

BERLIN GUIDELINES FOR THE PROMOTION OF THE RIGHT TO INFORMATION TO GROUPS IN SITUATION OF VULNERABILITY

Preamble

- Recognizing that the right of access to information is a fundamental enabler of inclusion and empowerment, and is affirmed in international instruments such as the Convention on the Rights of Persons with Disabilities, the Convention on the Rights of the Child, the United Nations Declaration on the Rights of Indigenous Peoples, the Convention of the Elimination of All Forms of Discrimination against Women, as well as in regional treaties, national and sub-national laws, which collectively reinforce States' obligations to ensure equitable access to information for all people.
- Recalling that governments have a duty to actively provide access to information to all people, including to groups in situation of vulnerability, in line with the 2030 Agenda for Sustainable Development, specifically with Goal 16.10, which calls for ensuring public access to information and protecting fundamental freedoms, and Goal 10, which aims to reduce inequalities through equitable access to services and information, irrespective of age, sex disability, race, ethnicity, origin, religion, economic or other status.
- Recognizing that vulnerability is understood, in international human rights and development frameworks, as a condition in which individuals or groups face heightened risks of exclusion, discrimination, or rights violations, due to structural, socioeconomic, cultural, or institutional barriers that hinder their ability to access information, services, and opportunities on equal terms.
- Expressing concern about the persistent divides in society in terms of exercising the right of access to information, to the detriment of women and youth as well as Indigenous people, and other groups in situation of vulnerability.
- Recalling the UNESCO Tashkent Declaration on Universal Access to Information call on countries to:
 - take effective steps to ensure equal access of all people to information, including women, youth and historically disadvantaged groups, and to build trust around governmental information processes with everyone in society; and
 - to ensure that all people can exercise their right to information equitably, respecting human rights, by addressing practices that may inhibit the exercise of the right, including by Indigenous peoples, persons with disabilities and other groups in situation of vulnerability.
- Highlighting that States should provide guidance, training and awareness to society on national access to information laws, their application and how to exercise rights encompassed by such laws, to all persons, equitably and without discriminations.
- Recalling the International Conference of Information Commissioners' (ICIC) Mission to share knowledge and best practices, to build capacity, to help identify what is needed for global progress and to act as a collective voice in international fora with a view to improving people's right to public information.

The International Conference of Information Commissioners, at its XVI Conference held on June 25, 2025, in Berlin, adopted these guidelines as a reference for ICIC members in the development of strategies to promote access to information for all groups in situation of vulnerability, while recognizing that their adoption is subject to the respective competencies, institutional capacities, constitutional and legal frameworks of each country, in full respect of national sovereignty.

General

Ensuring the right of access to information for all requires recognizing that certain individuals or groups face inequalities and exclusion resulting from structural, socioeconomic, cultural, institutional, and other barriers that may hinder their ability to access information, services, and opportunities on an equal basis.

In certain cases, such barriers may be intensified by intersectional factors, including disability, gender, age, ethnic origin, migratory status, geographic isolation, poverty, which may place certain groups in systemic disadvantage. In general terms, these conditions are not inherent to the individuals themselves but arise from unequal social conditions or arrangements that require proactive and inclusive public action.

In this context, understanding and addressing vulnerability becomes essential for developing strategies, standards, and institutional guidelines aimed, as a reference, at ensuring that access to information policies are inclusive, equitable, and responsive to the specific needs of those who are most at risk of being left behind.

Therefore, this document sets out general guidelines intended to support, as a reference to ICIC members, in the development and implementation of inclusive access to information policies that effectively address the needs of groups in situation of vulnerability, while recognizing that their adoption is subject to the respective competencies, institutional capacities, constitutional and legal frameworks of each country.

Key Guidelines

1. Promotion of comprehensive accessibility: public information should, where reasonably possible and where constitutional and legal frameworks permit, be made available in accessible formats and languages that address the needs of all people, irrespective of age, sex, disability, race, ethnicity, origin, religion, economic status, or any other condition, and considering literacy levels, developmental stages, access to technology, and situation of crises.

2. Development of local capacities and community empowerment: efforts should be made to promote and enhance the capacities of local actors, including community

organizations, civil society, public officials and service providers, and the media, to understand, exercise, and facilitate the right of access to information.

3. Consult these groups to identify the themes most relevant to them: promote access to information initiatives that focus on issues particularly important to them, ensuring transparency and clarity in the realization of their fundamental rights.

4. Promoting inclusive infrastructure and technologies: encourage the promotion of mechanisms to facilitate access to information in contexts where physical and digital infrastructure is limited, with the aim of ensuring equitable access for all individuals.

5. Continuous Monitoring and Evaluation: Mechanisms should be put in place to regularly evaluate the reach, effectiveness, and inclusiveness of access to information policies, programs and initiatives targeting groups in situation of vulnerability.

Independent oversight institutions could be entrusted with monitoring their implementation, in accordance with the constitutional and legal frameworks of each country.

Suggested practices and actions

The practices and actions suggested here, are intended to support, as a reference, ICIC members in the development and implementation of inclusive access to information policies that effectively address the needs of groups in situation of vulnerability

Nevertheless, its adoption is subject to the respective competencies, institutional capacities, constitutional and legal frameworks of each country. Moreover, the implementation of these references should be planned with due consideration for the resource constraints of each country.

1. Guarantee of comprehensive accessibility:

- Implement easy-to-read formats and language in essential public information to address the needs of groups in situation of vulnerability, including persons with intellectual disabilities or difficulties with reading comprehension.
- Provide, where reasonably possible, relevant public information for groups in situation of vulnerability in indigenous, other predominant non-official languages in each country, and into braille.
- Offer information in formats that do not rely on digital technology, to support those who do not have access.
- Promote access to information for children and adolescents about their right to privacy, using clear and simple language to help mitigate their exposure to other risks.
- Make their best efforts to use digital accessibility resources such as screen readers, audio description, video subtitles, and sign language interpretation.

- Make their best efforts to provide audiovisual materials adapted for people with visual, hearing, and reading disabilities.

2. Development of local capacities and community empowerment:

- Promote training for public officials on the importance of the right of access to information for groups in situation of vulnerability, and on the need to address the barriers these groups may face in exercising this right.
- Implement training and awareness programs for communities, including those in situation of vulnerability, on the right to access information, highlighting how to exercise this right and how it contributes to the realization of other fundamental rights, and tailoring to the approach to the specific needs of the community being engaged, where appropriate.
- Establish partnerships and consult with community organizations, civil society organizations, and representative associations of these groups to better understand their needs and to develop joint solutions.
- Promote the training and recognition of community facilitators or advocates of the right of access to information, who can serve as a bridge between institutions and people in situation of vulnerability, adapting messages to cultural contexts and specific needs.
- Create local support networks to facilitate mediation between citizens and public institutions, especially in rural and hard-to-reach areas.
- Promotion of digital and media literacy.

3. Consult these groups to identify the themes most relevant to them:

- Promote the active participation of representatives of individuals or groups in situation of vulnerability to assist ICIC members in identifying information that is relevant to their respective communities, aligning expectation on viable allocation of resources in line with restrictions of each country.
- Limited resources may hinder regulators and public from meeting all accessibility needs, such as language and technology.
- Focus the dissemination of information on issues such as health, education, housing rights, environmental concerns, social programs, food security, gender equality, child well-being, justice and mechanisms for the protection of rights, and labor inclusion, addressing, where possible and permitted by the constitutional and legal framework, the specific needs of each group, in accordance with other applicable constraints, such as budgetary limitations.
- Ensure transparency and clarity in processes related to social benefits and public policies in general, including those aimed at these segments, making sure that all groups understand how to access such services.

- Develop awareness campaigns using clear and accessible language, respecting the particularities of each group.
- Promote the provision of public information in times of crisis, such as public health emergencies such as pandemics, natural disasters, civil unrest, armed conflict, to guarantee timely, verified, and accessible information for all.

4. Promoting inclusive infrastructure and technologies:

- Conduct participatory assessments of technological access gaps (devices, connectivity, skills) among different groups in situation of vulnerability.
- Promote the exploration and implementation of low-cost technological solutions, as well as alternative and traditional communication channels - such as community radio, loudspeakers, physical information modules in relevant languages, where reasonably applicable, and printed materials in accessible formats - to ensure access to information for individuals with limited or no access to the internet or digital technologies.
- Promote, where reasonably applicable, technological tools that expand access to information, such as mobile applications and accessible digital platforms that are user-friendly and accessible to all.

5. Continuous monitoring and evaluation:

- Establish indicators and mechanisms to monitor access to information policies, programs and initiatives by groups in situation of vulnerability, where reasonably possible.
- Create feedback channels that allow the active participation of these groups in the development and improvement of public information access policies.
- Ensure transparency in the progress made by establishing public channels or forums to communicate the results of monitoring and feedback.
- Consider, where applicable, that Information Commissions or equivalent institutional arrangements in each country monitor and oversee the implementation of access to information policies within their jurisdiction, with a view to promoting continuous improvement and the dissemination of good practices for all.