IT Digital Accessibility Policy Proposal

This IT Accessibility Policy Proposal Template is based on the work of University College London Information Services Division.

For each section there is an explanation you can delete. This is followed by suggestions and examples you may wish to adjust to suit your circumstances, or just remove and write your own.

# Introduction

Introduce the policy in short and simple terms and how it relates to your institution.

University of X is committed to ensuring that all aspects of the University’s digital estate can be used to the maximum extent by all staff and students, regardless on impairment or disability. The University of X IT department works hard to support the University’s strategy and ambition and wants to maximise the value that members of the University can obtain from its work.

This paper proposes a digital accessibility policy for University of X IT and outlines how it may work.

# Drivers

Set out the external and internal drivers for an IT Accessibility policy

This may include:

## External drivers

[The Equality Act 2010](https://www.gov.uk/guidance/equality-act-2010-guidance) legally protects people from discrimination in the workplace and in wider society. Schools, universities, and higher and further education institutions are required [not only to respond to the needs of disabled staff and students, but to anticipate access needs](https://publications.parliament.uk/pa/ld201516/ldselect/ldeqact/117/11708.htm).

[The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018](https://www.legislation.gov.uk/uksi/2018/952/made?view=plain) requires that the websites, intranets, extranets, office documents, and mobile applications of public-sector bodies such as Universities meet accessibility guidelines set out in the [EN 301 549](https://www.etsi.org/standards#page=1&search=EN%20301%20549&title=1&etsiNumber=1&content=1&version=1&onApproval=1&published=1&historical=1&startDate=1988-01-15&endDate=2021-05-01&harmonized=0&keyword=&TB=&stdType=&frequency=&mandate=&collection=&sort=1) standard which is based on the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA.

## Internal drivers

The topics of accessibility, inclusion, equality, and diversity may be mentioned within University strategies, principles, and policies.

The University Disability Confident Employer status may refer to the importance of digitally accessible online services.

The University Access and Participation plan may show that students who have declared a disability are less likely to progress or complete their studies, resulting in a loss of funding for the University and poorer outcomes for the students concerned.

University Occupational Health may have identified that a significant proportion of cases referred to them relate to the use of computers, such as musculoskeletal pain.

The University may have a declared set of values that relate to accessibility, inclusion, equality, and diversity.

The University IT strategy may have areas that relate to this topic, such as enabling the exploitation of digital technology by all members of the University, getting the basics right, service improvement, and delivering excellence. This can all relate to digital accessibility.

University health and wellbeing policies will relate to digital accessibility.

The WCAG principle robust refers to compatibility with user-agents yet to be created, and this can relate to the quest for sustainable and efficient services.

Do colleagues raise the “clunkiness” of IT services? A digital service cannot offer a good user-experience without the foundation of accessibility.

# What does digital accessibility involve?

What are the basic concepts of digital accessibility?

According to the Web Content Accessibility Guidelines (WCAG), online platforms and content should be:

* **Perceivable** – Digital services and the information and facilities they present and enable must cater to our senses. For example alternative text is provided for images, the size of web sites can be increased without losing information or structure, when colour is used it is not the only means of conveying meaning.
* **Operable** – We can use a site, not only with a mouse but also with a keyboard, switch device or by using our voice.
* **Understandable** – The site and the way it works is readable and predictable: for example text has sufficient contrast to the background to be readable and a website should offer consistent navigation throughout.
* **Robust** - Content and services should meet common standards such that user-agents created in the future will be compatible.

# Policy aims

Make a pragmatic statement – readers may be quick to assume that you are asking the impossible.

For example, declare that a ‘100% accessible’ objective is not realistic. University IT departments typically have 100s of services with a frontend within their service catalogue. Many will be old and bespoke services. Some are so niche that only a small number of providers of such services are available. Some will be using technology stacks that have long since become unpopular and hard to support. The cost of remediating legacy services may be too expensive, or simply not possible.

Suggest that your policy aims are to:

1. Know how accessible our existing services are, so we can inform our users and plan for improvements.
2. Ensure new services, releases, and upgrades **developed internally** are accessible first.
3. Ensure solutions **procured**are accessible wherever possible; and lobby/negotiate with suppliers who fall short.

# Policy scope

The policy below covers:

1. All digital products/services/platforms delivered by University IT which have a user interface, whether developed in-house or bought-in. Currently these are identified in the Service Catalogue
2. Service support materials that University IT publishes via websites/intranets/wiki/blogs etc.
3. University IT ‘secondary products’ including documents, presentations and meetings/events that are produced day-to-day.

# Benefits

What are the benefits of this policy? The more that benefits can be measured and tracked the better.

Benefits you may consider are:

* End users have useful information about the accessibility of University IT services.
* Enables a corresponding workstream to explain the value of accessibility features to end-users, empowering them to derive greater value from our services and their use of IT.
* University managers and educators can respond to the needs of their staff, students, or potential students and employees.
* Reducing but not fully removing the need for our student disability and inclusion and Occupational Health teams to research and apply adjustments to our services for students, releasing time to concentrate on more complex cases.
* University IT can plan accessibility improvements and influence its suppliers to do so.
* The implementation of accessibility within processes and sustaining accessibility throughout services design and development is likely to require a rationalisation and reduction in the variance of platforms and frameworks that development teams use in order to seek greater efficiencies and reduce costs. An example of this is the development of an accessible component library and the adoption of atomic design principles.
* The University delivers on its values and strategic objectives.
* The University reduces its exposure to legal challenges.

# University IT policy on digital accessibility

This is where you will state standards and related practices that the department will implement. Example text follows.

The proposed University IT policy is described here. Identification of who is responsible for the different parts of the policy is covered separately in the ‘Responsibilities’ section, so that these can be updated without changing the policy itself.

1. **Standard**: University IT seeks to ensure its products and services conform to W3C WAI [WCAG 2.1](https://www.w3.org/TR/WCAG21/) level AA. This standard is a floor and not a ceiling. Where appropriate compliance with certain level AAA success criteria is welcome. As updates are made to the Web Content Accessibility Guidelines they shall be considered for inclusion within this policy.
2. **Accessibility Statements: University IT** publishes Accessibility Statements for all its products/services/platforms, wherever they are sourced. We review these when there is a substantial change to the product affecting the user interface.
3. **Product testing:** Accessibility is part of Definition of Done (DoD). This means University IT product teams test for accessibility as part of their standard test cycles. This can be omitted for externally sourced products where the supplier has provided satisfactory evidence of compliance and we have not customised the user interface. Satisfactory evidence could be a formal report using the Website Accessibility Conformance Evaluation Methodology, or an Accessibility Conformance Report (ACR) based on a completed VPAT (Voluntary Product Accessibility Template).
4. **Procurement:** Procurement of digital products and services:
   1. In procurement documents we specify [WCAG 2.1](https://www.w3.org/TR/WCAG21/) level AA as the required standard within our Non-Functional Requirements. We consider on a case-by-case basis making this mandatory, recognising that much of the market may not yet meet these standards. We request evidence of product compliance (see ’Satisfactory evidence’ above) and give it a high weighting in the scoring model. This may still have limited impact, where the accessibility requirement is one of many others.
   2. To give further weight to the accessibility criterion, under ‘Supplier suitability’ we also request evidence of the supplier’s commitment to developing accessible products – e.g. published accessibility statements, development processes which ensure accessibility, tooling, roadmaps, training, etc.
   3. We evaluate the product against the required standard using the evidence provided by the bidder or our own tests where the evidence is insufficient. Normally, a quick surface test will provide a good indication of problems without need of a full audit.
   4. If a preferred bidder’s product does not fully meet the accessibility criteria, then an *accessibility exception report* is produced. This is a templated form which summarises the impact on users, any mitigations that could be put in place, and whether there are any fit-for-purpose alternative products available. Examples of mitigations might be negotiating with the supplier to fix issues, providing alternative interfaces or other workarounds.
   5. The exception report is reviewed by an appropriate authority outside the project (see ‘Responsibilities’). They weigh up the user impact, proposed mitigations, and availability of alternative products. They may approve or not; approval may be subject to specific mitigations being implemented.
5. **Supplier management: University IT** lobbies its suppliers to make their products accessible and, where they are not, to develop improvement plans.
6. **Creating content: University IT** staff follow accessibility guidelines and use University accessible templates when producing documents, presentations, etc.

# Responsibilities

| **Policy area** | **Responsible** |
| --- | --- |
| **Approval of University IT accessibility policy** | Chief Information Officer |
| **Accessibility Statements**: |  |
| * Creating, publishing and keeping up to date | Service Owner |
| * Approving | Accessibility working group or taskforce |
| **Product testing**: |  |
| * Making accessibility part of DoD | Service teams |
| * Prioritising accessibility remediation work | Service Owner/Manager |
| **Procurement**: |  |
| * Ensuring accessibility criteria as per University IT policy are assessed as part of procurement | Project Manager/Agile Delivery Manager |
| * Producing accessibility exception report if criteria are not met | Project Manager/ Agile Delivery Manager |
| * Authorising exceptions | One or more of the below   * Technical Architecture Group * Application Governance Group * The relevant Domain Leader * CIO or University IT Leadership Team |
| **Lobbying suppliers on accessibility** | Business Owner, Service Owner, Procurement / Contracts / Software Purchasing Teams |
| **Creating content**:   * Producing accessible documents, web content, presentations, etc. | All University IT staff |

# Policy implementation

What is the pathway to approval within your University governance structure.

The following approach to implementation is proposed.

1. **Approval**: This framework will be endorsed by the CIO and University IT leadership team.
2. **Ownership**: The policy will be owned within the University IT Leadership Team.
3. **Process and tooling work**: Document the exception process, draft standard procurement questions, select testing tools (and procure if necessary).
4. **Skills and knowledge**: University IT staff involved in specifying, building or procuring solutions will need educating and upskilling. All staff need an awareness of accessibility and the policy, service/product teams additionally need the skills to design and test for accessibility. A learning needs analysis will identify the skills and knowledge required and the current gaps, which can be used to develop a learning programme.
5. **Accessibility champions**: Seek champions within product / service teams or at domain level who look at the work with an accessibility lens - offering challenge and maybe coaching to the team, and liaising with the Digital Accessibility Working Group or Taskforce.