



DPC/P5.4

ACROSS GOVERNMENT POLICY

DRAFT Online Accessibility Policy

1 Purpose

The purpose of the Online Accessibility Policy is to define accessibility requirements for all content and functionality of SA Government's online presence.

2 Scope

This policy applies to all SA Government online applications including:

- Public-facing websites
- Intranets (accessed within SA Government)
- Public-facing native apps
- Portable Document Format (PDF)
- Online forms and surveys (public-facing and accessed within SA Government)
- Non-web-based software

This policy applies to SA Government the digital content outlined under "2. Scope" regardless of whether they are provided solely by the SA Government, or are partly or wholly provided by external parties on behalf of the SA Government.

3 Legislation

3.1 Commonwealth Legislation

The Commonwealth [Disability Discrimination Act 1992](#) requires providing equitable access to people with disability. It is unlawful Under the Act, to discriminate against a person with disability by excluding access to information and services, which includes those delivered online.

3.2 South Australian Legislation

The [Disability Inclusion Act 2018](#) provides a legal framework to support a whole of Government approach to improving the inclusion of all South Australians with disability in all areas of life in this State (see 4.11 Reporting).

This is supported by the [Digital by Default Declaration](#): *"Digital services will be available online, mobile-ready, easy to use and accessible."*

It is also unlawful under the [Equal Opportunity Act 1984](#) to discriminate against a person with disability by denying or limiting access to opportunities for promotion, transfer or training, or to other benefits connected with employment.

3.3 Other guiding legislation and international conventions

Australian Human Rights Commission: World Wide Web Access, Disability Discrimination Act Advisory Notes, [2.2 Equal Access is Required by Law](#).

The Australian Government, through the 2010 [Web Accessibility National Transition Strategy \(NTS\)](#), implemented a policy of web accessibility for federal, state and local governments.

The Australian Government also approved the [UN Convention on the Rights of Persons with Disabilities \(UNCRPD\)](#). [Articles 9](#) and [Article 21](#) state access to information, communications and services (including the internet) is a human right.

Australia's response to the UNCRPD, the [National Disability Strategy 2010-2020](#), identifies the achievement of accessible, reliable and responsive communication and information systems as a key policy direction.

It is the intention of the Parliament of South Australia that, to such an extent as may be reasonably practicable, the operation, administration and enforcement of the [Disability Inclusion Act 2018](#) is to support and further the principles and purposes of the [UN Convention on the Rights of Persons with Disabilities](#), as well as any other relevant international human rights instruments affecting people with disability, as in force from time to time.

4 Policy Detail

4.1 Requirements

All SA Government online applications referenced in "2. Scope" must conform – at a minimum – to [Web Content Accessibility Guidelines \(WCAG\) 2.0](#) Level AA.

[WCAG 2.1](#) is an evolution of the accessibility guidance to include mobile, low vision, and cognitive provisions, and conformance to Level AA is encouraged at this time.

Accessibility must be addressed at every stage, from planning to development by integrating a user-centred design approach. Refer to "4.5 Accessible by Design".

4.2 Additional Requirements

Multi-jurisdictional websites and websites created through public-private partnerships should meet the accessibility requirement determined by the main authoring agency.

The accessibility requirement applies to the information structure and format, as well as navigational elements of a website.

Accessibility requirements apply to interactive elements, such as contact forms or similar, maps and interactive data visualisation.

Social media integration (such as Twitter and Facebook) should be optimised for accessibility. Content published on these platforms must not be the primary source of information especially where external users can post content and accessibility cannot be controlled by the content owner.

Beyond technical conformance of achieving WCAG 2.0, the Australian Government, Australian Human Rights Commission and the W3C all recommend usability testing with people with disability or age-related impairments using various adaptive strategies to assess online accessibility (see 4.9 Accessible by design).

4.3 Accessibility Standards

4.3.1 Websites

The [Web Content Accessibility Guidelines \(WCAG\) 2.0](#) how to make digital content accessible to the broadest population.

For more information, see:

- [How to Meet WCAG 2.0](#): customisable quick reference to WCAG 2.0 that includes all the guidelines, success criteria, and techniques for authors to use as they are developing and evaluating web content.
- [GOV.AU: Accessibility and inclusivity](#): a supporting resource for online content authors.

4.3.2 Native Apps

Accessibility for the mobile platform refers to making websites and applications accessible for users with disability while they are using mobile phones, tablets etc. The W3C has not established a separate standard for mobile web and native apps; but has covered accessibility for these techniques through additional Success Criteria in the [WCAG 2.1](#) specification that pertain to touchscreen technology.

The W3C recommends applying the following existing set of guidelines to the context apps:

- WCAG 2.1 includes recommendations to implement accessibility across web pages, web applications as well as web content designed to be used through mobile devices.
- [Mobile Accessibility: How WCAG 2.0 and Other W3C/WAI Guidelines Apply to Mobile](#) includes recommendations designed to improve the overall user experience of the web on mobile devices.

4.3.3 Portable Document Format

PDF accessibility is covered under [WCAG 2.0](#). However, due to the lack of support for PDF in mobile environments, agencies are reminded that Portable Document Format (PDF) alone is still not considered a sufficiently accessible format.

This shortcoming means that although PDFs can be made fully accessible to WCAG 2.0 standards, it may still be necessary to provide the same information in another format, ideally accessible HTML, which should be the default format for all government information.

- [GOV.AU: PDF accessibility](#): guidelines on structuring PDF, hyperlinking, and offering an alternative format to PDF.

An accessible HTML version of annual reports must be provided as outlined in the [Premier and Cabinet circular PC013](#).

4.3.4 Non-web-based software

The [Australian Accessible ICT Standard AS EN 301 549:2016](#) is a direct adoption of European Standard [EN 301 549](#). The standard address access to electronic products and information technology for people with physical, sensory, or cognitive disability. The standard contains technical criteria specific to various types of technologies and performance-based requirements that focus on the functional capabilities of digital products.

Specific criteria cover software applications and operating systems.

4.4 Responsibilities

SA Government agencies are responsible for implementing this policy in relation to all their own public facing online content as defined in 2. Scope.

4.5 Accessible by Design

Accessibility requirements are specifically addressed in [Criterion 9 of the Digital Service Standard: Make it Accessible](#).

Online content must be created in ways that support and maximise accessibility, including from fixed and mobile devices. Agencies must consider the varied needs of users, and plan for accessibility from the outset.

Where accessibility problems are known, agencies should put in place implementation plans to address the problem, then endeavour to minimise future risk by using standards-based web technologies and best practice content management processes.

4.6 Web Technologies

Agencies should not rely on any web technology that cannot demonstrate WCAG 2.0 conformance. Web technologies that claim accessibility support must prove WCAG 2.0 conformance.

4.7 Reporting

The [Disability Inclusion Act 2018](#) (the Act) provides a legal framework to support a whole of Government approach to improving the inclusion of all South Australians with disability in all areas of life in this State.

In addition to a State Disability Inclusion Plan, under Part 5 (17)(1) of the Act each State authority is required to prepare a [Disability Access and Inclusion Plan](#) (DAIP) and publish it online, by 31 October 2020. The authority must then report annually on the operation of its DAIP, with the first report due by 31 October 2021.

Part 5 (16)(3)(d)(ii) of the Act states that DAIPs must include strategies to support people with disability to access information and communications. An example might be measuring success in delivering online services delivered in line with this policy or evidence of WCAG 2.0 Level AA compliance through an internal or external audit, with an action plan to address any issues must be provided.

5 Procurement Policies

All SA Government procurement documents that relate to the development and/or implementation of SA Government's digital properties must clearly state SA Government's accessibility requirements as per this policy.

Australia has [adopted an internationally aligned standard](#) for the procurement of accessible ICT.

The Australian Accessible ICT Standard [AS EN 301 549:2016](#) is a direct adoption of European Standard [EN 301 549](#). The standard supports access to information, communication and technology (ICT) for people with disability and provides ICT procurers with accessibility guidance and certainty.

Vendors must provide sufficient evidence to demonstrate their compliance with these requirements. Evidence may include:

- Documentation detailing the level of accessibility of a product (against WCAG 2.0 or AS EN 301 549:2016)
- Past case studies where accessibility requirements have been addressed
- Details of how accessibility is represented on the future product roadmap
- Identification of specific reference sites where people with a disability are using the solution.

5.1 Compliance

Any product or supplier selected by SA Government must demonstrate how the solution meets the relevant standards as outlined in "4.3 Accessibility Standards", or the capability to deliver this as part of the implementation.

Any purchase arrangement or contract must include terms confirming the vendor's commitment to meet SA Government's accessibility requirements.

If the product or supplier cannot demonstrate the required level of accessibility, then the business area must engage an internal accessibility subject matter expert (SME) or a third-party digital accessibility consultancy to validate compliance before entering into any arrangements with the product or supplier.

6 Resources

Contact [Digital Citizen Services](#) for support, guidance and advice for SA Government agencies.