Media and Information Literacy in Palestine

Normative and Human Rights Observations from a Disability Inclusion Perspective

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(Palestine – 26 July 2026)

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Executive Summary

This paper is presented within the context of ongoing discussions on the development of a national Media and Information Literacy (MIL) Strategy in Palestine, amid transformations in the digital and media landscape and the expanding influence of online platforms, social media, and artificial intelligence on the production, circulation, and dissemination of information, as well as on the shaping of the public sphere. However, the question this paper seeks to examine is not limited to how digital skills can be developed, critical thinking enhanced, or misinformation addressed. Rather, it concerns the nature of the media and information environment itself: Who can access information? How is information produced and circulated? And who remains excluded from this space despite apparent participation?

Based on this perspective, the paper offers a normative and human rights-based analysis of the Reference Document for the Development of a Media and Information Literacy Strategy in Palestine from the perspective of disability inclusion and information justice. The analysis draws upon the international human rights framework and relevant international standards and good practices, including the Convention on the Rights of Persons with Disabilities (CRPD), the International Covenant on Civil and Political Rights (ICCPR), relevant treaty and non-treaty mechanisms, as well as the specialized frameworks developed by UNESCO in the field of media and information literacy. The paper proceeds from the premise that media and information literacy cannot be reduced to a technical or training-related issue detached from the human rights and institutional environment within which information itself is generated, circulated, and consumed.

The paper finds that the Reference Document demonstrates an advanced awareness of the importance of media and information literacy in engaging with the digital environment, particularly regarding critical thinking, digital citizenship, and combating misinformation. Nevertheless, disability inclusion remains structurally absent from the document's overarching framework, despite the cross-cutting nature that should characterize this type of national strategy. References to disability appear only in a limited manner through mentions of "vulnerable groups" or "persons with special needs," reflecting an approach that is closer to a welfare-based perspective than to the rights-based approach underpinning the Convention on the Rights of Persons with Disabilities.

From this standpoint, the paper re-examines media and information literacy through the lens of information justice, recognizing that the digital environment is not inherently neutral and that access to information depends not only on the availability of technology or the flow of digital content, but also on the structural barriers that may prevent effective access to information and equal digital participation. Digital divides are not

solely a matter of limited skills or inadequate technical resources; they are also shaped by legislation, policies, practices, digital design, accessibility mechanisms, accessible content, and the extent to which individuals can participate in shaping the information environment itself.

The paper concludes that the development of a national Media and Information Literacy Strategy in Palestine presents an important opportunity to reimagine a more inclusive and equitable media, digital, and information environment. Such a vision should balance regulation with rights and freedoms, technological advancement with accessibility and inclusion, and digital security with information justice. Ultimately, media and information literacy is not only about how individuals engage with information, but also about who possesses the actual ability to access it, participate in its production, and meaningfully influence its flow within the contemporary digital public sphere.

1. Introduction

Media and information literacy is no longer viewed merely as a technical or educational matter associated with acquiring digital skills or the ability to verify information and engage with media content. It is increasingly linked to the nature of the digital and information environment itself, as well as to the fundamental, constitutional, and legally protected rights and freedoms that govern access to information, its production, and its circulation within the contemporary digital public sphere. The rapid expansion in the use of digital platforms, social media, artificial intelligence, algorithms, and the vast flow of information and digital content has not only transformed the ways in which knowledge is accessed and information is consumed, but has also reshaped power relations within the information environment itself, including who has the ability to access information, produce it, influence the course of its circulation freely, and participate in shaping the digital public sphere.

In this context, efforts to develop a national Media and Information Literacy (MIL) Strategy in Palestine acquire particular significance, especially in light of the rapid digital transformations taking place in the Palestinian context and the growing challenges associated with misinformation, hate speech, freedom of opinion and expression, digital rights, digital security, privacy, and the increasing regulation of the digital space. However, the complex nature of this environment requires media and information literacy to be approached as part of a broader framework in which human rights, normative, institutional, and societal dimensions intersect. This includes the right to access information, information justice, and accessibility, rather than treating it as a purely

technical or training-oriented pathway detached from the human rights framework governing the digital environment itself and the mechanisms through which it is regulated.

Against this backdrop, this paper presents a normative and human rights-based reading of the Reference Document for the Development of a Media and Information Literacy Strategy in Palestine, prepared by the Media Development Center at Birzeit University on behalf of the United Nations Educational, Scientific and Cultural Organization in March 2025. The analysis is undertaken from the perspective of disability inclusion and information justice and is grounded in the international human rights framework, including the Convention on the Rights of Persons with Disabilities (CRPD), the International Covenant on Civil and Political Rights (ICCPR), relevant treaty and non-treaty mechanisms, as well as the specialized frameworks developed by UNESCO in this field. It proceeds from the premise that a media and information environment cannot be inclusive or equitable unless its conceptual, normative, and governance foundations are re-examined through the lenses of disability inclusion, digital rights, meaningful participation, and information justice.

Within this framework, the paper does not treat disability inclusion as a sector-specific issue or as a subsequent addition aimed at incorporating a particular target group. Rather, it approaches disability inclusion as a governing lens through which the media and information environment itself can be reassessed, including access to information, digital accessibility, accessible content, privacy, digital rights, consultation and participation mechanisms, and universal design. The central issue is not only the extent to which persons with disabilities are represented within the proposed national strategy, but also the extent to which the strategy is capable of advancing a more inclusive and equitable vision of the media, digital, and information environment within a context where information, data, and technology are playing an increasingly influential role in shaping the public sphere, producing knowledge, and enabling access to rights and fundamental freedoms.

2. Observation on the Background and Context Governing Media and Information Literacy in Palestine

Media and information literacy constitutes an important avenue for promoting critical thinking, digital citizenship, and informed engagement with both the media and digital spheres considering technological transformations, the growing influence of digital platforms, and the unprecedented flow of information. These developments are accompanied by challenges related to misinformation, hate speech, digital security, and the protection of privacy. Within this context, national efforts to develop a Media and Information Literacy (MIL)

Strategy in Palestine assume particular importance as an attempt to establish a more integrated approach to engaging with the media and digital environment and fostering critical and responsible interaction with it.

However, the development of an effective and sustainable national Media and Information Literacy Strategy is not solely a matter of building technical skills or developing educational and training tools. It is also closely linked to the nature of the prevailing political system and the human rights, legislative, and institutional environment within which the strategy operates. Equally important is the extent to which the strategy aligns with international human rights standards and its capacity to ensure equitable access to information, protect the right to freedom of opinion and expression, and promote inclusion, accessibility, and meaningful participation within the digital and media environment. This includes approaching disability-inclusion as a governing lens for the development of public policies, rather than as a separate sectoral issue.

2.1 Freedom of Opinion and Expression and the Right of Access to Information

Efforts to develop a national Media and Information Literacy (MIL) Strategy are gaining increasing importance considering digital transformations, the expanding influence of digital platforms and social media, and the growing challenges posed by misinformation, hate speech, and digital rights violations. These developments underscore the role of media and information literacy as a key avenue for strengthening critical thinking, digital citizenship, and the capacity for informed and responsible engagement. However, treating media and information literacy as a purely technical or training-related matter, detached from the human rights, legislative, and institutional environment within which it operates, risks reducing it to a set of skills and tools while overlooking the structural conditions that ultimately shape access to information, knowledge production, and meaningful participation in the public sphere.

In this context, freedom of opinion and expression and the right of access to information should be viewed as integral components of the enabling environment for media and information literacy, rather than as parallel or unrelated issues. It is difficult to envisage the development of genuine critical capacities or the promotion of digital citizenship within an environment characterized by restrictions or deficiencies in access to information, its circulation, and the guarantees necessary for its protection. Moreover, media and information literacy is not only concerned with individuals' ability to consume and analyze media content; it also encompasses their ability to access information on an equal basis, understand it, produce it, and engage with it within a public sphere that respects rights and freedoms and maintains an appropriate balance between regulation and protection.

While the Reference Document makes an important contribution by addressing digital transformations, the media environment, misinformation, and technological developments, the background and context governing media and information literacy would benefit from a clearer connection to the international human rights framework governing freedom of opinion and expression and the right of access to information. This includes the International Covenant on Civil and Political Rights (ICCPR), particularly Article 19, General Comment No. 34 of the Human Rights Committee, as well as the concluding observations issued by international treaty bodies during their dialogues with the delegation of the State of Palestine at the United Nations in Geneva, particularly the Human Rights Committee and the Committee on the Rights of Persons with Disabilities (CRPD Committee), alongside other relevant mechanisms addressing freedom of expression and digital rights. Such linkage is especially important in the Palestinian context given the rapid transformations taking place within the digital sphere, the growing intersection between digital regulation and fundamental rights and freedoms, and the questions this raises regarding the limits of regulation, the safeguards necessary to protect rights, and the need to ensure that restrictions and exceptions do not become a means of undermining the substance of fundamental rights.

The right of access to information also emerges as one of the essential pillars of any information environment capable of promoting media and information literacy in an effective and sustainable manner. In this regard, the legislative gap resulting from the absence of an enacted Access to Information Law in Palestine, despite the introduction of multiple draft laws since 2005, remains particularly significant when considering the enabling environment for media and information literacy. This is especially true considering the rapid expansion of the digital sphere and the adoption of legislation and regulations that directly or indirectly affect the digital environment, digital content, and digital rights. The issue extends beyond the mere absence of a legislative text; it concerns the extent to which the legal and institutional framework is capable of entrenching the right of access to information as a governing principle and ensuring that restrictions and exceptions do not evolve into mechanisms that unduly limit the flow of information or hinder effective and balanced access to and dissemination of information.

2.2 The Digital Environment and the Balance Between Rights and Regulation

The rapid expansion of the digital sphere, digital platforms, and social media has profoundly reshaped the media and information environment. The production, circulation, and influence of content are no longer confined to traditional media institutions; rather, they have become increasingly linked to digital platforms, algorithms, artificial intelligence, and the flow of information and data. This has created significant

opportunities to enhance access to information and digital participation, while at the same time generating growing challenges related to misinformation, hate speech, digital violence, privacy violations, cybersecurity, and the concentration of data and content.

In this context, it is important to approach the digital environment through a balanced framework that reconciles the legitimate regulation of the digital sphere with the protection of rights and freedoms, thereby avoiding a false dichotomy between regulation and liberty. The issue is not whether legal or institutional regulation of the digital environment is necessary, but rather the nature, limits, safeguards, and human rights compatibility of such regulation, particularly considering the growing impact of legislation and practices relating to digital content, social media, and cybercrime on freedom of opinion and expression, the right of access to information, and the right to privacy.

From this perspective, media and information literacy is more closely connected to the digital human rights environment than may initially appear. It is difficult to develop effective digital critical-thinking capacities within an environment where restrictions and exceptions may increasingly affect the balanced and secure flow, accessibility, and circulation of information. Likewise, promoting critical thinking, information verification, and the responsible use of digital spaces cannot be separated from ensuring a digital environment that respects fundamental rights and freedoms and maintains a balance between protecting society from digital violations and harmful content, and preventing regulation from becoming a means of restricting the digital sphere or limiting freedom of expression and access to information.

The significance of this issue is particularly evident in the Palestinian context considering the legislative and regulatory developments, practical measures, and judicial decisions relating to freedom of expression and the digital sphere, particularly during recent years. This is especially relevant to ongoing discussions surrounding cybercrime legislation, the regulation of the digital environment, and the right of access to information. In this regard, there is a need for a more integrated approach within the national Media and Information Literacy Strategy that addresses the digital environment as a domain intrinsically linked to digital rights, freedom of expression, governance, access to information, privacy protection, public participation, and information justice.

Rapid digital transformations also require a broader reconsideration of the concept of accessibility within the digital and media environment, including equal and inclusive access to digital platforms, content, and services. Digital divides are not solely related to internet connectivity or the availability of technological tools; they are also shaped by the design of the digital environment itself and its ability to accommodate human diversity and ensure the meaningful participation of different groups, including persons with disabilities, through an

inclusion-based approach. Accordingly, the concepts of universal accessibility, universal design, and digital accessibility should be incorporated into the overarching vision of media and information literacy in Palestine, as integral components of digital justice and information justice.

2.3 The Absence of an Access to Information Law and Its Impact on the Information Environment

The right of access to information is one of the fundamental pillars of any democratic information environment capable of promoting media and information literacy in an effective and sustainable manner. It serves as the gateway through which individuals and institutions can access information, understand it, analyze it, and engage with it critically and responsibly. This right is also directly linked to the promotion of transparency, accountability, and participation, as well as to enabling journalism, media institutions, civil society organizations, and academic institutions to perform their roles more effectively within the public sphere.

In this context, the legislative gap resulting from the absence of an Access to Information Law in Palestine, despite the introduction of several draft laws on the subject since the first bill was discussed by the First Palestinian Legislative Council in 2005, constitutes one of the structural issues directly affecting the enabling environment for media and information literacy. The significance of this issue extends beyond the absence of a legal framework regulating access to public information. It also relates to the persistence of this legislative vacuum amid rapid digital transformations, the growing influence of digital platforms, and the increasing reliance on the digital environment for the production, dissemination, and accessibility of information.

The importance of this discussion is further heightened considering legislative and regulatory developments relating to the digital sphere and cybercrime during recent years. These developments underscore the need to maintain a balance between the legitimate regulation of the digital environment on the one hand and the protection of the right of access to information and freedom of opinion and expression on the other, in a manner consistent with relevant international standards and that prevents disproportionate interference with the essence of fundamental rights and freedoms. The issue is not the existence of regulation itself, but rather the nature, limits, safeguards, and human rights compatibility of such regulation, including its adherence to the principles of legality, necessity, and proportionality, and its ability to avoid undermining the substance of the fundamental right to freedom of expression.

Accordingly, there is a need for a more integrated approach within the national Media and Information Literacy Strategy in Palestine that addresses the right of access to information as an integral component of the governance framework of the information environment, rather than as a separate legislative or technical issue.

Media and information literacy is not limited to skills related to information verification or the safe use of digital platforms. It is also shaped by the legal and institutional environment that protects freedom of expression within the digital sphere, determines the parameters governing access to, dissemination of, and availability of information, and influences the ability of individuals to participate meaningfully in the digital and media public sphere in a safe and balanced manner.

The significance of this dimension becomes even more pronounced when the right of access to information is examined from a disability inclusion perspective. The issue extends beyond making information available in principle to ensuring its actual accessibility in an inclusive and user-friendly manner. This includes accessible digital content, sign language interpretation, accessible formats, and universal digital design. In this context, access to information becomes an essential component of information justice itself, requiring the integration of universal accessibility and digital accessibility standards into the overarching vision of media and information literacy in Palestine, in a manner consistent with the Convention on the Rights of Persons with Disabilities (CRPD) and relevant international standards.

3. Observations on the Conceptual and Normative Framework of the Reference Document)

The Reference Document demonstrates a clear commitment to media and information literacy in addressing digital transformations and the evolving media environment, particularly regarding critical thinking, informed engagement with media and digital content, and efforts to combat misinformation and hate speech. However, the multifaceted nature of media and information literacy requires a broader approach to its governing conceptual and normative framework, extending beyond technical and training-related dimensions toward a more comprehensive human rights and institutional framework. Such an approach should consider international human rights standards, digital rights, access to information, accessibility, and information justice, including from a disability inclusion perspective as a governing lens for the development of public policies and national strategies related to the media and digital sphere.

3.1 The Need to Expand the Governing International References and Standards

The Reference Document reflects a clear effort to draw upon the frameworks and approaches developed by the United Nations Educational, Scientific and Cultural Organization (UNESCO) in the field of media and information literacy, particularly regarding promoting critical thinking, digital citizenship, addressing misinformation, and strengthening capacities within the digital and media environment. However, the

interconnected nature of media and information literacy, and its direct relationship to digital rights, the right of access to information, freedom of opinion and expression, and the protection of privacy, necessitates a broader normative framework for the proposed national strategy. Such a framework should not be limited to the technical and educational references developed by UNESCO, important as they are, but should more explicitly encompass the international human rights framework, relevant international mechanisms, and the United Nations human rights monitoring system.

In this context, there is a need to establish a clearer connection between media and information literacy and the International Covenant on Civil and Political Rights (ICCPR), particularly Article 19, which guarantees freedom of opinion and expression and the right to seek, receive, and impart information and ideas. This should also include reference to General Comment No. 34 of the Human Rights Committee and the principles it sets out regarding the flow of information, the right of access to information, the permissible limits of restrictions and how they should be applied, the digital environment, and the growing role of the internet and modern communication technologies in the exercise of rights and freedoms. Equally important is drawing upon the concluding observations issued by treaty bodies, the reports of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, and other international references related to digital rights and the information environment.

The importance of expanding this intersecting international normative framework becomes even more evident when media and information literacy is examined from a disability inclusion perspective. The Convention on the Rights of Persons with Disabilities (CRPD) does not treat access to information, communication, and digital accessibility as peripheral technical matters; rather, it recognizes them as fundamental rights directly linked to the full and effective participation of persons with disabilities in society on an equal basis with others. Moreover, the publication of the Convention in the Official Gazette (Palestinian Gazette) pursuant to Decree-Law No. 36 of 2023, together with the principles established through Palestinian constitutional jurisprudence regarding the status of international treaties following their publication, gives these international standards additional significance in the development of national policies and strategies related to the media, digital, and information environment.

Accordingly, the incorporation of international standards into the national Media and Information Literacy Strategy in Palestine should not be viewed merely as the addition of references or a theoretical expansion of the document. Rather, it forms part of a more comprehensive understanding of the information environment itself, the fundamental and constitutional rights and guarantees associated with it, and the boundaries

governing the relationship between digital regulation and rights and freedoms. Media and information literacy cannot be separated from the human rights environment within which it operates. Any approach that focuses primarily on technical skills and competencies while overlooking the governing human rights and normative framework risks undermining freedom of expression in a manner inconsistent with international obligations and reducing the information environment to a collection of tools and technologies, without addressing the deeper structural dimensions related to access, participation, transparency, information justice, and inclusion.

3.2 Observations on Certain Concepts and Terminology Used

Conceptual and terminological precision constitutes an essential component of the development of any national strategy related to the media, digital, and information environment, particularly in areas associated with rights and freedoms, accessibility, participation, and disability inclusion. The importance of the concepts employed extends beyond their linguistic or descriptive function, as they directly influence the nature of public policies, intervention mechanisms, the scope of participation, and the underlying assumptions that shape how targeted groups and communities are understood within the information and digital environment.

In this context, it is notable that some disability-related concepts appearing in the Reference Document remain more closely aligned with outdated welfare-based approaches to disability than with a rights-based and developmental approach. This includes the use of the term "persons with special needs," which is no longer consistent with the contemporary human rights approach to disability or with the Convention on the Rights of Persons with Disabilities (CRPD). The Convention is grounded in an understanding of disability as the result of the interaction between persons with disabilities and the various barriers that hinder their full and effective participation in society on an equal basis with others, rather than as an individual, medical, or needs-based condition.

The issue here is not merely one of replacing a particular term with another. Rather, it concerns the conceptual model underpinning the strategy itself. The transition from traditional or welfare-based approaches to a rights-based and developmental model of disability has direct implications for how access to information, reasonable accommodation, digital participation, content design, consultation and participation mechanisms, and the roles assigned to persons with disabilities and their representative organizations in the development of national policies and strategies are understood and implemented.

The continued use of outdated and stereotypical disability-related terminology may also contribute, directly or indirectly, to the reproduction of exclusion within the media and information environment, even in contexts

that ostensibly seek to promote inclusion. Framing persons with disabilities as a "group with needs," rather than as rights holders and equal partners within the media and digital sphere, risks reducing issues of participation, equal opportunity, and inherent dignity to a set of partial measures or subsequent arrangements. This approach stands in contrast to embedding reasonable accommodation, accessibility, and inclusion as foundational elements within the governing framework of the strategy from the outset.

Accordingly, there is a need to develop a conceptual approach that is more consistent with international human rights standards, particularly the Convention on the Rights of Persons with Disabilities (CRPD). This includes adopting rights-based terminology related to disability, digital accessibility, and universal design, and recognizing disability inclusion as an integral component of information justice itself, rather than as a sector-specific or technical addition concerning a particular group. At its core, media and information literacy is not only about the ability to engage with information, but also about who possesses the actual ability to access it, understand it, produce it, and participate in the media and digital environment on an equal basis with others.

3.3 Media and Information Literacy from an Information Justice Perspective

Rapid digital transformations and the expanding influence of the digital and media environment reveal an increasing need to develop a more inclusive approach to media and information literacy, one that extends beyond technical skills and information verification toward a deeper understanding of the information environment itself and the unequal power dynamics that may shape the production, accessibility, circulation, and use of information, as well as opportunities for participation within the digital and media sphere. In this regard, the concept of **information justice** emerges as a useful framework for re-examining media and information literacy through a lens more closely connected to rights and freedoms, reasonable accommodation, participation, and accessibility within the digital and media environment.

Information justice is not concerned solely with the availability of information in principle. It also encompasses the conditions that govern effective access to information, the ability to understand, produce, and engage with it, and the extent to which different groups and communities can participate in the digital and media sphere on an equal and safe basis. It is further linked to the design of the digital environment, inclusion, and the technical, institutional, linguistic, or social barriers that may reproduce exclusion within the information sphere, even in environments that appear technologically open and accessible.

From this perspective, media and information literacy is more closely connected to information justice than is often reflected in traditional approaches that focus primarily on individual skills or the safe use of digital

content. The ability to think critically, verify information, or engage in digital participation cannot be separated from the environment within which information is produced, nor from questions of who possesses the actual ability to access, influence, or contribute to shaping that information. Information and digital divides are not merely the result of limited skills or inadequate technological resources; they are also shaped by policies, legislation, digital design, accessibility mechanisms, and the institutional structures governing the media and digital environment.

The significance of this dimension becomes even more evident when media and information literacy is examined from a disability inclusion perspective. Persons with disabilities often encounter multiple and intersecting barriers related to reasonable accommodation and access to digital content, platforms, and media and information services. These barriers may include the absence of sign language interpretation, limited accessible content, insufficient availability of accessible formats, and challenges related to digital accessibility and non-inclusive digital design. In this context, disability inclusion is not simply a matter of introducing additional accommodations at a later stage. Rather, it requires a fundamental reconsideration of the information environment itself, its degree of fairness, and its capacity to embrace human diversity and ensure full and effective participation on an equal basis with others.

Accordingly, the development of a national Media and Information Literacy Strategy in Palestine requires information justice to be treated as an integral component of the strategy's governing framework rather than as a parallel theoretical concept. Building a more equitable and inclusive information environment requires a clearer connection between media and information literacy and the protection of freedom of opinion and expression, digital rights, access to information, accessibility, universal design, and meaningful partnership with groups and communities that face various forms of exclusion within the digital and media environment, including persons with disabilities and their representative organizations, in accordance with the Convention on the Rights of Persons with Disabilities (CRPD).

4. Disability Inclusion as a Governing Lens for the National Strategy

The overall reading of the Reference Document reveals that disability inclusion remains limited within the structural framework governing the proposed vision for media and information literacy, despite the cross-cutting nature that should characterize this type of national strategy. Disability does not appear in the document as an integral part of the conceptual and normative framework governing the media and information environment. Rather, it is addressed only partially and in a limited manner through

scattered references to target groups or needs, contrary to the approach embodied in the Convention on the Rights of Persons with Disabilities (CRPD). This limited treatment is not clearly reflected in the document's overarching approach to access to information, the digital environment, participation with organizations representing persons with disabilities, or the design of content, platforms, and media and information services.

In this context, the issue is not merely the limited visibility of disability-related concerns within the Reference Document, but also the nature of the approach governing that visibility. Disability appears to be framed through a sectoral or welfare-oriented lens that views persons with disabilities as a group requiring additional arrangements or interventions, rather than as an integral component of the overarching vision governing the media and digital environment. The absence of disability inclusion from the conceptual and normative foundations of the document has direct implications for the rights of persons with disabilities under the CRPD, particularly with respect to reasonable accommodation, digital accessibility, accessibility, effective consultation and participation mechanisms, and universal design. All these elements are fundamentally linked to information justice within the digital and media environment.

The significance of this issue is heightened by the obligations of the State of Palestine under the Convention on the Rights of Persons with Disabilities, particularly following the publication of the Convention in the Palestinian Official Gazette pursuant to Decree-Law No. 36 of 2023. This development necessitates the alignment of national policies and strategies with the rights-based approach embodied in the Convention. The CRPD does not treat access to information, communication, or the digital environment as separate technical issues; rather, it links them directly to full and effective participation, equality, accessibility, freedom of expression and opinion, access to information, and meaningful partnership with persons with disabilities and their representative organizations, in accordance with the obligations set forth in Article 4(3) of the Convention.

Accordingly, there is a need to reconsider the position of disability inclusion as a governing standard and analytical lens within the national Media and Information Literacy Strategy. Rather than remaining a marginal or partial consideration, disability inclusion should serve as the governing lens through which the media and information environment itself is re-examined, including the design of digital platforms and services, content production, access to information, digital participation, digital rights, consultation and public participation mechanisms, universal design, digital accessibility, and information justice. The issue is not simply whether persons with disabilities are included among the target groups, but whether the strategy itself can reimagine the information environment in a manner that is more inclusive, equitable, and accessible to all.

4.1 The Absence of Disability Inclusion from the Structural Framework Governing the Reference Document

A detailed review of the Reference Document reveals that disability inclusion is not incorporated into the governing vision of media and information literacy as part of the conceptual, normative, or structural framework of the proposed strategy. Instead, it appears only in a highly limited manner through scattered references to target groups or vulnerable groups, without influencing the document's structure, analysis, references, or approach to the media, digital, and information environment. This is particularly evident in references to the "special needs sector" among the sectors requiring media and information literacy, and in recommendations aimed at ensuring inclusiveness by developing programs to support "vulnerable groups" such as "persons with special needs" and residents of marginalized areas.

The issue here extends beyond the limited presence of disability within the Reference Document to the conceptual approach governing that presence. The document continues to employ terminology associated with welfare-based approaches to disability, such as "persons with special needs," as discussed above. This terminology is no longer consistent with the rights-based approach underpinning the Convention on the Rights of Persons with Disabilities, which understands disability as the result of

the interaction between persons with disabilities and the various barriers that hinder their full and effective participation in society on an equal basis with others, rather than as an individual, medical, or needs-based condition.

The importance of this issue is amplified within a strategy directly concerned with media, information, the digital environment, and the production and dissemination of knowledge. Language and concepts are not merely descriptive tools; they actively shape societal, cultural, and institutional perceptions of persons with disabilities. Consequently, the continued use of traditional disability-related concepts and approaches within the media and information environment, contrary to the CRPD, raises questions regarding the consistency of the Reference Document with a rights-based approach that seeks to move beyond stereotypes, discrimination, and welfare-based or medical models of disability.

Moreover, this issue is directly linked to Article 8 of the CRPD on awareness-raising, which requires States Parties to adopt effective and appropriate measures to foster respect for the rights and dignity of persons with disabilities and to combat stereotypes, prejudices, and harmful practices, including within media and information environments. In this regard, the terminology used in the Reference Document should not be viewed as a purely linguistic or stylistic matter. Rather, it forms part of the broader cultural and knowledge environment that shapes how disability is perceived and represented within the public sphere.

This structural absence becomes even more evident when examining the institutions and stakeholders involved in the development of the Reference Document. There is no clear indication that organizations representing persons with disabilities were included in consultation processes, genuine partnerships, or the development of the proposed strategic vision. This is particularly significant given that Article 4(3) of the CRPD requires States Parties to closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations in decision-making processes and in the development of policies and legislation affecting them. This raises broader questions regarding the extent to which disability inclusion has been integrated into the actual

governance of the proposed national strategy, rather than being confined to target groups or subsequent interventions.

4.2 Representative Partnership and the Challenge of Exclusion from Consultation Processes

Meaningful partnership with persons with disabilities and their representative organizations constitutes one of the fundamental pillars of developing rights-based and socially responsive policies and national strategies. It is also a clear and direct obligation under the Convention on the Rights of Persons with Disabilities (CRPD), particularly in matters related to the digital and information environment and accessibility. Developing more inclusive and equitable approaches is not solely a matter of the content or interventions proposed, but also of who participates in shaping the governing vision of these policies and strategies and the nature and seriousness of the roles assigned to affected groups within consultation, decision-making, and institutional development processes.

In this context, it is notable that, despite the broad range of stakeholders and institutions involved in or referenced throughout the development of the proposed national Media and Information Literacy Strategy, the Reference Document does not demonstrate the involvement of organizations representing persons with disabilities in consultation processes, partnership arrangements, or the development of the document's overarching vision. This observation is particularly significant given the cross-cutting nature of media and information literacy and its connections to disability inclusion, the digital environment, accessible content, digital accessibility, public participation, and information justice.

The issue here is not merely one of expanding participation or adding another stakeholder group to consultation processes. Rather, it concerns the underlying approach to participation itself. The CRPD does not treat the participation of persons with disabilities and their representative organizations as a symbolic or consultative exercise. Instead, it establishes participation as a normative obligation directly linked to their right to full and effective involvement in decision-making processes, public policies, legislation, and related procedures in all matters affecting them. In this regard, Article 4(3) of the

Convention requires States Parties to closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations in the development and implementation of relevant policies, legislation, and decisions.

This dimension is particularly important within the field of media and information literacy. Persons with disabilities are not merely recipients of awareness-raising initiatives, training programs, or accessible content. Rather, they are an integral part of the digital, media, and information environment itself, including content production, platform design, reasonable accommodation, universal design, accessibility, digital participation, and engagement with media and digital spaces. Accordingly, the absence of representative organizations of persons with disabilities from consultation and strategy-development processes raises broader questions regarding the extent to which disability inclusion has been integrated into the actual governance of the proposed strategy, rather than being confined to target groups or subsequent interventions.

Moreover, the inclusion of representative organizations of persons with disabilities within strategy-development processes should not be viewed as a procedural formality or supplementary measure. Rather, it should be regarded as an international obligation and as an essential component of developing a more informed understanding of the barriers associated with access to information, digital accessibility, accessible content, digital discrimination, and information gaps experienced by persons with disabilities within the media and digital environment. Representative partnership, in this context, is not only about participation as a principle; it is also about the capacity of policies and strategies themselves to create a more inclusive, equitable, and accessible information environment for all.

4.3 Freedom of Expression and Access to Information from a Disability Inclusion Perspective

Freedom of opinion and expression and the right of access to information are among the foundational pillars of media and information literacy, as they enable individuals to engage meaningfully with the media and digital environment, participate in the production and dissemination of knowledge, and

seek, receive, and impart information and ideas freely, safely, and on an equal basis. However, addressing these rights from a general perspective, without considering the shrinking digital space and the barriers that certain groups face in effectively accessing information and the digital environment, may contribute to reproducing exclusion within the information environment itself, even in contexts that appear more open or inclusive.

In this regard, Article 21 of the Convention on the Rights of Persons with Disabilities assumes particular importance. It not only affirms the right to freedom of expression and opinion and access to information, but also directly links these rights to accessibility, communication, assistive technologies, sign language, Braille, augmentative and alternative communication, accessible content, and inclusive digital technologies. Accordingly, access to information from a disability inclusion perspective is not merely a matter of making content available; it also concerns whether such content is genuinely accessible, usable, and interactive for persons with disabilities.

This dimension becomes increasingly important as societies rely more heavily on digital platforms and online environments for information, services, and media engagement. The absence of reasonable accommodation or the use of non-inclusive design in digital platforms and services may prevent persons with disabilities from effectively accessing information or participating fully in the media and digital sphere. Similarly, barriers related to digital accessibility, inaccessible content, limited use of sign language, and the lack of accessible formats are not merely technical challenges; they are directly connected to the rights of access to information, digital participation, and information justice.

The significance of this issue is reinforced by the List of Issues issued by the Committee on the Rights of Persons with Disabilities regarding the initial report of the State of Palestine (CRPD/C/PSE/Q/1), particularly concerning freedom of expression, access to information, respect for privacy, access to communication services, digital services, and accessible content. These concerns demonstrate that disability inclusion within the media and digital environment is not merely a technical matter but is fundamentally linked to the enjoyment of rights and freedoms.

Accordingly, there is a need to integrate a disability inclusion perspective more explicitly into the overarching vision of media and information literacy in Palestine. This includes developing policies that are more responsive to the need for reasonable accommodation, universal accessibility standards, and digital accessibility; promoting accessible content; incorporating sign language and accessible formats into the media and digital environment; and treating access to information as a substantive right that requires the removal of barriers that may hinder its equal enjoyment.

This issue becomes even more critical during emergencies, crises, armed conflict, military occupation, and situations involving the rapid dissemination of information. In such contexts, the absence of effective access to information may result not only in digital or informational exclusion but may also directly affect personal safety, protection, and access to essential services and information. This is particularly relevant in light of international obligations relating to situations of risk and humanitarian emergencies under Article 11 of the CRPD. Therefore, the development of a national Media and Information Literacy Strategy requires treating universal access to information as a core component of the governance framework of the media and digital environment, rather than as a purely technical issue or a matter of subsequent accommodations.

4.4 Accessibility and Accessible Content

The digital environment, including online platforms, social media, digital services, and the continuous flow of media and information content, has become an essential component of the contemporary public sphere and of the mechanisms through which knowledge, information, services, participation, and public oversight are accessed. In this context, digital accessibility is no longer a marginal technical issue or a matter of subsequent technical adjustments. Rather, it has become one of the fundamental prerequisites for ensuring substantive equality in access to information, participation, and accountability within the media and digital environment.

From this perspective, digital accessibility is not solely a matter of possessing technical skills. It is also determined by the design of digital platforms and services, media and information content, and the extent to which they are accessible, usable, and interactive for different groups, including persons with disabilities.

Inaccessible content or platforms that fail to incorporate universal design principles can effectively exclude entire groups from the information and digital environment, even amid the rapid expansion of technology and digital spaces.

In this context, digital accessibility standards are directly linked to the right of access to information, freedom of expression, and digital participation on an equal basis with others, as affirmed by the Convention on the Rights of Persons with Disabilities (CRPD), particularly Article 9 on accessibility, including access to technology, information systems, facilities, and services, and Article 21 on freedom of expression and opinion and access to information. The importance of this dimension continues to grow considering the rapid expansion in the use of artificial intelligence, electronic services, multimedia tools, and digital applications in education, media, and access to information. The absence of universal accessibility standards within these environments may further deepen digital and information divides, particularly for persons with disabilities.

The consequences of these shortcomings extend beyond technical and service-related dimensions and directly affect fundamental rights and freedoms. The absence of accessible content, limited use of sign language, insufficient availability of accessible formats, lack of alternative text, and inaccessible digital design may effectively deprive persons with disabilities of meaningful access to information and equal participation within the digital and media sphere. This, in turn, has direct implications for information justice and public participation.

This issue assumes additional significance in the Palestinian context considering ongoing discussions concerning the digital sphere, freedom of expression, and cybercrime, as well as the observations and reports issued by international human rights mechanisms. In its List of Issues concerning the initial report of the State of Palestine under the International Covenant on Civil and Political Rights (CCPR/C/PSE/Q/1), the Human Rights Committee requested information from the State of Palestine regarding individuals who had been detained or prosecuted on the basis of their social media posts during recent years. Furthermore, in its concluding observations on the report of the State of Palestine (CCPR/C/PSE/CO/1), the Committee expressed serious concern regarding restrictions on freedom of opinion and expression and the use of certain legal provisions relating to the digital and media environment. This issue becomes even more significant when considering persons with disabilities, who may experience the effects of restricted access to information, a shrinking digital space, or inaccessible content in a disproportionate manner.

Practical developments related to the digital sphere also raise questions regarding the role of the judiciary and the Public Prosecution in maintaining a balance between the legitimate regulation of the digital environment

and the protection of fundamental rights and freedoms, particularly in matters relating to freedom of expression, digital content, and access to information. Palestinian human rights studies and reports have highlighted growing concerns regarding the expanding impact of cybercrime-related legislation and practices on digital rights and freedom of expression within the Palestinian digital environment.

Accordingly, there is a need to address these issues more explicitly within analyses of the Palestinian context and the key issues associated with media and information literacy. This includes freedom of expression, access to information, digital accessibility, accessible content, and the balance between regulation and rights and freedoms within the digital sphere, alongside a disability inclusion approach. There is also a need to draw upon international standards and recommendations issued by United Nations mechanisms when developing the overarching vision of the national strategy, particularly regarding the challenges and opportunities associated with the media and digital environment in Palestine from the perspective of disability inclusion and information justice.

4.5 Privacy and Data Protection in the Digital and Information Environment

Issues related to privacy and personal data protection have become central to discussions concerning the digital environment, digital rights, and media and information literacy, considering the rapid expansion of digital platforms, artificial intelligence, electronic services, social media, and the vast flow of personal data and information associated with digital tracking, analytics, algorithms, and targeted advertising. Privacy is no longer viewed solely as a technical issue; rather, it has become an integral component of the human rights framework governing the digital and information environment and the balance between technological advancement and fundamental rights and freedoms.

From this perspective, media and information literacy is more closely connected to issues of privacy and data protection than is often reflected in traditional approaches that focus primarily on information verification skills or the safe use of digital platforms. Developing critical awareness within the digital environment also requires an understanding of how data are collected, processed, and shared; how they are used; and the risks associated with digital surveillance, profiling, manipulation of content, and privacy violations within the information environment.

The significance of this issue becomes even more pronounced when viewed through a disability inclusion lens. Persons with disabilities may face heightened risks related to digital privacy, misuse of personal data, and digital discrimination, particularly considering the growing reliance on applications and services linked to accessibility, communication, and assistive technologies. In addition, inadequate safeguards or the absence of inclusive design within digital environments may expose persons with disabilities to higher levels of information vulnerability, indirect discrimination, and digital exclusion.

In this regard, Article 22 of the Convention on the Rights of Persons with Disabilities (CRPD) is particularly important, as it affirms the right of persons with disabilities to the protection of their privacy, personal data, and information on an equal basis with others, including information relating to health, rehabilitation, services, and support. Such protection is directly linked to dignity, autonomy, and safe participation in the digital and information environment.

This issue is also highly relevant in the Palestinian context, considering the absence of a comprehensive and enforceable personal data protection law to date, despite the introduction of a draft decree-law on personal data protection in recent years. This legislative gap raises concerns regarding the regulation of personal data processing and the safeguards related to protection, oversight, and judicial remedies within the digital environment. The importance of these issues continues to grow with the increasing use of digital platforms, electronic services, artificial intelligence, and data analytics, all of which create additional challenges related to privacy protection, digital security, algorithmic discrimination, and the permissible use of personal data within the digital and information sphere, particularly for persons with disabilities and other groups vulnerable to digital exclusion or information-related risks.

Accordingly, the development of a national Media and Information Literacy Strategy in Palestine requires privacy and data protection to be treated as integral components of the human rights framework governing the digital environment, rather than as isolated technical or legal issues. It is equally important to integrate these concerns more explicitly into the analysis of the Palestinian context and the challenges associated with the media and digital environment, including digital rights

awareness, data protection, digital security, privacy safeguards, and the balance between technological development and the protection of fundamental rights and freedoms, in a manner consistent with international human rights standards and a disability inclusion approach.

4.6 Media and Information Literacy Between Digital Regulation and Rights and Freedoms

Media and information literacy is no longer limited to developing digital skills, verifying information, and critically engaging with media content. It now operates within a complex digital, legislative, and institutional environment in which issues of digital regulation, privacy, data protection, digital security, freedom of opinion and expression, access to information, and digital rights increasingly intersect. In this context, media and information literacy should be understood as part of the human rights framework governing the digital sphere rather than as an isolated technical or training-oriented field.

This dimension is particularly significant in the Palestinian context considering legislative and regulatory developments related to the digital sphere in recent years, including cybercrime legislation and practices, proposed laws concerning personal data protection, and the continued absence of an enforceable access to information law. These developments reflect the transformation of the digital sphere into a domain closely connected to rights, freedoms, policies, and digital governance rather than a purely technical space.

In this regard, the core international human rights treaties ratified and published by the State of Palestine assume particular significance, especially the International Covenant on Civil and Political Rights (ICCPR), General Comment No. 34 of the Human Rights Committee on Article 19, the reports of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, and other international standards relating to digital rights and the information environment. These frameworks affirm that the rights and freedoms protected offline must enjoy the same protection online, including freedom of expression, access to information, privacy, non-discrimination, and inclusion.

The observations and recommendations issued by United Nations human rights mechanisms concerning the State of Palestine also demonstrate increasing attention to issues relating to the digital sphere, freedom of expression, and online content, including restrictions on expression through social media, cybercrime-related legislation and practices, and safeguards necessary to protect rights and freedoms within the digital environment. This underscores the importance of integrating these issues more explicitly into analyses of the Palestinian context related to media and information literacy and avoiding their treatment as purely technical or regulatory matters detached from the information environment itself.

The importance of this balance becomes even more evident when viewed through a disability inclusion lens. Persons with disabilities may be disproportionately affected by barriers related to digital accessibility, inaccessible content, inadequate reasonable accommodation, or the absence of universal design within digital environments. Likewise, restrictions affecting access to information, digital services, or online public spaces may have a heightened impact on groups that already face barriers to accessibility and digital participation.

Accordingly, the development of a national Media and Information Literacy Strategy in Palestine requires a more context-sensitive approach that reflects Palestinian realities, current digital transformations, and emerging challenges. Such an approach should maintain a balance between the legitimate regulation of the digital sphere and the protection of rights, freedoms, and human dignity, including freedom of expression, access to information, privacy, digital accessibility, and information justice, while treating disability inclusion as an integral component of the overarching vision governing the media, digital, and information environment.

5. Towards a More Inclusive and Equitable Approach to Media and Information Literacy in Palestine

The preceding observations demonstrate that the development of a national Media and Information Literacy Strategy in Palestine is not merely a matter of designing training programs or developing tools for engagement with the digital and information environment. Rather, it requires a broader reconsideration of the conceptual, normative, and human rights framework governing this field, reflecting the complex nature of the contemporary digital and media environment and its connection to digital rights, access to information, freedom of opinion and expression and the safeguards protecting it from being undermined, privacy, digital accessibility, information justice, public participation, and disability inclusion.

In this context, there is a need for a more comprehensive approach to media and information literacy that views it as part of the human rights and institutional environment governing the digital sphere, rather than as a technical or training-related pathway detached from broader political, legislative, and human rights contexts. Media and information literacy cannot be separated from the environment in which information is produced or from the rules, standards, and institutions that regulate access to content, its circulation, and engagement with it within the digital and media public sphere.

Accordingly, there is a need to expand the references and standards underpinning the proposed national strategy to more explicitly include international law and United Nations treaty-based and non-treaty mechanisms alongside the specialized frameworks developed by UNESCO in the field of media and information literacy. Issues relating to freedom of expression, access to information, digital rights, privacy, non-discrimination, reasonable accommodation, and digital accessibility have become integral components of global human rights and normative discussions directly linked to the digital and information environment and can no longer be treated as technical issues detached from the human rights framework governing the digital sphere.

There is also a need to integrate disability inclusion more deeply as an analytical lens within the overarching vision of the national strategy so that it extends beyond target groups and subsequent interventions to encompass the conceptual, normative, and governance foundations of the strategy

itself. Persons with disabilities are not merely recipients of content or digital awareness services. They are an integral part of the media and information environment, including access to information, content production, digital participation, the design of platforms and services, and meaningful participation in consultation and decision-making processes related to the digital and media sphere.

This dimension becomes increasingly important considering ongoing digital transformations and the growing reliance on technology, digital platforms, and artificial intelligence in production, dissemination, and regulation of information. The absence of a rights-based approach, reasonable accommodation, accessibility, universal design, and disability inclusion may directly or indirectly contribute to the creation of new forms of digital and information exclusion, particularly for groups facing additional barriers within the digital environment.

An effective national Media and Information Literacy Strategy must also engage more realistically with the Palestinian digital environment and its challenges, including maintaining a balance between digital regulation and rights and freedoms, strengthening safeguards related to freedom of expression and access to information, protecting privacy and personal data, promoting digital accessibility and accessible content, and ensuring that exceptions or regulatory practices do not become mechanisms for shrinking the digital public sphere or deepening digital and information divides.

From this perspective, the development of a national Media and Information Literacy Strategy in Palestine presents an opportunity to advance a more inclusive and equitable vision of the media, digital, and information environment, based on a balance between regulation and rights and freedoms, between technological development and digital justice, and between access to information and its effective accessibility on an equal basis with others. Ultimately, media and information literacy is not only about the ability to engage with information, but also about the nature of the environment in which knowledge is produced, information flows are governed, and opportunities to access and shape information within the contemporary digital public sphere are determined.

6. Conclusion

The observations presented in this paper demonstrate that the development of a national Media and Information Literacy Strategy in Palestine extends far beyond the acquisition of technical or digital skills. It raises broader questions concerning human rights, normative, and institutional framework governing the media, information, and digital environment itself. Media and information literacy does not operate in a vacuum; rather, it functions within an environment where freedom of expression, access to information, privacy, digital regulation, digital rights, accessibility, information justice, and public participation increasingly intersect within the framework of respect for the Basic Law and the international treaties to which Palestine has acceded.

In this regard, the significance of the Reference Document lies in its contribution to an important discussion on the need to develop a national Media and Information Literacy Strategy in Palestine, particularly considering rapid digital transformations and the growing influence of digital platforms, social media, and artificial intelligence on the production, dissemination, and shaping of information within the public sphere. However, the complexity of this environment requires a broader and more integrated approach that views media and information literacy as part of an indivisible framework of rights, freedoms, human dignity, and digital justice, including disability inclusion, rather than as a separate technical or training-oriented field.

The paper further demonstrates that disability inclusion, as a governing principle and analytical lens, remains structurally absent from the overarching framework of the Reference Document, whether at the level of the conceptual and normative framework, governance and consultation processes, access to information, digital accessibility, accessible content, or information justice. The issue is therefore not merely one of including persons with disabilities among the target groups, but of rethinking the media and information environment itself through a more inclusive, equitable, and accessible lens.

This issue becomes increasingly important considering the rapid transformations taking place within the Palestinian digital sphere and the related discussions, legislation, draft laws, and practices concerning digital regulation, cybercrime, data protection, access to information, and digital rights. The development of a national Media and Information Literacy Strategy therefore offers an opportunity to foster a more balanced understanding of the relationship between digital regulation and rights and freedoms, particularly in light of the international treaties ratified and published by the State of Palestine, including the International Covenant on Civil and Political Rights (ICCPR), the Convention on the Rights of Persons with Disabilities (CRPD), relevant United Nations mechanisms, and the specialized frameworks developed by UNESCO in this field.

Ultimately, building a more inclusive and equitable media and information environment depends not only on strengthening digital skills or combating misinformation, but also on the nature of human rights and institutional framework governing access to information, its dissemination, and participation in its production within the digital public sphere. Media and information literacy is not only about how information is used, but also about who has the ability to access it, participate in its production, and influence its flow within a digital environment that should not become a new mechanism for reproducing exclusion or restricting rights and freedoms, but rather a space that is more equitable, open, and accessible to all.