Internet Society Policy on Accessibility for Persons With Disabilities

Version 0.0.8.1

1 Introduction and Background

The Internet Society's vision is that the Internet is for everyone. Yet it is plain that some parts of the Internet are less accessible to persons with disabilities who, the World Health Organization estimates, make up about 15% of the global population. Accordingly, in resolution 2023-8, the Internet Society Board of Trustees gave the following instructions:

> *Further resolved that the President and CEO shall formulate, or cause to be formulated, a comprehensive accessibility operational framework and fund allocation as the President/CEO deems appropriate and in furtherance of ISOC's progress to increase accessibility for persons with disabilities;*

The resolution text was the product of a number of discussions between the Board, the Internet Society Accessibility Standing Group, and Internet Society staff. Subsequent to the resolution, the Standing Group and Internet Society staff continued work on a Disability Inclusion Action Plan. That document, in turn, influenced elements in this policy.

This policy governs the accessibility operational framework for the Internet Society and Internet Society Foundation, but it does not specify the implementation of that framework. Implementation is covered elsewhere (especially the draft Disability Inclusion Action Plan 1.2). Therefore, at any given time, the full accessibility operational framework necessary to satisfy resolution 2023-8 requires this policy as well as whatever the current implementation plan is.

1.1 Acknowledgements

This policy and its development are informed by the contributions of the Internet Society Accessibility Standing Group.

1.2 Key principles

Resolution 2023-8 outlines two principles that form the basis of this policy:

- Building a culture of accessibility in the Internet Society
- Working toward eliminating barriers to participation and engagement with Internet Society content, events, services, processes, and practices for persons with disabilities

1.3 Audience

There are three audiences for this document.

The first is Internet Society staff, who are to be guided in subsequent work efforts by the principles laid out in this document.

The second is the Internet Society community, who may look to this policy to understand the guiding principles behind the organization's actions and priorities.

The third is the Internet community, who may regard this policy as a template for policies that they might adopt to ensure their own systems are accessible to persons with disabilities.

1.4 Scope

This policy covers the activities of both the Internet Society and Internet Society Foundation.

1.5 Periodic monitoring and internal audits

A mechanism will be put in place involving the ASG for periodic monitoring of compliance with this accessibility operational framework. Appropriate funds (around 10 %) for monitoring will be earmarked for this process.

[New section below]

2 Key Principles and their link to the operational framework

2.1 Building a culture of accessibility

Building a culture of accessibility in the Internet Society is the foundation for understanding, appreciating and embracing digital inclusion of persons with disability. Without a culture of accessibility, complying with accessibility rules may seem just to be another task to be undertaken. If a culture of accessibility is built, then various processes for digital inclusion become a natural part of staff and ISOC community activities.

Building a culture of accessibility takes time. A senior staff member will be given responsibility to align digital inclusion for persons with disabilities in policies, programs and processes. This role will cut across various parts of the organisation.

Involving persons with disability from the inception of policy, programs and processes on a number of levels helps build the culture of accessibility. The Internet Society recognises the disability movement's standpoint: 'Nothing about us without us'. Employing persons with disabilities is a key aspect of inclusion.

2.1.2 Employment

The Internet Society and Foundation have employment policies that specifically name diversity in the talent pool as a goal: "The organization will take specific actions to ensure there are equity principles applied to the recruitment stages…." The Internet Society makes accommodations for the needs of staff with disabilities as part of its standard HR policies. It is a goal of the Internet Society to employ persons with disabilities.

2 Rules Governing Accessibility Considerations

2.1 Accessibility Guidelines: Web

In general, it is the Internet Society's intention to make all its content and systems available under the Web Content Accessibility Guidelines (henceforth, WCAG) version 2.0 (ISO/IEC 40500:2012) or later, with a strong preference for conformance to version 2.2. When and if ISO/IEC 40500 changes to adopt WCAG 2.2, this rule will be updated. Updating to future versions beyond 2.2 will be evaluated when those versions are stabilized. In all cases, success criteria conformance shall be at level AA. There are some caveats to this general intent, discussed below.

2.2 New Content or Systems

New content and systems that are deployed or made available by Internet Society or Internet Society Foundation are *required* to meet the rule in section ###make proper xref to 2.1 in Word### , and to be consistent with all existing policies for content accessibility under existing Internet Society guidelines. Content may be produced in alternative format(s) if that permits conformance, so long as no substantial difference is introduced. (So, for example, it is acceptable to produce a given piece of content in both PDF and HTML forms, with *only* the HTML form meeting the guidelines, since the PDF might be intended for printing. But there must not be substantive

differences between the two forms in this case. Also all efforts need to be made to have the pdf version accessible to the extent possible)

2.3 Existing Content or Systems

Existing content and systems of Internet Society and Internet Society Foundation that do not conform *should* meet the rule in ###make proper xref in Word section 2.1###, prioritized according to both feasibility of conformance and the importance of the content or system compared to other priorities.

To determine whether conformance is feasible, an evaluator should consider factors such as the availability of the original source material, the license under which it was made available, the suitability of the original content's choices for processing into a conforming format, and so forth.

To determine importance, an evaluator should consider factors such as how old the content is, its current relevance to the Internet Society or Internet users more generally, how frequently the content is accessed, whether it is somehow foundational to other content, and so forth. (Note that guidance to, and the identity of, evaluators is not specified here, but in current implementation documentation.)

It is important to note that these factors are independent variables: content could be important but difficult to be made accessible (e.g. a low-quality page scan of an old document not suitable for OCR), and therefore not feasible to make accessible. It could also be material that is unimportant to achieving the mission of the Internet Society (e.g. rarely-accessed content that has become obsolete) so that, even though it would be trivial to make accessible (e.g. by producing an HTML document from available source material as opposed to only offering a PDF with poor support for people who use screen readers), the benefit would not reward the effort.

Imperfections in representation of the original content may be acceptable in the context of making older content accessible. In particular, automatic processing of materials that were originally intended to be presented for printing can sometimes introduce artifacts or remove content that was in the original. This policy does not provide a clear rule about when such introductions or removals cross the threshold into making accessibility of the content infeasible. Such decisions must be made on a case by case basis.

2.3.1 Special Note on Transcription

Transcription of content (for example., making audio content available to those with hearing loss) often introduces errors regardless of whether the transcription is performed by humans or by

machines. For automated transcription to be acceptable in support of accessibility, error rates for the automated system should be roughly equivalent to human transcription in real time. Perfectly error-free transcription is not mandatory under this policy.

2.3.2 Who Performs Evaluation?

It is not the place of this policy to pre-determine who performs the evaluations necessary under this section (or other sections of this document). In some cases, the requirements for evaluation might be trivial (e.g. one paragraph added to an existing document, which can likely be checked with automated tools). In other cases, the work might be exceptionally complicated (e.g. the adoption of an entirely new class of software package). It is important to note that while evaluation of simple matters might be accomplished using automated tools, more detailed and extensive evaluation may require specialized expertise such as that certified by the International Association of Accessibility Professionals (see https://www.accessibilityassociation.org/s/certification). (See also ###make proper xref in Word section 3.1.2.###)

2.4 Accessibility Guidelines: Non-Web

The "W" in "WCAG" stands for "web", and the WCAG does not provide conformance guidelines for non-web content. The W3C nevertheless produces a WCAG2ICT Note, "Guidance on Applying WCAG 2.2 to Non-Web Information and Communications Technologies (WCAG2ICT)". To the extent the Internet Society operates systems that are not web-accessible, the guidance in WCAG2ICT should be followed.

2.5 Accessibility Guidelines: Meetings

2.5.1 Physical Meetings

Internet Society-organized physical meetings should be convened in barrier-free locations—that is to say, in an environment conforming to ISO 21542:2021, and with attention to the Guidelines from the Dynamic Coalition on Accessibility and Disability. (The DCAD guidelines will be evaluated for feasibility beyond the current version, when and if they are updated.)

With the exception of purely social events (or social elements of an otherwise-substantive meeting, such as a coffee reception before a presentation), and events that require confidentiality or the avoidance of recording, provision should always be made for remote participation in any meeting. The remote participation facilities should be adequate for full participation in the meeting. The remote participation facilities should support all the functions of fully virtual meetings (see the next section). In effect, this requirement means that every in-person meeting is required to be a hybrid meeting unless it falls within the noted exceptions.

2.5.2 Virtual Meetings

Virtual meetings must be operated on a platform that is accessible to those who use assistive technologies on a regular basis, such that they can use those technologies with the virtual meeting too. This does not require that a virtual meeting platform is compatible with every assistive technology on the market (it would not be possible to confirm this). Rather, it requires that the virtual platform conforms with requirements in ### make real xref in Word sections 2.1 and 2.2###.

Transcription should be provided in such a way as to maximize the ability of those using assistive technologies to participate. (For instance, transcription may be offered in a separate stream so that persons with hearing loss and also persons with cognitive or other disabilities can focus just on the text and position it so it works best for them.)

Whenever possible, Real Time Text Captioning (RTT) should be provided. If that is not possible, automated captioning may be used in preference to nothing. For automated captioning to be acceptable in support of accessibility, error rates for the automated system should be roughly equivalent to human captioning in real time.

3 Rules Governing Accessibility Certification and Testing

To be confident that the provisions in ###make real xref in Word section 2### are met, systems and content may be certified, tested, or both.

3.1 Certification

3.1.1 Systems

During system specification and procurement, the system in question must be evaluated for certified conformance with the minimal levels specified elsewhere in this document. Licensing, terms of service, and user acceptance must be predicated on system certification to the rules in this document. Procured systems must conform with Section 508 of the US *Rehabilitation Act of 1973*, as amended; or with the European Telecommunication Standards Institute's standard EN 301 549.

Minor upgrades to systems do not affect the certification level, but release notes must be verified to ensure no downgrade of accessibility. .

3.1.2 Testing

New systems must be fully tested to validate accessibility claims. Testing shall not be purely of the software for conformance. Systems must be tested as configured for deployment. Testing with a broad array of accessibility aids in wide use is required.

System upgrades may focus testing on upgraded functionality and otherwise assume prior accessibility results remain in place, provided that the new tests indicate positive results. If accessibility appears to be reduced in a release, the rest of the system should likely be tested too unless there are good reasons to expect an isolated issue.

Content may be tested for accessibility using automated tools and facilities built into the creation software, provided the adequacy of the tools has been demonstrated. Note that automated PDF testing is notoriously unreliable, especially on MacOS (relevant to the Internet Society because of its standard operating systems for staff machines). Content must be checked for accessibility before being made generally available. Note that, as provided in Section 2.1###make proper xref###, there is no requirement that every output format of content be tested for accessibility so long as at least one format provides the necessary accessibility to meet this policy.

Fairly elementary testing may be achievable without any special expertise using automated tools. As automated testing needs become more complicated, specialized testing expertise (such as testers certified by the International Association of Accessibility Professionals see https://www.accessibilityassociation.org/s/certification) is likely to be required. (See also ###make proper xref using Word section 2.1.4###.)

