Title	Accessibility of HCCH documents and the HCCH website for persons with disabilities
Document	Prel. Doc. No 19 of January 2024
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Agenda Item	Item III.7
Mandate(s)	C&R No 55 of the 2022 SC, C&D No 51 of CGAP 2023
Objective	To report on the accessibility of HCCH documents and the HCCH website, identify possible opportunities for improvement and share their budgetary implications
Action to be Taken	For Decision ☐ For Approval ☐ For Discussion ☒ For Action / Completion ☐ For Information ☐
Annexes	Annex I: Microsoft guidance on accessibility of various types of documents for persons with disabilities
Related Documents	N/A

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Accessibility of HCCH documents and the HCCH website for persons with disabilities

I.   Introduction

1   The topic of the accessibility of HCCH documents, particularly those pertaining to the *Convention of 13 January 2000 on the International Protection of Adults* (2000 Convention), was raised during the First Meeting of the Special Commission on the practical operation of the 2000 Protection of Adults Convention (SC). The following Conclusion and Recommendation (C&R) was adopted in this regard:

> "The SC invited the Council on General Affairs and Policy (CGAP) to consider the issue of accessibility to HCCH documents by individuals with impairments, in particular to documentation pertaining to the 2000 Convention."[1]

2   Pursuant to the invitation from the SC, CGAP further discussed the matter and, in turn, adopted the following Conclusion and Decision (C&D):

> "Following a recommendation from the SC on the practical operation of the 2000 Protection of Adults Convention, CGAP discussed the accessibility to HCCH documents by persons with impairments. The PB will report to CGAP at its 2024 meeting on the possible obstacles to such accessibility, possible solutions and their budgetary implications."[2]

3   Based on the above mandate from CGAP, the PB examined the accessibility of HCCH documents by individuals with visual, auditory, sensory, cognitive or physical disabilities. Although not expressly mentioned by C&D No 51 of CGAP, the PB also took the opportunity to investigate the accessibility of the HCCH website by carrying out a free accessibility audit on Accessibility Checker[3] and by consulting the HCCH website host, New Story.[4] New Story provided general feedback on several parameters, including accessibility based on the ISO 40500 Standards[5] (see section IV below for more details). The accessibility audit by Accessibility Checker gave similar recommendations for enhancing accessibility.

4   This document aims to present the current accessibility status of HCCH documents and the HCCH website and identify possible opportunities for further improvements. This document aims to make suggestions for possible improvements and to share their budgetary implications.

II.   Background / relevant standards

5   Article 9 of the 2006 United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)[6] provides the foundation for understanding the meaning and extent of accessibility. It provides both a positive and a negative obligation on States – the obligation to ensure equal access to various facilities, environments and services as well as the obligation to identify and eliminate any barriers to such accessibility. Article 9 of the UNCRPD refers both to the material world and to the digital world:

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1   "Conclusions and Recommendations (C&R) adopted by the First Meeting of the Special Commission (SC) on the practical operation of the 2000 Protection of Adults Convention (9-11 November 2022)", C&R Nos 61-62 (C&R of the First Meeting of the SC) (available on the HCCH website at www.hcch.net under "Protection of Adults" then "Special Commission meetings"), C&R No 55.
2   C&D No 51 of CGAP 2023, available on the HCCH website at www.hcch.net under "Governance" then "Archive (2000-2023)".
3   For more information, please consult the Accessibility Checker website.
4   For more information, please consult the New Story website.
5   For more information, please consult the ISO 40500 Standards on the ISO website.
6   UN General Assembly, *Convention on the Rights of Persons with Disabilities: resolution / adopted by the General Assembly*, 24 January 2007, A/RES/61/106.

"1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to **ensure** to persons with disabilities **access, on an equal basis with others,** to the physical environment, to transportation, **to information and communications, including information and communications technologies and systems,** and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include **the identification and elimination of obstacles and barriers to accessibility**, shall apply to, *inter alia*:

[...]

b) **Information, communications and other services, including electronic services** and emergency services.

2. States Parties shall also take appropriate measures:

[...]

g) To promote **access for persons with disabilities to new information and communications technologies and systems**, including the Internet;

h) **To promote the design, development, production and distribution of accessible information and communications technologies and systems** at an early stage, so that these technologies and systems become accessible at minimum cost." [emphasis added]

6   The Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C) develops standards and support materials to facilitate and enhance the accessibility and usability of digital spaces and content. The standards produced by W3C are widely recognised by governments and businesses alike. Most well-known are the Web Content Accessibility Guidelines (WCAG),[7] which are also reflected in the ISO 40500 Standards and the European accessibility standards.[8] It should be noted that Version 3.0 of the WCAG is currently being beta tested. Version 2.2 of the Guidelines remains the official current standard until further notice.

7   The WCAG established four core accessibility principles for digital environments and content:

- **Perceivable:** The information and user interface components must be presentable to users in ways they can perceive. This means that users must be able to perceive the information being presented to them – it cannot be invisible to all of their senses.
- **Operable:** The user interface components and navigation must be operable. This means that users must be able to operate the interface.
- **Understandable:** Information and the operation of user interface must be understandable. This means that users must be able to understand the information as well as the operation of the user interface.
- **Robust:** Web content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies. This means that users must be able to access the content even as technologies advance.

III.   HCCH documents

8   Based on the aforementioned WCAG accessibility principles, this document will now explore the most frequently used document formats of the HCCH and present possible ways in which the accessibility of those documents can be further enhanced.

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7   For more information, please consult the WCAG on the W3C website.
8   Harmonised European Standard on Accessibility requirements for ICT products and services (EN 301 549).

A. Microsoft Word documents and PDFs

9   As the most utilised tool at the Permanent Bureau (PB) of the HCCH, to share and gather information both internally and externally, it is important that Microsoft Word (MS Word) documents are accessible. On its website, Microsoft shares a detailed guide containing best practices and step-by-step instructions on how to enhance the accessibility of MS Word documents on various operating systems, such as Windows, MacOS and Android.[9]

10   Portable Document Formats (PDFs) are the easiest way to produce accessible digital publications, as MS Word, PowerPoint and Excel documents can all be converted into PDFs. However, PDFs are not automatically accessible.[10] The aforementioned formatting steps applicable to MS Word are also applicable to PDFs. Additionally, tagging PDF documents in a manner that follows the logical reading order can ensure their accessibility. Properly tagging PDFs allows for documents to be consumed more easily via keyboard navigation. Adobe Acrobat has compiled a useful article on creating accessible PDFs, which thoroughly explains how to tag PDFs.[11] It is also important to ensure that the PDF can be accessed on all or most devices – desktop computers, laptops, smartphones or tablets.

B. PowerPoint documents

11   Presentations via PowerPoint are frequently used to raise awareness to, and provide updates on, the work of the HCCH. Microsoft has provided a detailed guide containing best practices and step-by-step instructions on how to enhance the accessibility of PowerPoints on various operating systems, such as Windows, MacOS and Android.[12] A lot of the advice provided by Microsoft pertaining to MS Word documents is also applicable to PowerPoint presentations (adequate colour contrast, easy-to-read font, alt text, etc).

C. Excel documents

12   Excel is a tool mostly utilised to produce documents for internal use. Documents produced using Excel are then posted on the HCCH website in PDF format. Therefore, the good practices highlighted above pertaining to MS Word and PDF documents would also apply here. However, on rare occasions (*e.g.*, for the purpose of collecting statistics under both the 1980 Child Abduction Convention and the 1993 Adoption Convention), Excel documents are circulated to Contracting Parties. Microsoft has provided a detailed guide containing best practices and step-by-step instructions on how to enhance the accessibility of Excel documents on various operating systems, such as Windows, MacOS and Android.[13]

D. Overview of possible budgetary implications

13   All of the above points made regarding the production of documents (MS Word, PDF, PowerPoint and Excel) do not have any budgetary implications. Members of the PB can utilise the free Accessibility Checker provided by Microsoft to resolve most common accessibility issues when developing documents.

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[9]   See Annex I of this document.
[10]   The current standard for accessible PDFs is PDF/UA (PDF for Universal Access), which is approved by the ISO committee (ISO 14289) and complements WCAG.
[11]   The article can be found here.
[12]   See Annex I of this document.
[13]   *Ibid.*

IV. HCCH website

A. Current status

14   Based on a general assessment made by the host of the HCCH website, New Story, as well as an accessibility audit made free of charge on Accessibility Checker, the website of the HCCH is generally compliant with the current accessibility standards (74-85% compliance rate). The audit reports from New Story and Accessibility Checker can be made available upon request.

B. Opportunities for improvement

15   According to both the report from New Story and the Accessibility Checker audit, one of the main opportunities for improvement pertains to enhancing the compatibility of the HCCH website with assistive technologies such as screen readers:

- Hyperlinks and buttons need a more accessible name, to allow screen readers and other assistive technologies to usefully announce it. Otherwise, the button or hyperlink will be announced as "button" / "link", making it unusable for users relying on screen readers.

- Links to social media (LinkedIn, Facebook, YouTube, X (Twitter) and the News Archive) require a more discernible name and alternative text when images are used as links. This would improve the navigation experience for screen reader users. Links must have a unique name or short description attached to them in the code to enable screen readers to read it out loud. Otherwise, the screen reader will simply read out loud "link," and the user will not have a contextual understanding of where this link leads.

- Although it is not possible to avoid the inclusion of tables on the HCCH website (*e.g.*, the Status Tables for each Convention), the addition of table headers that refer to some set of cells may improve the experience for screen reader users.

16   The other main opportunity for improvement, according to the reports, pertains to enhancing the user experience of individuals that require a keyboard to navigate a webpage:

- Keyboard navigation can be enhanced by the consistent and logical use of headings. The use of correct heading and landmark elements will dramatically improve the navigation experience on the HCCH website for users of assistive technologies. Certain parts of the HCCH website contain headings and landmark elements but this could be done throughout the website.

- Tab focus is what moves to each and every interactive element on a page. Every interactive element must be focusable so that keyboard users can recognise where keyboard focus is at all times.

17   Other opportunities for improvement on the HCCH website suggested by the reports include:

- It appears that in some sections, the use of magnifying tools may be more difficult or impossible.

- Some sections could benefit from a higher contrast ratio between the text and the background of the page.

- Some content is used to style a web page or make it more interactive for visual users. Examples include content that is simply presentational or decorative. Because this content is present on the page for styling purposes, it should be hidden from screen reader users. Assistive technologies should not be able to read this content as it will only confuse the user.

C. Future implementation of possible improvements

18   The HCCH website being generally compliant with the current accessibility standards (74-85% compliance rate),[14] the PB suggests, at this stage, to implement, subject to available resources, the above identified improvements in any further development / upgrade of the HCCH website.

V. Conclusion and proposal from the PB

19   Arguably one of the most crucial components of the work of the HCCH is the sharing of information. The ways in which the HCCH shares information include but are certainly not limited to raising awareness to HCCH Conventions, sharing information on how to interpret and implement them, facilitating the exchange of practical experiences among the relevant authorities as well as reporting on the work of the PB. The production and dissemination of documents is one of the biggest tools the HCCH has in this regard. It is, therefore, important that this information reaches as many individuals as possible and that all persons interested in the work of the HCCH can access information and documentation equally.

20   Based on the above information, CGAP may wish to consider the following C&D:

- CGAP welcomed the research conducted by the PB regarding the accessibility to HCCH documents and to the HCCH website more generally and, subject to available resources, invited the PB to consider the results of this research when further developing the HCCH website.

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[14]   See, *supra*, para. 14.

ANNEXES

Annex I: Microsoft guidance on accessibility of various types of documents for persons with disabilities

In its guide on **Word documents**,[1] Microsoft recommends, among others, that users:

- avoid using tables where possible. Tables can cause issues when using assistive technologies such as screen readers and magnifying software. If a table must be used, it is important to include headers and to make the structure as simple as possible, for data only. Paragraph banners appear to be a good alternative to tables for organising and separating content;

- utilise built-in headings and styles, in order to make it easier for screen readers to read documents;

- include alt text[2] with any meaningful (*i.e.*, non-decorative) visual that appears in the document, to allow individuals with visual impairments to perceive any important information being communicated through the visual;

- be intentional with hyperlinked text, ensuring that the hyperlinked texts make sense as standalone text;

- ensure that colour is not the only way in which information is conveyed (*e.g.*, colour coding). People who are blind, have low vision, or are colourblind might miss out on the meaning conveyed by particular colours;

- ensure that the document has sufficient contrast for text and background colours. Users should also work in easy-to-read fonts (*i.e.*, sans serif, sufficiently large size, minimal italic and underlined text);

- avoid writing important information in the headers and footers of documents, as the headers and footers are oftentimes lower in contrast and screen readers do not pick up on them;

- make use of the inbuilt Accessibility Checker in the "Review" tab of MS Word.[3] The Accessibility Checker is a highly useful tool to avoid common accessibility issues such as those mentioned in the bullets above.

In its guide on **PowerPoint presentations**,[4] Microsoft recommends, among others, that users:

- ensure that any video, music, or type of audio is accompanied by subtitles, closed captions and / or a video description;

- give every slide a unique title to ensure assistive technologies, such as screen readers, can relay the document in a useful manner;

- create accessible PDF versions of PowerPoint presentations by tagging the PDF accordingly. The tags make it possible for screen readers and other assistive technologies to read and navigate the document. The presentation can also be converted to a format that can be ported to a Braille reader;

- make use of the inbuilt Accessibility Checker.

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[1]   See here for the full Microsoft guide on Word documents.
[2]   Alt text is descriptive text that conveys the meaning and context of a visual item in a digital setting.
[3]   More information on how to utilise the Accessibility checker can be found here.
[4]   See here for the full Microsoft guide on PowerPoint presentations.

When creating accessible **Excel documents**,[5] Microsoft recommends, among others, that users:

- use clear table headers to provide context and make navigating the table content easier via a screen reader;

- utilise table styles with high contrast colours and accessible font formats (sans serif font, minimal italic / underline);

- avoid blank cells, columns, and rows as much as possible. When navigating using the keyboard, a blank cell, column, or row might lead a screen reader user to believe there is nothing more in the table. If it is not possible to delete the blank cell, column or row, users should enter text explaining that it is intentionally blank, for example, by typing "N/A" or "Intentionally Blank";

- keep the table as simple and straightforward as possible by avoiding split or merged cells, as they can make navigating Excel tables with assistive technologies very difficult, if not impossible;

- ensure that any images, charts, or graphs in an Excel document are accompanied by alt text. Users could also consider providing alt text for the tables themselves, explaining what they represent;

- ensure each Excel sheet tab has a unique and descriptive name;

- make use of the inbuilt Accessibility Checker.

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5   See here for the full Microsoft guide on Excel documents.