

Urgency of National Digital Accessibility Standards for Inclusive Online Services

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Abstract

This study investigated the absence of a clear and binding national standard on digital accessibility in Indonesia, which has created a significant legal gap and hindered equal access to online services for persons with disabilities. Although existing regulations, such as Law Number 8 of 2016 concerning Persons with Disabilities and Law Number 1 of 2024 concerning the Second Amendment to Law Number 11 of 2008 on Electronic Information and Transactions, uphold the principle of non-discrimination, they have not provided technical provisions aligned with international standards such as the Web Content Accessibility Guidelines (WCAG). This research was conducted using a normative juridical approach, supported by statutory analysis and comparative studies with global best practices. The proposed approach emphasized the integration of WCAG-based technical requirements into Indonesian legal frameworks, either through ministerial regulations or the development of a dedicated Indonesian National Standard (SNI). The findings revealed that the absence of such a legal framework leads to inconsistent implementation between government and private digital platforms, causing structural digital exclusion. The study concluded that regulatory reform is urgently needed to ensure inclusive and standardized digital environments. This reform would not only harmonize national practices with global norms but also strengthen Indonesia's commitment to the United Nations Convention on the Rights of Persons with Disabilities (CRPD), enhance social participation, and expand economic opportunities for persons with disabilities.

Keywords: *digital accessibility, disability rights, legal framework, WCAG*

INTRODUCTION

Digital transformation has now become a key initiative of the Indonesian government to accelerate access to public services through technology. However, without clear technical regulations, inclusivity—particularly for persons with disabilities—has yet to be achieved. Law No. 8 of 2016 and Government Regulation No. 13 of 2020 guarantee the right to accessibility and educational accommodation, but do not regulate technical standards such as the WCAG. As a result, the implementation of digital accessibility remains very limited [1].

The Web Content Accessibility Guidelines (WCAG) constitute a global standard to ensure that digital services are accessible to all individuals, including persons with disabilities. This standard covers text clarity, accessible navigation, and informative structure. Its implementation has become a legal requirement in several countries as part of inclusive ICT regulations. In Indonesia, however, these guidelines have yet to be adopted as a mandatory reference [2].

Recent studies indicate that the majority of government and university websites in Indonesia are not disability-friendly. Common issues include the absence of alternative text (alt

text), navigation incompatible with screen readers, and page structures that fail to comply with WCAG. This situation reveals a significant gap between existing regulations and actual practices, resulting in a digital accessibility divide [1].

Automated accessibility evaluations using aXe DevTools and other tools have shown that most ministerial websites do not meet even the minimum WCAG standards. Similar findings were recorded for provincial governments, with violations numbering in the thousands. This demonstrates that accessibility issues are not isolated cases but systemic in nature. This audit confirms the weakness of technical implementation [3].

The low level of accessibility-related digital literacy among developers and policymakers constitutes another contributing factor. Recently, the website PanduanWCAG.com—a WCAG guide in the Indonesian language—was launched to improve local understanding. However, this remains a community-driven initiative and has yet to be widely implemented by government institutions. This step highlights the urgent need for regulatory support [4].

During the 2024 Global Accessibility Awareness Day (GAAD), the Ministry of Communication and Informatics (Kominfo) and Suarise organized a panel discussion on digital accessibility regulations. Kominfo claimed to have prepared operational guidelines based on ISO 40500 and WCAG. Nevertheless, these guidelines have not yet been enacted as binding regulations with sanctions and reporting obligations. This indicates that the legal framework remains very weak [5].

Furthermore, research conducted by SAFENet in collaboration with the visually impaired community revealed that public service websites are far from inclusive. The study identified suboptimal navigation, lack of alt text, and minimal screen reader support. The Disability Commission noted the lack of involvement of persons with disabilities in the planning and evaluation process. This illustrates that inequality in access is structural in nature [6].

A legal vacuum (*rechtvacuum*) exists because there is no regulation mandating the application of WCAG to digital services. Existing regulations are merely aspirational, without technical guidance or standardized benchmarks, thereby leaving room for varying interpretations among institutions. Consequently, digital accessibility has not become a systemic priority. Legal vagueness also arises because “digital accessibility” lacks a clear operational definition. Some institutions adopt overlays or accessibility widgets as a quick fix, although these do not comply with WCAG principles. Such practices render inclusion symbolic rather than substantive, leaving persons with disabilities facing barriers.

The absence of binding technical regulations creates a serious accountability gap. Without standardized benchmarks, government agencies lack a clear basis to evaluate whether digital services genuinely meet accessibility requirements. Oversight, therefore, becomes subjective and often limited to rhetorical policy statements without substantive enforcement. From a human rights perspective, however, the state is under an obligation to establish accountability mechanisms that guarantee non-discriminatory digital services.

This regulatory gap also stifles innovation that should otherwise advance the interests of vulnerable groups. Many digital service providers hesitate to invest in accessibility features because there is no legal compulsion to do so. As a result, the adoption of universal design principles remains slow, and accessibility improvements are treated as optional enhancements rather than mandatory elements of service delivery. Binding WCAG-based rules could in fact encourage the growth of a new ecosystem of inclusive and globally competitive digital

innovation.

The lack of legal certainty further widens the digital divide between those with disabilities and the rest of society. While digitalization has been promoted as a tool for inclusion, the absence of enforceable standards makes accessibility dependent on institutional goodwill. This leaves persons with disabilities excluded from essential services such as e-government, online education, digital banking, and healthcare, thereby undermining the promise of digital transformation as a vehicle for equality.

Another consequence of legal vagueness is the reduced capacity for enforcement when violations occur. In the absence of explicit and measurable standards, authorities struggle to determine whether a service provider has failed to comply with accessibility obligations. This results in impunity, where inaccessible digital services persist without legal consequences. Such conditions perpetuate symbolic compliance and weaken the rule of law in the digital domain.

A comprehensive regulatory framework mandating WCAG compliance would not only address these systemic shortcomings but also affirm accessibility as a constitutional right rather than a policy choice. By establishing clear technical indicators, audit mechanisms, and sanctions, Indonesia could ensure that digital inclusion becomes a measurable legal duty. Such reforms would align national practice with international human rights commitments, while simultaneously strengthening social participation and economic opportunities for persons with disabilities.

Moreover, the decentralized nature of the government's digital system integration worsens coordination. Many work units or regions develop their own websites without centralized guidance from Kominfo, resulting in wide disparities in quality and inclusivity between websites. This fragmentation exacerbates disparities in digital access. The visually impaired community considers that digital access barriers stem not from individual limitations, but from systemic design failures. This indicates that the problem lies not with the users but with the digital framework itself. Ideally, accessibility is a right, not a choice. Non-compliance with WCAG standards reflects weak regulation [6].

International comparisons show that Indonesia lags behind jurisdictions such as the European Union, which already has the European Accessibility Act and EN 301 549. In those jurisdictions, accessibility violations may incur fines, whereas in Indonesia there is no legal enforcement mechanism. This creates an enforcement capacity gap. Non-binding technical regulations constitute the primary obstacle [5].

With nearly 23 million persons with disabilities in Indonesia (approximately 8.5% of the population), inclusive digital services are not merely a desire but a constitutional obligation. Poor accessibility effectively denies citizens the opportunity to participate in public life, which is contrary to the principle of equality in digital democracy. Technical regulation is an essential instrument to ensure the fulfillment of rights [7].

Without strong technical regulations, digital transformation will deepen the digital divide, particularly for persons with disabilities. Digitalization without inclusion merely widens inequality. This is why legislation or implementing regulations explicitly referring to WCAG are urgently required. Such regulations must be accompanied by audit mechanisms and sanctions. Therefore, the immediate adoption of binding National Digital Accessibility Standards applicable to all government and private digital services is necessary. These standards must incorporate WCAG, inclusive testing procedures, the involvement of persons with disabilities, and legal enforcement. Only with a concrete legal framework can digital transformation become genuinely

inclusive. Technical regulation is the foundation for disability-friendly online services.

The urgency of binding digital accessibility standards also lies in their role as instruments of equality before the law. Without enforceable obligations, the rights of persons with disabilities remain aspirational and unenforceable in practice. A robust legal framework transforms these rights into concrete entitlements, ensuring that individuals are not dependent on voluntary compliance or charitable initiatives by institutions. This shift from moral obligation to legal duty is essential to close the gap between normative recognition and practical realization of accessibility rights.

International practice demonstrates that accessibility standards can serve as powerful tools of accountability when embedded within national legal systems. Jurisdictions that have adopted WCAG into their regulatory frameworks have not only achieved higher levels of compliance but also established mechanisms for continuous monitoring and redress. Indonesia's failure to adopt similar measures risks placing its digital governance at odds with global accessibility norms, thereby undermining both domestic and international commitments to human rights.

The absence of mandatory standards also limits the participation of persons with disabilities in the design, evaluation, and improvement of digital services. Inclusive policymaking requires the active involvement of affected communities, not only as beneficiaries but also as contributors to the regulatory process. Embedding participatory mechanisms within the regulatory framework would ensure that digital accessibility is responsive to real user experiences rather than being treated as a technical afterthought.

From an economic perspective, legally binding accessibility standards should be understood not as a burden but as an investment. Accessible digital platforms broaden market reach, increase user satisfaction, and foster innovation in inclusive technologies. By positioning accessibility as a legal obligation, Indonesia could create incentives for industry players to integrate inclusivity into their core business models, thereby aligning social responsibility with economic competitiveness.

Ultimately, the adoption of national digital accessibility standards grounded in WCAG represents both a legal necessity and a moral imperative. A comprehensive regulatory framework would safeguard constitutional rights, reduce structural inequality, and enhance Indonesia's credibility in upholding international commitments such as the Convention on the Rights of Persons with Disabilities (CRPD). More importantly, it would ensure that digital transformation in Indonesia evolves as a vehicle for empowerment, not exclusion, thus embedding inclusivity at the very heart of technological progress.

The research problems in this study are as follows: 1) What is the current legal framework governing digital accessibility standards in Indonesia, particularly in the context of inclusive online services for persons with disabilities? 2) What are the implications of a legal vacuum or vagueness in digital accessibility regulations for the fulfillment of the rights of persons with disabilities to access equal online services?

This research primarily aims to analyze the existing legal framework governing digital accessibility standards in Indonesia, particularly in relation to inclusive online services for persons with disabilities. Furthermore, it seeks to examine the implications of legal gaps or regulatory ambiguities concerning digital accessibility on the fulfillment of the rights of persons with disabilities to obtain equal access to online services. This study also aims to identify best practices and international benchmarks, such as the Web Content Accessibility Guidelines

(WCAG), that may be adopted into the national legal system as a means of strengthening inclusivity. Ultimately, the research intends to formulate recommendations for the development of a binding National Digital Accessibility Standard that can be consistently implemented by both the public and private sectors.

The findings of this study are expected to provide theoretical, practical, social, and international benefits. Theoretically, it will enrich the body of legal scholarship, particularly in the field of human rights law in the digital era, by positioning accessibility as an inseparable component of human rights principles. Practically, the research may serve as a reference for policymakers, regulators, and digital service providers in formulating and implementing accessibility standards that are not only legally binding but also technically feasible. From a social perspective, this study supports the realization of equality and non-discrimination principles by ensuring that persons with disabilities have equal opportunities to access digital services. Internationally, this research may serve as a reference for other developing countries facing similar challenges in regulating digital accessibility.

The novelty of this research lies in three key aspects. First, it conducts an in-depth analysis of existing legal gaps, whether in the form of regulatory absence or ambiguity, within Indonesia's digital accessibility regulations. Second, it integrates national legal perspectives with international standards and best practices, thereby producing a comprehensive conceptual framework. Third, it offers concrete and applicable recommendations for the establishment of a National Digital Accessibility Standard that can be widely and effectively implemented by all digital service providers.

METHOD

This research employs a normative juridical method, which examines the positive legal norms relevant to the issue of digital accessibility in Indonesia. The approach applied includes the statute approach, by analyzing Law Number 8 of 2016 concerning Persons with Disabilities, Law Number 11 of 2008 as amended by Law Number 1 of 2024 concerning Electronic Information and Transactions, as well as regulations related to digital-based public services. In addition, this research adopts a conceptual approach to identify internationally recognized principles of digital accessibility, such as the Web Content Accessibility Guidelines (WCAG) issued by the W3C [8].

The secondary data used in this study consist of primary legal materials (laws, government regulations, international conventions), secondary legal materials (scientific journals, books, articles), and tertiary legal materials (legal dictionaries, encyclopedias). The analysis is conducted qualitatively through interpretation of existing legal provisions to identify legal gaps and vagueness in the regulation of digital accessibility in Indonesia [9]. The findings of this analysis are aimed at producing recommendations for the formulation of a national technical regulation mandating the implementation of digital accessibility standards across all online services, both in the public and private sectors [10].

ANALYSIS AND LEGAL REVIEW

The Current Legal Framework Governing Digital Accessibility Standards in Indonesia, Particularly in the Context of Inclusive Online Services for Persons with Disabilities

Digital accessibility has emerged as a critical aspect of human rights in the digital era, particularly in ensuring that persons with disabilities can fully participate in social, economic, cultural, and political life. In the Indonesian context, the legal framework governing digital accessibility is not only rooted in domestic regulations but also influenced by international human rights instruments to which Indonesia is a party. These frameworks establish the normative basis for ensuring that technology, information systems, and online services are accessible to all individuals, regardless of their physical, sensory, or cognitive abilities.

Indonesia's legal stance on digital accessibility is grounded in the recognition that access to information and communication technology (ICT) is integral to the realization of equality and non-discrimination. This recognition is explicitly aligned with global commitments, particularly the United Nations Convention on the Rights of Persons with Disabilities (CRPD), ratified through Law No. 19 of 2011. The CRPD underscores the obligation of state parties to ensure that persons with disabilities have equal access to information, communication, and the digital environment. As such, Indonesian legislation has gradually incorporated provisions related to accessibility, albeit with varying degrees of specificity and enforceability.

In practice, however, the development and implementation of accessibility standards remain fragmented. While some regulations explicitly refer to accessibility for persons with disabilities, others merely imply inclusivity without providing measurable criteria. This inconsistency often results in uncertainty for service providers, as well as limited enforcement mechanisms for ensuring compliance. Moreover, the rapid evolution of technology poses additional challenges in updating legal instruments to remain relevant and effective.

Given these circumstances, a comprehensive review of the current legal framework is necessary to identify existing gaps and ambiguities. This review should consider not only statutory regulations but also technical guidelines, institutional roles, and enforcement mechanisms. By examining the interplay between domestic laws and international obligations, this sub-chapter aims to provide a structured understanding of how Indonesia regulates digital accessibility in the context of inclusive online services for persons with disabilities. The discussion will also highlight best practices and potential reforms that can strengthen the legal infrastructure, ensuring that inclusivity becomes an operational reality rather than a mere normative aspiration.

The Government of Indonesia has recognized the rights of persons with disabilities in national normative instruments, particularly through Law No. 8 of 2016 on Persons with Disabilities, which contains general provisions regarding the right to access information and communication for persons with disabilities [11]. However, the provisions of this Law are normative in nature and do not elaborate technical parameters that may be used to assess the fulfillment of accessibility in online services. As a result, the rights recognized under the Law are not automatically translated into technical obligations for website and application developers or operators. This normative gap forms the starting point of the regulatory problem regarding digital accessibility in Indonesia.

The most frequently referenced international technical standard is the Web Content Accessibility Guidelines (WCAG) issued by the W3C, which from 2018 to 2025 has been

continuously updated up to WCAG 2.2 and the development of WCAG 3, thereby providing operational benchmarks for the accessibility of websites and applications [8]. In many jurisdictions, WCAG is adopted or directly referenced in technical regulations to make it legally binding; however, in Indonesia, WCAG has so far not been explicitly integrated into binding national regulations. The absence of such explicit reference results in inconsistent compliance assessments across institutions.

Empirical evidence demonstrates that this problem is systemic: audits of provincial government websites have uncovered thousands of accessibility violations, including the absence of alt text, keyboard navigation issues, and insufficient color contrast under WCAG criteria [12]. These findings reinforce the claim that general accessibility norms have not “become practice” because there is no centralized and mandatory technical standard or audit mechanism. Without binding standards, improvements are ad hoc and dependent on local initiatives or donor support.

At the national policy level, there are formal initiatives and commitments: Indonesia, through the Open Government Partnership, has included the drafting of Digital Accessibility Guidelines for Persons with Disabilities in the national action plan as a public policy commitment [13]. However, to date this commitment has taken the form of guidelines or a roadmap rather than binding regulations accompanied by administrative sanctions or enforcement mechanisms. The gap between policy commitments and binding rules has resulted in a *rechtvacuum* in the technical domain.

Efforts by local communities and practitioners to bridge the technical gap have begun to emerge, such as the launch of an Indonesian-language WCAG guide that helps improve the literacy of local stakeholders [14]. While beneficial, such initiatives are generally voluntary and do not substitute for mandatory regulatory requirements. Therefore, widespread adoption in public institutions requires regulatory impetus to ensure that resources and budgetary priorities are allocated for accessibility.

Several ministries and state institutions have developed internal guidelines or accessibility checklists for government websites; however, these guidelines remain fragmented and inconsistent across agencies [5]. This fragmentation of sectoral regulations produces variability in accessibility quality across government websites: some comply with certain WCAG elements, while many fail to meet even the basic standards. Without harmonization, it is difficult to implement a national technical standard comprehensively.

In terms of enforcement, there is no national oversight mechanism that routinely audits the accessibility compliance of public and private websites/applications and imposes administrative sanctions in cases of violation. The absence of such a mechanism renders compliance an administrative option rather than a measurable legal obligation. Other countries have shown that a combination of technical requirements, regular audits, and sanctions effectively increases accessibility levels significantly; Indonesia has yet to establish an institutionalized framework of this nature [15].

Issues of definition and interpretation are also evident: the term “digital accessibility” is often interpreted differently—some parties are satisfied with the addition of accessibility widgets (overlays) that in fact fail to meet WCAG principles and may create compatibility issues with screen readers [5]. This normative ambiguity allows many institutions to claim “accessibility” without a clear measurement standard, making such claims difficult to objectively verify. Accordingly, an operational definition that is applied nationally is necessary.

Beyond technical aspects of web content, regulatory coverage should also address inclusive design (e.g., user testing with persons with disabilities), mobile application accessibility, and the integration of government digital services (SPBE) so that end-to-end services are genuinely inclusive. At present, many programs focus solely on static content aspects without testing the holistic user experience of persons with disabilities. National technical regulations should ideally stipulate requirements for inclusive testing, certification, and audits based on real-user testing.

In conclusion, Indonesia's legal framework on digital accessibility standards is currently at the stage of recognizing normative rights but has yet to reach the stage of binding technical implementation. To close the legal gap and address normative ambiguity, legal measures are required: incorporating explicit references to WCAG (latest version) into implementing regulations, establishing audit mechanisms and administrative sanctions, and formulating an operational definition of digital accessibility to be adopted across ministries/agencies. Such measures would transform accessibility from a moral obligation into a measurable and enforceable legal duty.

The Implications of a Legal Vacuum or Vagueness in Digital Accessibility Regulations for The Fulfillment of The Rights of Persons with Disabilities to Access Equal Online Services

In the contemporary digital era, accessibility to online services has evolved from being a matter of convenience to becoming a fundamental human right, particularly for persons with disabilities. The digital transformation of public and private services ranging from e-government platforms to commercial applications has created new opportunities for inclusion, but also new challenges when accessibility is not adequately regulated. While Indonesia has enacted laws addressing both disability rights and electronic transactions, a closer examination reveals that the specific obligations for ensuring digital accessibility remain fragmented, incomplete, or in some cases, entirely absent.

This regulatory gap or legal vacuum creates a situation in which the rights of persons with disabilities to access equal online services are not guaranteed with the same level of protection afforded to other citizens. Even where regulations exist, vague provisions leave room for inconsistent interpretation and implementation. For example, the lack of explicit technical standards for digital accessibility allows service providers to claim compliance without meeting internationally recognized benchmarks such as the Web Content Accessibility Guidelines (WCAG). As a result, many online platforms remain partially or wholly inaccessible to individuals with visual, auditory, cognitive, or motor impairments.

The implications of such a legal vacuum extend beyond individual inconvenience; they strike at the core of equality and non-discrimination principles embedded in both domestic law and international conventions, such as the United Nations Convention on the Rights of Persons with Disabilities (CRPD), to which Indonesia is a party. Without clear, enforceable standards, the digital divide persists and, in some cases, deepens. Persons with disabilities may be systematically excluded from accessing essential online services, including healthcare, education, employment, and participation in public affairs. This exclusion not only undermines their personal autonomy and dignity but also weakens the nation's commitment to social justice and inclusive development.

Therefore, understanding and addressing the legal vacuum or vagueness in digital accessibility regulations is not merely a technical or administrative matter it is a pressing human

rights issue. A robust legal framework, with unambiguous obligations and clear enforcement mechanisms, is essential to ensure that technological advancement leads to greater inclusion rather than reinforcing existing inequalities.

The absence of clear technical regulations regarding digital accessibility standards in Indonesia creates a significant legal gap. Although Law Number 8 of 2016 on Persons with Disabilities guarantees the right to accessibility, its implementing regulations do not explicitly stipulate the adoption of international standards such as the Web Content Accessibility Guidelines (WCAG) [11]. This situation generates uncertainty among online service providers, particularly in the private sector, regarding the mandatory benchmarks to be met.

Normative ambiguity is also evident in the use of the term “accessibility” across various regulations, which is often interpreted solely as physical accessibility rather than digital accessibility. For instance, Minister of Communication and Informatics Regulation Number 1 of 2019 concerning the Implementation of Public Services Based on Electronic Systems does not explicitly contain technical accessibility indicators for persons with disabilities [16]. As a result, policy implementation in practice depends on each institution’s interpretation.

At the international level, jurisdictions such as the United States through the Americans with Disabilities Act (ADA) and the European Union through the European Accessibility Act (EAA) have established mandatory technical parameters for all online platforms [17]. In contrast, Indonesia, with this regulatory vacuum, has yet to provide legal certainty and optimal protection for vulnerable groups in the digital sphere.

The absence of legally binding digital accessibility standards directly impacts the constitutional rights of persons with disabilities to obtain equal access to information and public services, as guaranteed under Article 28F of the 1945 Constitution of the Republic of Indonesia. In practice, many government websites and public applications remain inaccessible to visually impaired users because they do not support screen readers or fail to provide alternative text for images.

This regulatory void also hinders the creation of an inclusive digital ecosystem capable of narrowing social disparities. A 2023 study by the World Health Organization shows that barriers to digital access increase the risk of economic exclusion for persons with disabilities by up to 50% compared to the general population [18]. This aligns with findings in Indonesia, where access to e-government and e-commerce services for persons with disabilities remains below 30% [19].

Furthermore, normative ambiguity complicates law enforcement when violations occur. Without clear standard references, law enforcement authorities face difficulties in determining the parameters for a service provider’s failure to fulfill accessibility obligations. Consequently, the rights of persons with disabilities are often neglected without tangible legal consequences [20].

To address both the regulatory vacuum and normative ambiguity, specific regulations are required that explicitly adopt international standards such as WCAG 2.2 into national law, either through Government Regulations or binding Ministerial Regulations issued by the Ministry of Communication and Informatics. Such regulations must set forth technical indicators, establish mechanisms for periodic evaluation, and provide for administrative or criminal sanctions against non-compliance [4].

The ideal *ius constituendum* should also integrate technology-based oversight, such as automated accessibility testing tools, so that compliance evaluations can be conducted in real time

for both government and private sector online services [21]. This approach would allow technical barriers experienced by persons with disabilities to be promptly identified and rectified.

Moreover, future regulations should extend accessibility obligations to all public service sectors, including digital banking, online education, and e-commerce, supported by fiscal incentives for service providers that invest in inclusive technology [22]. This approach not only fulfills the principle of non-discrimination but also aligns with the Sustainable Development Goals (SDGs), particularly Goal 10 on reducing inequality.

The integration of accessibility obligations into diverse public service sectors would also help standardize inclusive practices across industries. Fragmentation currently results in uneven levels of accessibility, with some sectors showing greater progress than others. By embedding a cross-sectoral mandate, regulations would provide coherence and consistency, ensuring that persons with disabilities are not subjected to varying levels of exclusion depending on the type of service they seek to access.

Expanding the regulatory scope further supports Indonesia's commitment to digital governance reform. The ongoing development of the Electronic-Based Government System (SPBE) can be strategically leveraged to mainstream accessibility as a default requirement in all digital platforms. Incorporating WCAG standards into SPBE policies would guarantee that accessibility becomes a systemic design principle, rather than a voluntary or symbolic practice adopted selectively by certain agencies.

The establishment of fiscal incentives for service providers also has the potential to accelerate compliance and innovation. Experiences from other jurisdictions demonstrate that tax reductions, grants, or preferential procurement policies for accessible digital platforms can motivate private actors to prioritize inclusivity. This economic approach, combined with legal compulsion, strikes a balance between obligation and opportunity, thereby cultivating a culture of accessibility that is both sustainable and scalable.

In addition, the success of such regulatory measures depends on the active involvement of civil society organizations and disability advocacy groups. Their participation in monitoring, evaluating, and providing feedback on digital accessibility would enhance accountability while also ensuring that policies remain responsive to evolving needs. Building formal partnerships between government institutions and disability communities would institutionalize participatory governance in the digital sphere.

Finally, strengthening accessibility regulations contributes to the realization of digital justice, whereby technology serves as an equalizer rather than a divider. Digital transformation that is inclusive by design enables persons with disabilities to fully exercise their civil, political, social, and economic rights. In this way, accessibility transcends its technical dimension and becomes an essential component of Indonesia's broader human rights agenda. Ensuring enforceable standards, sector-wide coverage, and participatory oversight will secure long-term progress toward a truly inclusive digital ecosystem.

CONCLUSION

The absence of clear and enforceable national standards on digital accessibility in Indonesia reflects a critical legal gap that hinders the realization of equal access to online services for persons with disabilities. Current regulations, such as Law No. 8 of 2016 on Persons with Disabilities and Law No. 19 of 2016 on Electronic Information and Transactions, provide general

guarantees of non-discrimination, yet lack detailed technical provisions aligned with international standards like the Web Content Accessibility Guidelines (WCAG). This normative vacuum results in inconsistent implementation across government and private digital platforms, leading to structural digital exclusion. From a theoretical perspective, these findings underline the urgency of integrating accessibility principles into the legal framework for digital transformation, thereby expanding the scope of inclusive governance and technology regulation. Practically, the study recommends the formulation of a specific ministerial regulation or national standard (SNI) mandating compliance with WCAG, reinforced with monitoring mechanisms and sanctions for non-compliance. Such a regulatory reform would not only harmonize national practices with global norms but also serve as a model for inclusive policymaking in other emerging digital economies. In terms of implications, the establishment of a robust legal framework on digital accessibility will strengthen Indonesia's commitment to the UN Convention on the Rights of Persons with Disabilities (CRPD), improve social participation, and enhance economic opportunities for persons with disabilities. Furthermore, the methodological insight from this study opens a pathway for interdisciplinary research that bridges legal analysis with technological usability testing, thereby refining the evidentiary base for policy development. For future studies, deeper empirical investigations into user experience among various disability groups in Indonesia's digital ecosystem are essential, enabling a more nuanced and responsive regulatory design that benefits not only persons with disabilities but also the broader public in achieving universal digital inclusion.

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