



Introduction to digital accessibility

In compliance with Responsible Business
Conduct in the technology sector





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Executive Summary

In recent decades, concerns about the negative impacts business activities have on human rights have been gaining prominence on the global agenda. Gradually, international instruments were created, shaping what is now recognized as the business and human rights framework. This enshrines respect for human rights as a globally expected behavior for companies of all sizes, natures, locations, structures, and sectors, expectations reflected in what is known as Responsible Business Conduct (RBC).

Nowadays, permanent technological development and the hasty process of digitalization present an unavoidable scenario for the exercise of the most varied rights and democratic interests. From the Asociación por los Derechos Civiles (ADC) we strive for the defense and advancement of fundamental rights in Argentina and the region. Consequently, part of our activity is aimed at promoting the business and the human rights framework in general, and the United Nations Guiding Principles in particular, within the development and diffusion of digital technologies.

This report seeks to guide tech companies through an introduction to digital accessibility as a feature of Responsible Business Conduct. It does so in consideration of the particular relevance it acquires due to its cross-cutting nature, but also its deep relationship to the exercise of rights by all citizens.

An approach to accessibility as a human right will thus be provided by inquiring into its definition and importance. We will focus on web accessibility, the basic guidelines for its implementation, and the ways it can be validated. Finally, we will consider the core features of RBC that link to digital accessibility, and the competitive advantages it offers.

This publication is targeted primarily at companies in the technology sector; however, other types of businesses using the Internet and digital means to market their products or services can make use of it, as well as professionals in computer programming and web development. Not to mention its convenience to those in charge of formulating policies or collaborating in business and human rights programs.

Introduction

It is a fact that business can affect the advancement of human rights positively as well as negatively. Over the last half-century, concerns about the detrimental impacts of business activities on people's fundamental rights have gained prominence on the international agenda.

Gradually, standards were created to address them. The array of international instruments which comprise the so-called business and human rights framework are:

- the OECD Guidelines for Multinational Enterprises (Organization for Economic Cooperation and Development – MNE),¹
- the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration),²
- the United Nations Guiding Principles on Business and Human Rights (UNGPs).³

The latter set of thirty-one propositions was adopted by the UN Human Rights Council in 2011. After recognizing the two previous instruments as their antecedent, together they formed the Responsible Business Conduct (RBC) agenda. The Guiding Principles are centered on three fundamental pillars:

- Pillar one: The duty of governments to **protect** citizens against human rights violations committed within their territory and/or jurisdiction by third parties, including business enterprises.

- Pillar two: The responsibility of companies to **respect** human rights.
- Pillar three: The joint obligation to **remediate** the harm that business may inflict on human rights.

Through the Guiding Principles, respect for human rights is enshrined as an expected corporate behavior worldwide and requires businesses to adopt the appropriate policies and practices. To fulfill this obligation, the UNGPs state that companies should conduct human rights due diligence to identify, prevent, mitigate, and be held accountable for adverse impacts while contributing to their remediation when they occur. In addition, they highlight the need to give special consideration to the rights, needs and problems of those individuals belonging to specific groups or populations at greater risk of vulnerability or marginalization.

En esta instancia vale la pena resaltar que este instrumento no crea exigencias jurídicas nuevas. En cambio, recepta obligaciones ya consagradas en tratados internacionales de derechos humanos y en muchas ocasiones en las legislaciones nacionales.

In this regard, it should be noted that the instrument does not create new legal requirements, but rather adopts obligations already laid down in international human rights treaties as well as national laws. From the Asociación por los Derechos Civiles (Association for Civil Rights – ADC) we strive for the defense and protection of fundamental rights in Argentina and the region. Over the last decade, continuous technological change and rapid digitalization have presented an unavoidable scenario in the exercise of democracy and rights. Therefore, promoting

the business and human rights framework within the digital technology sector, both in the public and private spheres, is essential to our activity.

This report aims to guide tech companies through the basics of digital accessibility in compliance with Responsible Business Conduct. It considers the particular relevance that digital accessibility currently has taken, not only due to its cross-cutting nature but also because of its deep relationship with the rights of all people, particularly those with disabilities, older adults, or people with low digital literacy.

In the following pages, we will provide an approach to accessibility as a human right, examining its definition and significance. We will focus on web accessibility, the main guidelines for its implementation and how it can be validated. Finally, we will ponder on the core elements of RBC as to digital accessibility and the competitive advantages that it offers.

This publication is targeted mainly at technology companies, understood as those industries whose business models enable access to and operation of IT systems and the Internet, including the development and distribution of digital products, services, and content.⁴

However, firms from other sectors that use digital means and the Internet to market their products and services can also benefit from it, as well as people who work professionally in computer programming and web development, without neglecting the convenience this text can bring to those formulating policies or collaborating in business and human rights programs.

An approach to digital accessibility

We have previously mentioned respect for human rights as the expected behavior from corporations worldwide. This expectation is condensed by the OECD under the denomination Responsible Business Conduct, which differs from the traditional Corporate Social Responsibility (CSR), linked to philanthropy.

The human rights that companies must respect are those internationally recognized as such – encompassing, at a minimum, the ones set out in the International Bill of Human Rights and the principles akin to fundamental labor rights established in the ILO Declaration.⁵

While the rights agreed therein are universal, i.e., the same for all people regardless of their circumstances, it is the International Convention on the Rights of Persons with Disabilities (CRPD),⁶ hereafter referred to as the Convention, that embodies the first instrument to recognize, describe and protect digital accessibility as a human right.

The Convention bases its provisions on the social model of disability, which holds that the root causes of disability are largely political, social, and cultural. It is the barriers presented by the environment that hinder the development of people with disabilities to their full potential and their effective participation in society.

The social approach implies a paradigm shift, in which disability is no longer understood as an individual attribute but rather the result of an environment that imposes barriers and gives rise to exclusion. Disability is, thus, a condition that can disappear if such

barriers are removed. In other words, if people with disabilities are guaranteed the exercise of their rights and effective participation on an equal footing with the rest of society.⁷

Disability is taken as a human rights issue by the Convention: the policies and responses tackling the problems faced by persons affected by it should be devised from a human rights perspective, responding to the principle of social inclusion.⁸

The Convention includes accessibility in its Article No. 9 and states that it means ensuring access for persons with disabilities to their physical surroundings, transport, information and communication services and technologies on an equal basis with others, as well as other public facilities, in urban and rural areas. Therefore, the main international human rights instrument of the United Nations aimed at protecting the rights of persons with disabilities refers to barriers in both, the analog and digital realms.

Accessibility, in broad terms and including digital accessibility, enables people to act within the social fabric with greater autonomy and efficacy. Digital accessibility in particular enables direct access to the virtual world without the aid of third parties, thus furthering greater social, civic, and cultural participation. The reality of the 21st century determines that access and accessibility to the digital realm and the effective exercise of citizenship go hand in hand.

Although access and accessibility are closely related in the online sphere, there is a difference between connectivity and digital accessibility that should be marked. The former refers to internet access, meaning the possibility to log into a network through a device. The latter refers to specific environments, such as websites, platforms, or applications being developed with criteria that enable access to the greatest diversity and number of people possible, in both, their programming and design, regardless of their technical

skills and types of equipment. The two concepts, access, and accessibility are key to the fulfillment of human rights since Internet connection allows logging into the virtual world. While digital accessibility ensures that all people can access, use, and interact with it.

The two rights empower us in the enjoyment of our autonomy and dignity as human beings, although basically, human rights are indivisible, interrelated, and interdependent. This means that the fulfillment of one right contributes to fulfilling the others, whereas, conversely, the denial of one right negatively affects the others. From this perspective, both, digital access, and accessibility facilitate the exercise of other rights, such as education, health, work, information, and freedom of expression, among others.

Adopted by the United Nations General Assembly in 2006, the Convention was ratified by the Argentinian government two years later and enjoys constitutional rank.⁹ In turn, the right to digital accessibility in web environments is recognized by National Law No. 26,653 (2010) and its Regulatory Decree No. 355/2013.¹⁰ Although far from being fully enforced, the law establishes that all information published on websites and web pages belonging to the national government, state-owned companies, and private concessionaires of public services must be accessible. It also applies to institutions or civil society organizations receiving subsidies or providing services to the government through contracts, with the National Office of Information Technologies (ONTI) as enforcement authority.¹¹

In this respect, it should be noted that the UNGPs indicate that governments must adopt additional measures to prevent human rights infringements committed by the companies they own or control, or those that receive significant support and services from state agencies.

The following chapter will refer to digital accessibility applied to the development of web content and sites. In acknowledgment of its relevance, we will examine the main guidelines to adopt web accessibility and the methods for its validation.

Web accessibility: guidelines and validation methods

Returning to the concepts described above, we can summarize that web accessibility encompasses digital environments such as sites, platforms, and applications, and consists of guaranteeing access to information and services in the virtual sphere through designs and software tools that enable the largest possible number of people to use it autonomously with any type of device.

En este apartado nos centraremos en la accesibilidad digital aplicada específicamente a la web, también llamada accesibilidad web. Tomaremos como referencia las recomendaciones impartidas por el Consorcio World Wide Web (W3C)¹² in its Web Accessibility Initiative (WAI),¹³ which seeks to facilitate access to online content for people with disabilities.

The Web is generally understood as the largest management system of data transmission over the Internet. The technology for its operation was developed in 1990 by Tim Berners Lee, founder of the W3C.

Within the W3C, Berners Lee emphasized that the web must be designed so that everyone can use it, implying that it must be accessible to people within the widest range of hearing, mobility, vision, and cognitive abilities. This links the notion of accessibility to usability, defined as “a measure of how well a specific user in a specific context can handle a product/design to achieve a defined goal effectively, efficiently and satisfactorily.”¹⁴ Thus, what is accessible is usable. While developing a digital environment, such as a website, the design should take the individual’s needs and motivations into account, both at the code and the aesthetic levels, in order to improve their navigation and user experience.

As mentioned above, within the Web Accessibility Initiative (WAI), the W3C issued a series of recommendations, the Web Content Accessibility Guidelines (WCAG), which intend to provide a single shared standard for web accessibility to meet the needs of individuals, organizations, and governments internationally. This large set of criteria serves as an orientation in the design of online content that reduces the barriers to information access. The WCAG were first published in 1999 and updated in 2008 and 2018, while a new version is expected to appear soon.

The WCAG 2.0 version has twelve Web Content Accessibility standards, grouped into four main principles which are perceivable, operable, understandable, and robust. These propose that web content should be:

1. **perceivable** so that the data and user interface components¹⁵ are presented to people in a way they can be discerned. For example, a textual alternative should be provided for all non-textual content such as images, graphics, animations, etc. and graphical elements should be clearly distinguishable.
2. **operable**, so that the interface components and navigation can be easily handled by all users. For example, alternative input methods to the mouse should be provided, such as keyboard shortcuts, to interact with the information available on the interface.
3. **understandable**, so that the content is transparent and user-friendly. For example, the information on a web page must have a predictable layout, with a set language, and a simple and comprehensible style.

4. **robust**, so that the content can be reliably interpreted by a wide variety of user applications, including technical aids such as screen readers.

Although the guidelines are defined in less general terms than the principles, the so-called “conformance requirements” are what allow them to be put into practice. These requirements are written in the form of verifiable statements and can be used both for testing and developing new material in compliance with the accessibility guidelines. In order to meet the different needs of web surfers, **three levels of conformance** have been defined. From least to most demanding, these are:

- **A**, twenty-five conformance requirements are met.
- **AA**, thirteen conformance requirements are added to the previous twenty-five, adding up to thirty-eight.
- **AAA**, twenty-three conformance requirements are added to the thirty-eight of the two previous levels, making a total of sixty-one.

For each **conformance requirement**, a wide variety of techniques have also been identified, grouped into two categories: those that are **sufficient** to meet the requirements and those which are recommended. The difference lies in the latter overcoming barriers beyond what is mentioned in the guidelines, contributing to overall improvement. Some of these **recommended** techniques deal with access obstacles not covered by the conformance requirements, and in addition, register the frequent errors encountered. The principles, guidelines, conformance requirements, and sufficient and recommended techniques all act together to advise on how to create more accessible and usable content.

Web validation methods

The Web Content Accessibility Guidelines (WCAG) provide us with a set of standards that serve as a basis to develop accessible products and services. This content is enriched by the work of interdisciplinary and diverse teams who help understand the principles, founded on their specific knowledge, and more importantly, through validations by user experience.

User experience refers to the impressions given by people navigating a website or an application, especially in terms of ease and enjoyment¹⁶. while validations refer to the assessment of a site or application's usability based on the interaction users make with it.

User experience validations are a core ingredient of web accessibility and should be adopted in the design of a digital product from the outset, since the sooner accessibility barriers are identified, the easier they are to solve.

As said before, accessibility is linked to usability; this implies that the dimensions belonging to each one of these seek to cover the needs of a wide variety of users.

These dimensions can all be grouped in the approach called User-Centered Design, in which developers focus on the end consumer. Validation by user experience substantially redefines usability. In the process where people access, find, understand, and use a product, the usability variable is of key importance to individuals in their self-realization as citizens.

Es por este motivo que las validaciones realizadas por medio de For this reason, validations carried out automatically, with no human intervention, prove insufficient. For the process of accessible web

development,¹⁷ it is recommended to implement:

1. Automatic validations through software tools, many of which are programs or online services, freely available, that help determine whether certain web content complies with accessibility standards.
2. User experience validations.

User experience validations are crucial because, as mentioned above, no single tool can determine whether a site complies with the four principles of web accessibility. Here is where UX (user experience assessment) is decisive.

Otro punto a tener en cuenta es la implementación de validaciones periódicas, tanto automáticas como por experiencia de personas usuarias, durante el ciclo de vida de una web. Ya que ningún elemento en línea puede ser considerado estático, por lo cual es importante realizar pruebas de usabilidad y accesibilidad luego de realizar actualizaciones o carga de contenido.

Another aspect to consider is the necessity of periodic validations, both automatic and by user experience, during the whole life cycle of a website. Since no online feature is static, usability and accessibility tests should be done after performing updates or uploading new content.

User-Centered Design and web validations are part of the human rights perspective for the development of digital environments and technologies based on the recognition of people's dignity.

Digital Accessibility in compliance with Responsible Business Conduct (RBC)

As mentioned initially, Responsible Business Conduct (RBC) is the norm of behavior expected from companies worldwide, including those in the technology sector. This denomination, which has been extensively developed by the OECD, results from the convergence of the standards and expectations of the United Nations and the ILO regarding the corporate duty to respect human rights.¹⁸

It is worth briefly reviewing the measures technology companies must take to operate under RBC and how they can integrate digital accessibility. Our reference will be the Guide published by ADC *How to conduct human rights due diligence for technology development (2020)*.¹⁹ The publication offers an agile methodology for entities to comply with it through a simple series of steps based on and adapted from those provided by the OECD.²⁰

Companies must know and make known that they respect human rights,²¹ for which they should implement specific policies and processes, appropriate to their size and circumstances, to provide themselves with the institutional capacity to do so.

The **first step** is to express their commitment in a statement available to the general public, approved at the highest level of the company hierarchy, and covering its entire structure. The statement should be assimilated at all levels of the company and reflected in methods, protocols, and operations. It should also include an explicit reference to the Convention that shapes the policies aiming to achieve digital accessibility. However, because of all the above-mentioned, accessibility should not be taken as a dimension reaching only people with disabilities but as a benefit for society as

a whole. Equally, accessibility alone does not completely fulfill the needs and rights of persons with disabilities set out by the Convention.

Secondly, the company must implement human rights due diligence, understood as the ongoing process by which a business detects and resolves any human rights impact it may cause or contribute to as a result of its activities. It includes four key steps:

1. Identifying and assessing actual or potential adverse human rights impacts that the company may cause or contribute to through its activities, or that are directly related to the operations, products, or services provided by its business relations;
2. Integrating the results of the impact assessments into the corresponding processes of the company and giving appropriate responses to mitigate and reverse the negative impacts;
3. Tracking the results and the effectiveness of the measures and procedures taken to counteract such adverse human rights effects;
4. Communicating that these impacts were addressed and informing stakeholders, particularly those affected, that the appropriate policies and procedures have been adopted.

The main objective of due diligence is to prevent the detrimental consequences that a business activity may bring to people's human rights²². It is an ongoing process, as risks change over time, and should provide for meaningful stakeholder engagement, especially those parties affected and social groups in vulnerable situations.

Through the guidelines, conformance requirements and validation methods outlined above, companies can begin to detect, assess, mitigate, and reverse restraints on digital accessibility and other rights that the online sphere helps to exercise. The due diligence process, in turn, can harness meaningful stakeholder engagement, especially those who are people with disabilities, older adults and/or have low digital literacy, among others. Digital accessibility boosts effective citizen participation.

Thirdly, companies that have shown to be infringing human rights must remediate or collaborate in their remedial by legitimate means. Operational-level grievance mechanisms must be made available to the people and communities affected, to quickly address and repair the damage inflicted. These company-managed processes only fulfill their function if the people they intend to know about, trust and have the means to use them. Once again, digital accessibility proves to be a key feature for the effective exercise of rights whenever the channels provided by companies are virtual. A bad design of the redress mechanism may help to intensify people's grievances. Companies must keep an open dialogue with the affected groups so as to prevent and mitigate this situation.

There are occasions in which a company must cooperate with other types of remedial mechanisms such as judicial and/or extrajudicial ones. Remediation is a complex concept that admits diverse and complementary responses, always combining preventive, deterrent, and restorative measures.²³

Digital accessibility plays a key role in maximizing the scope and efficacy of actions taken by technology companies to comply with the duty to respect international human rights standards, including the Convention, and national laws. Additionally, its implementation in business activities and relations improves competitiveness and sustainability. The UNGPs define corporate activities as including

both, actions, or omissions; and relations encompass partnerships, contractors, and suppliers in the different stages of the supply chain, and/or any others, directly related to its operations, products, or services.

For example, web environments adopting digital accessibility standards will be able to:²⁴

- Increase the customer base of their web products and services, as it improves usability for all types of consumers.
- Reduce design, development, and maintenance costs, since it allows content in multiple formats, platforms, and devices to be reused.
- Build loyalty and attract more clients by increasing interoperability²⁵ and usability.
- Contribute to bridging the digital divide and encouraging e-commerce, offering greater support for the use of online services.
- Improve and optimize a website's indexation in search engines, thus saving costs of advertising.
- Promote innovation, as accessibility guidelines often help solve unforeseen problems.
- Improve brand reputation, since diversity and inclusion, which are key to a company's success, are enhanced when there is a specific and integral commitment to accessibility.

Finally, it should be noted that digital accessibility is fundamental for companies to help break down structural barriers and narrow

the gaps that hinder the exercise of human rights in the online sphere. ADC has previously warned on the need for companies to adopt the gender and diversity approach to human rights due diligence,²⁶ understanding diversity broadly, representing people of different origins, ages, cultures, religions, traditions, nations, ethnic groups, skills, abilities, and all the traits that make each person unique.

If you found the content of this document useful, you may also be interested in our campaign **[PUEDA – For an Accessible Digital Environment campaign](#)**.

Notas

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[12] W3C is an independent, international consortium of governmental, non-governmental and business organizations whose purpose is to promote the long-term evolution and growth of the web <https://www.w3.org/> 12

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