

Plan for Increased Digital Accessibility

Type of document	Plan
Adopted by	President
Date of approval	2021-06-03
Ref. no.	SU FV-0737-21
Period of validity	2021-06-03 – until further notice
Replaces document	
Responsible administrative unit	Office of the President
Responsible administrator	Ulf Nyman

Description:

The act on accessibility to digital public service increases the need to make digital material on the university's website more accessible.

The purpose of the plan is to create a better understanding of accessibility, present the goals of Stockholm University, and to find a functional organisation for this work.

Disclaimer: In case of a discrepancy between the Swedish and the English versions, the Swedish version will prevail.

Introduction

What is accessibility?

Accessibility is about ensuring that all people, regardless of their abilities, can participate in society independently. This includes everything from being able to move about and orient oneself in the physical environment to assimilating information or performing services. This also includes being treated correctly and having the possibility to communicate on one's own terms.

Digital accessibility means taking into account individual differences when designing and developing digital services. Whatever is planned and designed by people with the purpose to be used by people, must also work for all people. When accessibility functions well, one does not generally think about it and it is not an inconvenience to anybody. Non functional accessibility, however, will clearly leave those with any kind of disability at a great disadvantage.

The goal of digital accessibility is to make sure that no one shall be forced to refrain from using public digital services because of a disability. Digital information and services must therefore be usable for people with the following disabilities or impairments:

- without eyesight
- vision impairment
- colour vision impairment
- without hearing
- hearing impairment
- speech impairment
- fine motor skills or strength impairment
- mobility impairment
- sensitivity to flicker
- cognitive impairment

It is important to bear in mind that disabilities can be permanent as well as periodical or situationally triggered. A film in Swedish with subtitles becomes accessible not only for people with a permanent hearing impairment, but it also increases the accessibility for others, such as those who watch the film in a noisy environment, have concentration difficulties or whose first language is not Swedish. Similarly, an increased contrast between background and text on a website or in a document helps not only those with a vision impairment but also those whose ability to read text on a screen is impacted by sun glare. Thus, good accessibility is often of advantage to a lot more people than one would think at first.

The act on accessibility to digital public service

On 23 September 2018, the EU Web Accessibility Directive on the accessibility of the websites and mobile applications of public sector bodies came into force (<https://eur-lex.europa.eu/legal-content/SV/TXT/?uri=CELEX%3A32016L2102>).

In Sweden the directive was implemented on 1 January 2019 when the act on accessibility to digital public service came into force. (https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/lag-20181937-om-tillganglighet-till-digital_sfs-2018-1937). (NB the act has not been translated into English.)

National authorities, regional and local authorities as well as other actors classified as public-sector bodies, i.e. actors which are considered as authorities charged with procurement, shall (with some exceptions) fulfil the requirements laid down in the act. Some private actors performing services with public funding are also subject to these requirements.

Broadly speaking, actors who are subject to this act shall:

1. Design their websites, apps as well as documents which are circulated through these media, including, if possible, the content which is disseminated through a third party (such as social media), so as to make them perceptible, operable, understandable and robust.
2. Offer users the possibility to call attention to deficiencies in relation to what is described above and to demand that it be rectified, also to request access to information which has been excluded in point 1.
3. Regularly publish an accessibility report showing how the provisions in point 1 have been met. This report is also to contain a link to the feedback mechanism described in point 2 above, as well as a link to the Agency for Digital Government (DIGG) which has the oversight responsibility in these matters.

DIGG defines a website as one or more web pages which are in some way connected to each other, e.g. through one or more of the following criteria:

- the same domain name
- the same design
- some systematic way of navigating between the pages.

For a website or an app to meet the requirements, this also applies to content which does not constitute web pages but which are nonetheless distributed via this website, e.g. PDF files, films or audio clips. Older documents (published before 23 September 2018) are exempt from these requirements, unless such documents are necessary to “carry out administrative procedures resulting from the tasks of the authority”; this includes for example forms which are still being used.

Digital accessibility at Stockholm University

Goal of Stockholm University

The new act on accessibility to public digital service entails more stringent demands on the university as to the use of and communication via digital services such as the web and learning platforms. This calls for more reflection on work methods, on how to share teaching material and research information, as well as how to communicate with students, staff and the rest of society.

As far as possible, Stockholm University shall focus on the users rather than the regulatory framework. Thus, the primary goal shall not be to seek an acceptable lowest level and to see how the demands could most easily be fulfilled. On the contrary, it is necessary to accept the decisions which have been made, to collaborate at all levels within the university in the development of work methods and tools according to the new demands, and to view all this as quality improvement measures.

The changed requirements brought about by the new act will not be transient. Rather than look for quick and easy solutions, the university will have to use these new conditions to look broadly in order to create work which is both sustainable and long-term. Making the digital public services of the university accessible is of advantage to everybody, not just a condition for including certain groups.

The Web Content Accessibility Guidelines (WCAG) 2.1 presents three levels of accessibility in different areas. One technically described goal of Stockholm University as a first step is to reach the minimum demands at level AA in WCAG 2.1, while maintaining the ambition to move, within the next 3-5 years, to the level AAA in so far as economy and technology make this possible. (Link to WCAG 2.1: <https://www.w3.org/TR/WCAG21/>)

On a practical level, the new requirements mean that all text-based content has to be in a generally accessible format, e.g. possible to handle by a voice reading tool with good results.

Similarly, all content other than text, i.e. images, films, animations and sound recordings, must also be described in text. As a consequence, the university must, among other things:

- provide subtitles to recorded moving media (video, sound, animations)
- provide alternatives if a recording consists exclusively of sound or video, e.g. transcriptions of speech and audio description of visual information
- add so-called alternative texts which describe/explain images, diagrams, etc.

According to the act, live stream broadcasts are not subject to the requirement of subtitling. If, however, the live stream is saved to a file available for further watching, it is to be considered a recording under the rules presented above. This exemption from the requirements set up in the act should not be a reason for not saving live broadcasts. When live broadcasts are recorded and saved, they contribute to increased inclusion.

In parallel with a high level of ambitions, it is also important to realize that the efforts to improve accessibility are not binary, i.e. all or nothing, rather they constitute a process where

we move towards a goal. The final goal is that all material shall be made accessible. However, relevant information should be published even when the adaptation to accessibility is less than perfect.

The ordinance (2018:1938) on the accessibility to digital public service states that the act is not applicable to “contents on websites which are only accessible to closed groups and not to the public as such, published before 23 September 2019 until such websites undergo a comprehensive overview”. This has given rise to the question whether the learning platforms at the universities are to be seen as part of this exemption, and in The Association of Swedish Higher Education Institutions (SUHF) work is in progress to formulate recommendations for an interpretation of this which would be common for all institutions of higher education. The position of Stockholm University is that learning platforms should eventually be subject to the accessibility requirements, but getting there will by necessity take time. Therefore, wise use of available resources in order to strike a good balance between pedagogical development and accessibility in the learning platforms is of great importance.

Who are affected?

The web and digital services form a large and vital part of the activities carried out at Stockholm University; therefore, the work to ensure web accessibility will involve many staff members, both in the core activities and in local and central support of the activities.

Directly involved are those members of staff who write, produce and/or publish material for the web, or those systems and services which can be reached via the web. Regardless of whether it concerns study material intended for present students, research presentations directed towards the interested public, information intended for potential students or guiding documents for the internal use of the university, they all need to be made accessible.

Examples of persons affected are therefore:

- accountable managers/heads of units (who plan and prioritize activities and budget)
- teachers (who produce teaching material for the web)
- researchers (who write and produce material for the web)
- communicators (who write and publish web pages)
- administrators (who produce documents for the web).

Besides those who do the direct work of producing and publishing content, the efforts to increase web accessibility will also involve persons who provide various kinds of support. One such example is practical support in how to create an accessible PDF document or how to subtitle a film, but it can also be about providing pedagogical support to teachers.

Furthermore, the accessibility requirements will also influence such things as the design and coding of web sites. To achieve high accessibility an integrated improvement work is needed. This includes a good design of both the information architecture and user interfaces (including navigation) as well as further development of technology (for example better written code).

Procurement and purchase is another area where accessibility aspects have an impact on specifications and follow-ups. In accordance with the Swedish Public Procurement Act



(LOU), so-called binding requirements of accessibility under WCAG 2.1 must be included in the tender documentation. The university should therefore have a process put in place to evaluate whether the procured systems actually fulfil the requirements under WCAG2.1 instead of just accepting a supplier's ticking the right box in the tender.

A lot of work related to digital accessibility is already being done, e.g. at the Communications Office, the IT Services and at several faculty departments, but the work needs to find clearer structure and systematics.

Needs, actions to take and organisation

Areas of development

After an initial mapping in the autumn of 2020, the overall picture is that at Stockholm University there is today a low awareness of the contents and purpose of the Web Accessibility Directive, and of how the directive affects work at the university. Low understanding of the directive can lead to resistance and obstacles for the change of approach and work methods which are needed if the adaptation to accessibility is to become a natural part of day-to-day operations.

A lacking knowledge and an uncertainty regarding requirements and who has the authority to determine them, can also lead to excessive caution when using digital media, tools and services, and this in turn hampers digitalization as a whole.

In addition to this, there is also ignorance and uncertainty about how to make digital material accessible in practice. Improved knowledge would probably have a positive influence on both the amount of accessible material and the quality of such material.

At present, there is no clear ownership of matters concerning digital accessibility at Stockholm University, nor is there one single body to handle questions or practical support. As a consequence there is a risk that questions fall between two stools or that the same questions are dealt with in more than one place.

Actions to take

In response to the development areas listed above, a number of actions need to be taken. Awareness and knowledge must increase, quick reference material and practical guidelines need to be created, and an organisation for the task must be clarified.

The support of creating accessibility calls for a wide spectrum of expertise as well as hard work. It is therefore not reasonable to place all relevant responsibilities within the duties of one single administrative unit. As a consequence, this calls for the setting up of an inter-organizational node comprising a number of the university's administrative units. Where possible, this node should also take advantage of the expertise existing within the core business of the university, such as the Institute for Interpreting and Translation Studies or the Centre for the Advancement of University Teaching.

The node should have as its mission to coordinate and drive the accessibility work forwards. It needs to be a central support function and a forum for discussion and exchange of experience both concerning practical matters, such as the setting up of boundaries, priorities and levels of quality, and to create a stable long-term administration of the day-to-day work. It should be noted that the mission of the node is to provide support in the work with digital accessibility; consequently, the node is not a function for actually making material accessible. Such responsibility lies with the respective department or administrative unit.

The work of the inter-organisational node will, at least initially, be coordinated by the Communications Office. The ability to participate intensively in project like work, for a limited period of time, is seen as necessary in order to find forms and routines for future day-to-day work.

The fact that a higher degree of central coordination of accessibility efforts is needed does not, however, mean that all accessibility work should be coordinated centrally. In parallel with the work within the node, administrative units must therefore continue to work separately in their respective parts, to ensure that the work does not come to a stand-still.

Responsibilities of the node and of the administrative units

Responsibilities of the node

- coordinate the activities and highlight overall needs
- build up/change attitude/approach through information and skills development, both in a broad sense and for specific target groups
- coordinate, produce and communicate SU-adapted practical guidelines and quick reference material
- test, evaluate, improve work processes, tools and organisation
- monitor the surrounding world
- build up and make visible the whole of the university's competence relating to accessibility
- manage and/or coordinate the development of routines to ensure the accessibility perspective in various processes within the university
- follow-up/evaluation of the situation.

Responsibilities and duties of respective administrative unit

The Communications Office shall:

- coordinate the work within the node
- lead and coordinate communication and information in order to increase awareness and cooperate with other relevant administrative units to reach out to all target groups (accountable managers, teachers, researchers, etc.)
- monitor and assess accounts of accessibility and provide support to the departments in their work at a local level
- produce Microsoft Office templates which are adapted to accessibility requirements and guidelines/quick reference material related to them, as well as information about this material.

The Human Resources Office shall:

- ensure the introduction of digital accessibility in the training of new staff, e.g. accountable managers, health and safety representatives and other relevant roles where the Human Resources Office is responsible for the training offered.

The Centre for the Advancement of University Teaching (CeUL) shall:

- be in charge of training and support for teachers concerning the organisation and accessibility of teaching and teaching material
- cooperate with Student Services in matters related to pedagogical accessibility competence and support for teachers (e.g. how interpretation and subtitling could function pedagogically).

Student Services shall:

- handle questions on targeted pedagogical support for students with long-term impairment
- provide targeted ICT (Information and Communication Technology) pedagogical support for students with impairment
- give consultative support to departments in matters relating to targeted pedagogical support for students with long-term impairments
- give consultative support to departments in matters relating to sign language interpretation and captioning.

The Office of the President shall:

- give support in legal and other matters in the assessment of different factual issues.

IT Services in consultation with the Procurement Section, and with units concerned shall:

- be responsible for and cooperate to ensure that accessibility requirements are met when tools and services which are to be offered centrally are developed and procured, in order that they live up to laws and ordinances (this applies to web templates, Microsoft Office templates and teaching tools, as well as subtitling tools and services)
- ensure that third part tools/resources which are recommended are in accordance with laws and ordinances and to communicate clearly under which conditions they can be used.

IT Services shall:

- make an inventory of the needs for accessibility in all services provided and communicate this in relevant partial portfolios to those who are responsible for making decisions on budget and administration.
- in consultation with the Communications Office be responsible for improvements of the design of information architecture and user interface.
- create and maintain development processes which support accessibility.
- Provide digital aids and study tools.