

 Web Accessibility Policy

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# Purpose

To establish a common and uniform policy to enable ACT Government online information and services to be usable and available to as many people as possible.

# Scope

## Inclusions

This policy pertains to all content, functionality and services presented via a web browser that are fully or partly owned and/or operated by the ACT Government, and to the staff who create, develop, maintain, manage or otherwise contribute to the provision of these. This includes documents that are presented online, as well as websites and other web content created through public-private partnerships and government-funded programs (including grants) or initiatives delivered through third-party providers where the information is considered to be ‘government information’.

A website, or web browser interface, includes:

* Internet sites
* Intranet sites
* Extranet sites with both internal and external access, and
* Social media sites.

This policy applies to all content presented through the above interfaces, including:

* static and dynamically generated content
* web forms and web applications
* standalone documents in Portable Document Format (PDF), Microsoft Excel or Word, etc., and
* legacy content.

For the purpose of the ACT Government’s Web Accessibility Policy, accessibility is discussed in the context of people’s capability to utilise online content and functionality regardless of ability, age, background or technology. Effectively addressing disability-oriented accessibility issues will also usually result in a measurable improvement in usability for all users.

## Exclusions

The policy does not address accessibility and usability of content or systems for all ICT platforms, such as ACT Government workstations and commercial off-the-shelf software applications. However, by applying the principles within this policy, access to information and services using these platforms may be improved.

# Introduction

As digital communication continues to form a major channel between government and the community, it is vital for the ACT Government to provide online information and services that are usable and available to all people.

Web accessibility is about creating a more socially inclusive environment in which people can access online information and services. This includes people with disabilities (visual, auditory, physical, cognitive), people with functional limitations (older people, low literacy, English as a second language), as well as environmental factors (noise, illumination levels) and technology issues (slow connections, older browsers).

The ACT Government’s commitment to inclusive online information and services is governed by domestic law, international convention and government policy as outlined in Appendix B.

# Policy

## Implementation

### Compliance requirements and timeframes

All in-scope ACT Government online information and services shall comply with the *Disability Discrimination Act 1992* (DDA) on an ongoing basis under the framework of the Web Content Accessibility Guidelines version 2.0 (WCAG 2.0).

Up until 31 December, 2014, conformance to WCAG 2.0 fell in line with ACT Government’s commitment to the Australian Government Web Accessibility National Transition Strategy (NTS). As of 31 December, 2014, ACT Government websites must conform to WCAG 2.0 Level AA.

On June 5, 2018, the World Wide Web Consortium (W3C) formally published [WCAG 2.1 conformance requirements](https://www.w3.org/TR/WCAG21/#conformance-to-wcag-2-1) in order to fill known gaps that exist in WCAG 2.0. It is highly encouraged that ACT Government websites meet WCAG 2.1 Level AA compliance. It is also highly encouraged that any web content or resources that target disability-related audiences, including families and carers, and/or offer critical information conform to WCAG 2.1 Level AAA.

#### New sites

It is highly encouraged that new or redeveloped sites strive to meet WCAG 2.1 Level AAA. While meeting WCAG 2.1 Level AAA is not mandatory, it is considered good practice and will reduce the amount of re-work/effort required in the future if meeting WCAG 2.1 Level AAA is made mandatory. At present, all new or redeveloped sites must conform, at a minimum, to WCAG 2.0 Level AA as a condition of release and satisfy all other WCAG 2.0 conformance requirements.

#### Legacy content and sites

Any content released prior to this policy is considered legacy content and must meet the above requirements or be decommissioned.

### Non-conformance and risk management

Where the above compliance levels and associated timeframes cannot be met, all instances of non-conformance and the associated risks of not conforming must be entered onto the directorate/agency’s risk register. In addition, strategies to mitigate risk and related action plans must be documented.

Updated risk registers and risk mitigation/action plans must be submitted regularly to the Government ICT and Business Systems Committee.

### Priority of implementation

In general, the focus should be on ensuring all new web content, sites and functionality are accessible. Core governmental information, such as any customer services, education, revenue collection, emergency and health-related information, as well as any information that targets disability-related audiences should also be a top priority. However, each directorate/agency is responsible for determining the appropriate course of action by establishing priorities based on usage, audience, any legislative requirements to retain or publish content, and sensitivity of function, as well as on their own risk/cost/benefit assessment.

## Governance

Improved and ongoing web accessibility is a shared responsibility across all directorates and agencies, with oversight by the Government ICT and Business Systems Committee and supported by all Directors-General and DDTS. It is the responsibility of each Director-General/Commissioner/Agency head or equivalent to enforce this policy.

# Roles and responsibilities

| Role | Responsibilities | Positions |
| --- | --- | --- |
| DDTS | * Develop and maintain the ACT Government’s Web Accessibility Policy.
* Provide general accessibility advice to the ACT Government.
* Apply the ACT Government’s Web Accessibility Policy in the provision of services to other areas of ACT Government, including requests to publish content or documents.
 | Online Services Team |
| Directors-General (or equivalent) | * Overall responsibility for their directorate’s/agency’s compliance with the ACT Government’s Web Accessibility Policy.
* Promote commitment within their directorate/agency to continuously work towards an accessible web environment as an ongoing commitment to improved social inclusion and minimisation of risk of discrimination complaints under the DDA.
* Escalate any higher-level concerns to the Government ICT and Business Systems Committee.
 | Individual Directors-General (or equivalent) |
| System owners (business and/or technical) | * Promote efforts within their area to continuously and proactively work towards an accessible web environment as an ongoing commitment to improved social inclusion and minimisation of risk of discrimination complaints under the DDA.
* Designate a staff member (or team) to be the coordination point for the application of this policy and associated standards and guidelines, maintenance of their area’s web stocktake/register, risk register and risk mitigation strategy/action plans.
* Seek regular accessibility testing for web system and content, whether conducted by internal or external parties.
* Ensure area is suitably skilled in building accessible systems and content authors have access to, and undertake, relevant accessibility training.
* Procure accessible goods and services.
* Ensure sound process for handling complaints or requests for accessible alternative solutions.
 | Anyone |
| Staff who contribute to web systems | * Build and maintain understanding and familiarity with accessibility requirements and web technologies relied upon by the directorate/agency as they apply to their area of focus.
* Undertake relevant accessibility training appropriate to role (document and web content, design, development, publishing, etc.)
* Comply with this policy and associated standards and guidelines in developing and managing web content, and in assessing the conformance of web content and systems.
* Where applicable, help maintain the directorate’s/agency’s risk register and risk mitigation/action plans, assist with conformance checking and provide input into reports.
* Where applicable, understand roles and responsibilities in handling complaints or requests for accessible alternative solutions, as well as escalation points.
 | Website ManagerWeb AuthorsWeb Publishers |

# Compliance with this policy

There are no options to opt out of our responsibilities under the DDA. The risks associated with non-compliance and fragmented approaches across government include poor uptake of government information and services, reputational damage and financial loss due to successful litigation under the DDA. In addition, if accessibility is not considered from the outset, there can be financial impacts from undertaking retrospective redevelopment and work to ensure compliance.

If a directorate/agency believes that they have a good reason for not complying with this policy, they should follow the procedure set out in the Policy Waiver Procedure by contacting the directorate ICT Manager.

# Associated documents

* [Disability Discrimination Act 1992](http://www.comlaw.gov.au/Series/C2004A04426)
* [National Disability Strategy 2010-2020](http://www.dss.gov.au/our-responsibilities/disability-and-carers/program-services/government-international/national-disability-strategy)
* [United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)](http://www.un.org/disabilities/convention/conventionfull.shtml)
* [Web Accessibility National Transition Strategy (NTS)](http://www.finance.gov.au/publications/wcag-2-implementation/index.html)
* [Web Content Accessibility Guidelines (WCAG 2.1)](http://www.w3.org/TR/WCAG21/)
* [Web Content Accessibility Guidelines (WCAG 2.0)](http://www.w3.org/TR/WCAG20/)
* [World Wide Web Access: Disability Discrimination Act Advisory Notes](http://www.humanrights.gov.au/our-work/disability-rights/standards/world-wide-web-access-disability-discrimination-act-advisory)

# Appendix A—Glossary and document details

## Glossary

| Term | Definition |
| --- | --- |
| accessibility supported | Supported by users' assistive technologies as well as the accessibility features of operating systems, browsers and other user agents. (See [WCAG 2.1, Glossary](https://www.w3.org/TR/WCAG21/#glossary) for further details.) |
| AGIMO | Australian Government Information Management Office |
| DDA | [*Disability Discrimination Act 1992*](http://www.comlaw.gov.au/Series/C2004A04426) |
| DDTS | Digital, Data and Technology Solutions |
| ICT | Information and Communications Technology |
| legacy content or site | Any content, including documents, published online prior to the effective date of this policy. |
| NDS | [National Disability Strategy 2010-2020](http://www.dss.gov.au/our-responsibilities/disability-and-carers/program-services/government-international/national-disability-strategy) |
| NTS | [Web Accessibility National Transition Strategy](http://www.finance.gov.au/publications/wcag-2-implementation/index.html) |
| RED Framework | [Respect, Equity and Diversity Framework](http://www.cmd.act.gov.au/governance/public/RED) |
| relied upon (technologies that are) | The content would not conform if that technology is turned off or is not supported. (Source: [WCAG 2.1, Glossary](https://www.w3.org/TR/WCAG21/#glossary)). |
| site | See ‘website’. |
| success criteria | See the explanation of WCAG 2.0 below for further information. |
| sufficient techniques | Reliable ways to meet the success criteria. See the explanation of WCAG 2.0 below for further information. |
| UNCRPD | [The *United Nations Convention on the Rights of Persons with Disabilities* (2008)](http://www.un.org/disabilities/convention/conventionfull.shtml) |
| user agent | Any software that retrieves and presents web content for users, e.g., web browsers, media players, plug-ins and other programs—including assistive technologies—that help in retrieving, rendering and interacting with web content. (Source: [WCAG 2.1, Glossary](https://www.w3.org/TR/WCAG21/#glossary)). |
| technology (web content) | Mechanism for encoding instructions to be rendered, played or executed by user agents.Web content technologies may include markup languages, data formats, or programming languages that authors may use alone or in combination to create end-user experiences that range from static web pages to synchronized media presentations to dynamic web applications. Example: Some common examples of web content technologies include HTML, CSS, SVG, PNG, PDF, Flash, and JavaScript. |
| WCAG 2.1/WCAG 2.0 | [Web Content Accessibility Guidelines version 2.1](http://www.w3.org/TR/WCAG21/) and [Web Content Accessibility Guidelines version 2.](http://www.w3.org/TR/WCAG20/)0.A set of standards and techniques published by the World Wide Web Consortium (W3C) on how to make web-based information and services accessible to as wide a range of people as possible.At the highest level, the four principles embodied by WCAG 2.1 are perceivable, operable, understandable and robust. Each of these principles is then broken down in to a number of behaviour-based guidelines, and each guideline in turn is broken down into a number of testable statements referred to as ‘success criteria’.For each of the guidelines and success criteria in the WCAG 2.1 document itself, the WCAG 2.1 Working Group has also documented a wide variety of techniques. The techniques are informative and fall into two categories: those that are sufficient for meeting the success criteria and those that are advisory. The advisory techniques go beyond what is required by the individual success criteria and allow authors to better address the guidelines. |
| web browser interface | This term is used interchangeably with ‘website’, ‘web page’, ‘web content’ and ‘site’ to refer to online content, functionalities and services presented via a web browser as covered under this policy. |
| web page | This term is used interchangeably with ‘website’, ‘site’, ‘web content’ and ‘web browser interface’ to refer to online content, functionalities and services presented via a web browser as covered under this policy. |
| website | This term is used interchangeably with ‘site’, ‘web page’, ‘web content’ and ‘web browser interface’ to refer to online content, functionalities and services presented via a web browser as covered under this policy. |
| W3C | The World Wide Web Consortium. The W3C is an international community that develops open standards to ensure the long-term growth of the Web. WCAG 2.1/WCAG 2.0 was developed through the W3C process in cooperation with individuals and organisations around the world. |

**Note:** other terms may be found in the [WCAG 2.1 Glossary](https://www.w3.org/TR/WCAG21/#glossary).

## Metadata

| Owner | Senior Manager, Online Services, DDTS |
| --- | --- |
| Document location | CMTEDD website |
| Review cycle | This policy should be reviewed every 12 months |
| Acknowledgements | Information has been sourced from the W3C, Department of Defence, the former Department of Education, Employment and Workplace Relations, the Department of Finance, Vision Australia, the NSW Government, the WA Government, the University of Tasmania, the New Hampshire State Government, the New Zealand Government, Queen’s University, the University of Wisconsin – Madison, the Treasury Board of Canada Secretariat and Purdue University to develop this policy. |

**Note:** This is a CONTROLLED document. Any documents appearing in paper form are not controlled and should be checked against the intranet version prior to use.

## Amendment history

| Version | Issue date | Amendment details | Author | Approval |
| --- | --- | --- | --- | --- |
| 1.0 | April 2014 | First release for comment. | Web Accessibility Officer and Online Systems Manager, Shared Services ICT |  |
| 1.1 | July 2014 | Revised to incorporate a different governance model and risk management approach and then further revised after internal feedback. | Web Accessibility Officer, Shared Services ICT |  |
| 1.2 | December 2014 | Revised following feedback from directorates via the Coordinated Communications Network (CCN). | Web Accessibility Officer, Shared Services ICT | ED SSICTED GIO |
| 1.3 | February 2016 | Minor updates. | Online Services, Shared Services ICT | Senior Manager, Online Services |
| 1.4 | February 2018 | Minor updates. | Online Services, Shared Services ICT | Senior Manager, Online Services |
| 1.5 | May 2019 | Minor updates. | Online Services, Shared Services ICT | Senior Manager, Online Services |
| 1.6 | December 2019 | Minor updates. | Online Services, Shared Services ICT | Senior Manager, Online Services |
| 1.7 | April 2021 | Minor updates. | Online Services, DDTS | Senior Manager, Online Services |
| 1.8 | June 2023 | Minor updates | Online Services, DDTS | Senior Manager, Online Services |

# Appendix B—Legislative and policy obligations

The pursuit of accessibility is a matter of international convention, domestic law and government policy. Furthermore, it is necessary for enabling the ACT Government to achieve its goal of providing productive, reliable and inclusive online information and services for both the community and its employees.

[**The *United Nations Convention on the Rights of Persons with Disabilities (2008) (UNCRPD)***](http://www.un.org/disabilities/convention/conventionfull.shtml): Ratified by the Australian Government in 2008, the UNCRPD recognises that access to information, technology, communications and services is a human right. As a signatory to the UNCRPD, the Australian Government made a commitment to accessible online government information and services through the Web Accessibility National Transition Strategy (NTS).

[**The *Disability Discrimination Act 1992 (DDA)***](http://www.comlaw.gov.au/Series/C2004A04426): Makes it unlawful to discriminate against people based on ability. Under the DDA it is an offence to not provide people with disabilities with the same access to goods, services and facilities as other people, though it does not provide specific guidance on how not to discriminate. The [World Wide Web Access: Disability Discrimination Act Advisory Notes](http://www.humanrights.gov.au/our-work/disability-rights/standards/world-wide-web-access-disability-discrimination-act-advisory) issued by the Australian Human Rights Commission addresses this with specific guidance around how to mitigate against the risk of complaint under the DDA in the provision of online information and services. They also provide significantly more detail regarding the recommended treatment of content in digital office document formats than the NTS, which is predominantly focused on web pages.

[**The *National Disability Strategy 2010-2020******(NDS)***](http://www.dss.gov.au/our-responsibilities/disability-and-carers/program-services/government-international/national-disability-strategy): The NDS was launched by the Council of Australian Governments (COAG) on 13 February 2011 and complements the UNCRPD and the DDA in showing the commitment by the Commonwealth, state and territory governments to a national approach towards an inclusive and enabling society. It recognises the Government’s adoption of mandated web accessibility standards through the NTS. Under the first outcome “inclusive and accessible communities”, there is a specific policy direction aimed at “communication and information systems that are accessible, reliable and responsive to the needs of people with disability, their families and carers”.

[**The** ***Web Content Accessibility Guidelines version 2.1 (WCAG 2.1)***](http://www.w3.org/TR/WCAG21/): A set of standards and techniques published by the World Wide Web Consortium (W3C) on how to make web-based information and services accessible to as wide a range of people as possible.

[**The *Web Accessibility National Transition Strategy (NTS)***](http://www.finance.gov.au/publications/wcag-2-implementation/index.html): In late 2009 the Online and Communications Council, a subcommittee of the Council of Australian Governments (COAG), endorsed the implementation of WCAG 2.0, requiring all federal, state and territory websites to conform to the guidelines to meet Single A level within a two-year period (by the end of 2012).

Subsequently, at its meeting on 8 December 2010, the ACT Government Shared Services Governing Committee formally endorsed the Government commitment to achieve WCAG 2.0 Level A compliance on all its websites by the end of 2012 and AA compliance by the end of 2014.

The Australian Government Information Management Office (AGIMO) was tasked with coordinating the implementation, and developed the NTS as a whole-of-government arrangement. The 2010/005 Circular from AGIMO makes the National Transition Strategy a matter of formal government policy.

The NTS is an Australian Government deliverable under both the NDS and the UNCRPD.

[***Australian Government Web Guide***](http://webguide.gov.au/) – The NTS refers to the Australian Government Web Guide for additional information to assist agencies with implementation. The accessibility section of the web guide is also a mandatory requirement.

[***ACT Public Service Respect, Equity and Diversity (RED) Framework***](http://www.cmd.act.gov.au/governance/public/RED)- The RED Framework articulates the ACT Government’s commitment to creating a workplace that embraces diversity and promotes inclusion. The Employment Strategy for People with Disability forms part of the overarching RED and aims to improve the recruitment and retention of people with disability through reduced barriers and disincentives.