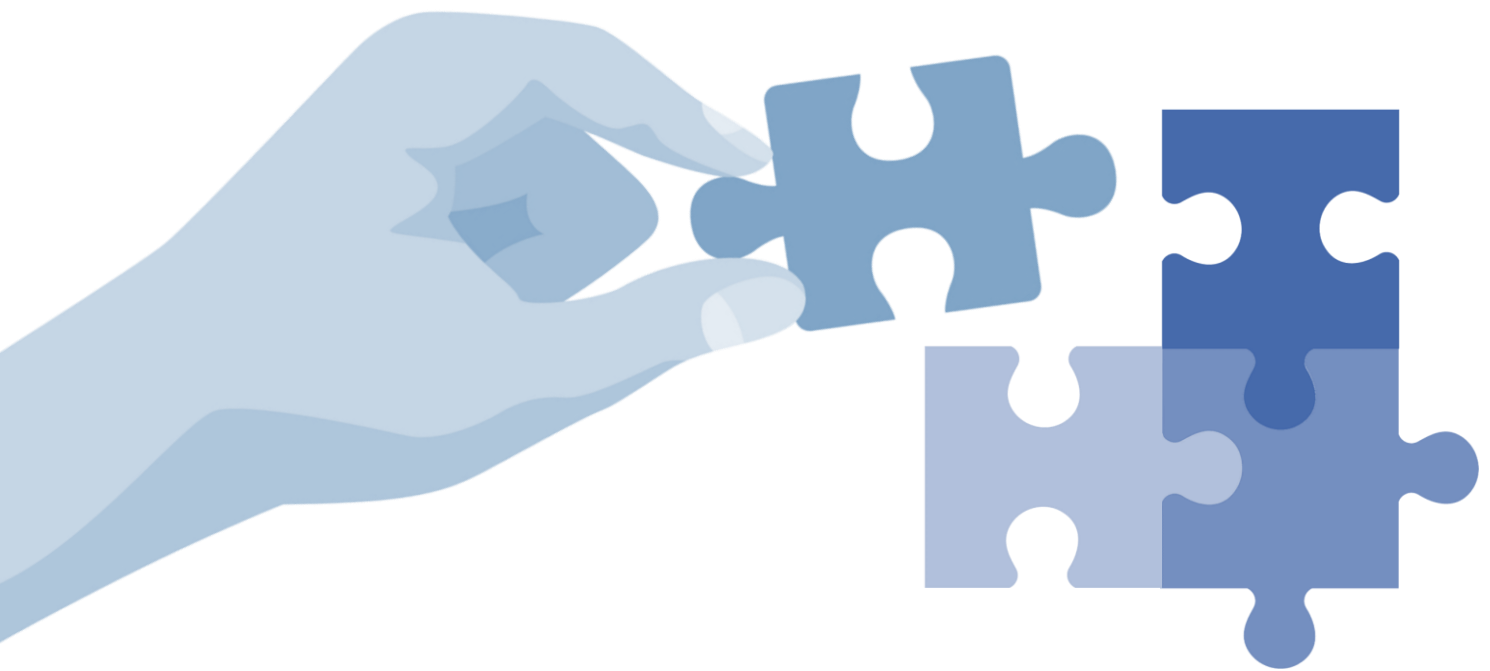


TECHNICAL GUIDELINES

# INCLUSIVE BUSINESS PRACTICES



# TECHNICAL GUIDELINES INCLUSIVE BUSINESS PRACTICES

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## **Disclaimer:**

The original version of this guidelines is written in the Indonesian language drafted by the authors mentioned above. Several adjustments are made in some parts of the guideline to align it with the ASEAN context by the GIZ PROTECT II without compromising the substance.

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Jakarta, February 2025

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## Preface

Consumer protection extends to everyone, regardless of conditions, backgrounds, abilities, ages, and genders. All consumers have the same rights to be treated equally and responsibilities to contribute to their own welfare and comfort. However, vulnerable consumers, including consumers with disability, the elderly, children, etc. might not be as well protected and even neglected. Therefore, efforts to raise awareness among relevant stakeholders to understand and implement inclusive business practices should be introduced and/or improved.

The Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, through the Consumer Protection in ASEAN II (PROTECT II) Project, is mandated to strengthen consumer protection regimes in ASEAN. The project aims to advocate for more inclusive consumer protection to all relevant stakeholders, such as the ASEAN Secretariat through its sectoral body like ACCP, as well as ASEAN Member States (AMS), business entities, civil society organizations, and consumers in general. Since 2019, the project has initiated activities in select AMS, including Indonesia, Cambodia, and Vietnam. These activities include research to identify the challenges faced by consumers with disabilities, particularly when settling disputes with businesses, and capacity building to raise awareness about the implementation of inclusive business practices.

This guideline is an updated version adopted from the document developed by SIGAB Indonesia and GIZ Indonesia & ASEAN with similar title and content. The guideline was originally written in Indonesian and has now been translated into English with some small adjustments to maintain the substance of the original version. It is intended to cover a broader audience in the ASEAN context and is expected to serve as a reference for consumer protection authorities, businesses, consumer associations, organizations of persons with disabilities, and other relevant stakeholders.

Let's leave no one behind, let's be inclusive.

Jakarta, February 2025

Consumer Protection in ASEAN II (PROTECT II)  
GIZ Indonesia and ASEAN

## Chapter I

# Introduction

### A. Background

Consumer protection refers to the measures that aim to protect and promote the well-being and/or financial interests of consumers. Consumer protection measures, including consumer education, mobilisation and representation, work to ensure that consumers can make well-informed decisions about their choices and that producers and sellers will fulfil their promises about the products and services they offer (ASEAN Handbook on Consumer Protection, 2021).

Consumer protection is an important aspect in the economy since many consumers nowadays often experience information asymmetry and/or unfair treatment by businesses because of an imbalance bargaining position between them. The asymmetry is even higher for vulnerable consumers, including consumers with disabilities, as they face more challenges whenever they wish to engage into a transaction with businesses. Consumers with disabilities face various challenges based on their abilities and conditions. For instance, consumers with visual impairments have difficulties in accessing products or services that do not provide any information other than visual objects; consumers with hearing impairment have difficulties to access any promotional videos without any text description or caption accompanying the videos; consumers with intellectual disability face challenges when they enter into a transaction that provides complex terms and conditions, and so on and so forth.

The United Nations Guidelines for Consumer Protection (UNGCP) elaborates a valuable set of principles for emphasising the main characteristics of effective consumer protection legislation, enforcement bodies, and redress mechanisms, particularly to consumer protection authorities of the Member States. Below are the basic consumer rights that are adopted by the UN General Assembly under the UNGCP:

1. The right to satisfaction of basic needs - To have access to basic, essential goods and services: adequate food, clothing, shelter, health care, education, public utilities, water and sanitation
2. The right to safety - To be protected against products, production processes and services which are hazardous to health or life
3. The right to be informed - To be given the facts needed to make an informed choice, and to be protected against dishonest or misleading advertising and labelling
4. The right to choose - To be able to select from a range of products and services, offered at competitive prices with an assurance of satisfactory quality
5. The right to be heard - To have consumer interests represented in the making and execution of government policy, and in the development of products and services
6. The right to redress - To receive a fair settlement of just claims, including compensation for misrepresentation, shoddy goods or unsatisfactory services
7. The right to consumer education - To acquire knowledge and skills needed to make informed, confident choices about goods and services, while being aware of basic consumer rights and responsibilities and how to act on them
8. The right to a healthy environment - To live and work in an environment, which is non-threatening to the well-being of present and future generations

It should be noted and understood that consumers may come and have various backgrounds not only in terms of purchasing power, but also the ability to obtain information, access to technology, access to literacy, ability and access to mobilise, including the access to communicate and other abilities. E-commerce on one side provides advantages and flexibility, however on the other side, it may also lead to the creation of more vulnerable conditions for particular groups of consumers.

One of the vulnerable groups of consumers is individuals with lower bargaining power compared to the general consumer. This may be because of limited access to information, limited purchasing power due to economic reasons, as well as to those with other particular limitations. Consequently, this condition will put the vulnerable consumers into a more fragile situation where their consumer rights might be compromised or abused. One of the most vulnerable groups of consumers is consumers with disability.

To date, there is limited reference about inclusive business practices from the perspective of protection of consumers with disabilities. Some studies and/or references emphasise on the inclusion of persons with disabilities into working places whenever discussing inclusive business practices. Hence, this guideline complements the reference in implementing inclusive business practices from the consumer perspectives particularly for small and medium enterprises or businesses.

This guideline is intended to provide guiding principles for businesses regardless of their sizes. However, considering that this guideline mainly derives from a bottom-up initiative, this guideline could be utilised to advocate from the smallest scope of businesses namely micro, small, and medium enterprises as an entry point. Whenever possible and with more resources and support, this guideline could then serve as guiding principles for bigger enterprises or businesses.

## **B. Objective**

This guideline aims to:

- a. provide overview of the development of consumer protection and SMEs in the ASEAN region
- b. disseminate challenges and particular needs of consumers with disability engaging in online transactions;
- c. provide practical solutions for businesses or enterprises to make sure that they provide inclusive e-commerce access for disabled consumers; and
- d. serve as basic principles for relevant authorities or entities that deal with the issue of consumer protection, such as governments, consumer associations, organisations for people with disability, to raise awareness and educate business or enterprises in the digital platform related to protecting the rights of consumers with disability.

## **C. Scope**

This guideline covers the following aspects:

- a. understanding people with disability and their rights;
- b. identifying challenges faced by consumers with disability and proposing measures for businesses or enterprises to minimise these challenges;
- c. suggesting transparent and accessible information for consumers with disability;
- d. inclusive complaint handling; and
- e. designing inclusive products.

## Understanding Key Concepts

### A. Consumer Protection in the ASEAN Region

Consumer protection has been recognised as one important element of the ASEAN Economic Community (AEC). The ASEAN Committee of Consumer Protection (ACCP), as the sectoral working group on consumer protection, comprises representatives of 10 ASEAN Member States (AMS) and has served as the focal point to implement and monitor regional exchanges and arrangements to foster consumer protection under AEC. The AMS are committed to develop a dynamic, people-centred AEC that generates prosperity for consumers and businesses; to build consumer confidence in fair and transparent ASEAN markets; and to achieve this by working along and together with national consumer administration and consumer organisations (ASEAN Handbook on Consumer Protection, 2021).

The ACCP has been implementing the ASEAN Strategic Action Plan on Consumer Protection (ASAPCP) 2016-2025 which consists of regional initiatives to strengthen the consumer protection regime in the region. Ranging from establishing and adopting a set of high-level principles on consumer protection up to promoting measures in particular sectors, the ASAPCP has guided AMS to strengthen the consumer protection system in their respective jurisdictions that closely contribute to the region's overarching objectives. To date, the AMS is finalising the foreseen ASAPCP 2030 which sets out priority initiatives to be accomplished by 2030.

On a higher level, the AEC Blueprint aims to enhance equal opportunity marketplaces for persons with disabilities as consumers, clients, suppliers, and entrepreneurs in all AMS by facilitating more inclusive, accessible, and liberalised trade. Besides that, AMS also work towards enhancing common ASEAN consumer protection framework by ensuring that it covers all consumers, including those with disabilities, by developing, enforcing, and monitoring inclusive consumers protection legislation, and making available redress mechanisms, including accessible alternative dispute resolution mechanisms.

However, while all 10 AMS have officially ratified the Convention on the Rights of Persons with Disabilities as well as enacted consumer protection laws, legislation and implementation at the national level varies widely amongst them all. Hence, comprehensive and crosscutting laws and regulations still need to be introduced and/or strengthened to protect the rights of persons or consumers with disabilities to aim for an inclusive business environment for all consumers regardless of the abilities and conditions. It may need more efforts to sensitise and advocate the inclusion of persons with disabilities within the ASEAN working groups and the Member States. The ASEAN Consumer Associations Network (ACAN) has served as the focal point from the civil society organisations in the region that work directly on consumer protection in the grassroots and have a regular exchange with the ACCP annually. Nevertheless, a parallel approach from the grassroots by civil society organisations in research, education, and advocacy could also be improved as a complimentary effort to speed up the awareness and importance of creating inclusive business practices.

## B. Understanding Persons with Disabilities

Consumer protection extends to all types of groups of consumers, including vulnerable consumers such as persons or consumers with disability. According to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. Different terminologies and philosophies might be often used to refer to disability; some references use the term 'disability', while another one prefers using the term 'difable' that stands for *different able* (ability). Despite the preference, the advocacy works to promote or strengthen the inclusion of persons with disabilities shall also extend not only in the public sector, but also private sector such as business-to-consumer (B2C) transactions.

Based on the data from UNESCAP in 2018, it is estimated that there is 1 in every 6 people in Asia and the Pacific live with a disability – the number is estimated about 690 million people. The figure is foreseen to rise and increase due to several factors, including population aging, chronic health conditions, disasters, and other factors (UNESCAP, 2018). The number of 690 million population comprises individuals with physical disabilities: blind or with low vision, deaf or hard of hearing, cognitive/developmental disabilities, psychosocial disabilities, or even with multiple disabilities. UNESCAP also highlighted that when persons with disabilities work or earn less than other groups of communities because of the challenges or barriers they encounter, they unfortunately contribute less to overall consumption and economic growth.

When entering into transactions with businesses, consumers with disability have been observed to be very loyal customers. In 2016, Nielsen company conducted a survey related to the behaviour of consumers with disability and found out that households with a disabled family member showed their loyalty to certain products or services is not based on the promotion or discount. Rather, the accessibility aspect is the main concern for consumers with disability to choose the products or services and be loyal to it whenever the products or services meet their needs well. Hence, from a business perspective, based on this finding, business should consider that fulfilling and protecting the rights of consumers with disability is a way to obtain a segment of targeted consumers.

However, some other studies conclude that consumers with disability have not obtained adequate attention in terms of protecting their rights as consumers. There are many rooms for improvement to provide space for disabled people whether they are businesses or consumers (Borch and Laitala: 2019). Therefore, the roles of government as the regulator is inevitably necessary in establishing and/or strengthening an inclusive consumer protection that also extends to all groups of consumers, including consumers with disability.

Based on the different types, disabled people have limitations particularly because of the regulations and environments that are not yet in favour of fulfilling and/or protecting the rights of consumers with disability. Below is the table of the rights of consumers with disability which businesses should be responsible for:

Consumer rights that are parts of businesses responsibilities	Needs of consumers with disability
A. Rights to obtain comfort, security and safety in using or consuming the goods and/or service	<p>The ability of businesses to:</p> <p>Interact and provide goods or services, both offline and online, which is accessible for consumers with disability</p> <p>Provide accurate information of goods or services, including the specifications and</p>



	usage which is easily understood, accessed, and operated for consumers with disability
B. Rights to choose the goods and/or services and obtain the said goods and/or services in accordance with the promised conversion value and condition and warranty	Information of goods or services should be accessible in any forms which are accessible for consumers with disability.  Feature of seeking for information and complaint in any forms such as text, audio, or video, to accommodate various types of disabilities.
C. Rights to obtain correct, clear and honest information on the condition and warranty of the goods and/or services	Clauses or agreements between the business and consumer should be provided in a format that is easily understood by the consumers with disability.  Business, whenever needed, should read the clauses or agreement when entering into transaction with consumer with disability.
D. Rights to be heard in expressing opinion and complaints on the goods and/or services they use or consume	Consumer care and complaint handling should be accessible for consumers including the use of text format/chat that is easily understood by the consumers.  Fast response and patience from the business side whenever interacting with consumers with disability.
E. Rights to receive proper and honest and nondiscriminatory treatment or service	Standard procedures or customer care for consumers with disability.  Business to employ staff(s) who has the capacity to deal with consumers with disability and accommodate the challenges faced by the consumers with disability.
F. Rights to obtain compensation, redress and/or substitution, if the goods and/or services received are not in accord with the agreement or not received as requested	Accessible complaint mechanism as well as refund/return/repair policy for consumers with disability.  Certainty, responsiveness, and adequate companion in the process of complaint handling, refund, return, or repair.

In the context of ASEAN, different perspectives or approaches might also occur in dealing with the issue of inclusion. Some jurisdictions may use the human rights approach, while some others may still use an approach based on charity. Nevertheless, efforts need to be made to develop concrete actions regardless of the approaches. In terms of laws and regulations on people with disability in the ASEAN region, there are different stages of development occur. Even though all the ASEAN Member States have ratified the UN CRPD and other disability-related regulatory frameworks, the setting at the national level widely varies amongst them, let alone the implementation of the laws and regulations. Comprehensive legislation and concrete implementation should be improved to protect the rights of persons with disabilities, including the regulatory frameworks on inclusive business practices.

### **C. Small and Medium-sized Enterprises in the ASEAN Region**

As a growing economy, Southeast Asia has proven its resilience especially during the economic downturn, among others, thanks to the contribution of small and medium-sized enterprises (SMEs) in the region. SMEs in the region constitute more than 99% of firms

and play a vital role in employment and inclusive economic growth (SME Policy Index 2024). Relevant policymakers in the ASEAN region have implemented measures to address economic challenges particularly to enhance the resilience and competitiveness of SMEs in the long term. In addition, thanks to digitalisation, SMEs in the region have also been growing and integrated in the digital ecosystem through promotion of SME especially in digital payment systems and financing.

**Definition of Micro, Small, and Medium Enterprises in ASEAN Member States**  
(Source: ASEAN Secretariat Website, 2024)

No	Country	Sector	Micro		Small		Medium	
			No of Employees	Other Criteria	No of Employees	Other Criteria	No of Employees	Other Criteria
1	Brunei Darussalam	-	1-9	Annual revenue less than B\$100,000  Assets less than B\$60,000	10-29	Annual revenue B\$100,000 to less than B\$1 million  Assets B\$60,000 to less than B\$600,000	30-99	Annual revenue B\$1 million to less than B\$5 million  Assets B\$600,000 to less than B\$3 million
2	Cambodia	-	1-10	Assets (excluding land) ≤ USD 50,000	11-50	Assets (excluding land) USD50,000 – 250,000	51-100	Assets (excluding land) USD250,000-500,000
3	Indonesia <sup>1</sup>		N/A	Net assets ≤ IDR 50 million	N/A	Net assets IDR 50 – 500 million	N/A	Net assets IDR 500 million – 1 billion
				Sales turnover ≤ IDR 300 million		Sales turnover IDR 300 million – 2,5 billion		Sales turnover IDR 2,5 – 50 billion
4	Lao PDR	Manufacturing	1-5	Assets ≤ LAK 120 million	6-50	Assets LAK 1,200 million	51-99	Assets LAK 4,800 billion
				Sales turnover ≤ LAK 400 million		Sales turnover LAK 3,000 million		Sales turnover LAK 6,000 billion
		Wholesale and retail	1-5	Assets ≤ LAK 180 million	6-50	Assets LAK 1,200 million	51-99	Assets LAK 4,800 billion
				Sales turnover ≤ LAK 400 million		Sales turnover LAK 4,500 million		Sales turnover LAK 9,000 billion
		Services	1-5	Assets ≤ LAK 240 million	6-50	Assets LAK 1,800 million	51-99	Assets LAK 7,200 billion
				Sales turnover ≤ LAK 400 million		Sales turnover LAK 2,250 million		Sales turnover LAK 6,000 billion
5	Malaysia	Manufacturing	1-4	Sales turnover < MYR 300,000	5-74	Sales turnover MYR 300,000 – 15 million	75-200	Sales turnover MYR 15-50 million
		Services and others	1-4	Sales turnover < MYR 300,000	5-29	Sales turnover MYR 300,000 – 3 million	30-75	Sales turnover MYR 3-20 million
6	Myanmar	Manufacturing	N/A	N/A	1-50	Fixed assets > KYAT 500 million	51-300	Fixed assets KYAT 500-1,000 million

<sup>1</sup> Although the official definition of the government of Indonesia does not include criteria on the number of employees, the Badan Pusat Statistik (BPS), national statistics bureau, classifies SMEs by the number of employees: Micro relates to 1-4, Small to 5-19 and Medium to 20–99 employees.

		Labour-intensive Manufacturing	N/A	N/A	1-300	Fixed assets > KYAT 500 million	301-600	Fixed assets KYAT 500 – 1,000 million
		Wholesale	N/A	N/A	1-30	Fixed assets > KYAT 100 million	31-60	Fixed assets KYAT 100-300 million
		Retail	N/A	N/A	1-30	Fixed assets > KYAT 50 million	31-60	Fixed assets KYAT 50-100 million
		Services	N/A	N/A	1-30	Fixed assets > KYAT 100 million	31-60	Fixed assets KYAT 50-200 million
		Others	N/A	N/A	1-30	Fixed assets > KYAT 50 million	31-60	Fixed assets KYAT 50-100 million
7	The Philippines <sup>2</sup>	-	N/A	Total assets exclusive of land ≤ PHP 3,000,000	N/A	Total assets exclusive of land PHP 3,000,001 – 15,000,000	N/A	Total assets exclusive of land PHP 15,000,001 – 100,000,000
8	Singapore	-	≤ 200	Sales turnover ≤ SGD 100 million	≤ 200	Sales turnover ≤ SGD 100 million	≤ 200	Sales turnover ≤ SGD 100 million
9	Thailand	Manufacturing	≤ 5	Annual income ≤ THB 1,8 million	≤ 50	Annual income ≤ 100 million THB	≤ 200	Annual income ≤ THB 500 million
		Service and Merchandising	≤ 5	Annual income ≤ THB 1,8 million	≤ 30	Annual income ≤ THB 50 million	≤ 100	Annual income ≤ THB 300 million
10	Vietnam	Agriculture, forestry and fishing Industry and construction	1-10	Total revenue < VND 3 billion	11-100	Total revenue VND 3-50 billion	101-200	Total revenue VND 50-300 billion
				Total capital < VND 3 billion		Total capital VND 3-20 billion		Total capital VND 20-100 billion
		Trade and services	1-10	Total revenue < VND 10 billion	11-50	Total revenue VND 10-100 billion	51-100	Total revenue VND 100-300 billion
				Total capital < VND 3 billion		Total capital VND 3-50 billion		Total capital VND 50-100 billion

The above table shows the different approach in identifying SMEs in the ASEAN Member States. Despite the difference, there are rooms for improvement to make SMEs more implement inclusive business practices that can be introduced further as joint efforts.

<sup>2</sup> Although the official definition of the government of the Philippines does not include criteria for the number of employees, the Philippine Statistics Authority (PSA), national statistics bureau, classifies SME by the number of employees: Micro relates to 1-9, Small to 10-99 and Medium to 100–199 employees.

## Guiding Principles

### A. Standard in implementing inclusive business practices for consumers with disability:

Standard	Definition	Example of Implementation
Fairness and inclusivity/accessibility	Businesses should treat all consumers equally and fairly, regardless of their backgrounds and needs, including consumers with disabilities.	Businesses providing digital forms must consider accessibility and convenience factors to ensure that consumers with disabilities can access necessary digital information for transactions.  Facilities and services for complaint handling must be accessible to consumers with disabilities.
Transparency and Access to Information	Businesses should ensure that all product or service information is open and transparent to all consumers, including those with disabilities	Provide clear, non-deceptive information, avoiding dark patterns, and using local languages relevant to the market.  Offer accessible customer care/hotline information for consumers with disabilities.
Accuracy of Information	Businesses should ensure they provide information that does not mislead, create misunderstandings or misperceptions, or overclaim their products or services	Clearly detail product specifications such as size, ingredients, and functionality.  Avoid overclaims and provide truthful information supported by evidence.
Safety	Businesses should ensure that any risks associated with the products or services they sell are clearly mentioned, especially for consumers with disabilities	Highlight information about expiry dates and allergens for food products.  Provide safety manuals for the use and/or storage of flammable or toxic products.  Provide warranties and guarantees that the quality of products delivered to consumers matches as advertised.

Privacy and Data Protection	Businesses should ensure that personal data or information provided by consumers, particularly those with disabilities, is treated confidentially and used only for purposes agreed upon by the consumers	<p>Ensure the safety and confidentiality of personal data and payment methods used by consumers with disabilities.</p> <p>Consult and obtain approval from consumers with disabilities for any use of their data, whether in printed or digital form. The approval should be provided in a format that is easily accessible and understandable to consumers with disabilities.</p> <p>Take all necessary measures or mitigation actions if there is an indication of data misuse involving information provided by consumers with disabilities.</p>
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\* Although the above principles are specifically addressed to consumers with disabilities, they do not exclusively preclude other groups of consumers.

## **B. E-Commerce and Accessibility of Website/Platform for Consumers with Disability**

Taking into account research conducted by SIGAB and LKY in 2022 in Indonesia, it was found that consumers with disabilities in Indonesia face challenges in accessing and using e-commerce platforms. These challenges may also be experienced by consumers with disabilities in other ASEAN countries, albeit with varying levels of difficulty. Key challenges include:

- 1. Inaccessible user interfaces:** Many e-commerce platforms are not designed to accommodate the needs of consumers with disabilities. Specific examples include:
  - a. Several features or functions, such as those for filing complaints, are located in areas that are difficult to find.
  - b. The color schemes or visual exposure of webpages are challenging for consumers with visual impairments to distinguish. For instance, insufficient contrast can hinder screen readers from translating text into speech effectively. Certain links, such as those directing users to more detailed product information, lack clear labeling.
  - c. Keyboard shortcut features are often unavailable across applications. For instance, food-ordering apps could offer shortcuts allowing users to customize pages to better suit their needs.
- 2. Lack of advanced accessibility technologies:** Some platforms have not integrated modern technologies to enhance accessibility. For example:
  - a. Pages that display only images or videos without accompanying labels make it difficult for consumers with visual impairments to obtain product information.
  - b. Videos showcasing products or services often lack subtitles, posing challenges for consumers with hearing impairments.

3. **Limited access to after-sales services:** Information about after-sales services, such as complaint handling mechanisms, refund policies, and return procedures, is often inadequate. Furthermore, sellers and platforms are frequently slow to respond to consumer inquiries or complaints.

### C. Recommendations for Platform Developers

To make e-commerce platforms or websites more accessible, businesses should consider the following recommendations:

1. **Develop Disabled-Friendly User Interfaces:** Create features and functions that cater to the needs of consumers with disabilities. This involves conducting preliminary user accessibility checks or testing with targeted consumers to gather information and feedback before finalizing the website .
2. **High Contrast Colors:** Ensure the website provides features with high contrast colors to enable access for consumers with visual impairments. This can be verified using accessibility check tools .
3. **Text or Caption for Images:** Include text or captions for images of advertised products to allow screen readers to translate the content into voice. This ensures that visually impaired users can understand the content .
4. **Clear Labels for Hyperlinks and Navigation Buttons:** Clearly label any hyperlinks or navigation buttons with captions to complement the symbols. Additionally, provide keyboard or menu shortcuts where feasible to aid navigation .
5. **Descriptive Texts for Images and Videos:** Offer descriptive texts for images and videos that accurately convey the information. For videos, provide subtitles or running texts to ensure accessibility for consumers with hearing impairments. Whenever possible, include sign language information in videos .
6. **After-Sale Services Information:** Display information about after-sale services, including compensation and redress mechanisms, on the homepage. This enables consumers to understand these services before making transactions, and should include contact information for customer care .

Implementing these recommendations can significantly enhance the accessibility of e-commerce platforms, ensuring a better user experience for consumers with disabilities.

## Chapter IV

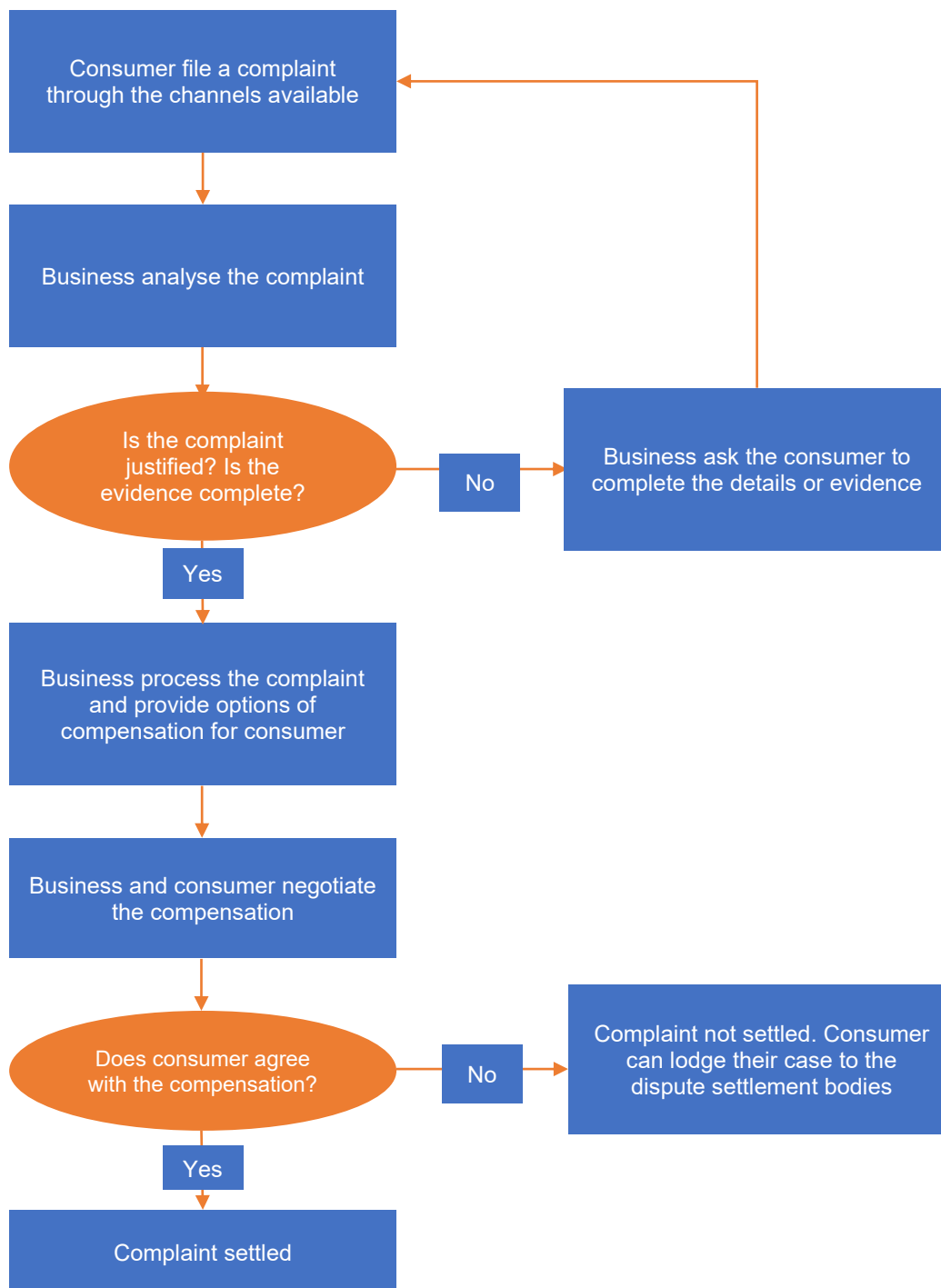
# Designing Inclusive Businesses

### A. Access to Customer Care and Communication

Businesses should provide various channels of communication for consumers to interact with them through both conventional and digital means. Each channel presents specific benefits and challenges for consumers with disabilities, as detailed below:

Channels of Communication	Advantage	Challenge
Chat feature	Easy to access within the website/platform	Sellers are not always responsive or fast to respond
Emails	Consumers can write longer queries or complaints and attach supporting evidence (images or videos)	Not all sellers mention their email address; Sellers do not check their emails regularly
WhatsApp	Sellers usually respond quickly	Consumers with physical challenges may take longer to respond to chats within the expected timeframe
Telephone	Consumers can directly communicate with sellers or platforms	Not all sellers or platforms provide telephone numbers for correspondence consumers with hearing impairments may have difficulty communicating over the phone

The following chart visualises the general complaint handling procedures of businesses to consumers:



The above flowchart is relevant for all consumer complaints, but businesses must prioritise creating accessible communication channels for consumers with disabilities. This ensures that consumers with specific needs can communicate and lodge complaints more easily and confidently. To achieve this level of accessibility, businesses should train their staff to cater to the needs of consumers with disabilities.

## B. Inclusive Product Information

Businesses need to consider whether they have already provided information about their products or services in accessible ways so that consumers with disabilities can fully understand them. Below is a list that businesses can consider when providing information about their



products or services to ensure that the information is accessible to all consumers, regardless of their background and abilities. Please note that the following list is not mandatory; however, it can serve as a reference for businesses to initiate fair business practices.

1. Products sold online on e-commerce platforms

- a. What category of products that businesses sell on the e-commerce platforms?  
For instance:
  - Processed food
  - Beauty products
  - Cosmetics
  - Fashion products
  - Fresh food
  - Others
- b. Are all the raw ingredients or materials clearly described?  
For instance:
  - Does it contain any allergens?
  - Does it contain high level of ingredients (sugar, natrium, etc)?
  - Does it contain chemical ingredients?
  - Does it contain any metal?
  - Does it have any specific benefits that can be scientifically proven?
- c. Is there any information about the process involved in producing the products that consumer needs to know of?  
For instance:
  - For processed foods, it should be mentioned whether it is still uncooked, half-cooked; whether it is roasted or fried; whether it has gone through an evaporation or fermentation process, etc.
  - For herbal products, it should be clear whether the product was made of isolate of any plants.
  - For printed products, it should be clear whether there is any particular printed material.
  - For textile products, it should be mentioned whether it used natural or chemical colouring, etc.
- d. Is there any information related to the safety of the product?  
For instance:
  - How long can the products be kept? Is there any expiry date?
  - Would some consumer find the product sensitive is they use it?
  - Is the product halal?
  - Does the product contain any flammable substances?
  - Is the product easily breakable?
  - Is the product safe for children or infants?
  - Is there any maximum dosage described?
  - Is there any manual or direction of use for consumers to know?
- e. Is there any specific handling and care that should be taken into account for delivery and storage?  
For instance:
  - Is the product fragile when wrapped or delivered in a certain packaging?
  - Does the product require another component in order to function?
  - Is the product only available for instant delivery?
  - Does the product need to be stored in a specific method?
  - Is the product washable or does it need special care?

2. Is all the above information on Point 1 clearly described and easily understood by consumers with disabilities (i.e. whether it is well-written and classified in the right subcategory of product)?
3. Is there any specific challenge on how the information can be described or put in the e-commerce platform?

### C. Inclusive Product Design

Every consumer, including those with disabilities, has different needs and challenges when it comes to handling product packaging. Packaging that is hard to open, for example, will pose challenges for consumers with motor impairments. Consumers with visual impairments will also face difficulties in differentiating between products with similar packaging. Therefore, the following recommendations can be considered and implemented by businesses to design their products more inclusively.

#### 1. Inclusive Packaging

- **Universal Design:** Business shall design the packaging of their products based on the universal design principle. According to the UN CRPD, “universal design” means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design. “Universal design” shall not exclude assistive devices for particular groups of persons with disabilities where this is needed.
- **Easy-to-Identify Packaging:** There are various products with similar packaging that are hard to identify for consumers with visual impairments. For example, some bottles of beverages can be uniquely identified so that consumers with visual impairments can easily differentiate this product from other similar products. Additionally, businesses can also include braille letters on their packaging surface or box to make it easier for consumers with visual impairments to identify.
- **Safe and Easy-to-Open Lid:** Consumers with motor impairments face challenges in opening lids or packages. Businesses should be aware of designing packaging that is both safe and easy for consumers to open.

#### 2. Inclusive Information Display

Consumers have the right to receive clear and accurate information about products or services in easy and accessible ways. Besides the information itself, the way businesses display the information is also an important aspect to consider. Some tips for displaying information include:

- Any photo or video of the product should be accurate and not misleading, including the size of the products. In addition to the image or video, explanatory captions or descriptions should also be an integral part of the display. It is important to minimize the variation of colors and avoid using green and grey, especially for consumers who have difficulty identifying colors.
- Businesses can introduce tactile symbols (easily identifiable through touch) to display information to consumers, especially to differentiate types of products such as foods, drugs, cosmetics, beauty care, and so on. This can be done by, for instance, providing embossed stickers to highlight important notices.
- The use of technology to enable easier access to information could also be introduced. This can be done by providing tactile QR codes so that consumers with visual impairments can access the description in an audio format.

### 3. Advertisement

Businesses these days advertise their products or services through both offline and online channels. Each of these channels poses some benefits and challenges for consumers with disabilities. Here are some recommendations for better advertisements that can help consumers with disabilities to access them.

Online/digital advertisement	Printed advertisement
Online or digital platforms, including social media, play an important role for businesses to promote their products or services through posts, threads, short videos, etc. However, it is very important that businesses provide accurate descriptions of their products in the captions using simple and clear language so that consumers with visual impairments can also learn about the products or services easily.	Businesses should consider using <b>color-safe</b> fonts for consumers with limited ability to identify colors.

## Chapter V

# DOs and DON'Ts

The following table summarises some recommendations for businesses in order to implement inclusive business practices in three different stages:

Stage	Dos	Don'ts
Pre-sale	Ensure that features and displays on the website or application include precise element labels for readability by screen readers.	Develop the website or platform to only emphasise on the use of visual element so that it can't be accessed by those with visual impairments
	Provide product information in both visual and text formats that convey the same quality of information.	Offer product descriptions solely in pictures or videos without accompanying text descriptions.
	Use simple and clear language to present information, aiding consumers with intellectual disabilities in accessing product details.	Provide information using complex sentences and difficult language.
	Include shortcuts for navigation within the digital platform or website	Omit shortcuts, making navigation difficult within the digital platform or website.
	Equip the website or application with features to adjust font size and contrast settings for consumers with visual impairments.	Fail to provide options for adjusting font size and contrast settings.
	Implement notifications for pop-ups or any new elements appearing on the display.	Neglect to notify users about pop-ups or changes in features or menus on the screen.
	Label every hyperlink on the website or application accurately.	Provide hyperlinks without any descriptive labels.
	Minimise the use of CAPTCHA. If necessary, offer audio and numeric alternatives.	Present CAPTCHA solely in images without accessible options for screen readers.
	Ensure that product or service descriptions are clear, accurate, honest, and not misleading. Include external references if needed.	Provide descriptions that are unclear, inaccurate, and misleading.
	Share authentic reviews from consumers.	Publish fake reviews to promote products.
	Provide easy access to communicate to the seller and platform through the available channels	Provide no contact or communication options for consumers to reach sellers or the platform.
	Accompany information in images or videos with text descriptions, sign language,	Present information exclusively in pictures and videos without any accompanying text.

	and audio descriptions to ensure accessibility for consumers with hearing and visual impairments.	
	Include voice command (dictation) features and options to adjust the speed of auto-refresh to accommodate consumers with motor impairments.	Overload the website or application with animated features, moving objects, and rapid auto-refresh.
During transaction	Ensure that product or service selection features are fully compatible with screen readers and can be easily navigated.	Make product selection features incompatible with screen readers.
	Clearly write terms and conditions in simple, easy-to-understand language that is readable by screen readers.	Make terms and conditions difficult to find, unfair, hard to understand, and not compatible with screen readers.
	Provide accessible payment options that can be navigated via keyboard and are readable by screen readers. Allow sufficient time before transactions are automatically cancelled.	Limit payment options and impose a short time limit for completing payments.
	Clearly communicate any vouchers or discounts with text descriptions	Present information about vouchers and discounts solely in images.
	Offer accessible communication channels for consumers with queries before they finalize their transactions.	Provide no communication options during the transaction process.
After sale	Clearly outline the delivery process, including courier details, receipts, and tracking numbers.	Provide vague or unupdated information about the delivery process.
	Allow consumers to submit reviews through various channels such as dedicated features, chat, video, or audio.	Provide no opportunities for consumers to leave reviews.
	Respond to consumer queries and complaints within an agreed-upon timeframe.	Be unresponsive to consumer queries and complaints.
	Offer accessible options for compensation (refund, repair, return)	Fail to provide options for compensation.
	Cover the delivery costs for defective products caused by the seller's fault.	Do not take responsibility for delivery costs associated with defects caused by the seller.

# Engagement

The guidelines on inclusive business practices aim to shift the paradigm that providing the needs and protecting the rights of all consumers regardless of their abilities and conditions should be seen as an investment instead of cost. As research already suggested that consumers with disabilities are relatively loyal to product or service that meets their needs, businesses shall put more efforts to accommodate the needs of consumers with disabilities.

Therefore, this guideline is intended to provide recommendations especially for consumer protection authorities as well as to businesses regardless of their size to move towards the implementation of inclusive business practices. Nevertheless, other relevant stakeholders such as consumer associations, organisations for persons with disability can also be included in the endeavour through multistakeholder and cross-sectoral efforts.

Stakeholder	Recommendations
Consumer protection authorities	<ul style="list-style-type: none"> <li>• Introduce or strengthen consumer protection laws and regulations that cater the needs of consumers with disabilities</li> <li>• Particularly regarding consumer access to redress, consumer protection authorities shall introduce more accessible means of settling consumer disputes both through litigation and alternative mechanisms</li> <li>• Explore avenues for cooperation and exchanges with the private sector, especially with e-commerce platforms as well as business associations, in order to encourage self-or co-regulatory initiatives in order to promote inclusive business practices</li> </ul>
Businesses	<ul style="list-style-type: none"> <li>• Together with the consumer protection authorities, businesses need to conduct regular exchange and cooperation to introduce or strengthen the legal provisions to promote inclusive business practices</li> <li>• In the absence of legal provisions that regulate inclusive business practices, businesses shall aim to implement the principles and guidance explored in the previous chapters</li> </ul>
Consumer associations and organisations of persons with disabilities	<ul style="list-style-type: none"> <li>• Initiate or strengthen cooperation to advocate inclusive consumer protections for consumer protection authorities and businesses</li> <li>• Conduct campaign or education to promote inclusive consumer protection</li> <li>• Provide assistance for consumers with disabilities in settling the disputes with businesses</li> </ul>

