



State Comptroller of Israel | Local Government Audit
Report | July 2024

Social Audit

Accessibility of Buildings and Services for People with Disabilities



Accessibility of Buildings and Services for People with Disabilities

Background

In 2021, about 1.017 million people with various disabilities lived in Israel, about 11% of the total population. Israel's social commitment to safeguard the rights of people with disabilities, anchored in legislation, is based on the principle of equality, the inherent dignity of every person created in the image of God, and respect for all individuals. The legislation protects these individuals' dignity and freedom, securing their right to equal and active participation in society across life facets, and adequately addresses their special needs, enabling them to live their lives with maximum independence, privacy, and dignity while fully realizing their capabilities.

A "person with a disability" is defined in the Equal Rights for Persons with Disabilities Law, 1998 (Equal Rights Law) as a person with a physical, mental, or intellectual, including cognitive, impairment – whether permanent or temporary, that significantly limits their functioning in one or more major life activities. Promoting the integration of people with disabilities into Israeli society requires special consideration of various aspects of their daily lives, including the consumption of information and the use of digital services to communicate with public institutions and local authorities. The Equal Rights Law stipulates that a person with a disability is entitled to access public places and public services. Accessibility applies to adapting buildings, infrastructure, the environment (BIE), and service accessibility.



Key Figures

**about
60%**

of public buildings, including educational institutions and non-building locations, that were not accessible as of September 2020, according to the Federation of Local Authorities survey

237

the local authorities (about. 92% of 256 authorities) that did not fully comply with the legal requirements for BIE (Buildings, Infrastructure, and Environment) accessibility as of September 2020, according to the Federation of Local Authorities survey

**about
91%**

of local authorities that joined the extension framework¹ for accessibility under the "Arrangements Law 2021"²; after the first year, about 79% of them continued to operate according to the above framework

**about
58%**

of educational institutions not accessible as of September 2020, according to the Federation of Local Authorities survey

**about
10%**

of all local authorities, that were scored below 50 for the quality of accessibility of their official website, according to the Ministry of Interior and Mifam Emek Yizrael's data

**about
71%**

of local authorities, out of the audited authorities, with a low level of accessibility (0–5) in their digital services

100%

of local authorities, out of the audited authorities, with non-compliant official website regarding the criteria for contrast levels and accessible documents


**about
57%**

of local authorities, out of the audited authorities, lack written procedures for regulating service accessibility

- 1 The framework for extending the deadline for implementing accessibility adjustments in local authorities, established under the Arrangements Law 2021 and the amendments to the Equal Rights Law, allowed local authorities to spread the implementation of accessibility for all public buildings and non-building locations within their jurisdictions over an additional four years (starting from March 31, 2022).
- 2 Amendment No. 19 to the Equal Rights Law, amended under Section 7 of the Economic Efficiency Law (Legislative Amendments for Achieving Budget Targets for Fiscal Years 2021 and 2022), 2021, Official Gazette No. 20.



Audit Actions

 From May to October 2023, the State Comptroller's Office examined aspects of the local government's preparation for making buildings and services accessible to people with disabilities. The organizational structure and procedures in local authorities related to accessibility were also audited; accessibility of buildings, infrastructure, and environment (BIE), including sample checks conducted by the audit team; local authorities' participation in the extension framework for accessibility under the Arrangements Law 2021, their compliance compared to the original plan; accessibility measures to which the deadline extension did not apply under the framework, accessibility of educational institutions, both general³ and individual accessibility. Additionally, service accessibility was audited, including sample checks conducted by the audit team in the tax collection and welfare departments, the accessibility of the local authorities' websites, enforcement of accessibility, special initiatives, and excellence in local authorities' accessibility activities.

The audit was conducted in seven local authorities: the municipalities of **Elad, Yokneam Illit, Kfar Sava, Nahariya, and Arraba**, and the regional councils of **Drom HaSharon** and **Merom HaGalil**.

Additional examinations were conducted at the Commission for Equal Rights for Persons with Disabilities in the Ministry of Justice, the Ministry of Education, the Federation of Local Authorities in Israel, and the Federation of Regional Authorities.

Key Findings




 **Accessibility in the Local Authority – Organizational Structure and Procedures** – **Merom HaGalil** has not appointed an accessibility coordinator, and the position remains unfilled, despite the Equal Rights Law requiring every public service provider employing at least 25 workers to appoint such a coordinator. **Yokneam Illit, Nahariya, and Arraba** have no internal procedures adapted to accessibility within the local authority. Additionally, **Yokneam Illit, Nahariya, and Arraba** have not conducted accessibility training for all municipal employees, as required. **Merom HaGalil** did hold


³ According to the Equal Rights Law, general accessibility includes an elevator shaft in the main building, accessible restrooms, and accessible pathways to the educational institution.


According to the Equal Rights Law, individual accessibility includes various types of accessibility adaptations in educational institutions or kindergartens, tailored to students or parents with a disability.




training; however, it was not mandatory, nor was there any documentation of which employees participated.

 **Implementation of the Framework in Regional Councils** – implementation of the framework in regional councils and local committees has encountered challenges and delays due to their unique legal status derived from their two-tiered structure. This situation stems, among other things, from ambiguity in identifying the owners and users of buildings and non-building locations, where, in some cases, the cooperative associations or local committees are the owners of the public buildings within the council's jurisdiction. Additionally, it derives from the different ways the two-tiered governance is managed in each regional council, including the budgeting and funding of accessibility, the lack of an accessibility coordinator within the Federation of Regional Authorities, and the absence of direct communication with local committees regarding the implementation of the framework.


 **Implementing the Framework in the Audited Local Authorities – Elad and Merom HaGalil** failed to meet the framework requirements by the end of the first year. As of the audit period, from May to October 2023, the accessibility adjustments to buildings and non-building locations they planned to complete by March 2023 were still unfinished.

 **Accessibility of BIE – Examination of the Local Authority Building** – the audit team's examinations raised deficiencies in the accessibility of local authority buildings in six of the audited local authorities (the municipalities of **Elad**, **Yokneam Illit**, **Kfar Sava**, **Nahariya**, and **Arraba**, and the **Merom HaGalil** regional council). **Elad's** municipality building has no parking for people with disability and does not have accessibility features for the visually impaired in the elevator and on the stairs; **Yokneam Illit's** municipality building does not have accessibility features for the visually impaired in the elevator and on the stairs, and the restrooms for people with disability were locked and unusable for about six months; **Kfar Sava's** municipality building does not have accessibility features for the visually impaired on the stairs, the entrance door does not close slowly as required, and the restrooms for people with disability lack necessary accessories; **Nahariya's** municipality building does not have accessibility features for the visually impaired in the elevator and on the stairs, and the lift at the entrance was non-functional for a period; **Arraba's** municipality building lacks parking for people with disability, the entrance path is blocked by parked cars, and there are no accessibility features for the visually impaired in the elevator and on the stairs; **Merom HaGalil's** regional council building does not have accessibility features for the visually impaired in the elevator and on the stairs.






 **Accessibility of BIE – Sample Examinations of Buildings** – deficiencies in the accessibility of local authorities' additional buildings were raised in all of the audited local authorities: In **Elad**, three out of 18 buildings were examined, and deficiencies were found in all three. There was no parking for people with disabilities, and the restrooms



for people with disabilities were locked; In **Yokneam Illit**, three out of 35 buildings were examined, and deficiencies were raised in two. In one building, the doors were too narrow; in another, there was no parking for people with disabilities. In **Kfar Sava**, six out of 140 buildings were examined, and deficiencies were raised in three of them. One building lacked accessibility features for the visually impaired in the elevator and stairs; another had no means to secure the entrance door, access to the restrooms for people with disabilities was blocked, and a third building lacked parking for people with disabilities. In **Nahariya**, three out of 196 buildings were examined, and deficiencies were raised in all three. One building lacked parking for people with disabilities, and the restrooms for people with disabilities lacked a hand dryer. In **Arraba**, three out of 23 buildings were examined, and deficiencies were raised in all three. All three lacked parking for people with disabilities; two lacked accessibility features for the visually impaired in the elevator and on the stairs. In **Drom HaSharon**, three out of 13 buildings were examined, and deficiencies were raised in all three. One building lacked a handrail in the restrooms for people with disabilities. In another building, there was no parking for people with disabilities, and the restrooms for people with disabilities were being used as storage rooms. In **Merom HaGalil**, three out of 21 buildings were examined, and deficiencies were raised in two. One building lacked the means to secure the entrance door and accessibility features for the visually impaired on the stairs, doors, and within the building. In addition, the restrooms for people with disabilities were being used for storage.

 **Accessibility of BIE – Sample Examinations of Non-Building Locations** – deficiencies were raised in the accessibility of non-building locations in all the audited local authorities. In **Elad**, three out of 47 locations were examined, and deficiencies were raised in two, as they lacked parking spaces for people with disabilities. In **Yokneam Illit**, three out of 31 locations were examined, and deficiencies were raised in two of them, as they had no parking for people with disabilities, and one of them had no accessible pathway. In **Kfar Sava**, six out of 164 locations were examined, and deficiencies were raised in two, as both locations lacked parking for people with disabilities. In **Nahariya**, three out of 74 locations were examined, and deficiencies were raised in all three. In one of the locations, the beach, the restrooms for people with disabilities were poorly maintained. An entry pathway from the parking lot to a playground, accessible via a concrete ramp, was blocked by a fence, making it inaccessible. In **Arraba**, three out of five locations were examined, and deficiencies were raised in all three. None of the locations had parking for people with disabilities. One lacked an accessible pathway, and another lacked restroom for people with disabilities. In **Drom HaSharon**, three out of 19 locations were examined, and deficiencies were raised in two. One lacked an accessible pathway, and the other lacked parking and restrooms for people with disabilities. In **Merom HaGalil**, three out of 14 locations were examined, and deficiencies were raised in all three. None of the locations had parking for people with disabilities, two lacked accessible pathways, and one lacked restroom for people with disabilities.



-  **Accessibility of Educational Institutions** – it was raised that four years after the deadline set by law for completing accessibility (May 2019), there are still educational institutions in five of the audited local authorities, **Elad, Yokneam Illit, Arraba, Drom HaSharon, and Merom HaGalil** that were generally inaccessible, including an elevator shaft, restrooms, entrances, and pathways. In **Elad**, 59 out of 82 educational institutions are not accessible (about 72%); in **Yokneam Illit**, eight out of 11 educational institutions are not accessible (about 73%); in **Arraba**, five out of 15 educational institutions are not accessible (about 33%); in **Drom HaSharon**, five out of 13 educational institutions are not accessible (about 38%); and in **Merom HaGalil**, two out of 10 educational institutions are not accessible (20%).
-  **Utilization of Budgets for Individual Accessibility** – it was raised that **Yokneam Illit, Nahariya, Arraba, and Merom HaGalil** failed to fully utilize the budgets from the Ministry of Education for individual accessibility in educational institutions within their jurisdictions.
-  **Accessibility of Educational Institutions Recognized but Unofficial (MUKHSHAR)** – it was raised that no mechanism exists that allows the Ministry of Education to assist in funding accessibility in MUKHSHAR educational institutions operating in buildings not owned by the local authorities.
-  **Accessibility of the Websites of the Audited Local Authorities** – examination of accessible documents and contrast levels criteria raised deficiencies in all the websites of the audited local authorities (**Elad, Yokneam Illit, Kfar Sava, Nahariya, Arraba, Drom HaSharon, and Merom HaGalil**). The digital documents, the contrast levels, and the sites' colors comply with the standards. Visible focus, skip to the main content option, hierarchical and organized navigation menu, accessibility statement, use of CAPTCHA, and a stop mechanism for videos or changing backgrounds had deficiencies at various levels.
-  **Service Accessibility** – it was raised that regarding the criterion of hearing assistance systems in the tax collection and welfare departments, in **Elad, Yokneam Illit, and Merom HaGalil**, there were no hearing assistance systems, contrary to what is required by regulations. Additionally, in **Nahariya, Arraba, and Drom HaSharon**, no hearing assistance systems existed in the welfare departments. Regarding the criterion of delivering information in various ways, it was raised that in **Merom HaGalil**, information in the welfare department is conveyed verbally but is not made accessible through sign language interpretation. Regarding the criterion of call routing systems, it was raised that in **Yokneam Illit and Kfar Sava**, it was impossible to reach the tax collection and welfare departments directly through the call routing system, nor was there any referral to an operator. In **Arraba**, no response was provided at the time of the examination. Regarding the criterion of procedures, practices, and service processes, it was raised that in **Yokneam Illit, Nahariya, Arraba, and Merom HaGalil**, no written procedures



existed; however, there are adapted practices and service processes in the tax collection and welfare departments.



Enforcement of Accessibility – Business Licensing – Elad, Arraba, and Merom HaGalil failed to enforce accessibility in businesses within their jurisdictions. In **Yokneam Illit, Nahariya, and Drom HaSharon**, accessibility was only partially enforced due to a lack of knowledge or training.



Accessibility of Educational Institutions – in **Kfar Sava**, about 92% of educational institutions are accessible, with the rest in the process of being made accessible. In **Nahariya**, about 86% of educational institutions are accessible, 5% are in the process of being made accessible, and 9% are inaccessible.

Enforcement of Accessibility – Business Licensing – the State Comptroller's Office commends **Kfar Sava** for its comprehensive efforts in making businesses within its jurisdiction accessible, highlighting the importance the municipality attributes to it.

Initiatives and Excellence in Accessibility – the State Comptroller's Office commends **Yokneam Illit, Kfar Sava, and Drom HaSharon** for their initiatives and excellence in accessibility. **Yokneam Illit** established an accessible park within its jurisdiction; **Kfar Sava** made it possible for individuals with color vision deficiencies to order tickets for shows and events through its website; and **Drom HaSharon** launched a mobile service on a bus for people with disabilities and established an agricultural farm where students with disabilities can participate in a learning experience.

Key Recommendations



Accessibility in Local Authorities – Organizational Structure and Procedures – **Merom HaGalil** should appoint and train an accessibility coordinator from among its employees, as required by law, and ensure in advance that the trained employee commits to filling the position. **Yokneam Illit, Nahariya, and Arraba** should adapt existing work procedures for accessibility and establish new procedures. **Yokneam Illit, Nahariya, Arraba, and Merom HaGalil** should develop a system of general and specialized accessibility training (according to the role in the organization), including documentation, tracking, and regular refreshers on the accessibility of services for people with disabilities.



Implementation of the Framework in Regional Councils – given the complexity of their two-tiered structure, it is recommended that the Commission for Equal Rights for Persons with Disabilities, the Federation of Local Authorities in Israel, and the Federation of Regional Authorities collaborate to secure an additional extension to implement the framework in regional councils and local committees.



Implementation of the Framework in the Audited Local Authorities – Elad and Merom HaGalil, which failed to comply with the framework's requirements, must promptly complete and implement all necessary accessibility adjustments for all public buildings and non-building locations within their jurisdictions, including the local authority building.



Accessibility of BIE – Sample Examination – Yokneam Illit, Kfar Sava, Nahariya, Arraba, and Drom HaSharon must complete all necessary accessibility adjustments for public buildings and non-building locations within their jurisdictions according to the framework. **Yokneam Illit, Kfar Sava, Nahariya, and Arraba** must also complete all necessary accessibility. Adjustments for their local authority buildings. All of the audited local authorities – **Elad, Yokneam Illit, Kfar Sava, Nahariya, Arraba, Drom HaSharon, and Merom HaGalil**, following the audit, reported to improve the accessibility of some of the inspected buildings and non-building locations, must ensure that all public buildings and non-building locations within their jurisdictions are accessible and available for public use at all times when open to the public.



Accessibility of Educational Institutions – Elad, Yokneam Illit, Arraba, Drom HaSharon, and Merom HaGalil must promptly complete the general accessibility adjustments (elevator shaft, accessible restrooms, entrance, and pathways) in all educational institutions within their jurisdictions.



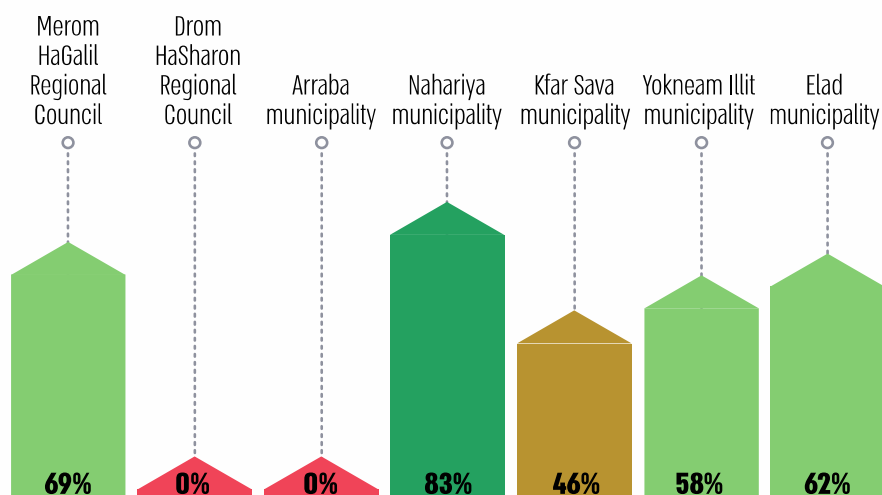
Accessibility of the Websites of the Audited Local Authorities – Elad, Yokneam Illit, Kfar Sava, Nahariya, Arraba, Drom HaSharon, and Merom HaGalil, must rectify the deficiencies raised in the digital service accessibility on their websites under the accessibility regulations.



Service Accessibility – Elad, Yokneam Illit, Nahariya, Arraba, Drom HaSharon, and Merom HaGalil must promptly install hearing assistance systems at service desks in the tax collection and welfare departments, as regulations require. **Merom HaGalil** must ensure that information delivered verbally in the welfare department is made accessible as needed, including in sign language. The **Yokneam Illit** and **Kfar Sava** call routing systems should direct calls to the tax collection and welfare departments. **Yokneam Illit, Nahariya, Arraba, and Merom HaGalil** must draft and approve service accessibility procedures and adapt them according to the needs of people with disabilities within their jurisdictions.



Rate of Accessibility of Buildings, Infrastructure, and Environment (BIE) Within the Framework in the Audited Local Authorities, March 2022



According to the local authorities' reports within the framework as of March 2022, processed by the State Comptroller's Office.

Dark green – over 80% of BIE is accessible.

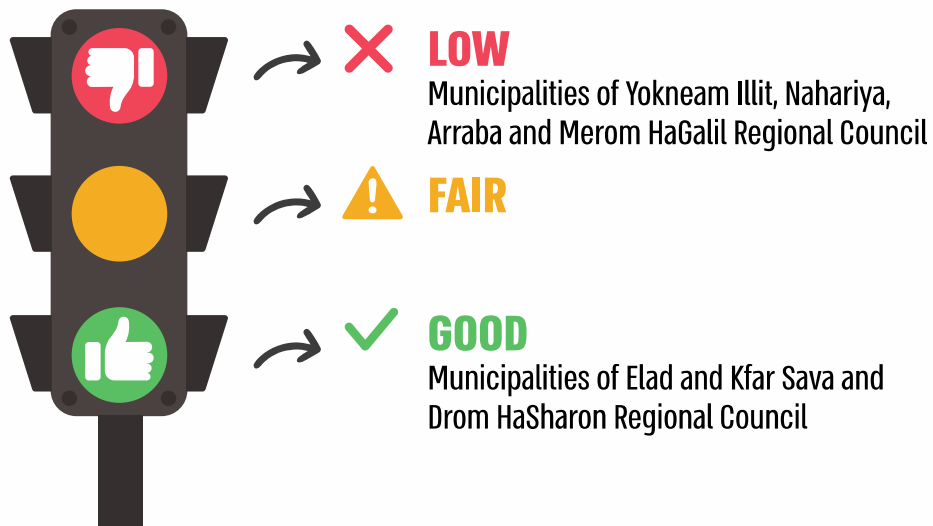
Green – between 50%–80% of BIE is accessible.

Yellow – less than 50% of BIE is accessible.

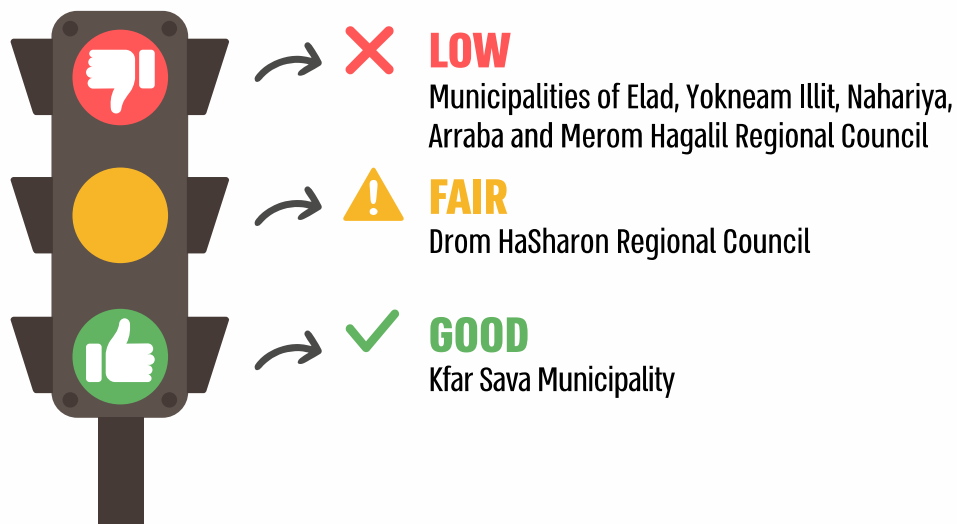
Red – none of BIE is accessible.



The Organizational Structure and Procedures in the Audited Local Authorities – Summary of Results

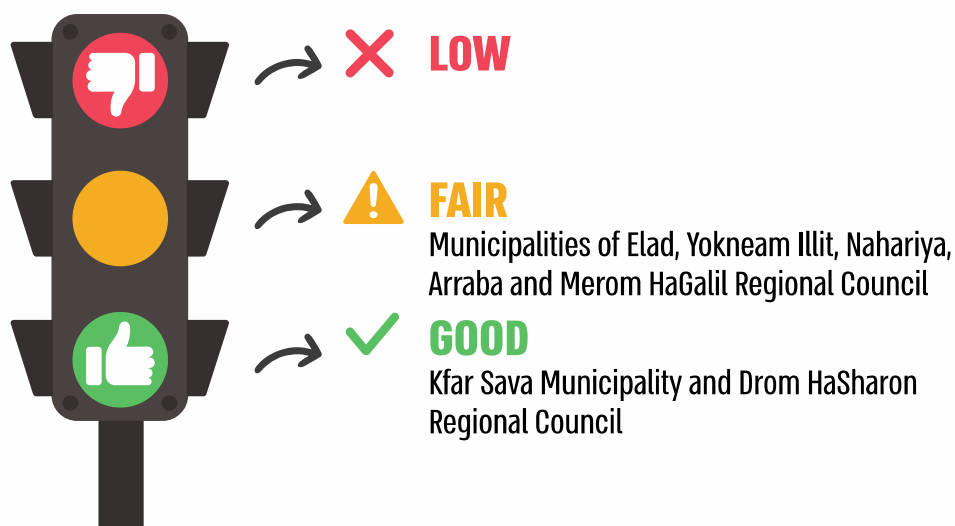


Summary of the Results of the Digital Service Accessibility Assessment on the Websites of the Audited Local Authorities





Summary of the Results of the Service Accessibility Assessment in the Audited Local Authorities





Summary

About one in nine residents of Israel is a person with a disability. Local authorities, bodies with direct and ongoing contact with the population, play a key role in integrating people with disabilities as full and equal community members and active participants within it. The audit raised gaps among the examined local authorities in promoting the accessibility of buildings and services within their jurisdictions. It was raised that in the examined aspects, local authorities that adapted their organizational structure and operations to address accessibility – such as appointing an accessibility coordinator, establishing an accessibility committee, adapting internal procedures, and providing specialized training for employees – had better accessibility outcomes than those that failed to do so.

The audit raised deficiencies in the audited local authorities, including non-compliance with the framework for extending the implementation of accessibility over four additional years, lack of accessibility and availability of public buildings and non-building locations, failure to complete general accessibility in educational institutions, deficiencies in service accessibility, including digital services on the local authorities' websites, and shortcomings in the supervision and enforcement of business accessibility. However, three of the audited local authorities (the municipalities of **Yokneam Illit** and **Kfar Sava** and the **Drom HaSharon** Regional Council) stood out by having taken initiatives and demonstrated excellence in the inclusion and integration of people with disabilities.

The audited local authorities – **Elad**, **Yokneam Illit**, **Kfar Sava**, **Nahariya**, and **Arraba** municipalities, as well as the **Drom HaSharon** and **Merom HaGalil** regional councils – should rectify the deficiencies and consider the recommendations noted in the report. It is also recommended that they promote positive initiatives in accessibility, similar to those mentioned in the report, to ensure the full and successful integration of people with disabilities within their jurisdictions.

It should be noted that the gaps in accessibility and the failure to address them constitute significant barriers to the full integration of people with disabilities as equal participants in society. These gaps harm socially (harming social cohesion) and economically (impacting GDP). Therefore, the State Comptroller's Office recommends that all local authorities, including the seven audited local authorities, continue to promote accessibility within their jurisdictions. Additionally, the State Comptroller's Office recommends that the Commission for Equal Rights for People with Disabilities monitor accessibility in local authorities and enforce the implementation of accessibility measures across all local authorities in Israel.