Leave no one offline
A primer on engaging your company on digital accessibility
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1. Executive summary

The development of this primer for companies on digital accessibility was kicked off in July 2020, during the first wave of the COVID-19 global pandemic, with the support of the ILO Global Business and Disability Network (GBDN).

COVID-19 has significantly raised the visibility of digital technology's impact on the workplace. In many cases, COVID-19 exposed the lack of accessibility in solutions for remote workers, and in other cases, executives and managers realized that the jobs they thought could never be remote actually can be. Overall, the impact of this pandemic has further accelerated digital transformation. It also has “normalized” accommodation requests and the adoption of inclusive technology.

Representatives of GBDN members who were interviewed as part of this initiative were extremely generous with their time and forthcoming in sharing both their personal and their company's digital accessibility journey.

All of them recognize the intrinsic value of digital accessibility, its strategic importance to the future of their company's business, beyond compliance, its intersectionality and universal value.

They all mentioned that at the top of the business there is strong momentum to embrace inclusion and that disability is beginning to gain exposure as part of the overall C-suite Diversity & Inclusion (D&I) focus. However, for most, digital accessibility, as a topic, has not. Its visibility tends to be low, as it is often viewed as a compliance initiative. As a result, it has not been proactively considered as part of the company's overall digital transformation strategy.

In recent years, the general awareness of digital accessibility has been on the rise, and many companies do have well-established accessibility solutions and practices around mobility, vision, hearing, and increasingly in the area of cognitive and neurodiversity disability. One fast emerging area of disability is mental health. The social isolation and wellbeing challenges caused by COVID-19 are creating new challenges to explore new digital solutions in this area.

Most companies reported that the cross-company, senior executive-led or -sponsored Advisory Council is the place where digital accessibility direction and strategy are being discussed. There is no dedicated executive owner, such as a Chief Accessibility Officer, that has company-wide digital accessibility responsibility. Because of that, there usually is not any formal strategy setting or operational interlock amongst organizations regarding digital accessibility plans, investment or outcome measurements.

When it comes to digital accessibility skills and resources, most companies shared that they have relatively few in-house expert resources. These resources tend to be scattered, and there is no centralized approach to assessing the resources and skills needed. Most of the companies use third-party resources to augment their knowledge and skill gaps.

With the rising tide of the global disability movement and the convergence of social justice movements and pandemic disruption, there is an opportunity to re-think the D&I approach, including increasing the focus on digital accessibility as part of the inclusive digital transformation strategy.
This primer document integrates findings from the pulse interviews with the GBDN members with market insight and subject matter expertise provided by FrancesWestCo. It intends to create a baseline understanding to kickoff discussions and actions to operationalize digital accessibility as a strategic digital inclusion imperative.

2. Background

Digital technology brings unprecedented opportunities for businesses, workers and society. Powerful information technology and communication networks have created flexible, collaborative, fast-paced work environments capable of adapting to new markets and labor dynamics.

Globally, organizations are looking for talent to create growth and increase profitability. There is an increasing awareness that people with disabilities are an untapped pool of talent that can propel business objectives. We have seen progressive actions from business organizations such as Return on Disability Group, The Valuable 500 and Autism@Work. We also have seen leading-edge work from the GBDN and the country-level networks of inclusive companies linked to the GBDN in promoting and embracing the hiring and career development of people with disabilities.

However, even though there is an increased understanding and focus on hiring people with disabilities and servicing customers with disabilities, especially by CEOs and senior executives in the Human Resources (HR) community and disability inclusion leaders, Information Technology (IT) and other functional lines of business as a whole have not been as engaged in taking a strategic and holistic approach to supporting people with disabilities through technology. Many organizations continue to build and acquire workplace technologies, websites, mobile applications, and create marketing and communication content without proactive or intentional consideration of digital accessibility.

Since digital information technology now underpins most of what we do in society and digital transformation, a process of using digital technologies to create new or modify existing business processes, culture and user experiences for both internal workplace and external marketplace,
strategic focus has to be put on digital accessibility. If digital accessibility is part of businesses digital transformation, then the digital workplace infrastructure will be accessible to provide productivity parity for people with disabilities. This workplace parity will support people with disabilities being competitive in job promotion, career advancement. Most importantly, it will enable innovation impact that people with disabilities can bring to the organization. When it comes to the external marketplace, if customer/partner acquisition, relationship management digital channel access can be made accessible, businesses will be able to attract and retain customers, partners with disabilities, hence creating a new market-share and revenue growth opportunity.

Given that the pace of digital transformation is accelerating with changing economic dynamics and the global pandemic, there is an unusual opportunity to serve up the digital accessibility and digital inclusion topic, as the current Work-from-Home (WFH) situation highlights the interdependency between humans and digital information technology.

Investment in digital accessibility is not just for people with disabilities: it has a universal impact because digital accessibility, if implemented with transformational strategy in mind, is about extreme personalization, such that each person, whether it is a customer, employee or partner can have a meaningful and enjoyable digital experience. It is about putting the human first in the technology infrastructure, solution thinking, design and development. Since it is a technology strategy based on not just recognizing but respecting individual differences in ability, its implementation can have the deepest impact on people and business.

As such, digital accessibility can and should become a rallying point where communities for HR, IT and all of the lines of business come together proactively, collaboratively and holistically to address the tremendous impact digital transformation is having on the future of the workplace and marketplace.

2.1 Goals

The goal of this primer document is to start conversation and begin to establish:

- Digital accessibility as a strategic business imperative with C-suites.
- Digital accessibility's impact on the workplace, beyond compliance to innovation with IT and lines of business executives.
- Organizational approaches to implementing digital accessibility as a transformational initiative.
2.2 Process

Frances West, Founder of FrancesWestCo and co-author Kathleen Delgado, Director of Strategic Initiatives:

- Prepared questionnaires and conducted organic pulse interviews with invited GBDN members to understand each organization's digital accessibility journey, readiness, obstacles and opportunities.
- The interview approach and questions leveraged FrancesWestCo's 6-e Authentic Inclusion in Action Framework, detailed in Reference.
- The anonymous interview results were integrated with subject matter knowledge to provide a summary of key insights and recommendations for GBDN members to start engaging senior executives in IT and other functional line of business organizations for implementation consideration.

2.3 Acknowledgement

This primer was made possible by participation from the GBDN company members Accenture, Merck, Repsol, Standard Chartered Bank and Zain.

3. Key insights and recommendations

Five key themes emerged from the interviews and are detailed below along with key insights and recommendations.

### Key Themes

1. Top leaders embrace inclusion but not digital inclusion.
2. Digital accessibility is a new/emerging trend.
3. Governance, policy, roles and responsibilities for accessibility are not well defined.
5. Skilled resources and expectation gap increasing.

1. Top leaders embrace inclusion but not digital inclusion

**Key Insights:**

CEOs and senior leaders are embracing inclusion. For example, over 1500 companies, 85 industries have signed up for the CEO Actions Diversity & Inclusion initiative in the US.
There is even an increased focus on hiring people with disabilities globally, owing to the groundbreaking work by organizations such as The Valuable 500.

Companies such as Unilever openly declaring a 5% of hiring target by 2025, and Zain's CEO personally engaged and assigning resources to support the initiative are highly encouraging.

However, when it comes to technology, while all businesses have accelerated their digital transformation during COVID-19, according to the latest McKinsey report, very few C-suites have made the connection that digital accessibility needs to be an integral part of the company’s digital transformation strategy.

They are not connecting the dots that a digital accessibility investment has a universally positive impact on all users, internal and external, and is a pre-requisite for sustainable and scalable hiring in serving people with all different abilities.

**Recommendations:**

Senior business executives especially at the C-suite level respond best when a technology investment such as digital accessibility is presented in the context of digital transformation. GBDN members may consider leveraging a McKinsey-type technology report to engage senior executives, especially in the IT department, in discussing how digital accessibility investment can support key trends such as increased remote working and/or collaboration, customer demand for online purchasing/services.

The conversation can be further extended to highlight the value and impact that people with disabilities bring to future products, services, technology innovation as the market enters the “human-first” era. As an example, of the companies we interviewed, Accenture has started to engage their employees with disabilities in product design while Repsol has done the same for their external customer-facing commercial lines of products.

As C-suites appreciate more of the direct impact employees with disabilities can have on product and market differentiation that leads to revenue generation, they will be more inclined to embrace digital accessibility as not just a compliance based, “cost” initiative. Instead, they can embrace the idea of digital inclusion, which refers to a broader technology-based inclusion strategy that includes more than the current focus on digital accessibility with web and mobile experiences. This broader frame of digital inclusion also embraces emerging technologies such as Artificial Intelligence (AI), Virtual Reality (VR), Extended Reality (XR) and even Blockchain.

2. Digital accessibility is an emerging focus

**Key Insights:**

Digital accessibility refers to the digital design and development of products, devices, services, to be usable by everyone, especially for people who are aging and with disabilities.

While most companies have well-established physical accessibility policies and practices for their customers, employees and partners, digital accessibility has been a relatively new and emerging topic as an innovation strategy vs legal compliance.
For most companies, digital accessibility strategy has been focused on meeting legislative mandates, such as the Section 508 procurement act of the U.S. federal government, the recently passed European Accessibility Act, the Accessible Canada Act, and therefore tends to be compliance focused. As such, the associated actions tend to be more focused on risk containment versus business differentiation or innovation.

**Recommendations:**

Several of the companies interviewed spoke about the lack of a cohesive story-line or marketing theme about communicating the impact that employees with disabilities have on innovation, and there is very little mention made of companies’ digital accessibility initiatives.

In fact, “storytelling” is one of the most powerful ways to change perception of the value of people with disabilities.

A recent video by Google highlighting a deaf research scientist at work is a good example. This “story telling” content, format and channel can be a difference-maker in its effectiveness. This offers a great opportunity for GBDN members to engage communications and marketing departments to be partners in producing this new narrative, but also collaborating to ensure that marketing content is accessible. This is important, especially in the video and social media channels, as they have the broadest reach, hence the highest exposure and opportunity to differentiate. Biden administration’s actions to highlight the US White House website being fully accessible is a good examples of how implementing digital accessibility can establish inclusion leadership.

When it comes to the IT department, many IT executives often look to technology analyst companies such as Gartner to understand digital transformation trends and to gain IT strategy insight. Gartner’s recent report on “Compliance and Beyond: 4 Ways Digital Accessibility Gives You a Competitive Advantage” could be a good way to initiate the conversation. By referencing Gartner’s work, GBDN members now can speak the “same language” as their IT counterparts.

**3. Governance, policy, roles and responsibility for accessibility are not well defined**

**Key Insights:**

Digital accessibility governance and policy is emerging as a topic. Most companies interviewed do have an official document on accessibility guidance, especially for physical accessibility, but digital accessibility standards, guidance, checklists are still evolving.

This information tends to reside inside the IT department and is not customized based on functions, roles, and responsibilities. But progress is being made.

For example, companies interviewed like Merck have well-established standards and are beginning to have active participation from the IT department to explore a corporate-wide governance framework. Standard Chartered Bank, another example, published an external Disability Tool Kit which calls out a confidence assessment in such areas as accessibility requirements, accessible workplace and assistive technology.
Digital accessibility accountability varies greatly. Some companies have it under the D&I team, some have it under the Chief Information Officer (CIO) and others have the responsibility spread among multiple organizations. Additionally, the reporting line and organizations are varied as well. The most common place where digital accessibility progress is reported is at the Global Diversity Council or its equivalent.

A couple of companies commented that they see an emerging need to have a Chief Accessibility Officer (CAO). The question of where the CAO, if named, should report into -- business, IT or HR -- remains open.

**Recommendations:**

Digital accessibility needs to be viewed as a foundational pillar of any digital architecture and infrastructure, very similar to privacy and security. Because privacy and security have a legislative mandate, such as GDPR (Global Data Protection Regulation), which is similar to the digital accessibility legislation mandate, GBDN members could work with their IT leaders to examine how privacy and security governance and policy are established and explore the possibility of implementing a similar corporate-wide policy and process for digital accessibility.

Since digital accessibility is an emerging topic, it is important to ensure it is a critical part of any D&I internal/external survey, assessment, gap analysis going forward. It should go beyond the high level of assistive technology accommodation assessment and be extended into different disability types, as the functional solution requirements for the technology are very different from mobility to vision, to hearing, to cognitive, to mental health, and others.

As an example, Scientific American highlighted how “Virtual Reality Might Be the Next Big Thing for Mental Health”.

Once the knowledge for digital accessibility baseline assessment is established, based on the companies needs and readiness, GBDN members can team up with IT leaders to explore the creation of a Digital Accessibility Center of Competency (CoC) organization to standardize digital inclusion policy, practice, actions across the whole organization to gain efficiency and competency.

Accenture’s recently published Amplify Accessibility: An Accessible Digital Future and the Driving the Technology Accessibility Advantage use case of their journey creating an Accessibility Center of Excellence can be a good discussion document with IT leaders.
4. Few in-house competencies in digital accessibility

**Key Insights:**

While there is keen recognition that digital accessibility is an emerging trend, most companies do not appear to have a critical mass of in-house expertise or an adequate curriculum in place to educate employees at large about this topic.

Some companies are leveraging grassroots employee events hosted by IT or Employee Resource Groups (ERGs) employees to share the know-how. Also, most companies use third-party resources to conduct digital accessibility related tasks such as website, mobile app testing. An overall resource strategy to plan for the increasing need for digital accessibility is lacking.

Another observation is that the allocation of digital accessibility resources tends to tilt towards customer-facing, external websites and applications. As a result, the internal support of employees with disabilities and accessible workplace needs gets lowered or de-prioritized.

**Recommendations:**

Engage senior leadership such as the Advisory Council to examine the organization’s capacity to deal with increasing digital accessibility needs based on inclusion strategy requirements and on legal legislation and new market potential.

Work across the organization to explore the feasibility of having a centralized corporate functional team with a dedicated executive such as the CAO to provide cross-functional, cross-organizational strategic planning and tactical support.

5. Skilled resources and expectation gap increasing

**Key Insights:**

When Section 508 of the US Rehabilitation Act was passed in 1973, it was considered groundbreaking legislation, as this law applied to all government procurement and acquisitions of future web- and non-web-based goods and services. This law in effect put access, both physical and digital accessibility, on the map.

Since the 2006 passing of the UN Convention on the Rights of People with Disabilities (CRPD), more than 180 countries have signed on to the treaty, and there is an acceleration of digital accessibility focus as more countries are passing laws and regulations mandating the public and private sector’s adherence to this human rights treaty.

For example, both the European Accessibility Act and Accessible Canada Act became law in 2019.

China enacted their accessibility law in 2008. These actions created a higher demand for talent skilled in digital accessibility.

And yet at the same time, according to a report generated by the World Economic Forum in March of 2019, the digital gap is widening and there are over 750,000 unfilled IT jobs in Europe alone.

The confluence of all these factors has resulted in a shortage of digital accessibility skills and talent.
All the companies interviewed recognize that not only is there an increasing need for digital accessibility skills such as website testing, but there are also new skills such as inclusive design thinking that will be required if digital accessibility is to move from compliance to a business advantage strategy as more advanced technology such as AI, VR, XR comes onto the scene.

**Recommendations:**

Digital accessibility as a professional competency is gaining momentum.

Major companies such as Google, Facebook and Verizon have come together to form the TeachAccess initiative, with the support of the US Department of Labor's ODEP (Office of Disability Employment Policy) to encourage universities to teach a digital accessibility curriculum and to raise the visibility of accessibility in the workplace.

There are also professional conferences such as the global M-Enabling Summit, AccessU and professional digital accessibility certification organizations such as IAAP (International Association of Accessibility Professionals) in which companies can participate to raise both the quality and quantity of their employees' skills in digital accessibility. Accenture, for example, is looking to embed accessibility certification in all of its developers' education.

Another area of opportunity is that many IT leaders now adopt Design Thinking as the methodology for building new technology solutions.

Since Design thinking is based on understanding individual customer's or employee's persona and journey, this offers a great opportunity for employees with disabilities to participate at the design stage and influence the direction of IT leaders' thinking and tracked outcomes.

In other words, it is promoting Inclusive Design Thinking to IT leaders beyond the current scope of Design Thinking.
# 3.1 Summary table

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<th>Key Themes</th>
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| **1. Top leaders embrace inclusion but not digital inclusion** | - Leverage business-centric digital accessibility related reports from the top business strategy and management consulting firms, as CEOs and senior executives have a greater affinity for their point of view.  
- Expand digital accessibility frame of reference to digital inclusion, as it moves the subject from compliance to inclusion and innovation. Also consider the universality and intersectionality impact of digital accessibility on inclusion. Both innovation and inclusion are top-of-mind focus for C-suites. |
| **2. Digital accessibility is an emerging focus** | - Team with marketing and communications to create new internal and external narratives and stories that not just affect “heart share” but change “mind share”, with an ultimate goal of delivering “market share”.  
- Share latest IT analyst reports on the topic of digital accessibility with the CIO. CTOs as similar to the CEO’s, these technologists have greater affinity with IT Analyst firms such as Garner, Forrester and trust their opinion and point of view. |
| **3. Governance, policy, roles and responsibility for accessibility are not well defined** | - Work with the CIO office to perform baseline assessment of organization’s readiness for digital accessibility. The Accessibility Maturity Model from the Business Disability Forum can for example be leveraged as a fast-start.  
- Raise the visibility of accessibility to be on a par with privacy and security, as all three topics affect individual human’s trust and engagement with technology. Examine the potential to create policy statements and a governance model, as privacy, security and accessibility are all cross-organizational and foundational “must do’s”. |
| **4. Few in-house competencies in digital accessibility** | Create or leverage cross-organization constructs like the Executive Advisory Council to serve up strategic topics, such as how to integrate digital accessibility/inclusion into a company’s digital transformation initiative. Also present operational topics such as skills sets, and resources (both financial and talent) required to move digital accessibility beyond compliance into innovation.  
Reference information on external trends, such as a growing number of Chief Accessibility Officers in the marketplace, to engage senior executives in the strategic discussion and investment in this area. |
| **5. Skilled resources and expectation gap increasing** | Share the accessibility skills certification trend with senior executives from organizations such as IAAP, TeachAccess, especially the CIOs, to point out the emerging importance of this skill set.  
Work with CIOs and HR to establish digital accessibility as a baseline competency for all designers, developers. And create skills strategy and plans to extend accessibility knowledge into all new technology solutions such as AI that impact a company’s digital transformation strategy. |
4. Conclusion

Digital accessibility, not as a compliance measure, but as a “human-first” based digital inclusion transformation initiative, is at the beginning of its journey and can have a universal impact on every individual, every diversity group, every workplace, every organization and every society.

If companies can establish digital accessibility as a foundational pillar to their overall digital transformation strategy and engage employees with disabilities at the product and service and workplace design phase, then we can begin to move digital impact measurement of digital accessibility away from compliance and over to innovation and business differentiation.

There are tremendous opportunities for GBDN members to lead this new perspective and proactively engage corporate senior leadership teams, especially CIOs and CTOs, to think differently, to manage differently and to act differently. As with every business that has openly embraced the diversity and inclusion initiative publicly, to invest in digital accessibility through concrete action is no longer optional.

Digital accessibility as a strategic business imperative allows parity in workplace participation and productivity. Its impact, if implemented holistically, authentically and expanded to include future technologies, will ensure that all people, especially people with disabilities, not just get hired for the job but have a work environment in which they can grow and thrive. Corporations can thereby benefit from their digital inclusion investment, as it will lead to better talent acquisition, business differentiation, market expansion and brand recognition.
5. Reference and resources

This primer leveraged the Authentic Inclusion™ in Action Framework developed by FrancesWestCo which aims to help leaders view digital inclusion from a business transformation perspective and to help line management to operationalize digital inclusion in a measurable, sustainable and scalable ways.

**Authentic Inclusion™ in Action Strategy Framework 6-E definitions:**

- **Embrace:** CEO/Board/highest level leader’s commitment to digital accessibility.
- **Envision:** an organization's stated vision and commitment to digital accessibility.
- **Enact:** an organization's governance, policy and process to implement digital accessibility.
- **Enlist:** an organization's resource commitment to execute on digital accessibility.
- **Enable:** an organization's capability to train employees on skills such as accessibility, inclusive design.
- **Ensure:** an organization's commitment to measure and track progress of digital accessibility.


https://www.accessibilityassociation.org/.


https://www.w3.org/WAI/policies/china/.

https://www.w3.org/WAI/fundamentals/accessibility-usability-inclusion/.


