

A submission in response to the Australian Prime Minister and Cabinet Taskforce into the Rules, Capability and culture for ICT procurement

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Submitted by

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Accessibility statement

This document is built in an accessible Microsoft Word template using accessible content principles. The document was checked for accessibility and verified as being accessible to users of assistive technology. If you experience any issues accessing the content contained within this document or have usability feedback you would like to share, please contact the authors at Media Access Australia by phone on (02) 9212 6242 or by email on accessibleservices@mediaaccess.org.au.



About Media Access Australia

Media Access Australia is Australia's only independent not-for-profit organisation devoted to increasing access to media for people with a disability.

We promote inclusion by providing information and expertise on the accessibility of mainstream technologies to government, industry, educators, consumer organisations and individuals.

We work as a catalyst for change across television, video, cinema, the arts, education, digital technology and online media, with a primary focus on people who are blind or vision impaired, or Deaf or hearing impaired.

Media Access Australia (MAA) grew out of the Australian Caption Centre (ACC), which was founded in 1982. As the ACC we provided captioning services for all Australian television networks, as well as the captioning of live theatre, videos and DVDs. The captioning and other commercial operations of the ACC were sold to Red Bee Media in 2006.

About this submission

Media Access Australia understands that the Department of Prime Minister and Cabinet is seeking submissions from organisations working in the digital technology sector in three key areas of procurement: Rules, capability and culture.

The purpose of this submission is to provide the Department of Prime Minister and Cabinet and its Taskforce with information on why accessibility needs to be considered and what is currently in place. This information will also assist the Australian Government to increase awareness and knowledge about existing standards, and help educate ICT suppliers on these standards and the benefits of accessibility in ICT procurement.

This submission specifically focuses on how the Australian Government can support their agencies and organisations to:

1. adopt accessibility standards and requirements as part of the ICT Procurement process
2. provide guidance on how the Australian Governments' procurement processes and outcomes can be improved through increased awareness of these accessibility standards,
3. provide better capability to address gaps in Australian Government procurement and
4. guidance on culture and attitudinal change required to drive accessibility in Australian government ICT procurements.

Why is accessibility with ICT needed?

In Australia today, over 4 million people have disclosed some form of disability, with 2.2 million of current working age (16 – 64 years).¹ There are also many more people who do not disclose their disability, as it may be in the form of a cognitive impairment such as dyslexia, or may be age-related, such as early onset hearing impairment or loss of vision.

¹ Australian Bureau of Statistics, Survey of Disability Ageing and Carers 2012



Impacts on people with disabilities and other groups

Inaccessible ICT has an enormous impact on people with disabilities, older Australian and people who speak English as a second language. The examples below demonstrate only some of the barriers experienced when accessibility and universal design is not included in the ICT procurement process.

- People with low vision use assistive technology such as screen readers, screen magnifiers and may invert the colours on their screens. When websites, software, documents and digital video content is not created to be accessible these users cannot understand the content being presented.
- If videos do not have captions, Deaf and hearing impaired users may misunderstand video content because there are no captions. Captions also benefit wider audiences including people who speak English as a second language and struggling readers.
- If video players do not support audio description, blind or low vision users cannot understand the context of the video, including who is speaking, the setting, text presented on screen but not narrated or other important cues portrayed but not announced.
- If web software is not created to be accessible different browsers may render content differently or not at all, potentially impacting all users, including users of assistive technologies.
- Inaccessible mobile or tablet device Apps may due to buttons and form fields that are not labelled correctly meaning screen reader users cannot navigate the app and find the information they need.
- Computing devices are purchased without consideration for in-built accessibility features impacting people with disabilities who may rely on those features in mainstream technologies.
- Photocopiers and printers are purchased without a flexible input display meaning wheelchair users cannot see the screen.

Impact and risk for Government

With ICT and digital transformation in government becoming a prolific, integral and cost-effective way for information to be consumed and services delivered, inclusion of accessible and inclusive ICT become critical to the selection, management and monitoring of ICT procurements irrespective of their size and value.

To this end and to demonstrate the significance of this oversight is a common scenario experienced by Media Access Australia with website, software and digital technology projects. This occurs where a vendor has been selected to deliver a web or digital based platform. Accessibility standards have not been considered at the point of briefing or during the procurement process. The platform is developed and deployed only to find that a user with low vision cannot use the service. The government department then requires the platform vendor to retrofit accessibility into the platform meaning significant interface and functionality redevelopment is required adding huge expense to the overall project.

Another common scenario is where accessibility has been included in the procurement and delivery process but there has been no check or due diligence that the vendor actually has any knowledge about accessibility and therefore delivers an inaccessible product or service.

A significant risk to government is the risk of complaint and legal action if ICT is not accessible for people. Complaints can be handled within the department, however may be escalated if there is inaction or the response is unsatisfactory. If there is a perceived breach of human rights under the



Disability Discrimination Act 1992 (Cth), complainants may escalate the issue to the Australian Human Rights Commission.

Whilst this practice is widespread there are also examples of where accessibility and universal design have been considered and integrated into business requirements and the procurement process. Media Access Australia encourages the Taskforce to promote these as examples of best practice.

Accessibility and ICT Procurement: What is in place?

In June 2010, the Australian Government adopted and began implementation of the Web Content Accessibility Guidelines (WCAG) 2.0. Created by the World Wide Web Consortium (W3C), the WCAG standard set to improve the accessibility of information and services online and was implemented as part of the Web Accessibility National Transition Strategy (WANTS) delivered over four years, whereby the aim was for Australian government websites were to comply with WCAG 2.0 Level AA by 31 December 2014.² The WCAG standard remains adopted by the Australian government as well as some State governments and local governments.

Following on from the WANTS in July 2015, shortly after the Digital Transformation Office was established, (now the Digital Transformation Agency), A Digital Design Standard³ was created for Australian Government and its agencies. Building on information and experience of digital transformation in UK, the Standard outlines how agencies should develop digital experiences, such as transactional services, websites, software applications, device applications, e-learning, multimedia, digital content and digital services to be person-centric, accessible and incorporating universal and inclusive design principles.

In August 2016, the Australian Government through The Department of Finance, with Standards Australia agreed to adopt an internationally aligned standard for accessibility in ICT procurement⁴. The Accessibility requirements suitable for public procurement of ICT Products and services establishes a minimum standard for ensuring websites, software and digital devices are accessible. This standard adopted from the European Standard EN 301 549⁵ provides standardised accessibility requirements suitable for public procurement of ICT Products and services by establishing a minimum standard for ensuring websites, software and digital devices are accessible for people with disabilities. The Accessible ICT Procurement Toolkit with EN 301 549 provides very detailed and thorough information on how accessibility can be integrated into procurement including different types of capability checks for vendors and suppliers, WCAG and accessibility requirement assessment checks and documentation for all aspects of procurement including contract management. Media Access Australia believes this toolkit is an excellent resource from which to begin considering accessible ICT procurement and with some practical guidance, recommendations could be made on how best to include accessibility in large scale and small procurements,

² [Web Accessibility National Transition Strategy](#)

³ Digital Transformation Agency: [Digital Design Standard](#)

⁴ Minister for Finance, Media Release: [Access to technology made easier.](#)

⁵ Standard EN 301 549: [Accessible ICT Procurement Toolkit](#)



appropriate vendor assessments, validation and information for procurement managers and officials.

The standards and initiatives that the Australian Government has in place at the moment can be confusing to navigate, highly technical to consume and difficult to understand without specialist assistance. There is a need for these standards and initiatives to be brought together and distilled into practical information and resources procurement managers and officials can use to better guide Australian Government ICT Procurements.

Conclusions and recommendations

Media Access Australia recommends that:

1. An information awareness and education resource is created to upskill procurement managers and teams on how best to practically include accessibility, incorporating all the main standards and digital transformation initiatives in one space for ICT procurements. This should be completed in conjunction with reputable accessibility specialists and could either be in the form of an online guide or online course.
2. Accessibility standards including the Web Content Accessibility Guidelines (WCAG 2.0) are built into procurement processes for all ICT procurements irrespective of size or value of the procurement.
3. Government consider practical ways for vendors and practitioners to demonstrate their knowledge and capability for accessibility.



Media Access Australia services

Media Access Australia provides a wide-range of training, consulting services, task-specific guides and technical information covering the main areas of accessibility. As the nation's only independent Not-For-Profit devoted to increasing access to web and digital media for people with disabilities along with those who provide care and support, we believe that all Australians have the right to access all forms of media and information through technology, so that they can fully participate in this digital age.

We work with federal, state and local government agencies in Australia to ensure that online communications are accessible to people of all abilities. Our services include:

Digital Accessibility Maturity Assessment (DAMA) – an extensive low-cost review of your current methods and processes assessed according to management best practice, against a clear set of external benchmarks. The detailed report examines the risk associated with these levels and puts forward key priority actions.

Auditing existing web and app content – for a formal audit of existing websites and apps, across a range of browsers and devices, testing against international WCAG 2.0 standards ('A', 'AA', 'AAA') and looking at key processes, as well as static content on the website.

Training – we offer programs that are practically-based and use real-world situations. This includes creating accessible content in Word, PDF and InDesign. There are specific modules for accessible social media, video content, Excel and forms. For web professionals, we offer our higher-level six-week online Professional Certificate in Web Accessibility course.

Document accessibility – for documents, forms and maps that need to be made accessible, we provide document remediation in a range of formats that meet benchmark accessibility standards. We can also help you create accessible templates for documents and forms.

For more information, call 02 9212 6242, email accessibleservices@mediaaccess.org.au or visit <http://www.mediaaccess.org.au/digitalaccessibilityservices> for our full range of services.

