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PARTICIPATION OF PERSONS WITH DISABILITIES IN ELECTORAL PROCESSES

International good practices and practical
recommendations for the electoral system
of Bosnia and Herzegovina



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List of Commonly Used Abbreviations

BiH	Bosnia and Herzegovina
CEC	Central Election Commission
CoE	Council of Europe
CRPD	UN Convention on the Rights of Persons with Disabilities
ECtHR	European Court of Human Rights
EOM	Election observation mission
EU	European Union
EVM	Electronic Voting Machine
MEC	Municipal Election Commission (local level election commission in BiH)
OPDs	Organisation of Persons with Disabilities
OSCE	Organization for Security and Co-operation in Europe
OSCE/ODIHR	OSCE Office for Democratic Institutions and Human Rights
PSC	Polling Station Committee

Executive Summary

On 12 March 2010, Bosnia and Herzegovina (BiH) ratified the UN Convention on the Rights of Persons with Disabilities (CRPD). BiH is a participating state of the Organization for Security and Co-operation in Europe (OSCE) and a member of the Council of Europe (CoE) and Venice Commission. On 15 December 2022, BiH became a European Union (EU) candidate country. The EU closely follows its member states' practices in ensuring accessibility of EU Parliament elections, and it has issued a *Guide of good electoral practices in Member States* addressing the participation of citizens with disabilities in the electoral process.¹ The present Study therefore benchmarks its suggestions along those institutions' norms and the good practices of their member states.

The BiH electoral framework already features several of the building blocks of inclusive elections: assisted voting on request, a legal duty to consider accessibility when designating polling stations, mobile voting. This Study therefore starts from these existing foundations and asks how they can be made more effective in practice, while identifying the remaining legal, procedural and implementation challenges that BiH faces in ensuring that voters with disabilities can participate independently, secretly and on an equal basis with others.

On a normative level, legal capacity² is one of the main areas where BiH framework would benefit from further alignment with international and European standards. Citizens whose legal capacity has been withdrawn are excluded from the Central Voters Register, a rule that raises concerns under the CRPD, particularly where the exclusion is automatic and linked to disability-related status. Because the restriction operates without any individualised judicial assessment, it is also difficult to reconcile with the more permissive European Court of Human Rights (ECtHR) standard and the CoE/Venice Commission interpretative note.³ Within the EU, 15 countries have now fully enfranchised persons with psychosocial disabilities in line with the CRPD, while another six EU member states respect the ECtHR/CoE standard. Respective reforms have been tabled in several of the remaining six EU member states. These developments point to legal-capacity reform as one of the clearest areas where BiH could strengthen compliance and align with evolving European practice.⁴

Physical accessibility remains one of the most persistent implementation challenges in BiH's electoral process. For the 2024 local elections, observers reported that 51 percent of sampled polling stations did not provide independent access for voters with physical disabilities and in 21 percent the interior layout was unsuitable. These findings suggest that the existing legal duty to consider accessibility when designating polling stations is not yet being applied consistently in practice. Similar implementation issues were observed in relation to voting booth placement and assisted voting

¹ [Guide of good electoral practices in Member States addressing the participation of citizens with disabilities in the electoral process](#)

² The CRPD Committee's General Comment No. 1 (2014) on Article 12 draws a clear distinction between two related but separate concepts: *legal capacity* – the legal authority to hold rights and to exercise those rights (sometimes described as "legal standing" and "legal agency"); and *mental capacity* – the actual decision-making skills of a person, which vary between individuals and may fluctuate depending on environmental and social circumstances. The CRPD treats these as distinct: a person may have reduced decision-making ability in certain contexts without this affecting their legal capacity or their right to participate in elections. Under Article 12, States Parties are required to recognise that persons with disabilities, including those with psychosocial or intellectual disabilities, enjoy legal capacity on an equal basis with others in all aspects of life, and may never be deprived of that capacity solely on the basis of disability.

³ [Revised Interpretative Declaration to the Code of Good Practice in Electoral Matters on the Participation of People with Disabilities in Elections](#)

⁴ ODIHR EOM Final Report (Local Elections, 6 October 2024, BiH), Priority Recommendation No. 2: "To ensure equal suffrage in accordance with international standards, restrictions to the right to vote based on intellectual or psychosocial disability should be reviewed."

which in some cases affected the secrecy of the vote or led to uneven treatment of voters requesting assistance.

Four EU member states were selected as comparators – Croatia, Ireland, Germany and Estonia⁵ – as they show that progress is achievable and, importantly, that many measures do not require constitutional or even legal reform. For instance: Croatia provides audio cues for voters and it repealed the legal-capacity bar to voting through a civil-society-led reform; Ireland, along with eight other EU Member States, uses tactile ballot-paper templates with a freephone candidate guide;⁶ Germany, along with six other EU Member States, offers sign language voter information, and ended disenfranchisement of people under guardianship; and Estonia is among the eight Member States that provide voters with magnifying foils/glasses, and it makes remote and online channels accessible by design.⁷ The common thread is that the most replicable gains – templates, magnifying devices, audio devices, voting booth layout and height, staff training, and structured cooperation with organisations of persons with disabilities (OPDs) – are operational measures within the Central Election Commission (CEC)’s existing regulatory powers.

The choice of ballot scanners for voting technology in Bosnia and Herzegovina reduces opportunities for built-in peripheral electronic accommodations for voters with disabilities. At the same time, ballot scanners, and the reduced ballot size they require, allow for provision of Braille ballot sleeves and magnifying devices to facilitate completion of the paper ballots. The procured scanner interface can also add-on accessible status and error feedback, including through headphone audio feedback, although configuring peripherals may be possible only as a limited pilot for the current electoral cycle. Additionally, lowering the position of the secrecy-booth tables and ballot scanners would allow voters who use a wheelchair to complete ballot papers and slide them into the scanner independently and in secret.

The recommendations in Section 5 are deliberately sequenced into measures that can be taken without legal change, measures for the medium term, and reforms that require legislative or constitutional action.

⁵ Many countries around Europe and around the world have made progress regarding inclusion of persons with disabilities in the electoral process, in the aftermath of ratifying the CRPD – these 4 are chosen due to their proximity to BiH, relevance and ease of adaptation. A table of additional good practices around Europe is included in the study along with a few other examples that may be of interest to BiH.

⁶ [Political participation of persons with disabilities; new developments. Issued by European Union Agency for Fundamental Rights, 2024.](#)

⁷ [People with disabilities and the European elections; Infographic by European Parliament Research Service; February 2024](#)

About this Study

This Study reviews relevant international and European standards and comparative practice on the participation of persons with disabilities in electoral processes, and translates them into practical, context-sensitive options for Bosnia and Herzegovina. It is intended to support the Central Election Commission of BiH (CEC BiH) and to be validated with institutional stakeholders and organisations of persons with disabilities. The focus is participation of persons with disabilities across the electoral cycle – as voters, and, more briefly, as candidates and election officials. How the Study was produced:

- Standards review: Extraction of the relevant CRPD, Council of Europe / Venice Commission, OSCE/ODIHR and EU standards (Section 1).
- Comparative analysis: Desk research on four European systems – one from the immediate region (Croatia) and three other EU members (Ireland, Germany, Estonia) – selected for the transferability of their practices rather than the size of their reforms. Also included are a small number of additional jurisdictions as brief illustrative examples, not full comparators (Section 2).
- BiH contextualisation: Mapping of the BiH legal and institutional framework and of recent election-observation evidence; further informed by a national consultant's input paper⁸ (Sect.3).
- Voting Technology section with the mind on introductions of new technologies in electoral process of BiH for October 2026 elections (Section 4).
- Consultation with OPDs: A targeted online consultation with organisations of persons with disabilities and CEC representatives, whose input is reflected in Annex A and throughout the recommendations. A follow-up questionnaire was circulated to widen the evidence base - findings from which are incorporated in comparative recommendations; the national consultant's paper (Annex B) provides a fuller account of the BiH-specific legal framework, OPD responses and proposed local measures.

Methodological scope. This study was prepared primarily as a desk-based comparative and legal analysis, complemented by coordination with the national consultant and one targeted online consultation with organisations of persons with disabilities and CEC representatives. It is therefore not a nationwide accessibility audit, field assessment of polling stations, or comprehensive stakeholder-mapping exercise. Its purpose is to identify transferable European practices and translate them into practical, context-sensitive options for BiH, to be tested and refined through the validation process with electoral institutions and OPDs.

The guiding principle is **"nothing about us without us"**: the practices presented here are assessed not only for legal compliance but also for their practical relevance to voters with disabilities, drawing on available comparative evidence and the targeted OPD consultation conducted for this study.

A note on terminology. *Persons with disabilities* is used in line with the CRPD: "Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others."⁹ *OPD* means an organisation of – led and governed by – persons with disabilities. *EMB* means electoral management body; the Central Election Commission (CEC BiH) is a permanent body with a broad mandate to oversee the implementation of electoral legislation and is responsible for the overall conduct of elections, including issuing regulations. The

⁸ Pristupačnost biračkog prava za osobe sa invaliditetom u Bosni i Hercegovini, Vera Zih, June 2026 paper for COE

⁹ [Convention on the Rights of Persons with Disabilities](#)

election administration comprises the CEC BiH, 143 municipal election commissions (MECs), and 5,400 polling station committees (PSCs).¹⁰

1. International and European Standards

Over the last two decades the framework for disability inclusion has shifted from a medical model – disability as a personal misfortune calling for charity – to a human-rights model, in which the barriers in the environment, not the disability, are the problem to be fixed. For Bosnia and Herzegovina these are not aspirations but binding obligations and accession benchmarks.

1.1 The CRPD: the global baseline¹¹

Bosnia and Herzegovina ratified the CRPD in 2010. Three articles are decisive for elections.

Article 9 – Accessibility. Accessibility is a precondition for participation, not an optional add-on. States must identify and remove barriers in the physical environment, in transport and in information and communication, including ICT. In electoral terms, every stage – from registration through to the announcement of results – must be accessible.

Article 12 – Equal recognition before the law. Legal capacity is to be enjoyed on an equal basis with others, with supported decision-making replacing substitute decision-making. This is the article that makes blanket disenfranchisement of people “deprived of legal capacity” incompatible with the Convention.

Article 29 – Participation in political and public life. The cornerstone provision. States Parties must guarantee that voting procedures, facilities and materials are appropriate, accessible and easy to understand and use; protect the secret ballot; facilitate assistive and new technologies; and allow assistance by a person of the voter’s own choosing, on request. The CRPD Committee reads Article 29 as admitting no “reasonable restriction” on the basis of disability – including after an individualised assessment.

A note on the standard. The CRPD Committee and the Council of Europe are not fully aligned on this point. The CRPD permits no disability-based restriction on the vote, even after an individual assessment, while the Venice Commission and the European Court of Human Rights still allow narrowly drawn, individualised exclusions ordered by a court. The divergence does not change BiH’s position: an exclusion that follows automatically from a person’s legal-capacity status fails both standards, as Section 3 sets out.

1.2 Council of Europe standards and case-law

Venice Commission. The Revised Interpretative Declaration to the Code of Good Practice in Electoral Matters on the Participation of People with Disabilities in Elections¹² completes the five principles of Europe’s electoral heritage as they apply to persons with disabilities. It confirms that universal suffrage — the principle that all human beings have the right to vote and to stand for election — extends to persons with disabilities, who may not be discriminated against in this regard, in conformity with Article 29 CRPD and the case-law of the European Court of Human Rights. The Declaration further requires that voting procedures and facilities be accessible, with assistance

¹⁰ Number of PSCs in 2024 local elections – may be reduced for 2026 election.

¹¹ [Convention on the Rights of Persons with Disabilities](#)

¹² [Revised Interpretative Declaration to the Code of Good Practice in Electoral Matters on the Participation of People with Disabilities in Elections](#)

permitted where necessary subject to the individual character of the vote (§3); that Universal Design principles and user participation in design guide the accessibility of polling and electoral information (§4); that information be made available in accessible, easy-to-read formats with due account taken of reasonable accommodation (§6); that the secret ballot be protected, including through assistive technologies or assistance by a person of the voter's own choice exercising no undue influence (§7); and that equality of opportunity extend to persons with disabilities who stand for election (§5).

[European Court of Human Rights \(ECtHR\)](#) case law has progressively clarified the application of the Convention to the electoral rights of persons with disabilities. In *Alajos Kiss v. Hungary*¹³, the Court held that the automatic removal of voting rights from persons under partial guardianship, without an individualised judicial assessment, violated the Convention. This approach was reaffirmed in *Anatoliy Marinov v. Bulgaria*¹⁴, while in *Strøbye and Rosenlind v. Denmark*¹⁵ and *Caamaño Valle v. Spain*¹⁶ the Court accepted that restrictions on voting rights may be compatible with the Convention where they are based on a thorough and individualised judicial assessment. Beyond legal capacity, the Court has also recognised that physical barriers to voting may engage Convention rights: in *Mółka v. Poland*¹⁷ it accepted that the inability of a wheelchair user to access a polling station could affect Convention rights. While not focused on disability rights, broader message of the Court's Bosnia and Herzegovina jurisprudence (*Sejdić and Finci*¹⁸, *Zornić*¹⁹, *Pilav*²⁰, *Pudarić*²¹) is that categorical exclusions from electoral rights require particularly strong justification in a democratic society, a principle that resonates beyond their ethnicity-based facts.

1.3 Election Observation Missions (EOMs)

International Election Observation Missions, conducted jointly by ODIHR, the Parliamentary Assembly of the Council of Europe (PACE) and the Congress of Local and Regional Authorities, assess accessibility systematically: the suitability of polling stations, the availability of accessible materials and candidate information, and the treatment of assisted voting. The observation reports have repeatedly flagged the exclusion of citizens deprived of legal capacity in BiH as inconsistent with international standards, most recently as a priority recommendation following the 2024 local elections.

1.4 *Acquis communautaire* and the EU accession path

For BiH, alignment with the EU *acquis* and the European Commission's priorities forms part of the accession process. The EU Charter of Fundamental Rights²² prohibits disability discrimination (Article 21) and recognises the right of persons with disabilities to measures securing their independence and participation (Article 26). Treaty on the Functioning of the European Union (Articles 10 and 19) establishes the EU's competence and obligation to combat discrimination on the grounds of disability.²³ The European Accessibility Act²⁴ reinforces the EU's commitment to accessible products and digital services, helping remove barriers to participation in society more broadly. While it does not regulate elections or political participation, its accessibility requirements for digital services and certain information technologies contribute to the wider accessibility environment within which

¹³ [Case of Alajos Kiss v. Hungary.](#)

¹⁴ [Case of Anatoliy Marinov v. Bulgaria.](#)

¹⁵ [Case of Strøbye and Rosenlind v. Denmark.](#)

¹⁶ [Case of Caamaño Valle v. Spain.](#)

¹⁷ [Case of Mółka v Poland, 2006.](#)

¹⁸ [Presuda Evropskog suda za ljudska prava - Sejdić - Finci](#)

¹⁹ [Presuda Evropskog suda za ljudska prava - Zornić](#)

²⁰ [Presuda Evropskog suda za ljudska prava - Ilijaz Pilav](#)

²¹ [Presuda Evropskog suda za ljudska prava- Pudarić](#)

²² [Charter of Fundamental Rights of The European Union](#)

²³ [Treaty on the Functioning of the European Union](#)

²⁴ [European Accessibility Act](#)

electoral processes increasingly operate (especially as BiH further adopts electoral technology). Web Accessibility Directive (EU) 2016/2102²⁵ requires Member States to ensure that websites and mobile applications of public sector bodies are perceivable, operable, understandable and robust for users, particularly persons with disabilities. While it does not regulate elections or voting, the Directive applies directly to public authorities' digital services and therefore provides an important legal basis for ensuring that election management body websites, voter information, registration portals and other online electoral services are accessible to persons with disabilities. The European Commission has also published a Guide of Good Electoral Practices addressing the participation of citizens with disabilities in the electoral process that provides practical guidance and examples of good practice for Member States.²⁶

1.5 Six principles that translate standards into practice

1. **Accessibility by design.** Electoral procedures, facilities, information and technologies should be designed to be accessible from the outset (universal design), with reasonable accommodation provided where individual needs remain.
2. **Accessibility throughout the electoral cycle.** Accessibility should extend beyond polling day to voter information, registration, polling stations, ballot design, complaints mechanisms and opportunities to stand as a candidate.
3. **Independence and secrecy together.** The objective is a vote that is both independent and secret. Where assistance is needed, it should be available at the voter's request and, wherever possible, provided by a person of their choice rather than being the default means of participation.
4. **The system carries the duty.** Ensuring accessible and secret voting is the responsibility of the State. That responsibility should not be shifted onto voters with disabilities by requiring them to bring their own assistant in order to vote.
5. **Avoid unnecessary proof-of-disability requirements.** Good practice favours self-identification of accessibility needs over medical certification or other documentary requirements that may discourage participation.
6. **Nothing about us without us.** Organisations of persons with disabilities should be involved in designing, testing, implementing and evaluating electoral procedures, technologies and accessibility measures.

²⁵ [Web Accessibility Directive](#)

²⁶ [Guide of good electoral practices in Member States addressing the participation of citizens with disabilities in the electoral process](#)

2. Comparative Analysis

While many countries have made progress in providing equal access to elections for persons with disabilities, this section looks at four EU member states selected for the transferability of their practices to BiH rather than for the scale of their reforms: Croatia, Ireland, Germany and Estonia. Each illustrates a different lever – legal-capacity reform, a low-tech independent-voting tool, removal of guardianship-based disenfranchisement, and accessible alternative channels.

Table of assistive devices for voters with disabilities provided by various EU countries as collected by the European Parliamentary Research Service in February 2024.²⁷

EPRS | European Parliamentary Research Service

Table of pictograms

Templates	Audio description	Braille ballot papers	Mobile voting
Magnifiers	Sign language	Accessible voting booths	Choice of polling station
Adequate lighting	Large printouts	Accessible ballot boxes	Free choice of assistance

Existing voting tools and support in Member States (ordered by range offered)												
Lithuania												
Belgium												
Spain												
Ireland												
The Netherlands												
Estonia												
Croatia												
Hungary												
Luxembourg												
Slovenia												
Austria												
Germany												
Denmark												
Finland												
Czechia												
France												
Latvia												
Poland												
Portugal												
Sweden												
Bulgaria												
Italy												
Malta												
Romania												
Slovakia												
Cyprus												
Greece												

Sources: [Guide of good electoral practices in Member States addressing the participation of citizens with disabilities in the electoral process](#), European Commission, SWD(2023) 408 final; [Human Rights Report 2022 – political participation of persons with disabilities: the right to vote and stand for election](#), Issue 6 - 2022, European Disability Forum

Note: the information provided by these sources and illustrated in this infographic reflects the best data available. There is however no EU agency or body currently collecting comprehensive data concerning the political participation of persons with disabilities.

²⁷ [People with disabilities and the European elections; Infographic by European Parliament Research Service; February 2024](#)

2.1 Croatia – turning restored voting rights into usable procedures

Croatia's example is interesting for BiH for two reasons: first, it removed a legal-capacity restriction on voting; and second, because it shows how an election administration can build practical accessibility measures through instructions, training and cooperation, not only through legislative reform.

Legal-capacity reform and the role of OPDs. Croatia's 2012 Act on the Electoral Register restored voting rights to citizens deprived of legal capacity by entering them into the voter register. This brought Croatia into the group of EU Member States that guarantee the vote regardless of legal-capacity status.²⁸ The reform was also important because of how it happened: It was led by a coalition of OPDs – the [Association for Self-Advocacy](#) together with [GONG](#) and others – negotiating with the State Electoral Commission and ministries and pressing for a universal solution, rejecting a case-by-case judicial model that would have left voting rights dependent on individual capacity assessments.

The most transferable practice: mandatory election instructions. Croatia's State Electoral Commission issues mandatory instructions before elections on how polling committees should enable voters with disabilities, illiterate voters and voters who cannot access the polling place to vote. These instructions make the general right to vote operational. They provide that a voter who cannot mark the ballot independently may be assisted by a person of trust; that, where a voter cannot come to the polling place, at least two polling committee members may go to the voter's residence; and that, where a voter reaches a polling place but cannot physically enter it, two polling committee members should come to the voter and enable voting while protecting secrecy.²⁹ This is the clearest lesson for BiH: many improvements do not require new primary legislation, but clearer, binding, election-specific procedures issued by the EMB.

Training and polling-board guidance. Croatia does not appear to require disability-specific training by law, but the State Electoral Commission includes guidance on voters with disabilities in training for election committee members and distributes written materials to polling committees explaining the relevant voting procedures. This is a low-cost measure that BiH could adapt through the training of electoral administration and future functional Centre for Education within the CEC BiH: standard polling-station training could include a short module on assistance, secrecy, communication with voters with different disabilities, and what to do when the polling station is inaccessible.

Practical voting accommodations. Croatia combines several forms of accommodation: assistance by a person chosen by the voter, home/mobile voting where the voter cannot come to the polling station, and arrangements for voters who arrive at an inaccessible polling place. For voters in long-term social-welfare institutions, special polling stations may be designated for parliamentary, presidential and European Parliament elections. The Croatian model is not perfect, local elections remain more restrictive for residents whose registered residence is elsewhere, but it illustrates how an EMB can give poll workers a practical script for responding to real-life barriers on election day.

Accessible materials and polling-station tools. The European Commission's guide records that Croatia provides several polling-station accessibility tools, including templates, adequate lighting, audio description, sign-language support at polling stations, accessible voting booths and accessible ballot boxes. These are useful for BiH because they are concrete and scalable: the CEC could begin with a limited package in selected municipalities, test it with OPDs, and then expand.

²⁸ [EU Agency for Fundamental Rights: Political Participation of People with Disabilities, New Developments.](#)

²⁹ <https://fra.europa.eu/sites/default/files/political-participation-persons-disabilities-hr.docx>

Cooperation with OPDs and monitoring bodies. Croatia also shows the value of structured cooperation. Disability organisations have been involved in supporting voters, including through projects assisting voters with visual or audiovisual disabilities. More broadly, the European Commission Guide notes that Croatia is among the Member States that have formalised cooperation with OPDs, either through agreements or working groups. Croatia's *Ombudsperson for Persons with Disabilities* also plays a useful oversight role: before the 2020 parliamentary elections, the Ombudsperson issued recommendations to political actors and the media, calling for accessible voting procedures, spaces and materials, and for campaign and election information to be available in formats such as Braille, large print, audio, easy-to-understand versions and sign language.

Local-level planning: the Zagreb example. A useful sub-national practice is the *City of Zagreb Strategy for Equalisation of Opportunities for Persons with Disabilities 2022–2025*,³⁰ which includes measures to improve electoral participation. These include monitoring and ensuring polling-station accessibility, adapting polling stations to different disability-related needs, educating electoral and polling committees on inclusive electoral processes, and educating persons with disabilities about their political rights. This is particularly relevant for BiH, where much of polling-station accessibility depends on municipal-level implementation.

Accessible information and media. Croatia has transposed the EU Web Accessibility Directive through legislation requiring public-sector websites and mobile applications to be accessible. The State Electoral Commission's website is covered by this framework, although its own accessibility statement records only partial compliance. Croatia also has media-accessibility obligations under the Electronic Media Act and the Act on Croatian Radio-Television, and the 2023–2027 contract between the public broadcaster and the Government sets measurable annual targets for adapted programming, including subtitling, sign language and audio description. This provides a useful model for BiH: accessibility commitments are more meaningful when they are measurable and assigned to specific institutions.

An honest reading of the gaps. Croatia is not a complete model. The FRA background report notes gaps: the State Electoral Commission website is only partially compliant with accessibility standards; there is no identified data on the proportion of accessible polling stations; no detailed polling-station accessibility standards are in place; accessible electoral programming and party manifestos remain limited; and the accessibility of the electoral process varies across elections and types of disability.³¹ These gaps are useful for BiH because they show that progress can be sequenced. Croatia's strongest lesson is not that everything has been solved, but that legal reform can be followed by

Point of interest: Spain - an accessibility system, not a single accommodation.

Spain stands out because accessibility is treated as an operational system across the electoral cycle rather than as a set of isolated polling-day adjustments. The Commission Guide highlights cooperation between the Ministry of Interior and disability organisations, including ONCE and Plena Inclusión España, to develop accessible voting procedures for blind voters and cognitive-accessibility signage in polling places. Spain also provides easy-to-read manuals, free sign-language interpretation and magnetic induction loop services for persons with hearing disabilities appointed as polling-station officials, and specific support for voters with visual, hearing or intellectual disabilities. After elections, Spain uses accessibility questionnaires and reports, with designated accessibility managers in each government delegation and sub-delegation to follow up incidents. For BiH, Spain is useful as a model of how an EMB can build an accessibility architecture: partnership with OPDs, practical tools, trained officials, designated focal points and post-election review.

³⁰ *City of Zagreb Strategy for Equalisation of Opportunities for Persons with Disabilities 2022–2025*

³¹ <https://fra.europa.eu/sites/default/files/political-participation-persons-disabilities-hr.docx>

practical administrative measures: binding instructions, training, OPD cooperation, accessible information, and local-level planning.

2.2 Ireland – designing for independent voting

Ireland's most significant contribution is not a single assistive device, but an approach centred on enabling blind and low vision voters to vote independently and in secret, rather than relying on assistance. The best-known example is the [ballot paper template](#): a transparent tactile overlay with raised print and Braille that fits over the ordinary ballot paper, allowing voters to locate candidates and mark their choice independently. The template is supported by a free telephone service that reads the ballot and candidate order for each constituency, enabling voters to familiarise themselves with the ballot before election day or while in the polling booth. Working versions of the template are also made available through [Vision Ireland](#) (formerly NCBI) so that voters can practise in advance, and the system continues to be refined in partnership with users. The ballot template emerged following litigation brought by a blind voter in 2016–2017, after the High Court accepted that requiring a blind voter to rely on the presiding officer to mark a ballot was incompatible with a genuinely secret vote. Rather than simply expanding assisted voting, Ireland developed a practical solution that allows many blind voters to cast a ballot without revealing their electoral choice. The principle is transferable to Bosnia and Herzegovina: wherever possible, accessibility measures should maximise voter independence before relying on assisted voting.

[Ireland has complemented the template with broader administrative reforms.](#) The Electoral Reform Act 2022 extended existing voting facilities beyond physical disabilities to include voters with mental health disabilities, recognising that accessibility barriers are not exclusively physical. Polling stations are expected to be accessible, voters may transfer to a more accessible polling station where necessary, and returning officers are responsible for making practical arrangements to facilitate voting by persons with disabilities. The newly established Electoral Commission (*An Coimisiún Toghcháin*) also has an explicit statutory mandate to promote participation among under-represented groups, conduct public awareness campaigns, and review electoral events after each election, including the accessibility of polling stations and voting procedures.

For Bosnia and Herzegovina, the Irish experience suggests several relatively low-cost reforms within the competence of an election management body:

- introducing tactile ballot templates for blind voters;
- pairing assistive tools with accessible audio information;
- involving organisations of persons with disabilities in testing accessibility measures before elections;
- and systematically reviewing accessibility after each electoral event so that improvements become part of the EMB's institutional practice rather than one-off initiatives.

Point of interest: The Netherlands - helping voters practice and plan.

The Dutch example is useful because it focuses on reducing uncertainty before election day. The Commission Guide notes that voters can use an online tool to identify accessible polling stations, while municipalities and partners use a communication toolkit with accessible election information, sign-language videos, infographics, accessible ballots and proxy forms. Some municipalities also organise practice voting before elections so voters can familiarise themselves with the polling process and feel more confident voting independently. The Netherlands also operates an accessibility hotline, “Unlimited Voting,” where voters can report positive or negative experiences and suggest improvements. These are practical measures for BiH: publish accessibility information in advance, let voters practice, & create a simple feedback channel after election day.

2.3 Germany – standardising accessibility

Germany’s principal legal reform came in 2019, when the Federal Constitutional Court held that the automatic exclusion of persons under full guardianship from voting violated the constitutional principles of universal suffrage and equality. Around 85,000 citizens regained the right to vote before the 2019 European Parliament elections, completing Germany’s move away from guardianship-based disenfranchisement.

More relevant for election administrators, however, are Germany’s practical accessibility measures. Voter notification cards indicate the accessibility of polling stations through standardised pictograms and contact information, allowing voters to identify potential barriers before election day and make alternative arrangements where necessary. Polling stations are equipped with tactile ballot templates for blind voters, accessible voting booths and other assistive tools, while voters may choose another accessible polling station and receive assistance from a person of their choice. Rather than relying on ad hoc local solutions, Germany has embedded these accommodations into its standard election procedures.

Germany also illustrates the value of involving organisations of persons with disabilities beyond consultation. Before the 2019 European Parliament elections, the German Association for the Blind and Visually Impaired assessed the accessibility of political parties’ campaign materials for screen-reader users and published the results, demonstrating how disability organisations can contribute to improving electoral accessibility throughout the electoral cycle rather than only on polling day.

2.4 Estonia – making every voting channel accessible

Estonia is often cited for nationwide internet voting, but its more transferable lesson is that accessibility has been integrated across every voting channel rather than treated as a feature of digital voting alone. The same accessibility principles are reflected in ordinary polling stations, home voting and online services. Polling stations are equipped with assistive tools including magnifiers, adjustable voting tables and adequate lighting, while remote sign-language interpretation enables deaf voters to communicate with election officials even where no interpreter is physically present. Election information is provided through accessible videos and online services, and voters can identify accessible polling stations before election day through publicly available information.

Estonia's experience suggests that accessibility should not depend on a single technology. Rather, election authorities should ensure that every available voting method, from polling stations to remote voting options, is usable by persons with different disabilities. For Bosnia and Herzegovina, the most readily transferable practices are the publication of accessibility information before election day, standard polling-station assistive equipment, and remote interpretation services where appropriate.

Point of interest: France - Accessibility by design

France illustrates how accessibility can be integrated into every stage of election administration through practical guidance rather than legislative change. National guidance covers polling-station design, accessible communication, polling-official conduct, accessible campaign materials and post-election evaluation. Rather than focusing on individual accommodations, the French model emphasises designing the electoral environment so that accessibility becomes part of ordinary election planning. Several of the accompanying manuals and checklists could readily be adapted by the CEC BiH for polling-board training and polling-station preparation.

Practical accessibility measures used by European EMBs³²

Illustrative practices observed across EU Member States that could inform future accessibility planning in BiH, organised across the electoral cycle.

Planning & preparation	Polling station	Information & communication	Monitoring & continuous improvement
Accessibility checklists for polling stations before election day <i>Finland, Estonia, Belgium</i>	Tactile / Braille ballot templates for blind voters <i>Ireland, Germany, Austria, Portugal, Slovenia, Luxembourg, etc.</i>	Easy-to-read voter guides and election materials <i>France, Hungary, Lithuania, Portugal</i>	Post-election accessibility reviews conducted by the EMB <i>Ireland, Spain, Netherlands, France</i>
Joint planning with OPDs when designing accessibility measures <i>Croatia, Spain, Netherlands, Finland, Belgium</i>	Adjustable voting booths, appropriate lighting, magnifiers and accessible ballot boxes <i>Estonia, Denmark, Finland and others</i>	Accessible election websites meeting web accessibility standards <i>All Member States under EU law</i>	Accessibility hotlines and complaint channels for voters <i>Netherlands, Germany, Ireland</i>
Disability-awareness training for polling officials <i>Croatia, Spain, Belgium, Denmark, Lithuania</i>	Choice of an accessible polling station where the assigned station presents barriers <i>Ireland, Germany, Italy, Latvia, Romania and others</i>	Sign-language videos, QR codes, telephone helplines and accessible online information <i>Estonia, Lithuania, Finland, Ireland</i>	Collection of accessibility data to improve future planning <i>Sweden, Romania, Luxembourg</i>
Quick-reference guidance for polling boards on assisting voters with disabilities <i>Croatia, Spain</i>	Mobile or home voting for voters unable to attend polling stations <i>Croatia, Estonia, Ireland, Portugal, Romania and others</i>	Accessible campaign guidance for political parties and broadcasters <i>France, Lithuania, Spain</i>	Accessibility focal points during elections <i>Spain</i>

None of these practices is unique to a single Member State, nor do they require wholesale electoral reform. Many are administrative measures implemented by election management bodies, through polling-station planning, operational guidance, training, cooperation with organisations of persons with disabilities, and post-election evaluation, illustrating that accessibility can often be improved incrementally through administrative practice rather than legislative amendment.

³² [Guide of good electoral practices in Member States addressing the participation of citizens with disabilities in the electoral process](#)

3. The Bosnia and Herzegovina Context

BiH's electoral framework provides a basis for democratic elections and includes several provisions relevant to voters with disabilities, including polling-station accessibility, assisted voting, mobile voting and the possibility of using election technology to support independent voting. However, access for persons with disabilities remains uneven in practice. The principal legal gap is the continued exclusion from the Central Voters Register of citizens whose full legal capacity has been withdrawn by a final decision, including on the basis of intellectual or psychosocial disability. This affects not only the right to vote, but also candidacy, because candidates must be registered voters. This is the principal legal-reform issue for the study and should be addressed separately from the mainly operational barriers discussed below.³³

For most voters with disabilities, however, the decisive barriers are practical: whether polling stations can be entered independently; whether the interior layout protects secrecy; whether polling-station staff understand assistance rules; whether mobile voting is organized reliably; whether voter information is accessible; whether new election technologies are designed for different disabilities; and whether persons with disabilities can participate not only as voters, but also as candidates, observers and election officials. ODIHR's disability-participation guidance frames access in this broader way: persons with disabilities should be able to participate in political life as voters, candidates, party members, campaign staff, observers, election officials and elected representatives.³⁴

3.1 Institutional and operational setting

Election access in BiH depends on a multi-level implementation chain. The CEC sets rules, issues by-laws, maintains the Central Voters Register, certifies political subjects, provides training and regulates election technologies. Municipal election commissions (MECs) are responsible for many of the decisions that most directly affect voters with disabilities: identifying polling-station locations, managing voter-register centres, informing voters, appointing of and providing mandatory training for the polling-station committees, distributing election material and ensuring the technical organization of polling stations. Polling-station committees manage the conduct of the elections at polling stations, implementing the rules on election day, including identification, secrecy, assistance, order in the polling station, use of technology and recording objections.³⁵

This means that accessibility is not only a matter of policy prescribed by the CEC but largely dependent on municipal planning and premises-selection question. A formally good rule will not help if MECs select an inaccessible school, if a ramp is missing or unusable, if the voting screen is placed so that the ballot is visible, if the queue is not manageable for older voters or voters with physical disabilities, or if polling-station staff treat invisible disabilities with suspicion. Accessibility therefore must be built into the whole chain: CEC regulations and forms; municipal election commission checklists; polling-station selection; voter-register centres; polling-station committee training; mobile-team logistics; technology procurement; and election-day monitoring.

³³ [BiH Election Law](#)

³⁴ [Guidelines on Promoting the Political Participation of Persons with Disabilities, OSCE Office for Democratic Institutions and Human Rights \(ODIHR\), 2019](#)

³⁵ [Pod Lupom Final report on citizen, non-partisan observation of the 2024 Local Elections in Bosnia and Herzegovina](#)

OPDs can play a practical role within the existing electoral framework. Although the Election Law does not create a separate formal consultation category for OPDs, accredited civil-society observers may monitor the work of election commissions, polling stations and counting processes, document accessibility barriers and submit observations that can inform complaints, recommendations and future procedural reform. Recent practice, including designated contact points for disability-related election issues within the CEC and Pod Lupom, provides a useful basis for making this cooperation more systematic.³⁶

The 2024 amendments to the Election Law created both an opportunity and a capacity challenge. They strengthened election integrity, professionalized polling-station committee leadership by shifting appointment of presidents and deputies to the CEC and created the basis for gradual introduction of election technologies. At the same time, observers noted that the amendments significantly expanded the CEC's workload, while municipal election commissions continued to miss deadlines and experience working-capacity problems. Pod Lupom recorded 111 violations of electoral deadlines by municipal election commissions during the pre-election period, including deadlines related to polling-station lists, publication of voter numbers and training of polling-station committee members.³⁷

For this Study, the practical implication is clear: any accessibility measure must be simple enough to be implemented by MECs and polling-station committees, but clear enough to be enforceable. Disability inclusion should be part of the mandatory training of polling-station committee presidents, deputies and members, not an optional add-on. Once established functional and sustainable Centre for Education within the CEC BiH will provide a natural institutional home for such modules. The training should be scenario-based and practical: how to respond to a voter requesting assistance; how to protect secrecy when assistance is used; how to communicate with voters with different disabilities; how to handle biometric identification if disability prevents its use; how to record objections; and how to distinguish genuine support from coercion or family voting.

3.2 Access before election day: voter information, registration and mobile voting

Access problems begin before the voter reaches the polling station. Voters must be able to check their registration, understand where and how they vote, request mobile voting where necessary, and receive information in formats they can use. The Election Law provides for public access to excerpts from the Central Voters Register and for voters to check and request correction of their personal data. It also requires Voter Register Centres in each municipality to support access to the voter register and voter requests.³⁸

In practice, this creates several access risks. Pod Lupom reported that two MECs voter-register centres, in Ključ and Živinice, were not accessible to citizens. It also criticized the limited public access to the Central Voters Register during the 2024 process, arguing that the CEC did not publish the register on its website in the way required by the amended law. For voters with disabilities, inaccessible voter-register centres, inaccessible websites or unclear voter information can exclude them before election day. This is particularly important for voters who also face poverty,

³⁶ Pristupačnost biračkog prava za osobe sa invaliditetom u Bosni i Hercegovini, Vera Zih, June 2026 paper for COE

³⁷ Idem.

³⁸ [BiH Election Law](#)

displacement, rural isolation, lack of documentation, including Roma-related documentation and residence barriers.

Voter education and outreach provides another opportunity for improvement. The CEC has previously cooperated with OPDs and has identified persons with disabilities as a target group in its voter-education strategies, but resources remain limited. Accessible voter information should be treated as a core election-administration task. At minimum, information on registration, polling-station location, voter assistance, mobile voting, ballot marking, complaints and new technologies should be available in plain language, easy-read, audio, screen-reader compatible digital text, large print, captioned video and sign-language video.

The OPD questionnaire conducted for the Study confirms this as a practical barrier: organisations rated the accessibility of information on how and where to vote below average, noting that information is still largely distributed through standard media and websites and is often not available in easy-read, audio, Braille, sign-language or other adapted formats. Respondents also stressed the need for targeted voter education on how to vote and what forms of support are available.³⁹

Mobile voting is an important accommodation for voters who cannot reach a polling station because of age, illness or disability. The Election Law requires the CEC to regulate voting for homebound voters and voters in institutions. In practice, however, mobile voting depends on early registration, medical documentation, correct contact information, communication with the voter, route planning and reliable mobile teams. OPD participants consulted for this Study described coordination failures in which mobile teams and voters missed each other. The practical issue is therefore not only whether mobile voting exists, but whether it is easy to request, well communicated, and delivered in a way that protects both access and secrecy.

3.3 Election-day access: physical access, secrecy and assistance

The 2024 local elections confirmed that physical access remains one of the clearest barriers. EOMs observed that 51 percent of polling stations where voting was observed did not provide independent access for voters with physical disabilities, and that in 21 percent the interior layout was unsuitable.⁴⁰ Pod Lupom used a different methodology but reached a complementary conclusion: it estimated that 21.98 percent of polling stations were not accessible for persons using wheelchairs or other aids, while noting improvement from earlier cycles.⁴¹

The difference between these figures is useful rather than contradictory. It shows that “accessibility” needs to be measured in more than one way. A polling station may be reachable but not independently accessible. It may have an entrance but no usable interior layout. It may be usable by some wheelchair users but not by blind voters, voters with low vision, deaf voters, voters with intellectual disabilities, or voters who need a quiet and clearly organized environment.

OPDs reported that assistive tools such as ballot templates, easy-read materials, sign-language video instructions, magnifiers and other aids are generally not available at polling stations. They also identified rural polling stations as particularly problematic, with frequent barriers including steps, lack of ramps or handrails and insufficient space for movement. Some respondents also

³⁹ *Pristupačnost biračkog prava za osobe sa invaliditetom u Bosni i Hercegovini*, Vera Zih, June 2026 paper for COE

⁴⁰ [Bosnia and Herzegovina local elections 2024: ODIHR election observation mission final report](#)

⁴¹ [Pod Lupom Final report on citizen, non-partisan observation of the 2024 Local Elections in Bosnia and Herzegovina](#)

pointed to accessible transport as an indirect but significant condition for equal access to the polling station.⁴²

Election-day observation in 2024 again raised concerns about whether voters could mark their ballots privately, often because of poor placement of voting screens or inadequate premises layout. This is directly relevant for voters with disabilities. If a voter cannot reach the voting screen, cannot read or mark the ballot independently, or must rely on another person because no accessible voting tool exists, the right to vote may be exercised only at the cost of secrecy. The same questionnaire findings also confirm that privacy is a recurring concern for voters who rely on assistance, voters with visual disabilities and voters using mobile teams, with some organisations noting the risk of influence by assistants, polling-station staff or mobile-team members.

Assisted voting is both an access measure and a risk area. Article 5.19 of BiH Election Law allows a blind, illiterate voter or voter with disability to be assisted by a person of their own choice, subject to safeguards: the assistant may not be a polling-station committee member or observer, and one person may assist only one voter on election day. The same provision states that if election technologies enable a voter with disability to vote independently, assistance is excluded to protect secrecy. The current practice around “proof of disability” is one of the most sensitive operational issues. It was introduced to deter abuse of assistance, and the concern is real. Pod Lupom reported significant increases in family voting and abuse of voter assistance in regular polling stations where new technologies were not piloted. At the same time, OPDs consulted for this Study stressed that proof requirements can deter genuine voters with disabilities, particularly voters with invisible disabilities, and can shift the burden from the election administration to the individual voter. A better model would preserve safeguards against coercion while reducing medicalized proof burdens: clear recording of the assistant, one-assistant-one-voter enforcement, observation of repeated assistance patterns, sanctions for abuse, and training that starts from the voter’s own request for support.

3.4 Participation beyond voting

The available evidence is much stronger on persons with disabilities as voters than as candidates, observers, party members or election officials. This is itself a contextual finding. Persons with disabilities are still most visible in the election framework as voters needing assistance or mobile voting, rather than as political actors.

There is no disability-specific restriction on candidacy comparable to the ethnicity- and residence-based limitations addressed in Sejdić-Finci and related cases, which should be considered separately. However, the legal-capacity restriction indirectly affects passive suffrage because candidacy depends on being recorded in the Central Voters Register. In practical terms, parties, campaign structures and election-administration bodies also need to be accessible. OPD consultation for this Study included the example of a wheelchair user serving as a polling-station committee president while the polling station he chaired was itself inaccessible. This captures the wider point: accessible elections require accessible workplaces, training, materials and procedures for election officials as well as voters.

The questionnaire conducted for the Study adds some important nuance. Five out of ten OPDs that submitted completed responses, reported that members or users had stood as candidates for elected office, and two reported that such candidates had been elected. At the same time, respondents identified barriers to candidacy and political participation, including prejudice within

⁴² Pristupačnost biračkog prava za osobe sa invaliditetom u Bosni i Hercegovini, Vera Zih, June 2026 paper for COE

political parties, inaccessible public events, insufficient political inclusion of persons with disabilities, and perceptions of persons with visual disabilities as objects of social care rather than as political actors. This suggests that persons with disabilities are present in political life, but that parties, campaign spaces and public events are not yet consistently accessible or inclusive.⁴³

Campaign access is also under-documented. The reviewed sources provide little systematic evidence on whether party offices, rallies, debates, candidate materials, websites, social-media content and campaign videos are accessible to persons with visual, hearing, intellectual, psychosocial or physical disabilities. ODIHR guidance describes political parties as gatekeepers to representation and recommends that parties engage persons with disabilities as voters, members, observers, staff and candidates.⁴⁴ For this Study, campaign accessibility should be identified as an evidence gap and a practical area for future OPD engagement.

3.5 Intersecting barriers and data gaps

Persons with disabilities are not a homogeneous group. OPD participants stressed that barriers differ for voters with visual disabilities, dyslexia or other reading difficulties, hearing loss, reduced mobility, intellectual disabilities, psychosocial disabilities and invisible disabilities. Many older voters experience similar barriers without identifying as persons with disabilities. Roma with disabilities may face disability barriers together with documentation and residence barriers. Women with disabilities may face barriers linked to gender, disability, income, care responsibilities and party gatekeeping. Rural voters with disabilities may face transport and information barriers even where polling stations are formally designated.

These intersections argue for universal-design solutions that benefit the widest range of voters: accessible premises, clear signage, simple instructions, well-positioned voting screens, staff trained in respectful communication, accessible digital and printed information, reliable mobile voting, and voting tools that support secrecy and independence.

Finally, BiH lacks systematic public data on disability and elections especially as it pertains to tracking accessibility of the process: polling-station accessibility audits, Voter Register Centre accessibility, accessible-format materials produced, mobile-voting requests and completed visits, assistance-voting incidents, technology-accessibility problems, complaints related to disability access, and participation of persons with disabilities as election officials, observers and candidates.

The overall picture is mixed: BiH has a legal and institutional framework that can support accessible elections, and the 2024 amendments created new entry points through professionalized polling-station leadership, stronger integrity safeguards and election technologies. But the 2024 local elections once again confirmed that the most important barriers remain practical: inaccessible premises, weak enforcement, inconsistent assistance practice, secrecy problems, mobile-voting coordination, inaccessible information, uneven local implementation, limited data and insufficient evidence on participation beyond voting. The practical challenge is therefore not only whether voters with disabilities can vote somehow, but whether they can vote independently, secretly and on an equal basis with others.

⁴³ Pristupačnost biračkog prava za osobe sa invaliditetom u Bosni i Hercegovini, Vera Zih, June 2026 paper for COE

⁴⁴ [Guidelines on Promoting the Political Participation of Persons with Disabilities, OSCE Office for Democratic Institutions and Human Rights \(ODIHR\), 2019](#)

4. Voting Technology and Disability Access

Bosnia and Herzegovina is entering a new phase of conduct of elections. Following the 2024 pilot projects, the CEC is preparing for wider use of biometric voter identification devices and optical ballot scanners at the 2026 General Elections. Reports indicate that the planned system will involve approximately 6,000 biometric identification devices and 6,000 ballot scanners integrated into ballot boxes, and large-scale training of polling station committees and technical operators.

This section therefore does not ask whether technology should be introduced, but **how can the new technology be implemented so that voters with disabilities are not left behind?**⁴⁵

The Council of Europe has issued Guidance on Use of ICTs in Elections in 2004, and updated them in 2009 and in 2017. CoE Guidance specifically states that, “The e-voting system shall be designed, as far as is practicable, to enable persons with disabilities and special needs to vote independently.”

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The technology selected for BiH is closer to a paper-ballot scanning model than to electronic voting. This distinction matters. A ballot scanner does not itself enable a voter to mark the ballot independently. The voter still identifies themselves, receives a paper ballot, marks it manually and inserts it into a scanner before the ballot is deposited into the ballot box – preserving some familiarity of the voting process for all voters and administrators.

For voters with disabilities, the accessibility risks are therefore located at several points: biometric identification; understanding the new ballot; physically marking the ballot; inserting the ballot into the scanner; and knowing what to do if the technology rejects the fingerprint, ballot or voter action. The scanner may strengthen integrity, but it does not automatically make voting more accessible.

The redesigned ballot⁴⁷ requires particular attention. Under the new system, reports indicate that candidates’ names will no longer appear directly on ballots; voters wishing to cast preferential votes will use candidates’ assigned serial numbers. This may present a challenge for voters with disabilities, especially for blind and low-vision voters, voters with intellectual disabilities, older voters, and voters with limited literacy. It makes advance, accessible voter information essential. Candidate numbers and instructions should be available before election day in large print, audio, easy-to-read formats, accessible digital formats, and through OPDs and voter-education partners. Magnifying foils and tactile ballot sleeves/templates remain options, with the former at very low cost.

Biometric voter identification also requires safeguards. Fingerprint authentication can fail for reasons unrelated to eligibility, including age, disability, injury, manual labour, worn fingerprints, or loss of limb. To ensure that voters are not disenfranchised, the system should include a clear and auditable override procedure, with safeguards against misuse and a clear instruction that eligible voters cannot be turned away because of a biometric “false negative.” Polling staff and technical operators should be trained on this procedure, and observers and political stakeholders should understand it before election day.

The ballot-scanning model can still be made more accessible through low-cost measures. The PSCs should ensure that polling booths and scanner/ballot-box units can be used from a seated position;

⁴⁵ This section addresses voter authentication, polling and counting technology, but not voter registration technology or other functions, such as results transmission.

⁴⁶ [CM/Rec\(2017\)5 - Recommendation of the Committee of Ministers to member States on standards for e-voting](#)

⁴⁷ At the time of writing, the final design of the new ballot paper had not yet been published. The observations in this section are therefore based on the information and public announcements available as of May 2026.

that there is enough circulation space for wheelchair users; that lighting is sufficient; that polling staff understand how to preserve secrecy when assisting a voter near the scanner; and that voters are not required to hand a marked ballot to another person except where they request assistance. For blind and low-vision voters, tactile or Braille ballot templates, magnifying sheets, large-print candidate lists and audio information are especially important because the scanner does not solve the problem of independently marking a paper ballot.

[Training should incorporate accessibility-related scenarios alongside instruction on the technical operation of the equipment.](#) Accessibility scenarios to cover: a wheelchair user cannot reach the scanner; a blind voter needs to verify how to insert the ballot; a voter with limited hand movement cannot complete the biometric step; a voter with an intellectual disability does not understand the candidate-number system; a fingerprint cannot be read; the scanner rejects a ballot; or the voter fears that the device compromises vote secrecy. These are not exceptional cases. They are predictable situations that should be built into polling-station training and simulations.

[Voter outreach efforts](#) using voting with biometric identification devices and optical ballot scanners could serve as a model to be adapted for voters with disabilities, in cooperation with organisations of persons with disabilities. Simulations would allow voters to practice the new procedure before election day and would allow the CEC to identify design or training problems early.⁴⁸ Voter outreach and public information can also minimize vulnerabilities of the new technology rollout to misunderstanding and disinformation.

[The 2024 pilots provide a useful foundation.](#) According to the CEC President, the pilots generated feedback not only from the election administration but also from voters, technical operators and polling station committee presidents. As BiH scales from pilot municipalities to nationwide use, disability access should become a specific part of that feedback loop: testing with OPDs, accessible voter education, accessibility questions in post-election review, and clear procedures for correcting problems before the next cycle.⁴⁹

OPD questionnaire responses similarly suggest cautious interest in new technologies: some respondents saw potential benefits, including from scanners, while others warned that new technology may create barriers for voters with limited hand movement, reduced mobility or other disability-related access needs unless accessibility is built into design, testing and training.⁵⁰

The practical lesson is simple: election technology can support integrity, but accessibility depends on implementation. For BiH, the priority is not to add a separate “disability feature” after procurement, but to ensure that every step of the new process - identification, ballot marking, scanning, troubleshooting, voter information and post-election review - works for voters with disabilities on an equal basis with others.

⁴⁸ [Ready for the Ballot: Over 500 Young Voters Trained Across Bosnia and Herzegovina](#)

⁴⁹ [New Electoral Technologies: From Pilot Project to General Elections – Experiences, Lessons, and Plans for 2026](#)

⁵⁰ [Pristupačnost biračkog prava za osobe sa invaliditetom u Bosni i Hercegovini](#), Vera Zih, June 2026 paper for COE

Point of Interest: Brazil - accessible EVMs and the limits of numeric voting

Brazil is a useful example of how accessibility can be built directly into electronic voting machines (EVMs). The Brazilian EVM is based on a numeric keyboard: voters select candidates by entering the number assigned to their chosen candidate. The system includes several accessibility features for voters with disabilities. The Superior Electoral Court reports that all EVMs include Braille markings and an identifiable number-five key to help blind and low-vision voters orient themselves on the keypad, and that headphones are provided at special polling stations or on request so voters can receive audio signals confirming the numbers selected. Since 2022, all EVMs have also included a Libras interpreter on screen, supporting deaf voters through Brazilian Sign Language. (<https://international.tse.jus.br/en/elections/accessibility>)

Brazil's approach is not limited to the machine itself. The Electoral Justice Accessibility Programme combines technology with wider administrative measures: accessible polling locations, priority service, the possibility for voters with disabilities to transfer to polling stations better suited to their needs, advance notification of disability-related support needs, assistance by a trusted person, training for polling officials, and accessibility planning by electoral authorities. Zero Project presents this programme as an example of public policy for electoral inclusion and reports that approximately 380,000 voters with disabilities benefited during the 2018 presidential election. (<https://zeroproject.org/view/project/da2e5907-9917-eb11-a813-0022489b3a6d>)

The Brazilian case also carries a caution relevant to Bosnia and Herzegovina. Research on Brazil's electronic voting system found that EVMs reduced error-ridden or uncounted votes and contributed to the de facto enfranchisement of less-educated voters. At the same time, other research has noted that requiring voters to enter candidate numbers can increase the information burden on voters where candidate names are not visible on the ballot interface. (https://www.princeton.edu/~fujiwara/papers/elecvote_site.pdf)

For BiH, where ballot scanning may be paired with candidate serial numbers, the lesson is twofold: technology can improve access when designed well, but candidate-number systems must be accompanied by accessible voter education, large-print and audio candidate lists, easy-to-read instructions and testing with voters with disabilities before election day.

4.1 Technology rollout: accessibility measures to pair with biometric identification and ballot scanning

As BiH moved toward biometric identification and ballot scanning, the relevant accessibility question is no longer whether technology will be used, but how the full voter journey will work for persons with disabilities. Comparative practice suggests that technology should be accompanied by low-cost assistive tools, accessible ballot information, trained staff, clear override procedures, OPD testing and post-election review.⁵¹

Stage	Accessibility risk	Practice seen in comparative sources	Practical adaptation for BiH
1. Procurement and testing	Accessibility is treated as an optional feature after devices are procured.	The Commission Guide recommends that voting machines be equipped with software that can incorporate accessibility features and that OPDs be consulted when preparing election rules and tools.	Require suppliers to demonstrate accessibility before deployment; test the full process with OPDs, not only the device.
2. Biometric identification	Fingerprint readers may fail for older voters, voters with worn fingerprints, injury, disability or loss of limb.	The uploaded technology note flags the risk of biometric “false negatives” and the need for a secure override procedure.	Adopt a clear override rule: secure enough to prevent abuse, but explicit that no eligible voter is turned away because the device cannot read a fingerprint.
3. Redesigned ballot / candidate numbers	Candidate serial numbers can create memory, literacy and cross-reference barriers, especially for blind voters, voters with intellectual disabilities and older voters.	The Guide highlights easy-to-read information, audio, large print, tactile stencils, QR codes and accessible candidate information as relevant tools.	Treat candidate-number lists as part of the ballot-accessibility package: large print, audio, easy-to-read, accessible digital versions and OPD distribution before election day.
4. Marking the paper ballot	Scanners count ballots, but they do not help voters mark the ballot independently.	Ireland pairs Braille/tactile templates with a telephone line explaining ballot layout; Denmark uses thick pens, magnifiers, LED lamps, CCTV magnifiers and adjustable tables; Lithuania uses Braille-marked ballot folders.	Provide a basic “accessible voting kit”: tactile/Braille template where feasible, magnifier, large-grip pen, large-print candidate list, good lighting and seated-height writing surface.

⁵¹ The Guide throughout the table refers to the: [Guide of good electoral practices in Member States addressing the participation of citizens with disabilities in the electoral process](#)

Stage	Accessibility risk	Practice seen in comparative sources	Practical adaptation for BiH
5. Inserting the ballot into scanner / box	A voter may mark the ballot but still need help reaching or inserting it into the scanner, risking secrecy.	The Guide's assistive-tools table tracks accessible voting booths and accessible ballot boxes across Member States, and the framework recommends designing booths and ballot boxes for a wide range of voters.	Ensure scanner / ballot-box height, placement and surrounding space allow wheelchair users and voters with limited mobility to cast the ballot without handing it to another person.
6. Instructions at the polling station	New technology can increase confusion if instructions are only verbal, small-print or technical.	Czechia uses QR codes linking to sign-language videos; Malta uses audio playback reading ballot content; several states use audio, video, captioning and sign-language materials.	Prepare simple visual instructions, short videos with captions / sign language, and audio explanations of the new process. Use the same wording in training and voter education.
7. Polling staff and technical operators	Staff may know how to operate devices but not how to respond when technology creates an accessibility barrier.	The LSE study notes that training materials or instructions on disability access exist in multiple Member States and highlights Denmark's quiz for election officials. ⁵²	Add accessibility scenarios to training: fingerprint failure, voter cannot reach scanner, blind voter needs ballot orientation, voter with intellectual disability needs process explained.
8. Accessible alternative pathways	If the assigned polling station or technology setup is not usable, the voter may lose the practical ability to vote.	The Guide records options including choosing an accessible polling station, mobile voting, curb-side voting, postal voting, online voting and assisted voting by a person of choice.	Publicise accessible polling-station information in advance and make transfer, mobile voting and assistance procedures simple, clear and consistently applied.
9. Public trust and secrecy	Voters may believe biometric devices or scanners can reveal how they voted.	The Guide stresses clear language and accessible communication, including to combat misinformation and disinformation.	Explain in accessible language what each device does and does not do: biometric ID verifies identity; scanner reads the ballot; neither should reveal how a person voted.
10. Post-election review	Accessibility problems remain anecdotal and are not fixed before the next cycle.	Ireland, Spain, the Netherlands and France conduct post-election reviews or accessibility assessments; the Netherlands has an "Unlimited Voting" feedback hotline.	Add a disability-access section to the CEC's post-election review: complaints, device failures, polling-station barriers, OPD feedback and corrective actions before the next election.

⁵² Study on Participation of Persons with Disabilities in Elections JUST/2021/OP/0002

5. Recommendations

Recommendations are grouped by theme and sequenced by feasibility: what can be done now without legal change; what to build in the medium term; and the reforms that require legislation. They are addressed primarily to the electoral administration, with partners noted where relevant. They are offered for validation with rightsholders and interest holders.

A. Immediate – before the next cycle, no legal change

- A1. Introduce tactile ballot-paper templates with audio candidate information.** Adopt the Irish model under the CEC's power to regulate ballot form and voting procedure: a reusable overlay matched to the BiH ballot, with raised numbering/Braille, paired with an audio guide (a recorded read-out of candidate lists and ballot layout, by constituency). Pilot in a few municipalities – as with the 2024 ICT pilots – design and test with the blind-persons' association, then scale. Provide magnifying foil.
- A2. Prioritise audio over Braille-only for information.** Produce audio versions of candidate information and key voter materials, building on the CEC's existing audio-materials experience, because audio reaches far more voters than Braille alone.
- A3. Roll out an accessibility checklist and practical training for municipal election commissions and polling station committees.** With the support of international donors, prepare a short mandatory accessibility package for MECs and polling-station committees, co-designed with OPDs. It should include a polling-station accessibility checklist, a practical communication guide for working with voters with different disabilities, short examples of good and bad practice, and accessible versions of training materials in plain language, audio, captioned video and screen-reader-compatible formats. Training should include practical scenarios and simulations, including invisible disabilities, assistance requests, secrecy, mobile voting and technology-related barriers. Once functional Centre for Education within CEC BiH is established, the produced materials can be further updated and developed.
- A4. Provide information to voters in advance about which stations are accessible.** Publish a searchable accessibility status for every polling station (and, following the German practice, signal it on voter notifications), so voters can plan and request re-assignment.
- A5. Formalise cooperation with OPDs** at CEC and municipal level. Establish a standing working arrangement with OPDs to co-design, test and evaluate accessibility tools, distribute information through OPD networks and review each electoral cycle. In addition, CEC should issue a standard instruction encouraging or requiring municipal election commissions to consult local OPDs before confirming polling-station locations, with a record of barriers identified, proposed solutions and follow-up taken.
- A6. Build accessibility into the technology rollout.** Ideally, before any large technology deployment, test the full voter journey with OPDs, including biometric identification, ballot marking, scanner insertion, error messages, secrecy, and assistance scenarios. Adopt a clear override procedure so that no eligible voter is turned away because a fingerprint cannot be read. Ensure scanner/ballot-box height, booth layout, lighting, circulation space, and instructions allow use by wheelchair users, blind and low-vision voters, voters with limited hand movement, voters with intellectual disabilities, older voters, and voters with low literacy. Prepare accessible public messages explaining that biometric identification verifies the voter's identity and that scanners count/read ballots without revealing how a person voted. Given the timing of this Study and the limited time remaining before the 2026 General Elections, comprehensive accessibility

testing with OPDs may not be feasible before deployment. Instead, the CEC BiH should conduct [targeted pilots and usability testing](#) where possible, document lessons learned, and incorporate the findings into the final system design and operational procedures for the next electoral cycle in 2028. **International development partners** supporting electoral technology in BiH should earmark dedicated resources for accessibility testing, consultation and outreach with representative OPDs throughout the technology lifecycle, from procurement and design to testing, voter education and post-election evaluation.

- A7. [Treat candidate-number lists as part of the ballot-accessibility package.](#)** Publish candidate numbers and ballot-layout instructions in large print, audio, easy-read, screen-reader-compatible digital formats, captioned/sign-language video, and through OPD networks before election day. Provide the same information at polling stations in accessible formats.

B. Medium term – operational redesign

- B1. [Recalibrate the proof-of-disability practice toward self-identification](#)** of the need for assistance, with safeguards against abuse through recording, one-assistant-one-voter enforcement, observation of repeated assistance patterns, and sanctions for coercion.
- B2. [Make secrecy the system's responsibility.](#)** Ensure that a voter who arrives without an assistant still has a route to a secret, independent vote – through templates/audio and a clearly regulated, trusted fallback – so the duty does not rest on the individual. Develop the precise model with OPDs to preserve both secrecy and accountability.
- B3. [Improve mobile/home voting](#)** while keeping it as a fallback, not a substitute. Simplify documentation and communication procedures, ensure voters know when and how mobile teams will arrive, and strengthen secrecy safeguards during mobile voting. Mobile voting should remain available for voters who cannot attend a polling station, but should not replace the obligation to make ordinary polling stations accessible.
- B4. [Require accessibility in future technology procurement.](#)** Require that any technology procured or configured for future elections supports independent, secret voting for persons with disabilities (consistent with Article 5.19(5)), and design out the returned-ballot secrecy risk observed in 2024.
- B5. [Create accessible complaints and escalation channels.](#)** Provide an accessible route to challenge inaccessible polling-station designation and other disability-access barriers, including accessible forms, plain-language instructions, phone/audio options, support through OPDs where appropriate, and clear escalation where the complaint concerns a decision of the body that created the barrier. Because electoral complaint deadlines are short, voters with disabilities should have practical, accessible information before election day on how to complain if access, assistance or secrecy is denied.
- B6. [Extend accessibility beyond voters.](#)** In cooperation with OPDs, develop guidance for political parties, candidates, media and public broadcasters on accessible campaign materials, party programmes, websites, social-media content, debates and public events. Election-administration training, venues and materials should also be accessible so that persons with disabilities can serve as polling-station committee members, observers, trainers, candidates and elected representatives.

C. Legislative / structural reform

- C1. Remove the legal-capacity exclusion.** Amend the Election Law so that citizens are no longer removed from the voter register on the basis of withdrawn legal capacity, bringing BiH into line with CRPD Articles 12 and 29 and with Croatia and Germany. The Croatian experience shows OPD-led advocacy can drive this reform.
- C2. Secure sustainable funding for disability-inclusive voter education.** Provide the CEC with dedicated, protected resources for accessible voter education and outreach, so that priority status in the voter-education strategy is matched by money.
- C3. Anchor accessibility duties and enforcement** in CEC by-laws. Reinforce the existing polling-station accessibility duty through minimum accessibility standards, standard assessment forms, local consultation requirements, reporting by municipal election commissions on measures taken, and a clear obligation to relocate voting to accessible premises where feasible.

If only five things are done first

1. Accessible candidate-number package: magnifying foils, tactile/Braille template where feasible, audio guide, large print, easy-read, and accessible digital candidate lists.
2. Biometric override and accessible scanner/booth setup before deployment.
3. Accessibility checklist and scenario/simulation training for polling staff and technical operators.
4. Public accessibility information displayed at PSCs, plus simple transfer/mobile-voting instructions.
5. Initial formal cooperation with OPDs for testing, voter education, validation, and post-election review.

7. Conclusion

Bosnia and Herzegovina does not need to design an entirely new electoral system to make elections more inclusive. The legal and institutional avenues already exist: the Election Law recognises assisted voting, mobile voting and polling-station accessibility; the CEC has regulatory and training functions; and the Council of Europe project is explicitly focused on strengthening integrity, professionalism and inclusiveness. What is needed now is to translate these into consistent, enforceable practice.

The urgency is greater because BiH is entering a new technology phase. Biometric voter identification and ballot scanning may strengthen integrity and public confidence, but they will not automatically make voting accessible. Unless accessibility is built into procurement, testing, staff training, ballot information, scanner layout, override procedures and voter education, new technologies may reproduce or deepen existing barriers. The immediate priority is therefore to ensure that the full voter journey works for persons with disabilities: checking information, reaching the polling station, passing identification, understanding the ballot and candidate numbers, marking the ballot, inserting it into the scanner, receiving assistance where requested, and lodging a complaint where access fails.

The OPD consultation confirms the central principle: accessibility is the responsibility of the electoral system, not a burden that should fall on the individual voter. Voters with disabilities should not have to prove their disability, bring their own solution, or sacrifice secrecy to participate. Practical measures such as tactile templates, audio candidate information, accessible polling-station data, clear biometric override rules, accessible voting kits, trained polling staff and structured OPD cooperation can be implemented before the next election cycle without waiting for major constitutional reform.

At the same time, some reforms require structural follow-up. BiH should remove automatic legal-capacity-based exclusion from the voter register, strengthen enforceable accessibility standards for polling-station designation, secure sustainable funding for accessible voter education, and collect aggregate accessibility data to guide future improvements. Accessibility should also extend beyond voters to candidates, observers, party members, campaign participants and election officials.

The Study recommends that the validation session be used to test feasibility of recommendations withing this study, assign institutional responsibility, and turn the recommendations into a short implementation roadmap for the CEC, municipal election commissions and partners. The validation itself should model the Study's principles by providing accessible materials in advance, sign-language interpretation or captioning where needed, plain-language summaries, and a clear channel for OPDs to provide further input.

Key Sources

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- Project consultation materials: online consultation with organisations of persons with disabilities and CEC representatives; follow-up questionnaire.

Annex A: Feedback from Organisations of Persons with Disabilities

A targeted online consultation brought together OPD representatives – covering physical, visual, hearing and other disabilities – with CEC representatives. A follow-up questionnaire was circulated to widen input. The discussion was candid and solution-focused; participants consistently asked for practical measures feasible within the current cycle. The follow-up questionnaire broadly confirmed the consultation findings. Responding OPDs identified architectural barriers, lack of accessible information, complicated mobile-team procedures, insufficient assistance, legal-capacity restrictions, lack of privacy and the inaccessibility of voting for persons with visual disabilities as recurring barriers. Several organisations nevertheless reported that turnout among their members or users did not necessarily differ from general turnout, which suggests that participation exists despite barriers rather than because the process is fully accessible. In addition to the summary of the discussion below, additional information resulting from the questionnaire accompanying this Study is available in the national consultant's input paper provided as Annex B.

5.1 Assistance, secrecy and the proof-of-disability certificate

This was the single most charged theme. Participants reported voters being turned away or discouraged when they could not produce a disability certificate, and described the deeper problem: the responsibility for a secret, independent vote has been shifted onto the disabled voter. As one blind participant put it, for every other citizen the system guarantees secrecy, whereas a disabled voter is expected to bring their own trusted assistant – and if they arrive alone, the materials are inaccessible and the polling-station committee cannot help. The CEC representative explained the integrity rationale honestly – the certificate was introduced to stop people falsely claiming a need for assistance in order to control votes – and asked OPDs directly whether it helps or hinders. The consensus from OPDs: self-identification of the need for assistance, with the voter free to choose their assistant, better matches both their lived experience and the CRPD, and the system should take responsibility for offering a secret, independent option.

5.2 Polling-station accessibility and the complaints gap

Physical inaccessibility was described as a chronic, unmoved problem. One participant, a long-standing wheelchair user and former polling-station committee president, said that in roughly a decade he had not seen an inaccessible station in his area relocated to an accessible building, even though accessible classrooms often exist in the same school but are reserved for staff on election day. A structural point emerged: the complaint about an inaccessible station goes to the very commission that designated it, so there is effectively no independent route to challenge the choice.

5.3 Information: audio over Braille, and reaching people

On accessible information, participants made a practical distinction: Braille reaches only the minority of blind people who read it (many lose their sight later in life), so audio formats – read-out candidate lists and ballot layouts, and audio versions of key materials – reach far more people. They urged greater use of OPD networks and social media to distribute CEC information, and stronger, sustained voter education for both voters and polling staff. The meeting itself underlined the point: it lacked

a sign-language interpreter, which the organisers acknowledged as a lesson for planning future events.

5.4 Technology as an opportunity – if accessibility is built in

Participants saw the new election technology as a genuine opportunity. The CEC noted that the current machines authenticate identity rather than enable electronic voting, but that future configurations could support independent voting – the direction Article 5.19(5) already anticipates. There was interest in tactile/Braille templates as an immediate, low-cost bridge, and in exploring whether the procured technology can be configured for accessible independent voting. Mobile/home voting was seen as worth keeping and improving, with better advance communication so teams and voters connect.

5.5 Training that changes behaviour

A recurring, concrete idea: short accessibility checklists for polling staff, and disability-awareness simulation during EMB training – having officials experience the process using a wheelchair, a blindfold or ear-protection, and try voting at a “good” versus a “bad” station. Participants who had run such exercises described them as far more effective than lectures at shifting staff attitudes, and noted these are low-cost and could become a standard feature of the training cycle. Attitudinal barriers and prejudice from some polling staff were raised as a real deterrent, particularly for people with invisible disabilities.