

NZ Government Web Standards

2012 Consultation Response Form

Submitted by:

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Date (required): 2013-02-12

Note:

- Refer to the consultation document for the details associated with each of the consultation questions below.
- You do not have to answer every question.
- Your responses may be shared publicly.
- **The closing date for submissions is 22 February 2013.**
- **Please email your submission to: web.standards@dia.govt.nz.**

Or mail to:

Web Standards Consultation
Digital Engagement
Government Information Services
Department of Internal Affairs
PO Box 805
Wellington

General comments

Grey Power welcomes the opportunity to comment on the proposed adoption of WCAG 2.0.

We consider the proposal to adopt WCAG 2.0 as a welcome and positive step. We are concerned however to ensure that the requirements under the W3C Web Accessibility Initiative (W3C WAI) are fully met by any New Zealand Government standards. In particular we are concerned that in addition to WCAG 2.0, the requirements of User Agent Accessibility Guidelines (UAAG) and Authoring Tool Accessibility Guidelines (ATAG) are met.

We note that the background paper is drafted in terms that imply W3C WAI is directed at people with specific disabilities rather than acknowledging that sensory and motor impairment is a continuum that afflicts the majority of people with advancing age. We note that the W3C WAI-AGE project acknowledges the overlap between age-related accessibility issues and those for people with disabilities.

Given that demographic projections indicate that over 22% of the NZ population will be aged over 65 by 2030¹, this part of the population, represented by Grey Power, will be the major cohort affected by accessibility issues. We note that this is significant both for the economy since many people are choosing to work beyond age 65 regardless of any move to alter the age of entitlement for NZ Super, and socially, as the internet provides a mainstream mechanism to assist people to participate in society at all levels and to age in place through the following mechanisms²:

- social interaction and communication
- access to information
- access to eCommerce
- access to government services and civic participation
- training and learning opportunities
- employment, research, and access to workplace applications

The W3C WAI-AGE project also notes that older people are experiencing web accessibility barriers due to:

- poor design and poor coding of websites
- complex software and assistive technologies

We suggest that these issues, although assisted by, are not fully addressed by a reliance on WCAG 2.0 in isolation. In particular we are concerned that accessibility guidelines need to address the impact of age-related decline in motor skills (estimated to affect over 60% of those over 65), and of mild cognitive impairment (approx. 7% of those aged over 65³).

¹ http://www.stats.govt.nz/browse_for_stats/population/estimates_and_projections/NationalPopulationProjections_MR2011.aspx

² Source W3C WAI-AGE

³ Ministry of Health, 2011

Areas that need to be addressed by appropriate web design standards include:

- Difficulty in using mouse or keyboard
- Difficulty in screen navigation, especially accessing small areas of screens to gain focus or initiate functions
- Increased strain from non-ergonomic layouts

Our comments on age-related sensory impairment are discussed under the relevant headings concerning WCAG 2.0. However we would make the general comment that W3C WAI-AGE identified hearing loss as the sensory impairment most commonly ignored in web design. Secondly, we would note that when considering accessibility, the importance of clear text and good contrast is a vital component frequently overlooked in favour of 'eye candy'. We note especially that the Government sites cited as exemplars follow these principles.

Consultation Question 1

Do you agree with focussing the Web Standards on accessibility in this way? If not, what other elements should be added to or removed from the Standards?

Answer 1

We agree that conformance to at least level 2 (Should) of WCAG 2.0 is the primary purpose, and as such its amalgamation with other non accessibility related requirements in the current 'New Zealand Layer' is confusing and detracts from this focus. We therefore fully support the proposed split. We also agree that aligning the responsibility for standards setting in other areas with the appropriate agency strengthens the requirement for accountability. Our only concern is that it is unclear from the briefing paper how compliance with WCAG 2.0 will be monitored and enforced. We would again emphasise the importance of good design in achieving accessibility and suggest conformance with UAAG and ATAG principles should be included.

Consultation Question 2

Do you agree with redefining "web page" this way? If not, how should website and web page be defined?

Answer 2

Yes. Any definition used by NZ Government agencies should conform to the W3C definition.

Consultation Question 3

Do you agree with this reframing of the Web Standards' scope of application? If not, what range of government web pages should be subject to the Web Standards?

Answer 3

We consider that WCAG 2.0 accessibility standards should be applicable to all sites provided for or by publicly funded bodies. We recognise that not all sites can be made compliant immediately, and would agree that public facing sites should be given priority given the age breakdown of accessibility problems. We would not however wish to exclude intranet sites from the scope. As noted in the background paper, the extra cost of compliance is minimal as a percentage of the whole of life cost of a site. We consider that having a different standard of compliance for external and internal sites can only lead to extra cost and lack of flexibility as well as a the failure to meet the obligations of a good employer. We also consider that a blanket requirement for compliance will increase both industry, and client awareness of the standards and the means of applying them. We note that compliance is currently client driven (opt in) rather than an assumed requirement⁴, and that any move towards universality of compliance will also lead to reduced costs as vendor expertise becomes commonplace.

Consultation Question 4

Do you agree with prioritising certain types of information for repair? Are there other ways to achieve this balancing of agency resources and delivering on accessible content and services?

Answer 4

We agree that some information and applications should have priority. We consider that all new content or site should comply with level 2, and that categories for retrospective compliance should be clearly defined and given explicit completion dates.

Consultation Question 5

Do you agree with this classification of online information and services? What other types of information should be considered "critical"?

Answer 5

We consider that the two categories suggested are too restrictive. We agree that 'Critical' information and services should include the areas defined in the background document, ie *'any information or service whose inaccessibility at the time of publication could reasonably be expected to have a negative impact on an individual's emergency preparedness and response, OR health and physical safety, OR financial entitlements and obligations (e.g.*

⁴ The author has met with some incredulity from vendors when specifications for web based applications have included the requirement to comply with W3C WAI (both WGAG 1.0 and 2.0)

personal taxes, benefits and eligibility)'. However we consider that the remainder should be sub-divided. We suggest that, particularly in the area of on-line services, there are many cases where the lack of accessibility, whilst not critical as defined above, could reasonably be considered to be a major impediment to the individual's ability to function as an informed member of society in the manner that they would wish. We would certainly accept that non-functional content eg historical reports etc can be deferred providing the user has the option to obtain the information in another form eg hard copy.

Consultation Question 6

Do you agree with the Web Standards implementation taking this phased approach? Are the proposed timeframes realistic?

Answer 6

We are concerned that the suggested timeframe does not make explicit the timeframe by which all web form based services should be compliant. We recognise that this is likely within the requirement for 'Critical' information and services, and the 'top 25% of pages visited', but in line with our submission above, we would suggest that all on-line services should be compliant within the first phase.

Consultation Question 7

Do you agree with the Web Standards modifying certain WCAG 2.0 requirements to make accessibility more practical and achievable by agencies?

Answer 7

Please see comments below

Consultation Question 8

Do you agree with this modification to WCAG 2.0 Success Criterion 1.1.1? If not, why not, and what other changes would you propose to balance the needs addressed by this requirement and the demands on agencies?

Answer 8

We consider that the requirement of WCAG 2.0 success criterion 1.1.1 should not be modified. However we consider that the approaches suggested in the background paper para 62 can be considered to conform to the criterion. For example, the WCAG 2.0 explanation of a 'text alternative' indicates that it is sufficient to refer to a non-image version elsewhere that can be 'programmatically determined'. This could be accomplished by, for example an immediately accessible text associated with the image that directs the user to a full text summary and / or to the location of the raw data.

Consultation Question 9

Do you agree with this modification to WCAG 2.0 Success Criterion 1.2.1? If not, why not, and what other changes would you propose to balance the needs addressed by this requirement and the demands on agencies?

Answer 9

We agree that the requirement for a descriptive text transcript should be mandatory for pre-recorded visual content. Whilst we accept the problems inherent in providing for an audio description of visual only content, we are concerned that removing this from the standard diminishes accessibility not just to the deaf blind, but to others with lesser impairment but who nonetheless find following video content on a PC difficult.

We suggest that a similar phased approach is adopted to that of the overall standard. We see no reason why compliance for pre-recorded video content should not be deferred where it is purely 'decorative' or marketing orientated, ie it is not necessary to the understanding of the site / page's purpose nor directly helpful in completing a task. Conversely we consider that where pre-recorded video content assists the user in completing a task or provides information not elsewhere available, descriptive audio alternative should be mandatory.

Consultation Question 10

Do you agree with this modification to WCAG 2.0 Success Criterion 1.2.2? If not, why not, and what other changes would you propose to balance the needs addressed by this requirement and the demands on agencies?

Answer 10

We support this proposal since it merely sets a timeframe for compliance rather than modify the criterion per se.

Consultation Question 11

Do you agree with this modification to WCAG 2.0 Success Criterion 1.2.3? If not, why not, and what other changes would you propose to balance the needs addressed by this requirement and the demands on agencies?

Answer 11

Please refer to comments on Question 9.

Consultation Question 12

Do you agree with this modification to WCAG 2.0 Success Criterion 1.2.4? If not, why not, and what other changes would you propose to balance the needs addressed by this requirement and the demands on agencies?

Answer 12

We agree with this modification. However, we consider that if the content is considered sufficiently important to provide live streaming, it should be a requirement that the content be also provided later as pre-recorded content and with the associated alternatives defined in WCAG 2.0

Consultation Question 13

Do you agree with this modification to WCAG 2.0 Success Criterion 1.2.5? If not, why not, and what other changes would you propose to balance the needs addressed by this requirement and the demands on agencies?

Answer 13

Please see response to question 9.

Consultation Question 14

Do you agree that Web Standards should focus on principles and outcomes that can be applied to the implementation of relevant technologies?

Answer 14

We completely agree that accessibility standards should be technology agnostic.

Consultation Question 15

Are there other issues with the Web Standards or limitations to accessibility that should be addressed?

Answer 15

We note above that WC3 identify the commonality of problems between older users and those with disabilities. We also note that many of the problems with compliance noted in questions 8 to 13 can be addressed by avoiding the use of the types of content identified. Whilst we would not, in line with our response to question 14, wish to go beyond outcomes and principles, we also note that the sites identified in the survey as having a high level of conformance succeed for all users by being clear and well laid out with a minimum of images (no 'eye candy') nor requirements for users to have the latest version of program X to be able

to use them. We consider that accessibility starts with clear simple text based designs with high contrast between text and background.

Specifically in line with W3C WAI-AGE we would suggest that the following principles should be applied:

- Page layout and design are consistent across a site, and preferably across all Government related sites
- Information is compartmentalised to avoid overload
- Text presentation is clear and consistent. Left justified, wide line spacing, fonts consistent and with minimal differentiation.
- Forms should be clearly laid out for on-line use rather than ape paper forms. Clear guidance should be provided and obvious. No assumptions should be made regarding knowledge of 'Windows' based conventions.
- Menus and links should also be placed predictably and have consistent wording for a given function.