

Using human translators' skills to bridge the digital communication divide between migrants and public services through an *accessibility assessment*: outsmarting machines

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ABSTRACT

The changing language industry requires experts who are able to provide new services. In the face of the advance of machine translation and artificial intelligence, it is vital to foreground the added value of human translators' skills to provide services that machines cannot provide in this industry (Massey et al., 2022). On this understanding, in this chapter we highlight the added value of human translators' skills to provide services that machines cannot provide in the current language industry beyond the scope of automation. Specifically, we contend that translators can provide an *accessibility assessment* of defective digital resources created by the Public Administration, which will contribute to enhance the digital communicative divide occurring in institutional contexts. Thus, after introducing our *accessibility assessment*, we will implement the first phase of this *accessibility assessment* and, using a case study, we will showcase its usefulness as a first step to enhance digital communication between Spanish authorities and migrants.

KEYWORDS

human translators, translators' skills, digital communicative divide, *accessibility assessment*, Public Administration

1. Introduction

In Translation Studies (TS), accessibility has been traditionally linked to groups with disabilities. Nonetheless, several scholars have recently foregrounded the need to shift from particularist accounts of accessibility, which frame access as exclusively or mainly related to certain groups of people, towards a universalist account, in which access issues concern all citizens (Greco 2018; Jankowska 2019; Jiménez, 2021). Unquestionably, embracing this universal view of accessibility will allow certain citizens, who are not covered by disability legislation (Hansen-Schirra & Maaß, 2020, p. 27), to benefit from accessible services. This is the case of newly arrived migrants, who are often deprived of accessible multilingual communication when arriving in their host countries across the globe in digital and non-digital contexts (Felici & Griebel, 2019; Klein, 2015; Taibi, 2006; Ruiz, 2021a; Toledo & Conrad, 2017).

In our view, addressing the accessibility of digital communication in institutional contexts is essential since, although e-government is supposed to provide a more "efficient, affordable and convenient citizen-centred service" (Longford, 2002, p. 2), in practice online administration introduces "new layers of complexity" for citizens when digitally interacting with the public services (Loveluck, 2015, p. 93). Furthermore, it has been suggested that this digital communication divide may be accentuated when vulnerable groups, such as migrants, are brought into the equation. In this vein, Loveluck (2015) argues that in these cases "far from making things more easy [*sic*] and efficient, [...] online administration can be a strong filter,

which prevents many individuals entitled to welfare benefits [...] from actually receiving them” (p. 93). This fact is generally connected to the so-called digital divide or digital exclusions³, and particularly to the “second-level digital divide” (Hargittai, 2001 in Loveluck 2015, p. 93), which takes into account “many other socioeconomic factors and more subtle forms of resource inequalities such as experience and abilities, social capital, autonomy of use, or availability of social support” (Loveluck, 2015, p. 93). In fact, in migratory contexts, this digital divide can also be connected to digital literacy⁴, which has arisen as a third-level digital divide, where different skill levels create new inequalities related to the knowledge gap (see Khorshed & Imran, 2015, p. 347).

In this chapter, we propose a possible solution to initially bridge this digital communicative divide: using human translators’ skills to provide an *accessibility assessment*⁵ of defective digital resources for the Public Administration in order to enhance digital communication in institutional contexts. To do so, we will focus on the Spanish context, where we have detected a profound digital communication divide between the Spanish Ministry for Migration⁶ and newly arrived migrants, during the immigration procedures that allow them to obtain their residence documentation in Spain (Ruiz, 2021a; 2021b). This chapter reports on the first stage of an ongoing project which relies on the methodological research proposal of Borja et al. (2009, pp. 60-61). This proposal comprises three fundamental stages of research: a conceptual stage, an empirical stage and an interpretative stage. Our chapter is framed within the conceptual stage of the project, in which we seek to achieve a twofold goal. On the one hand, we aim to outline an *accessibility assessment* that may assist in enhancing digital communication between migrants and Spanish authorities in the case study chosen. On the other hand, we seek to foreground the added value of human translators’ skills to provide this *accessibility assessment* within the current language industry. In order to meet our twofold goal, the chapter is structured as follows. Firstly, we will present an overview of how the Spanish Ministry for Migration digitally communicates with migrants in our case study to identify specific problems that hinder accessible digital communication in this context. Secondly, drawing on this prior analysis, we will outline the *accessibility assessment* proposed. Thirdly, we will showcase its usefulness to enhance digital communication, and, finally, our main conclusions will be summarised.

2. Digital communication between the Spanish Ministry for Migration and migrants: an overview to identify problems

For years our research endeavours have been focused on exploring how the Spanish Ministry for Migration (hereinafter the Ministry) communicates with migrants during immigration procedures in Spain (Ruiz, 2021a; 2021b). This research interest stems from the fact that the Ministry is a bureaucratic agency of key symbolic and material significance for migrants’ insertion into Spanish society, since it implements the Spanish immigration system by regulating and creating immigration procedures in Spain. As rightly argued by Eurrutia (2016, p. 37), immigration services have created new administrative needs in our societies concerning the provision of public information. In Spain this has led this Ministry to be primarily responsible for providing migrants with key public documents to effectively allow them to apply for residence in Spain. The Ministry has chosen to provide all this information digitally through the webpages of the *Portal de Inmigración* (hereinafter the Immigration Portal).

Concerning how digitally mediated communication occurs in this Ministry, several relevant conclusions may be drawn from previous research (Ruiz, 2021a). Even if “websites are a crucial

point of entry for many citizens seeking services” (González, 2017, p. 163), the Ministry implements a deficient translation policy that generally hinders migrants’ chances of understanding the immigration procedures involved when accessing its mainly monolingual website (Ruiz, 2021a, pp. 415-419). Furthermore, our previous research shows that migrants have unequal access to (multilingual) digital information in the Immigration Portal, depending on the kind of immigration procedure in which they are involved. Thus, broadly speaking, our previous studies reveal considerable differences in how the Ministry supports, or fails to support, migrants digitally throughout immigration procedures in terms of both the amount of digital materials available in Spanish and, especially, the digital translated materials available⁷. After previously advocating for translation provision as one possible way of partially bridging this digital communicative divide (Ruiz, 2021a; 2021b), here we seek to address another problematic issue identified while investigating translation policy in this Ministry: the incomprehensibility of the digital administrative documents⁸ and of the multimodal features used by this institution. Thus, in this chapter we seek to address this matter by analysing the accessibility of the defective digital administrative documents and of the defective multimodal features used on the Ministry’s webpage (see section 3).

In TS, both aspects have been previously discussed. On the one hand, the obscurity of Spanish administrative texts has not escaped scholarly debate (see Ruiz, 2021c, in press; Way, 2016), which is only natural considering that professional translators are confronted with these defective administrative source texts (STs) in their professional practice (Molnár, 2013). In fact, previous TS research shows that administrative texts’ defects should not be underestimated, since they impact the comprehensibility of the subsequent translations (Felici & Griebel, 2019; Klein, 2015; Taibi, 2006; Toledo & Conrad, 2017; Ruiz, 2021a). This undeniably foregrounds the need to pay more attention to ST quality in TS (Ruiz, in press), although our discipline has traditionally paid more attention to the quality of translations. As for multimodal communication, several TS researchers have also defended that multimodality should be brought into the equation when addressing accessible communication, since audiovisual information represent a considerable part of the information flow nowadays (Arias & Fernández, 2020, p. 309). We concur with this, which justifies considering the role of multimodal features when addressing accessible institutional communication in this chapter. Addressing these multimodal features is certainly essential since – even if non-verbal sources of meaning are often overlooked in the process of meaning construction – making sense of texts, even of their linguistic parts alone, is unviable without analysing how other features may be contributing to the construction of their meaning (Kress, 2000, p. 337). Having considered the specific digital communication needs and problems identified in the Spanish context, we will now outline the *accessibility assessment*.

3. The *accessibility assessment*: a starting point

Considering the digital communication needs identified in terms of accessible communication in our case study (section 2), at this conceptual stage of our research we believe that the *accessibility assessment* needs to start by addressing both the defective administrative texts and multimodal features produced by the Ministry in question. Given the array of digital resources that may be analysed within this webpage, we will focus on a specific case study: the resources involved in the digital communication between the Ministry and EU nationals during their residence application process in Spain⁹.

Due to space constraints, we have chosen to divide our *accessibility assessment* into three separate phases. Our accessibility assessment draws on the features of accessible communication identified in Maaß (2020, pp.26-48), who contends that in order to grant users access to information and, then, in order to enable them to take it as a basis for their subsequent decisions and actions, texts (or resources in this case) need to be retrievable, perceptible, comprehensible, linkable, acceptable and action-enabling. In this model, these features of accessible communication represent different steps that build upon each other. The rationale that lies behind the model is that there is always a text and a user perspective to be considered when assessing accessible communication (i.e. a text needs to be retrievable —the text perspective— in order for users to retrieve it —the user perspective). Since this chapter is framed within the conceptual stage of our research project (see section 1), we will carry out the first phase of the *accessibility assessment*, in which we will address the first features required for accessible communication to occur, i.e. retrievability, perceptibility and (partial) comprehensibility¹⁰ of the resources involved, by identifying and describing defects in them and evaluating how they may hinder digital communication. Thus, the results obtained in the first phase of the *accessibility assessment* will pave the way for the ensuing phases of our *accessibility assessment* in order to allow us to continue exploring the features of accessible communication required (Maaß2020, p. 26). In other words, it facilitates the second empirical phase in which a pilot study will be designed and performed drawing on usability and user experience studies (the empirical stage of the research project) in which we will address whether these resources are comprehended by users empirically, whether they are able to connect them to prior knowledge and whether they find them acceptable (Maaß,2020). And, lastly, the third phase will be performed where the main results obtained in the empirical study will be analysed by exploring whether these resources are action-enabling and allow users to utilise them as basis for decision-making and acting in practice(the interpretative stage of the research project). Table 1 summarises all of the above (phase 1 of the *accessibility assessment* appears in blue, phase 2 appears in green and phase 3 appears in red):

TABLE 1

Accessibility assessment

ACCESSIBILITY ASSESMENT (The author)	FEATURES OF ACCESSIBLE COMMUNICATION (Adapted from Maaß 2020, pp. 26-48)		RESEARCH PROJECT (Borja et al. 2009)
	Text perspective	User perspective	
Phase 1: Identification, description and evaluation of defective resources that may hinder digital communication	Retrievable	Retrieve	Stage 1: Conceptual stage
	Perceptible	Perceive	
	Comprehensible	Comprehend	
Phase 2: Empirical study based on phase 1	Linkable	Recall	Stage 2: Empirical stage
	Acceptable	Accept	
Phase 3: Interpretation of results obtained in phase 2	Action-enabling	Act	Stage 3: Interpretative stage

Source: prepared by the author.

As for why translators are able to implement the first phase of the *accessibility assessment* to be performed as described in this chapter, several reasons justify this position. In our view, in order to perform this first phase of the *accessibility assessment* within the public services context, it needs to be linked to the notion of effectiveness of the digital resources involved (along the lines of the model mentioned above). In previous research, we have defined what effectiveness entails for translation purposes, which within the public services context is measured by:

[...] the extent to which translations are tailored to the varying needs of their target readers in order to allow them not only to access their key public information, but also to use this information to become active participants with control over the communicative act occurring within the public service context. (Ruiz, 2021b, p. 165)

In our view, the effectiveness that this first phase of the *accessibility assessment* pursues is exactly the same, and, accordingly, translators are trained to achieve not only translation effectiveness, but also to assess both ST and multimodal feature effectiveness in this digital context. This is the case, since as argued in Ruiz (in press):

Translators, as intercultural mediators, are in an ideal position to discern how the problems of the ST may affect not only its comprehension, but also the comprehension of its subsequent translations into different languages. Accordingly, translators [...] not only identify problems [that hinder texts' accessibility] [...] that a qualified monolingual linguist or a copy editor would identify [...], but they are also trained to anticipate textual, linguistic, culture-bound and (subsequent) translation problems that would go unnoticed by other language professionals. This is so since translators not only analyse the STs' comprehensibility based on thorough knowledge of the source language, the source culture and the source Public Administration, but also by recognising how the asymmetries of the tentative target languages, target cultures and target Public Administrations involved may affect the comprehensibility of the ST and its translations.

However, this rationale not only applies to defective STs, but also to defective multimodal features, since translators are trained to know how the synergy of an array of semiotic signs, such as images and texts, create meaning and how this synergy may impact on users' understanding. Therefore, we argue that translators are well-equipped to implement this first phase of the *accessibility assessment*, since they are in an ideal position to identify and solve communication problems that other language professionals cannot. Then, as they do during the translation process, when performing this first phase of the *accessibility assessment*, translators need to identify which defects may hinder accessibility of administrative texts and multimodal features in the digital context involved. Once these defects have been identified, translators are also trained to reflect upon the implications they may have for effective and accessible communication and what the possible solutions may be. Therefore, the *accessibility assessment* proposed here is a mere starting point to address accessibility of digital resources in a systematic way. As can be observed above, we have customised our *accessibility assessment* to the needs identified in the digital context studied (see section 2). Accordingly, we contend that *accessibility assessments* should not be static but flexible, in order to allow researchers to adapt their assessments to the specific needs identified in a given context.

4. Showcasing the usefulness of the first phase of the accessibility assessment: identification and evaluation of defective resources that hinder digital communication

After succinctly presenting our *accessibility assessment*, in this section we will address its first phase and showcase its usefulness to enhance digital communication in our case study. In the first phase of our *accessibility assessment*, framed within Descriptive Translation Studies (Toury, 2012), we will address two main aspects. Firstly, we will explore the Ministry's website describing the multimodal features that EU nationals encounter when digitally accessing the information concerning their immigration procedure. Secondly, after describing the array of digital administrative texts involved in this EU immigration procedure, we will focus on one – the EU immigration form that allows EU nationals to apply for residence documentation in Spain. Finally, we will evaluate the resources described exploring to what extent they are retrievable, perceptible and comprehensible for users (Maaß 2020).

4.1. Identification and description

In this section, we will identify the defects present in the digital resources analysed in this case study.

4.1.1. The multimodal features

In order to access the digital documents concerning their immigration procedure, EU nationals need to navigate through the different webpages of the Immigration Portal to find this scattered digital information.

Figure 1 represents the initial webpage found on the Immigration Portal. On the left-hand side of the webpage, a grey vertical column, in the form of an index of the Immigration Portal, can be found. The upper horizontal section of Figure 1 comprises: (1) the emblem of the Spanish government; (2) the names of the different institutions involved (Spanish government, the Ministry involved and the department responsible for immigration within the Ministry); (3) the Immigration Portal reference and (4) a navigation bar for information searches. Apart from having the function of clearly situating the webpage in the Spanish institutional context, it is worth highlighting that the blue colour selected for this upper section is quite revealing since, as suggested by empirical studies, “‘stability’ and ‘trustworthiness’ are traditionally associated with blue” (Hynes, 2009, p. 551) – two attributes public sector institutions may want to foreground in this context. Below this upper horizontal section, an image of a smiling girl, possibly coming from a migrant community, may be found.

FIGURE 1

Initial webpage of the Immigration Portal



Source: Immigration Portal of the Spanish Ministry for Migration.

In the *Estudiar, trabajar y residir. Hojas informativas* section of the index, and after navigating through three intermediate webpages, EU nationals find the first digital document relevant for their procedure: the *Hoja informativa*, which is an extended leaflet, roughly explaining the procedure (Figure 2). As can be observed in Figure 2, the distribution of this webpage is the same as the one presented in Figure 1, except for the horizontal image chosen for the central section. In this case, the authorities have opted for an image in which people, mostly young people, can be seen studying in a library.

FIGURE 2

Extended leaflets in the Immigration Portal



Source: Immigration Portal of the Spanish Ministry for Migration.

In the *Estudiar, trabajar y residir. Hojas informativas* section of the index, the actual leaflet applicable to this procedure is found in the subsection *Folleto informativo*, as can be observed in Figure 3 (with the same distribution and horizontal image used in Figure 2). Two aspects are worth highlighting in this case: (1) EU nationals' leaflets are the only ones provided only in Spanish, while the other immigration leaflets included in this webpage have been translated into English and French; (2) the multimodal decision to use flags to visually represent the languages available for each document. As for the flags, on the one hand, the Spanish flag

has been used to mark the digital information available in Spanish. Even if Spanish is not only spoken in Spain, and Spanish-speaking migrants worldwide are the end users of these documents, the logic of this decision may be understandable since Spain is the country from which all these immigration documents originate. On the other hand, the situation is far more complicated in the case of the flags used to visually represent the languages chosen for translation (a multimodal decision maintained in the different webpages of the Immigration Portal), because specific national flags have been used to represent languages that are spoken in several countries. Specifically, the British flag has been used for the English translations, the French flag for the French translation, and further examples can be found in other webpages of the Ministry (for instance the flag of Saudi Arabia for the Arabic translation and the Portuguese flag for the Portuguese translation.)

FIGURE 3

Leaflets section in the Immigration Portal



Source: Immigration Portal of the Spanish Ministry for Migration.

The last relevant digital document available for this EU procedure can be found in the *Modelos de solicitud* section of the vertical index on the left-hand side of the Immigration Portal. We are referring to the application form (Figure 4).

FIGURE 4

Immigration forms in the Immigration Portal



Source: Immigration Portal of the Spanish Ministry for Migration.

Besides the common elements present in Figure 4 if compared with the figures above, it is interesting to note the intriguing choice of a mountain as the central image on the page. In this section, and after navigating through several webpages, the applicants will find the application form relevant to them (*EX-18*).

4.1.2. *The immigration form*¹¹

After the succinct description presented above, the main defects in the immigration form involved will be analysed in more detail here following a top-down approach. The title of the form is found in the header and reads: “Application form for the certificate of registration of EU citizens”. This formulation is problematic since this form is not addressed solely to EU citizens, but all EEA nationals (comprising EU States, Iceland, Liechtenstein and Norway) and also Swiss nationals¹².

The sections of the form are presented in the first two pages: parties’ details (sections 1 to 3), and the questions regarding the relevant immigration procedure (section 4). Several assumptions may be found in the first two pages of the form, such as: (1) not explaining cultural references (*DNI* or *NIE*)¹³; (2) creating acronyms not established in the Spanish language without further explanation (*PAS* for passport); (3) introducing terms in the form without further explaining them (*titular* at the beginning of page two) or (4) leaving blanks without specifying that they are to be completed by the authorities only (the *DIR3* code on page two). Additionally, both spelling mistakes and incongruences can be found: (1) presenting acronyms, such as *NIE*, separated and unseparated by full stops (only the latter option is correct); (2) presenting abbreviations without full stops (*Nº*) or (3) using both *PASSPORT* and *PAS*.

On the third page of the form instructions are presented in the form of footnotes, even though it has been found that applicants tend to avoid footnotes (Barnett, 2007, p. 13). Besides their location, several content-related problems arise when analysing the notes. For instance, footnote 3 includes an explanation of the non-existent abbreviations used to express marital status in Spanish. Furthermore, although this field reflects the five marital statuses regulated under Spanish law, it may be confusing for partners since it fails to clarify for them that being a partner is not a marital status in Spain. In footnote 4, the problem stems from the term *títulos*, which refers to the capacity in which the applicants’ representatives submit the form on their behalf. Indeed, after analysing possible definitions of *título* in Spanish, it became clear that it is difficult to establish a direct correlation between its possible definitions and the categories provided in the form¹⁴. In footnote 6, vital information concerning communication with the authorities is presented in small print and outside the frame of section 3, which makes it less likely to be noticed. In footnote 7, which reads “tick the appropriate box”, authorities seek to assist applicants in choosing the immigration procedure applicable to them, as part of section 4. Arguably, this short sentence is vague, since it does not clarify which criteria must be followed to tick one of or several of the categories available. Lastly, another vague sentence is found in the last paragraph of the page when specifying that forms are available at the *unidades encargadas de su gestión* or the “departments responsible for processing them”. Authorities certainly know which departments they are referring, but, if they are not specified, how will users know?

4.2. Evaluation

Several conclusions can be drawn from the first phase of the *accessibility assessment* performed above.

The defects encountered in the digital resources analysed suggest that, generally, they fail to be retrievable, perceptible and, thus, initially comprehensible for their end users. Firstly, since the ability to retrieve information requires the ability to find this information, the information-seeking behaviour of the heterogeneous migrant population involved should be considered when designing accessible resources. In this case study, all the resources available are provided only online, even if vulnerable groups of migrants —such as senior citizens or citizens with a low socioeconomic status— may encounter considerable problems when accessing online information (see Maaß, 2020, pp. 31-32). Unquestionably, this stems from the assumption that everybody can access online information, which fails to consider that some citizens may lack an internet connection, a device to do so or even the digital literacy required to navigate complex web structures. Furthermore, in our case study, the retrievability of the resources studied is unquestionably hindered by the complexity of finding the scattered digital information applicable to the EU immigration procedure analysed on the Ministry's webpage. Thus, in terms of retrievability of this procedure's digital information, EU nationals may be disadvantaged by this decision, unlike the applicants of other immigration procedures in Spain for whom all this digital information has been gathered on a fairly straightforward webpage (see Ruiz, 2021a).

As for perceptibility of these resources, only images and texts have been used in order to communicate with this migrant population, even though videos, audios or pictograms have proven to be useful when communicating with these communities (see Jiménez, 2021, p.47). Beyond that, if the specific multimodal features chosen to communicate with these migrants are considered, it may be argued that, generally, the multimodal decisions made call into question whether a lot of effort has been put into reconciling texts and images in the Immigration Portal.

Firstly, if we consider the image depicted in Figure 2, which was used on the extended leaflets section, we see a group of people, mostly young people, studying in a library. This is certainly an intriguing choice, as it seems to depict EU migration as mostly students in Spain, even though in 2020 the newspaper *La Vanguardia* reported that Spain was the third EU country to receive the most EU workers¹⁵. Arguably the image choice should be customised in view of that fact. Secondly, a communication problem may arise from the decision to use flags (Figure 3) to visually represent the languages available for each document. Even if, broadly speaking, these visual images may be understood across cultures to convey a language in this context, it is also possible that they may mislead some applicants into believing that the translations only apply to the nationals of the countries of the flag in question. Beyond this, an evident Eurocentric perspective seems to underlie the use of flags by the Ministry (these flags are used in all immigration procedures, not only EU immigration procedures). Thirdly, the mountain image used on the webpage devoted to the digital immigration form (Figure 4) is also worth mentioning. Interestingly, this image of a mountain appears on all the webpages of this portal presenting immigration forms, but it remains a mystery whether it has a specific meaning for the Spanish authorities. Nonetheless, this image is arguably not the most suitable to convey the information provided in a webpage on immigration forms. It would thus appear that little thought was given to which images to include in the webpages and how certain images, such as the aforementioned flags, could actually be misinterpreted by a heterogeneous migrant population. Undeniably, all of the above also impede users from forming assumptions on the function and

main content of the websites studied, which in turn hinders their comprehensibility of the resources involved

With respect to the defects encountered in the immigration form, several implications can be drawn from the analysis in terms of comprehensibility. To begin with, the EU-centric terminology used in the headline of the form is problematic for two main reasons: (1) because it is an imprecise term that seems to exclude certain nationals to whom this term also applies (other EEA nationals beyond EU nationals, and Swiss nationals); and (2) because applicants tend to skip headings that they think do not apply in their circumstances (Barnett, 2007, p. 15) (this is likely to occur to the applicants not included in the term). In addition, the many assumptions found in this immigration form (such as the unexplained cultural references *DNI* or *NIE* or the lack of specification that the DIR3 code section is to be completed by the authorities only), the undefined terms (such as the case of *titular*) as well as the incongruences and spelling mistakes (acronyms, abbreviations...) need to be addressed in order to enhance the comprehensibility of the form. Thus, in the light of all the above, it could be argued that comprehension of these resources is not favoured in this case study, which we will further address in the empirical stage of our project (see section 3). Table 2 summarises the initial findings obtained in the first phase of the *accessibility assessment*.

TABLE 2

Summary of phase 1 of the *accessibility assessment*

PHASE 1 OF THE ACCESSIBILITY ASSESMENT: Identification and description of defective digital resources and evaluation of how they hinder digital communication			
LEVEL	TYPE OF DEFECT	EXAMPLE	IMPLICATIONS IN TERMS OF HINDERING DIGITAL COMMUNICATION
Information architecture decisions in the website	Defective information architecture in this case study	In order to access the digital documents concerning their immigration procedure, EU nationals need to navigate through the different webpages of the Immigration Portal to find this scattered digital information. Furthermore, other means of communication could have been used to foster accessible communication, such as videos, audios or pictograms.	Access to this information is hindered by the fact that they do not find all the relevant information gathered on a fairly straightforward webpage as other migrants do (see Ruiz, 2021a), which may impact on their understanding of the immigration procedure as a whole. Furthermore, the existing digital resources are not complemented by other kind of digital resources such as videos, which can foster accessible communication.
Multimodal decisions in the website	Defective image	Library image used in the webpage devoted to leaflets and mountain image used in the webpage devoted to immigration forms	Little thought seems to have been given to reconciling text and image, which clearly does not foster effective communication.
		Flags to visually represent the languages available for each document	This decision may lead to confusion.
Design	Defective use	Footnotes presented at the end of	Reception studies have shown that

decisions in the form	of footnotes	the document	footnotes remain unread in forms (Barnett, 2007, p. 13). Accordingly, the best decision to foster effective communication is to situate them right at the point where users need them.
	Defective use of small print and outsideframes	In footnote 6, vital information concerning communication with the authorities is presented in small print and outside the frame of section 3.	Frames help users to know where to participate and small print makes information less likely to be noticed, so this could also be reassessed to foster effective communication.
Textual and linguistic decisions in the form	Vague sentences	Departments responsible for processing them (the forms)	This needs clarification since the reference is unclear.
	Imprecise terms	EU nationals	This EU-centric term is used in the headline of the form, which is problematic for two main reasons: (1) because it is an imprecise term that seems to exclude certain nationals to whom this term also applies (other EEA nationals beyond EU nationals, and Swiss nationals); and (2) because applicants tend to skip headings that they think do not apply in their circumstances (Barnett, 2007, p. 15).
	Vague terms	<i>Título</i>	After analysing the possible definitions of <i>título</i> in Spanish, a direct correlation between its possible definitions and the categories provided in the form is difficult to establish. Consequently, this vague term may lead to confusion.
	Undefined terms	<i>Titular</i>	We have not found who or what <i>titular</i> refers to in this form, which illustrates the difficulty of understanding this term.
	Made-up acronyms	<i>PAS</i>	The acronym <i>PAS</i> does not exist in Spanish. Spanish authorities have not only invented it, but they have also failed to explain that <i>PAS</i> means passport in the form. Again, this may lead to confusion.
	Non-existent abbreviations	Abbreviations used for marital status	The abbreviations used do not exist in Spanish, which may be confusing.
	Assumptions	<i>DNI</i> and <i>NIE</i>	Unexplained cultural references.

		DIR 3 Code	Unexplained internal references of the Spanish Public Administration.
		Partner	It fails to clarify that partner is not a marital status in Spain, which may be relevant to applicants completing the form.
	Vague instructions	Tick the appropriate box	Vagueness may mislead the applicant in this pivotal part of the form, where the appropriate immigration procedure must be ticked.
	Incongruences	Using both <i>PASSPORT</i> and <i>PAS</i>	Spanish authorities use both to refer to the same concept without further explanation, which may be confusing.

Source: prepared by the author.

Our initial findings seem to confirm that, in this case study, the existing digital communication divide between this Ministry and migrants stems not only from a deficient translation policy (Ruiz, 2021a), but also from an obscure and vague digital communication policy that results in the creation of defective administrative texts and multimodal features to communicate with these communities. Thus, even if this is an exploratory study, it brings to the fore that the further implementation of this *accessibility assessment* may play an essential role in not only in bridging this digital communication divide but also in enhancing the digital empowerment of migrant communities in the Spanish migratory context. Drawing on Mäkinen (2006, p. 381), we understand digital empowerment as “a multi-phased process [...] to increase the competence of individuals and communities to act as influential participants in the information society”. Mäkinen (2006, pp. 391-392) argues that digital empowerment is an “enabling process”, which proceeds like a spiral from the prerequisites for digital empowerment (first phase) —such as awareness or motivation— to the improvements in skills and knowledge (second phase) —such as being connected to widening social networks or learning new ways to act and participate by using information technology— to psychological changes that lead to digital empowerment (third phase). In Ruiz (2021a), we contended that, in migratory contexts, translation provision is a necessary prerequisite of the first phase of the process of digital empowerment. Indeed, for migrants with language barriers, translation will allow for a vital understanding of the digital context in question, which in turn enables them to address the other prerequisites of the first phase and, hence, to move towards the following phases of the process. Arguably, these initial findings can be taken to indicate that an efficient digital communication policy seems to be yet another prerequisite of the first phase of the digital empowerment process in this context, since it is an essential element for digital communication to actually occur. However, this needs to be empirically tested in the next research stage of our project (see section 3)¹⁶.

5. Conclusions

The changing language industry requires experts who are able to provide new services. In the face of the advance of machine translation and artificial intelligence, it is vital to foreground the

added value of human translators' skills to provide services that machines cannot provide in this industry (Massey et al.,2022). In this chapter, we have proposed an *accessibility assessment*, which will be provided by translators for the Public Administration, to enhance digital communication between migrants and the Spanish authorities, while bringing to the fore that human translators' skills equip them to provide this *accessibility assessment*.

The *accessibility assessment* proposed in this chapter is envisaged as a three-phase process. In this chapter, we have completed its first phase. Even if this exploratory analysis shows neither exhaustive nor definitive findings, it certainly provides us with data that may be relevant to future studies. In particular, it has allowed us to initially identify and evaluate defective digital resources which require close follow-up investigation in the next empirical and interpretative stages of our research. In the empirical stage, we plan to conduct a pilot study with the applicants to analyse the impact of these defective administrative texts and multimodal features on the success of the immigration procedure with a view to assess whether accessible communication actually occurs in the interpretative stage. Furthermore, these initial findings seem to confirm that, at times, online administration may be a strong filter for citizens accessing digital services (Loveluck, 2015, p. 93), which may result in them accessing key social rights unequally in practice. Therefore, since digitally mediated communication in the public sector has changed how citizens and authorities communicate, addressing lines of research that explore how this communication actually occurs is essential not only to promote an inclusive digital society, but also to help citizens to exercise their rights on an equal footing in a society that is becoming more and more digital by the minute.

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³ Mäkinen (2006, pp. 383-384) believes that digital exclusion describes the inequality suffered in this context better than digital division: “The excluded people of the information society are the ones who could increase their welfare and prospects by using the information technology, but who don’t have the chance or ability to use it.”

⁴ “Having the skills you need to live, learn, and work in a society where communication and access to information is increasingly through digital technologies” (Cambridge Dictionary) Further information available at: <https://dictionary.cambridge.org/dictionary/english/empowerment>

⁵ This term has been coined by the author.

⁶ In Spain, the ministry in charge of immigration procedures nationally is the *Ministerio de Inclusión, Seguridad Social y Migraciones* (Ministry for Inclusion, Social Security and Migration).

⁷ This imbalance results in the Ministry benefiting the most powerful groups of migrants in Spain, while marginalising other migrant communities in this digital context (for a more detailed description, see Ruiz, 2021a, pp. 415-419).

⁸ Further information available at: https://www.thelocal.es/20220608/spanish-legalise-is-so-wordy-most-spaniards-dont-understand-it-new-study-reveals/?utm_source=dlvr.it&utm_medium=facebook&fbclid=IwAR09-0LFbEhTt1Ye-h811jZ85OkdP5Qm2OiSJezrIEhOWrFIiVn2BT7eYQ

⁹ This choice has been informed by previous research (Ruiz, 2021a; 2021b).

¹⁰ In this first phase we will address comprehensibility analysing the problems users may encounter from a theoretical perspective that subsequently will be complemented by the findings of the empirical study performed in the second phase. Accordingly the comprehensibility feature of the model is addressed in both the first phase and the second phase of our *accessibility assessment*, as visually represented in Table 1.

¹¹ Further information available at :

https://extranjeros.inclusion.gob.es/ficheros/Modelos_solicitudes/mod_solicitudes2/18-Certificado_residencia_comunitaria.pdf

¹² Spanish authorities have chosen to create one immigration form to be used by EU nationals, other EEA nationals and Swiss nationals alike. However, this cannot be deduced from the imprecise title of the immigration form.

¹³ The *DNI* (*Documento Nacional de Identidad*) is the personal identity number assigned to Spanish citizens in Spain, and the *NIE* (*Número de Identidad de Extranjero*) is the national identity number assigned to foreign citizens residing in Spain.

¹⁴ Further information available at: <https://dle.rae.es/t%C3%ADtulo>

¹⁵ Further information available at <https://www.lavanguardia.com/politica/20200130/473221459259/espana-tercero-de-ue-con-mas-trabajadores-procedentes-de-otro-estado-miembro.html>

¹⁶ If these resources prove to be inaccessible at the end of our research project, the defects identified in the form analysed could be addressed through the implementation of “plain text design” (Ruiz, in press), i.e. “a consultancy service that translators can provide as “intercultural, interlingual [and intralingual] information brokers and consultants” (Way, 2020, p. 187) “in which the translator intervenes to ensure that a ST fits the textual and linguistic abilities of the ST audience by clarifying complex and expert-sounding texts for non-experts”. Unquestionably, a consultancy service provided by translators could also be of assistance in the case of the multimodal features analysed (Ruiz, 2021a, pp. 416-417). We hope to shed more light on this in the future.