allows for fines ranging from € 301 to € 1 million.

Damages: In addition to fines, organizations may need to compensate individuals who were discriminated against because of their disability for damages suffered.

Company sanctions: A non-compliant company may be barred from receiving public funds or subsidies for up to two years, or it may be suppressed or suspended entirely or partially.

Ley (“Law”) 56 / 2007

Summary:

Ley 56 / 2007, the Spaniards with Disabilities Act, is a national law that prohibits discrimination against people with disabilities in Spain in many areas of public life.

While the law does not explicitly mention digital accessibility, or outline specific technical standards for compliance, it has been referenced in digital accessibility-related regulatory action against organizations, particularly private businesses. Large businesses, including airlines, have been fined for violating Ley 56 / 2007.

Requirements:

Although Ley 56 / 2007 does not include technical standards for compliance, organizations must ensure that people with disabilities have equal access to digital experiences.

As a best practice to avoid regulatory action, organizations should aim to conform with EN 301 549 (the harmonized European standard for web accessibility). They should also satisfy the requirements of Real Decreto Legislativo 1112 / 2018, including adopting all possible measures to improve accessibility, providing a mechanism for users to submit accessibility complaints, and publishing an accessibility statement.

Enforcement:

Ley 56 / 2007 is enforced through the sanctions and penalties outlined in Real Decreto Legislativo (“Legal Royal Decree”) 1 / 2013.

Laws impacting public-sector and business-to-government (B2G) organizations

Real Decreto Legislativo (“Legal Royal Decree”) 1112 / 2018

Summary:

Real Decreto Legislativo 1112 / 2018 is Spain’s transposition of the EU WAD. It explicitly regulates digital accessibility for national, regional, and location administrations in Spain. Private-sector companies in Spain that sell digital products to public-sector organizations in the country must also meet this law’s requirements to do business with government entities.

Requirements:

The EU WAD requires that the websites, mobile apps, and other digital experiences of public-sector entities conform with EN 301 549. In practice, that means ensuring digital content is perceivable, operable, understandable, and robust (POUR) for all users. Organizations must also take additional actions, including:

- Adopting, whenever possible, measures to increase accessibility, bearing in mind the minimum level of accessibility that must be met at all times.

- Offering users a communication mechanism that allows any person to submit suggestions and complaints.
- Providing an accessibility statement (a detailed, comprehensive, and clear declaration of compliance with the law) on websites and applications.

Enforcement:

Real Decreto Legislativo 1112 / 2018 is enforced through the sanctions and penalties outlined in Real Decreto Legislativo (“Legal Royal Decree”) 1 / 2013.

Laws impacting private businesses

Ley (“Law”) 11 / 2023

Summary:

Ley 11 / 2023 is Spain’s transposition of the EAA. The EAA is an EU regulation that mandates the accessibility of a wide range of consumer products and services circulating within the EU. These include many types of digital experiences, such as websites and apps related to e-commerce, banking, and transportation. Enforcement of the EAA is set to begin in June of 2025.

Requirements:

The requirements for compliance with Ley 11 / 2023 align with the general requirements for EAA compliance. To meet these, web and mobile content should conform with EN 301 549. Conformance with EN 301 549 involves adhering to digital accessibility best practices including:

- Ensuring compatibility with assistive technologies like screen readers.

- Offering flexible input methods.
- Providing alternatives for visual and auditory content.

The EAA also mandates that software and hardware associated with covered products and services are accessible to people with disabilities.

Enforcement:

Beginning in June 2025, organizations that violate Ley 11 / 2023 may face:

Fines: Organizations may be fined up to € 30,000 for minor infractions, up to € 150,000 for serious infractions, and up to € 600,000 for very serious infractions.

Company sanctions: If an individual commits two or more serious infractions within three years, they risk being prohibited from engaging in the activities that resulted in these infractions. This ban can last for a maximum of two years.

Start your journey to compliance

To comply with current Spanish digital accessibility laws and stay ahead of the 2025 EAA enforcement deadline, we recommend that your organization start by taking the following actions:



Audit your digital assets for conformance with EN 301 549.



Swiftly address existing accessibility issues in your digital assets.



Publish a detailed accessibility statement and regularly update this document.

Third-party digital accessibility solution providers, like Level Access, can help you understand your legal obligations and equip you with advanced technology, expert support services, and training to ensure all assets in your portfolio are accessible and compliant.



5 critical findings

Findings

Total findings
300

Unresolved
50

21%

372 findings automatically remediated

Search

For multiple keywords, separate by comma



Search

Filter >

<input type="checkbox"/>	Finding ID ▾	Task ID ▾	Type ⇅	Status ⇅
<input checked="" type="checkbox"/>	ABC-001	XDC-001	Identify verification flow	● Remediated
<input checked="" type="checkbox"/>	ABC-002	-	Page header missing	● Open

Let's get started

Engage our team to make accessibility a priority now. An investment in digital accessibility today is an investment in the sustainability and success of your company tomorrow.

Info@levelaccess.com

LevelAccess.com

