Logius
Ministry of the Interior and Kingdom Relations

Web accessibility in your organisation: roles and responsibilities

Web accessibility in the public sector

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1 Introduction

The web team, the communications department or the ICT department cannot ensure digital accessibility on their own. This requires an effort on the part of the entire organisation, from upper management to legal experts, procurement, designers, HR advisers, trainers, editors and testers.

This publication tells you all you need to know and do to make the information and services provided by your organisation more accessible. Determine the steps you can take now as well as any related future steps.

12 organisational roles are highlighted. Find out what you in your role should know and do. It might be that you are combining multiple roles, or that some areas of expertise have been broken down further in your organisation. If that is the case, try to work together with your relevant colleagues.

The author of this publication is Logius, the digital government service of the Dutch Ministry of the Interior and Kingdom Relations. Logius maintains government-wide ICT solutions and common standards, that simplify the communication between authorities, citizens and businesses. The organisation supplies products relating to access, data exchange, standardization and information security.

The original Dutch text is targeted to public sector bodies in the Netherlands. They are legally required to take the necessary steps to make digital information and services available in an accessible way.

Each EU memberstate has transposed the Web Accessibility Directive into national law. As a result there can be differences in requirements on a national level. The Accessibility Statement in the Netherlands for example has to contain a link to the report with the results of the accessibility test and needs to be signed off by higher management.

2 Web accessibility and functional disabilities

Web accessibility is about making digital information and services as easy to use for people with a functional disability as for people without such a disability.

People with a functional disability are those who are deaf, hard of hearing, blind, partially sighted or colour-blind. This group also includes those with an autism spectrum disorder, dyslexia or a working memory impairment and those who are unable to use a mouse or touch screen because of a motor impairment or tremors, or those who need to use a keyboard or other device for another reason.

In any case, people who do not have a functional disability appreciate information that is easily accessible as well. For example, subtitles allow them to watch a video with the sound off in the quiet zone on the train or at the office, and high-contrast colours are useful outdoors. Accessible information is also easier to find for both users and search engines.

Digital information and services include websites, apps and documents. Public sector bodies have a legal obligation to make all of their own websites and websites they (partially) paid for or commissioned more accessible. This obligation extends to digital documents published online, mobile apps and eventually intranet.

3 Legislation

Public sector bodies in all EU Member States are required to take the necessary steps to make digital information and services available in an accessible way. In the Netherlands, it is a legal obligation that is anchored in Dutch laws such as the Decree on web accessibility for public sector bodies and the Digital government act.

In accordance with the Equal Treatment of Disabled and Chronically Ill People Act, all people must be treated equally. Organisations are not allowed to exclude people with a functional disability, including when it comes to digital accessibility. The law covers education, labour, transport, goods and services.

Tip: you can find more information on legislation in the section on the legal expert role.

If your organisation's digital information and services are also intended for sectors other than the ones specified above or organisations or countries outside the EU, you must check carefully whether any supplementary legislation or policy applies.

4 Accessibility statement

All government organisations are required to make available online an up-to-date accessibility statement. This statement must be based on the official template. A board member or any other authorised person must sign the declaration.

The statement must include the following:

1. Name of the public sector body and name of the website or app.
2. Scope of the statement:
   a. Which parts of the website have been tested (and which have not)?
   b. Did the test cover all legal accessibility requirements?
3. Link to the full digital accessibility test.
4. In case of deviations from the standard:
   a. Deviations from the accessibility standard that have consequences for people with a functional disability, their causes, consequences, countermeasures, planning and alternatives.
   b. List of non-technical issues that cause accessibility problems, their causes, consequences, countermeasures and planning.
5. Feedback mechanism for reporting complaints and the opportunity to escalate a complaint to the ombudsman if the complaint has not been dealt with satisfactorily by the public sector body.
6. Status indicating the extent to which the organisation is 'in control' (see the accessibility status section on the next page).
7. Signature of a board member or any other person that is authorised to sign.

In addition, organisations must publish an overview of all their accessibility statements. This allows a supervisory authority or user to find information on the accessibility of all of a public sector body´s websites, internal websites, apps and digital information.

Tip: *For more information, go to digitoegankelijk.nl/verklaring or generate a complete accessability statement on toegankelijkheidsverklaring.nl*

Accessibility status

The accessibility statement must list the current status of the website or app:

- **Fully compliant**, with test results in conformity with the WCAG-EM testing method or an equivalent documented evaluation method for the WCAG 2.1 accessibility standard (see below). In that case, the organisation is 'in control'.
- **Partially compliant**, with test results in conformity with WCAG-EM or an equivalent documented evaluation method for WCAG 2.1. In addition, the statement specifies the deviations from WCAG 2.1 AA, the consequences for various people with a functional disability, countermeasures, alternatives and countermeasure planning. In that case, the organisation is 'in control'.
- **Initial measures taken**. A test conforming to WCAG-EM or an equivalent documented evaluation method for WCAG 2.1 has been scheduled, but not yet carried out.
- **Not compliant**. There are no test results or the test results are incomplete, obsolete or incorrect. No test has been scheduled yet.

Standards

Among the various standards available, we want to highlight the following:

- **EN 301 549:** European standard for accessible ICT products and services. The Decree on web accessibility for public sector bodies states that government organisations should adhere to this standard when making their websites and apps accessible. WCAG is part of EN 301 549.
- **WCAG 2.1** is a standard of the World Wide Web Consortium (W3C) and is recognised as the leading standard for web accessibility worldwide. The level that government organisations must comply with is AA. This means that they must meet all requirements at both the A and AA levels.
- **WCAG-EM** is the W3C Evaluation Method. It describes the testing method for checking a website's conformity with WCAG. The test results used to support an accessibility statement must be based on WCAG-EM or an equivalent documented evaluation method for WCAG 2.1.

5 Organisation-wide approach

Managing digital accessibility demands an organisation-wide approach. In order to engage all employees and meet legal obligations, upper management needs to support this approach and develop a strategy to be elaborated further in policies and preconditions.
An approach that works in one organisation will not necessarily be successful in another, so you will have to work together with colleagues to draw up a road map. Key success factors include:

1. The approach has management support.
2. There is a person who has final responsibility for digital accessibility.
3. There is a defined set of responsibilities for specific processes, duties and individual topics, with knowledge acquisition and documentation playing an important role.
4. Accessibility is included in processes and permanent budget and capacity are allocated.
5. Digital accessibility forms part of the purchasing process. Checks are in place to ensure that suppliers demonstrably meet contractual obligations (and if so, to what extent). There are follow-up steps when this is not the case.
6. The organisation keeps a record of all websites, documents, apps, systems and intranet sites it manages and the accessibility status of each. This record forms the basis for an action plan.
7. The organisation uses accessibility statements and draws up action plans for each separate service or product.

6 Supervision and enforcement

Supervisory authorities can use accessibility statements to verify whether an organisation is 'in control'. This means that it should be obvious what digital information and services the organisation offers, what the accessibility status of each digital channel is and what improvement measures have been planned.
Supervision is carried out through existing powers, structures and instruments of supervision:

Administrative bodies with a supervisory role at their specific level of government verify whether organisations meet their legal obligation. This is called horizontal control. Example: a municipal council supervises the accessibility of a municipality's websites, apps, intranet sites and documents.

An organisation at a higher level of government carries out inter-administrative supervision to verify whether the horizontal supervision is sufficiently effective. This is called vertical supervision. The higher-ranking organisation has the authority to intervene (by virtue of its power of substitution) if the lower-ranking organisation breaks the law, acts against the public interest or neglects its duties.

The ministries and provinces are the organisations that carry out the inter-administrative supervision. They share their findings on the (level of) compliance by public sector bodies with the Ministry of the Interior and Kingdom Relations. The Ministry submits a progress report to the House of Representatives each year and to the European Commission every three years.

Although not punishable by a fine or sanction, neglecting to take measures to manage digital accessibility or failing to supply a valid statement to supervisory authorities poses an administrative risk for the responsible administrative bodies. Moreover, a failure to meet legal obligations may lead to adverse press coverage and negative reactions from interest groups.

7 Conformity: control and transparency

Things are not so strict that you must comply to the digital accessibility standard 100% at all times. However, government organisations are required to be 'in control'. This means that they are aware of the types of digital communication they are responsible for and know how accessible they are. They should identify measures to improve accessibility, apply them within a set timeframe, and thus gain more control.

In sum, it is essential that you know where you stand, have an action plan, take measures, introduce preconditions and offer transparency. The accessibility statement allows a supervisory authority to verify whether the organisation is in fact in control.

8 Misconceptions

1. **You should adhere to the guidelines as closely as possible.** Accessibility is a legal obligation that you cannot abandon without good reason. Nevertheless, if you incorporate accessibility into your processes at the earliest possible stage, it should not be a limiting factor. Accessibility is a precondition.
2. **Accessibility is always expensive.** Setting up the process does indeed cost money. However, prevention is cheaper than cure. Make sure to allocate an accessibility budget and capacity for each process and project.
3. **It will not work in our organisation and there is no budget.** Government organisations have a duty to allocate budget and capacity to manage the quality of their digital services and products.
4. **All it takes to make a website accessible is a tool or a button.** No, you cannot simply make a website or document more accessible afterwards Although tools and buttons can be useful, accessibility is not a late-stage add-on or a quick fix. Accessibility should be embedded in the organisation's working methods.
5. **We want to ensure that the majority of people (i.e. those without a functional disability) are able to use our information and services first.** Government organisations should not exclude anyone for any reason. Rather than being a burden, accessibility makes your sites and apps available to a wider audience. It also makes information easier to locate for search engines.
6. **We use a tool to determine how accessible our site is.** A tool only measures a limited number of all existing accessibility problems. It may play a useful part in monitoring accessibility, but in order to take the right measures, you must have insight into the extent to which the site meets all accessibility requirements. This requires manual testing.

9 Liaising with experiential experts

Liaise with people with a functional disability and learn from them. Experiential experts can provide you with insight into what various people need and how you can prevent the exclusion of certain groups.

People with disabilities are also important in creating awareness. Have an experiential expert - for example, someone who is blind - give a demonstration about how he or she uses a website and what the impact is of digital inaccessibility. This is a revelation for most people. For administrators and policymakers, this often leads to a direct sense of urgency. And with people involved in the implementation, it creates a deeper understanding of how someone with a disability uses a website and why the accessibility criteria are used.

Keep in mind that experiential experts cannot be expected to have the technical knowledge to establish the cause of a specific problem, to know the impact on others with the same or another functional disability or the exact contents of the accessibility guidelines.

Engage an expert in the field of digital accessibility where necessary. He or she may be able to help you maintain oversight, so that making a certain change for the benefit of one group does not lead to the exclusion of another group. Be sure to ask them about WCAG 2.1 AA. This standard is the basic level that all digital information and services should comply with. The standard is based on a wide variety of functional disabilities and assistive equipment.

How can you contribute in your role?

On the following pages, you will find steps you can take to contribute to digital accessibility in your role.
Share this information with others in the organisation.
Determine your initial steps and follow-up steps.

Tip: also familiarise yourself with the steps for people in other roles and positions. Work together with them when it comes to digital accessibility.

Board member or manager

Digital services are becoming increasingly important. The digital accessibility of government websites has been subject to a compulsory policy since 2008. On 1 july 2018, a law was introduced in the Netherlands that governs accessibility of websites, intranet sites, apps and digital documents.
As a board member or manager, it is your responsibility to ensure that the services your organisation offers are accessible to everyone. Organisations can meet this requirement by liaising with the right people, introducing preconditions and improving processes.

In short: as a board member or manager, you are responsible for the preconditions that are necessary to carry out activities in the fields of vision and strategy, budget, knowledge, time and human capital.

What does a board member or manager have to do?

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

- ☐ Be aware of the legal obligations. Government organisations are bound by obligations in terms of the accessibility of their websites, apps, documents and (eventually) their intranet sites. Contact your legal expert for more information about current and imminent obligations.
- ☐ Make sure that you meet your legal obligations. The organisation must:
  - Take measures to make its digital information and services (more) accessible for people with a functional disability;
  - Ensure that existing and new websites, digital documents, apps and intranet sites are accessible by a certain date;
  - Publish an accessibility statement online based on a mandatory official template.
- ☐ Define the board and the management's vision and strategy. Without clarity and the support of upper management, no organisation can make structural improvements to digital accessibility. Clarify what needs to be achieved, prioritise and set internal deadlines for the various digital information sources and services. Create an overview and disseminate these targets throughout the organisation.
- ☐ Remember that digital accessibility is primarily an organisational challenge and only marginally a technical one.
- ☐ Determine which board member has final responsibility for digital accessibility.
- ☐ Appoint a person who has responsibility for the digital accessibility policy. Set clear parameters for this person and give him or her a broad mandate to take stock, set up processes and liaise with the right people.
- ☐ Make sure that a framework and preconditions are in place, so that digital accessibility can be arranged smoothly. A permanent budget, time and

space for knowledge acquisition and process adaptation are essential.

- ☐ Be aware that the accessibility statement is a formal supervision instrument. The statement must be signed off by a board member or any other person authorised to sign. This is a legal obligation.
- ☐ Remember that a separate accessibility statement must be prepared for each channel. This includes not just general or corporate websites, but also other sites and apps. For municipalities, this also includes municipal council information (including documents), waste collection calendars, spatial planning proposals, digital portals and themed websites.
- ☐ Keep in mind that the accessibility statement must contain measures and a schedule for items that are not yet fully accessible for people with a functional disability. Remember that the statement must specify a feedback mechanism for people who use the website. If their report is not dealt with satisfactorily, they must be able to lodge a complaint with the ombudsman.
- ☐ Set up a process for the preparation of accessibility statements: Who will test conformity? Who will decide what measures are to be taken? Who will prepare the statements? Which board member or other person authorised to sign will sign the statements? Who will be responsible for the scheduling of manual testing?
- ☐ Keep an eye out for deadlines in the statement that have passed. The information in the statement must be up to date.
- ☐ Offer employees the opportunity to attend courses and training programmes.
- ☐ Enable employees to perform their duties with regard to accessibility to the best of their ability by giving them a broad mandate.
- ☐ Recognise the fact that an existing corporate identity and branding rarely offer a solid basis for accessibility. The most viable option for ensuring accessibility is usually to develop a new corporate identity or expand the existing corporate identity. The corporate identity must be suitable for digital communications. A high contrast and a design suitable for people who are partially sighted or unable to use a mouse or touch screen are important points to consider.
- ☐ Make sure that all parties involved are informed about their roles in digital accessibility and ask for their input.

Useful links

- digitoegankelijk.nl/beleid
- digitoegankelijk.nl/verklaring
- digitoegankelijk.nl/onderwerpen/themas/organiseren-en-beheren
- w3.org/WAI/roles/managers

Policy officer

As the policy officer responsible for digital accessibility, you make sure that the organisation meets the legal obligations with regard to government websites and apps. Setting up organisation-wide working processes for implementation and supervision requires a clear vision or strategy. The accessibility statement is a useful tool for this.

What does the policy officer responsible for digital accessibility have to do?

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

- ☐ Make sure that there is an organisation-wide vision and strategy for digital accessibility. Have this adopted by the board and the management. Implement the strategy in consultation with the parties involved.
- ☐ Launch a project in cooperation with the parties involved to draw up a list of all digital services and products, their life expectancy, their accessibility status and any measures already taken. Include scheduled or expected projects.
- ☐ Check whether the purchasing department is aware. Digital accessibility should be embedded early on in the process. Purchasing should include digital accessibility as a precondition and investigate for which products and services digital accessibility is a requirement.
- ☐ Find out whether any existing strategies specify accessibility targets.
- ☐ Investigate which policy areas require further embedding of accessibility, where policy needs to be amended and where additional policy is needed.
- ☐ Check content creation systems and processes for digital accessibility bottlenecks or have such an investigation carried out by specialists. Draw up an action plan, list of priorities and deadlines that are tailored to your organisation.
- ☐ Organise meetings to raise awareness. Engage experiential experts. Use them to disseminate insights and knowledge about digital accessibility throughout the organisation.
- ☐ Make sure that a framework and preconditions are in place, so that digital accessibility can be realized smoothly. A permanent budget, time and space for knowledge acquisition and process adaptation are essential.
- ☐ Gather all information necessary for the accessibility statement. You can use the generator for this. The generator helps you prepare an accessibility statement based on the official template. Involve the responsible board member or any other person that is authorised to sign. Publish the statement online.
- ☐ Keep the accessibility statement up to date. Keep an eye out for passed deadlines and obsolete data. Make digital accessibility part of the policy cycle.

Useful links

- digitoegankelijk.nl/beleid
- digitoegankelijk.nl/verklaring
- digitoegankelijk.nl/onderwerpen/themas/organiseren-en-beheren
- w3.org/WAI/roles/managers

Legal expert or compliance manager

As the legal expert or compliance manager, you are responsible for keeping your colleagues well informed about their obligations with regard to digital accessibility. You help them determine the websites and apps that must be made compliant and the timelines for doing so.

What does a legal expert or compliance manager have to do?

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

- ☐ Prepare an overview of all legislation and regulations that are relevant to your organisation and disseminate this overview throughout the organisation. Such legislation and regulations could include the UN Convention on the Rights of Persons with Disabilities, Equal treatment of disabled and chronically ill people act, Decree on web accessibility for public sector bodies, the European accessibility act and the Digital government act.
- ☐ Establish the risks of non-compliance and advise upper management accordingly.
- ☐ Actively keep up to date with new legislation and standards and assess their relevance to the organisation. Examples include legislation arising from the European accessibility act. Disseminate this information actively throughout the organisation.
- ☐ Find out which of your organisation's digital information sources, services, apps and documents are covered by digital accessibility legislation. This will require a list of all digital services and products. Please note that such a list may be overly limited or may not exist. Contact the policy officer or other employee responsible for digital services to launch a project to draw up such a list.
- ☐ Advise the board, management and the purchasing department about the impact of legislation and regulations.
- ☐ Make sure that you are well informed about exceptions in the law and are familiar with the concept of a 'disproportionate burden'. Both are defined in the relevant European directives and Dutch legislation. Give advice on when this does and does not apply. If a 'disproportionate burden' applies, be aware of the accessible alternatives that must be offered.
- ☐ Advise the responsible board member about whether the content of the accessibility statement meets the legal obligation.

Useful links

- wetten.overheid.nl/BWBR0040936/2018-07-01
- digitoegankelijk.nl/beleid/wet-en-regelgeving
- digitoegankelijk.nl/beleid/wat-is-verplicht
- digitoegankelijk.nl/beleid/voor-wie-is-het-verplicht
- digitoegankelijk.nl/beleid/specifieke-situaties
- digitoegankelijk.nl/verklaring

Purchasing manager

As a purchasing manager for a government organisation, you are required to be aware of the relevant legislation and regulations and mandatory standards. These must be observed during the purchasing process.

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

What does a purchasing manager have to do?

- ☐ Include digital accessibility as a precondition in your purchasing policy.
- ☐ Incorporate the latest version of the European standard EN 301 549 (Accessible requirements for ICT products and services) in contracts and follow-up evaluations. This is the European standard referred to in regulations. EN 301 549 contains all success criteria for WCAG 2.1 levels A and AA.
- ☐ Check with the internal legal expert(s) which of your organisation's websites, apps, documents, intranet sites and extranet sites must meet legal obligations.
- ☐ Recognise that the purchasing policy has a major impact on digital accessibility. Many products and services that are procured externally are relevant in this respect: websites and intranet sites (or CMS for these sites), software for documents, video, infographics, corporate identity, forms, training programmes, document management systems, cookie statement etc.
- ☐ Publish links to standards, guidelines and the purchasing policy on the intranet.
- ☐ Make clear agreements with suppliers on the standard and the level that a procured service or product should meet. This is currently WCAG 2.1 (i.e. the success criteria for conformity levels A and AA).
- ☐ Be aware that there is an official evaluation method to test whether a service or product meets the requirements. This is the W3C's Web Content Accessibility Guidelines - Evaluation Method (WCAG-EM). Alternatively, you may use an equivalent documented evaluation method based on WCAG 2.1.
- ☐ Prior to purchasing an existing product or service, ask for a report stating which success criteria the product or service is able to meet. Request facts or ensure that a report is prepared if these are not available.

Useful links

- digitoegankelijk.nl/onderwerpen/aanbesteden
- pianoo.nl/nl/toolkit-aanbesteden
- digitoegankelijk.nl/onderwerpen/stappenplan-toegankelijkheid
- forumstandaardisatie.nl/standaard/digitoegankelijk-en-301-549-met-wcag-21
- w3.org/TR/WCAG21
- w3.org/TR/WCAG-EM

- ☐ Agree with the supplier that proof of full compliance with all requirements in the standard will be provided upon delivery, and stipulate the characteristics of such proof. Include this in the contract. If it transpires upon delivery that not all the requirements have been met, ask about the reason for each deviation and the consequences, the alternative (temporary or permanent), the improvement measures to be taken and when they will be taken. Do not accept the delivery until you are satisfied that all deviations have been remedied or there is an acceptable alternative or an acceptable timetable for improvement.
- ☐ Be wary of such unverifiable claims as 'We adhere to the guidelines as closely as possible', or claims that pertain to a subgroup only, such as 'The PDF files generated by our system are accessible because they can be read by people who use screen readers'.
- ☐ Ask for input from subject matter experts when evaluating suppliers. Examining code in a supplier portfolio may provide useful clues as to their ability to meet digital accessibility requirements.
- ☐ Conclude agreements with suppliers on testing and repairs during the development process. Make clear agreements on the methods to be used and who will bear the costs.
- ☐ Make clear agreements on a final test, repair periods and the cost of testing and repairs. Agree on follow-up steps in case the supplier deviates from any requirement or agreement.
- ☐ Make sure that you document your efforts to safeguard accessibility during the purchasing process and record deviations and measures to remedy them. Feed this information back to the legal expert and those with final responsibility for digital accessibility, so that it can be included in the accessibility statement.
- ☐ Check for any information, services or agreements on digital accessibility procurement or commissioned without the knowledge of the purchasing department. Examples could include online video playback software, formatted PDF files, an online magazine or infographics. Ensure that all procurement is in accordance with the agreed purchasing conditions.
- ☐ Consult the legal expert or subject matter experts if you suspect that a 'disproportionate burden' or 'ground for exception' specified in the law applies.

Project initiator or product owner

The extent to which a product or service can be used by people with a functional disability is largely determined at the start of a project. As a project leader, product owner, scrum master or employee responsible for innovation, research and development, you play an important role in this.

What does a project initiator or product owner have to do?

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

- ☐ Remember that digital accessibility is a legal obligation for government organisations.
- ☐ Be aware that a government organisation's websites, apps, documents and intranet must comply with the WCAG 2.1 AA accessibility standard, and that the organisation must publish an extensive accessibility statement for supervisory authorities.
- ☐ Recognise that digital accessibility cannot be added afterwards in an easy or cost-effective way, so it is important to take accessibility into account at the earliest possible stage of the innovation, research and development process. This makes products and services easier to use for everyone, for example through voice activation.
- ☐ Think about accessibility at the start of each project. Include it in the purchasing requirements and consider whether a new communication tool reaches everyone, whether it requires much additional work or cost, whether it excludes people and whether it meets the legal obligation.
- ☐ Ensure that people in your department or team are knowledgeable about digital accessibility, including having an understanding of WCAG 2.1 AA and being aware of the need for timely testing. This begins with the initial concept. Think about how people who are colour-blind, deaf, blind or have a motor impairment will use the product or service.
- ☐ Include digital accessibility as a requirement at all stages of development.
- ☐ Include digital accessibility in the 'definition of done'.
- ☐ Liaise with colleagues from other departments, such as Purchasing, Legal Affairs and Communications.
- ☐ Do not choose a platform or technology until you have investigated whether it can contribute to an accessible result.
- ☐ Liaise with people with a functional disability in the development of a product or service. Take care not to prioritise accessibility for one person or group of people with a functional disability at the expense of user-friendliness for other people with a functional disability. WCAG 2.1 AA is the basic level that all digital information must comply with. User research and input from people with functional disabilities can help you with further improvements.

Useful links

- digitoegankelijk.nl/onderwerpen/stappenplan-toegankelijkheid
- digitoegankelijk.nl/beleid/wet-en-regelgeving
- digitoegankelijk.nl/onderwerpen/aanbesteden
- w3.org/WAI/roles/managers
- w3.org/TR/WCAG21

HIMS

Document creator or document manager

Digital documents you publish online need to be accessible for everyone, including people with a functional disability. As a document writer, your responsibilities include using suitable software to make a document accessible and store it accessibly. As an administrator, your job is to ensure that there are requirements for documents created or managed by the organisation.

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

What does a document writer or administrator have to do?

- ☐ Be aware that the legal obligation applies to digital documents created after 23 September 2018. Depending on the age of the website, these documents need to meet the following requirements by 2019 or 2020:
  - If the website is new or has been overhauled (after 23 September 2018), the documents created after that date that are still online must be accessible by 23 September 2019 at the latest. Alternatively, an accessible alternative of equal value must be offered.
  - As for older websites (before 23 September 2018), documents created after that date that are still online must be accessible by 23 September 2020 at the latest. Alternatively, a comparable accessible alternative must be offered.
  - Older documents that are required for 'active administrative processes' must be made accessible after the relevant process has been completed. Examples include a PDF file dating back to 2016 that explains how to register or specifies conditions that the reader must agree to.
- ☐ Know what the characteristics of an accessible document are. These include a structure with headings, the correct language settings, a descriptive document title, text alternatives for images, images that do not contain vital information, accessible tables and forms, sufficient contrast and the option to have the document displayed differently.
- ☐ Bear in mind that the end result should be usable information and services, rather than just a document or file format. Devise a strategy for the choice of file format and the sort of content to be published online. PDF files (including conversions of PowerPoint or Excel files to PDF) are not always the most suitable medium for visitors and do not always match the objectives or possibilities of the organisation.
- ☐ Ensure that those who prepare the documents have a solid basic knowledge of accessible images and tables, the correct heading structure, bookmarks (in the case of a PDF file), lists, contrast and metadata.

- ☐ Investigate the suitability and use of the software available on workstations. Not every version of word processing software is suitable for creating accessible documents. This is especially true of older versions. Usually, you need different or additional software to create an accessible PDF file. 'PDF printers' do not create accessible PDF files. You will need assistance from the ICT department for this.
- ☐ Research (or have somebody else research) whether the templates you use are suitable for creating accessible documents. Amend the templates if necessary. Take steps to safeguard a proper testing and repair process. Testing will also give you the necessary input to improve your workflow.
- ☐ Be aware that automated accessibility tests can only be used to test a small part of the requirements. You will always need to carry out manual testing, which requires specific knowledge. The results of a testing tool do not provide sufficient information on whether a document is accessible.
- ☐ Set up a process that includes follow-up steps if any document is found to be not accessible. Give editors the mandate to refuse PDF files that are not accessible. Decide whether editors should have the PDF files fixed themselves or send them back where they came from.
- ☐ Make sure that PDF files do not contain information that is not accessible, e.g. an infographic without complete and visible written text.
- ☐ If you use an external party, such as a design agency, specify accessibility as a condition in the purchasing agreement. If a party demonstrates that it is able to generate an accessible document, this does not mean that it will do so automatically every time. Conduct regular tests. Fixing PDF files after the fact is expensive and digital documents that are not accessible lead to exclusion.
- ☐ Research which documents authored before 23 September 2018 are still online and form part of an 'active administrative process'. Check whether they are accessible. If they are not, make them accessible or provide an accessible alternative.
- ☐ Determine standards to be used for documents and specify what requirements documents must meet to comply with this standard. Examples include the PDF/UA standard, open standards or specifications and WCAG 2.1 AA.
- ☐ Gather input for the accessibility statement. Describe what measures should be taken to ensure that new documents are properly accessible by default. Compile a list of ongoing problems and measures to be taken.

Useful links

- digitoegankelijk.nl/onderwerpen/pdf-bestanden
- digitoegankelijk.nl/onderwerpen/verplichte-bestandsformaten
- forumstandaardisatie.nl/standaard/pdfua
- forumstandaardisatie.nl/standaard/pdf-nen-iso
- forumstandaardisatie.nl/thema/hoe-maak-je-een-duurzaam-toegankelijke-pdf
- w3.org/TR/WCAG21
- forumstandaardisatie.nl/standaard/odf
- forumstandaardisatie.nl/standaard/digitoegankelijk-en-301-549-met-wcag-21

Content specialist or editor

As a content specialist or editor, you are responsible for ensuring that the content of websites and apps is accessible. You must therefore make sure that you are familiar with the needs and wishes of people with a functional disability and that you know how to make information compliant with the legal obligation.

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

What does a content specialist or editor have to do?

- ☐ Understand how people with different functional disabilities consume digital information and services and what their needs are. As an example, alternative text alongside an image is beneficial to blind people, but not to those who are partially sighted. What matters to those who are partially sighted is that information is not merely displayed in an image, but is also given in the text itself. They will never be able to see alternative text. Learn how to recognise accessibility problems, taking care not to use yourself or your colleagues as a yardstick.
- ☐ Make sure that all editors and employees who work on and publish the various websites, apps, the intranet and documents are sufficiently informed. Important aspects to bear in mind are headings, links, images, tables, video and infographics.
- ☐ Include digital accessibility as a requirement in all manuals and style guides. Do not treat accessibility as something that is separate from other requirements or can be done later.
- ☐ Make sure that videos are accessible straight away. Making a video accessible for blind and partially sighted people during production is much cheaper and easier. Add subtitles for the deaf and hard of hearing. Ensure that the contrast is high enough to meet the contrast requirements in the WCAG 2.1 AA standard.
- ☐ Be aware of what testing tools can and cannot help you with. Although testing tools are useful, manual testing is always required. Do not introduce improvements merely to satisfy the testing tool. Think carefully about whether the warning or error is valid and which improvements might actually benefit people.
- ☐ A good CMS (content management system) will help editors enter and write accessible content. A CMS should allow you to select different languages if required, compile accessible tables and enter an alternative attribute with ease. A good CMS will prevent redundant or superseded code. Ask follow-up questions when selecting or adapting a CMS.

Useful links

- digitoegankelijk.nl/onderwerpen/tekst
- digitoegankelijk.nl/onderwerpen/audio--video
- forumstandaardisatie.nl/standaard/pdfua
- forumstandaardisatie.nl/standaard/pdf-nen-iso
- forumstandaardisatie.nl/thema/hoe-maak-je-een-duurzaam-toegankelijke-pdf
- w3.org/WAI/roles/writers
- w3.org/TR/WCAG21

- ☐ Launch or take part in a project to draw up a list of all digital services and products, their life expectancy, their accessibility status (see box) and any measures already taken.
- ☐ When launching a new communication medium, content type or channel, consider whether it will reach everyone, including people with a functional disability. Include costs and opportunities as a determining factor when deciding whether to use a particular medium. Liaise with the purchasing department in setting conditions.
- ☐ Be wary of myths and outdated views. Do not assume, but keep investigating whether certain ideas are still valid. The internet is changing, and devices (including assistive devices) with it.
- ☐ Make sure that substantive knowledge throughout the organisation is up to date. Keep up to date by taking training courses, reading up on issues and sharing your knowledge with others in the organisation.
- ☐ Learn how to recognise a PDF file that is not accessible. Work together with colleagues to discover the consequences of a PDF file that is not accessible remaining live and help set up a process to avoid this (including a mandate not to publish PDF files that are not accessible online).

Communications adviser

As a communications adviser, you have a key role when it comes to digital accessibility. Communications issued by a government organisation must be accessible for everyone. This requirement must be included in the communication strategy and be observed for every communication.

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

What does a communications adviser have to do?

- ☐ Incorporate digital accessibility into your communication strategy and policy.
- ☐ Find out more about digital accessibility and what it means for your work by taking a training course or acquiring knowledge another way. Make sure that you know and understand what the requirements are. Take care not to use yourself or your colleagues as a yardstick. Familiarise yourself with functional disabilities, assistive equipment and the accessibility standard.
- ☐ Think about accessibility at the start of each project. Include it in the purchasing requirements and prevent a new communication tool from excluding anyone. If this is unavoidable, provide an accessible alternative for the information, such as subtitles for a video or a full transcription of an infographic. Apps also need to be accessible.
- ☐ A PDF intended for print does not necessarily make for good web content and is usually not accessible. Decide beforehand what content you want to disseminate online, what the most suitable file format would be and how you can ensure that the content is accessible.
- ☐ Provide input for the people who prepare the legal accessibility statement. What measures and checks are in place in your department?
- ☐ Bear in mind that the accessibility statement should contain a proper feedback mechanism to ensure that issues regarding the accessibility of a website, document or app are addressed. Provide feedback to the parties involved, including designers and editors.
- ☐ If you work with personas or user surveys, be sure to include people with a range of functional disabilities.
- ☐ Only use services such as survey tools if they do not hamper the accessibility of a page and people with a functional disability are able to use them.

Useful links

- digitoegankelijk.nl/onderwerpen/stappenplan-toegankelijkheid
- digitoegankelijk.nl/onderwerpen/tekst
- digitoegankelijk.nl/onderwerpen/vormgeving
- digitoegankelijk.nl/verklaring
- w3.org/WAI/roles/writers
- w3.org/WAI/roles/designers

Corporate identity owner or designer

As the designer or owner of the corporate identity, you are responsible for ensuring that the designs and corporate identity of websites, documents and apps are accessible for all. For instance, this means that designs must be suitable for people who are unable to use a mouse or touch screen. You must also guarantee that the contrast is high enough and the information can be used by people who are colour-blind.

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

What does a corporate identity owner or designer have to do?

- ☐ Include accessibility in the requirements for designs and the corporate identity and monitor this.
- ☐ Do not merely design with the aim of achieving the best possible visual end result. When creating new designs for web pages or the intranet, create a heading structure for each page and prepare an overview of all colours and contrast ratios. This makes it easier to monitor accessibility and conduct tests.
- ☐ Make sure that the corporate identity is suitable for accessible content. Specifically, this means that it must be clear which colour combinations can be used for running text and which ones only for large text or larger bold text. It may be useful to use colours that contrast well against both black and white, so that you can use them in combination with both black and white text.
- ☐ Remember that a button for high contrast on your website cannot solve fundamental low-contrast issues. Accessibility issues due to insufficiently high contrast will persist for features that do not benefit from a high-contrast button, such as PDF files, presentations and flyers. Moreover, developing and managing two separate colour combinations will take more time and cost more. Offering information that is not accessible by default is not user-friendly.
- ☐ The text in an organisation's logo does not have to comply with the contrast requirements. If the corporate identity undergoes fundamental changes or a new logo is adopted, it may be sensible to ensure that the contrast between the colours in the logo is sufficient. This is because these colours or related colours are often used for text that does need to meet the contrast requirements. Bearing this in mind will avoid the need for ad-hoc changes to the corporate identity or logo colours that deviate considerably from the other colours that have been used.
- ☐ Monitor the use of templates and the corporate identity. Many accessibility issues with documents arise because people use the wrong colours or use the templates incorrectly or not at all.

Useful links

- digitoegankelijk.nl/onderwerpen/stappenplan-toegankelijkheid
- digitoegankelijk.nl/onderwerpen/vormgeving
- digitoegankelijk.nl/onderwerpen/afbeeldingen
- digitoegankelijk.nl/verklaring
- w3.org/WAI/roles/designers

- ☐ Ensure that all information can be accessed by people who are blind, colour-blind or partially sighted. For example: you need to make sure that graphics and infographics can also be understood by people who are unable to distinguish colours, i.e. they need to be able to tell the difference between a red line and a green line. You can solve this by using a solid red line and a dotted green line.
- ☐ Do not merely design for people who use a mouse or touch screen to navigate. Consider such issues as focus visibility for people who use a keyboard or assistive equipment.

ICT consultant

As an ICT consultant, you need to make sure that people in your department are sufficiently knowledgeable about accessibility in general and the accessibility of software and systems in your organisation in particular.

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

What does an ICT consultant have to do?

- ☐ Include accessibility in software and system requirements. Liaise with the purchasing department.
- ☐ Make sure that the organisation only uses software capable of generating accessible content. Draw up a list of all software packages in use and investigate whether any package is causing accessibility issues. If this is the case, find out whether any additional or replacement software is required.. An example of software that does not meet the requirements is a PDF printer.
- ☐ Compile a list of the software packages employees should use and which additional software needs to be installed on workstations (e.g. screen readers, contrast measurement tools or voice activation). Developers, editors and communications staff all need to be able to conduct tests. If they do not have the necessary software available, they will be hindered in their efforts to create accessible information and services.
- ☐ Be aware that not everyone uses computers 'the usual way' and recognise what this means. Make sure that IT support staff and staff in other departments who come into contact with users are sufficiently knowledgeable about functional disabilities and assistive equipment.
- ☐ Find out and record which aspects of the systems and software in use are and are not accessible.
- ☐ Assess whether the processes and systems that are used to create or manage digital information in the organisation can cause accessibility issues to arise and recommend solutions.

Useful links

- digitoegankelijk.nl/onderwerpen/stappenplan-toegankelijkheid
- digitoegankelijk.nl/verklaring
- digitoegankelijk.nl/onderwerpen/techniek--code
- digitoegankelijk.nl/onderwerpen/testen
- w3.org/WAI/roles/developers
- w3.org/WAI/roles/testers
- w3.org/TR/WCAG21
- w3.org/TR/WCAG-EM
- forumstandaardisatie.nl/standaard/digitoegankelijk-en-301-549-met-wcag-21
- rijksoverheid.nl/onderwerpen/rechten-van-mensen-met-een-handicap

DigiD
Inloggen

Developer or tester

As a developer or tester, you are responsible for building code, designs and systems that improve accessibility rather than create accessibility issues. Accessible development and testing is well documented. This overview presents a number of key points for your attention.

What does a developer or tester have to do?

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

- ☐ Make sure that accessibility is a regular component of software and system development and testing.
- ☐ Make sure you understand how people with a functional disability use digital information and systems. Regularly use the keyboard instead of the mouse or touch screen to navigate. Learn to work with a screen reader. Use assistive equipment and ask people with a functional disability for their input. Remember that the average user does not exist.
- ☐ Launch or take part in a project to draw up a list of all digital services and products, their life expectancy, their accessibility status and any measures already taken.
- ☐ Ensure that you are thoroughly familiar with the technical standard WCAG 2.1. While much has been written about accessibility, this document outlines the fundamentals of accessibility for a very broad range of people with a functional disability. Take a training course and attend meetings to increase and share your knowledge.
- ☐ Use HTML elements and attributes in conformity with the HTML specification. If you use them as intended, accessibility will automatically be accounted for. Examples include using 'a' elements for links and buttons for buttons, instead of a span or div element that behaves similarly but can lead to accessibility issues. Use the specifications for CSS, SVG, etc.
- ☐ Use ARIA sparingly; only when absolutely necessary.
- ☐ Be wary of existing frameworks such as React, Angular and bootstrap. These often incorporate ARIA incorrectly, leading to accessibility issues. Check and fix them with the aid of the specification. In many cases, you do not need to use ARIA and default HTML is a better option.
- ☐ If you are working with a component library, make sure that it has been tested and improved at length. These components are your building blocks.

Useful links

- digitoegankelijk.nl/onderwerpen/stappenplan-toegankelijkheid
- digitoegankelijk.nl/onderwerpen/techniek--code
- digitoegankelijk.nl/onderwerpen/testen
- forumstandaardisatie.nl/standaard/digitoegankelijk-en-301-549-met-wcag-21
- w3.org/WAI/roles/testers
- w3.org/TR/WCAG21
- w3.org/TR/WCAG-EM
- w3.org/TR/wai-aria-practices-1.1

- ☐ Tools may assist in testing, but testing with tools alone will not give you a full and comprehensive idea of the level of accessibility. Tools measure only a part of the requirements, and interpretation of the outcomes requires the necessary expertise. Do not fall into the trap of optimising an aspect merely to satisfy the testing tool instead of improving accessibility. Test manually for all success criteria and ensure the needed knowledge to do this properly.
- ☐ Set up a proper and comprehensive testing process. Conduct tests at all stages of development. Prevention is always cheaper than cure. Besides, repairs can lead to frustration among the parties involved.
- ☐ Test products and services using the WCAG-EM testing method (or an equivalent documented evaluation method for the WCAG 2.1 accessibility standard). Adhere to this standard throughout the testing process, deploying experts if needed. Testing in line with this method helps substantiate the legal accessibility statement.
- ☐ Record any instances of a WCAG 2.1 AA success criterion not being met and the reason. Specify the impact for people with a variety of functional disabilities, what measures your organisation will take, what the alternatives are and when the issue will be resolved. This information must be included in the accessibility statement as well.
- ☐ Include digital accessibility in the 'definition of done' and make sure that it is a condition for going live.
- ☐ Develop only apps that are accessible and test them (or have them tested) for accessibility.

HR adviser or training consultant

As an HR adviser or training consultant, your job is to safeguard the skills and knowledge of various employees when it comes to digital accessibility.

Tip: use the boxes to indicate which actions have already been taken or require follow up steps.

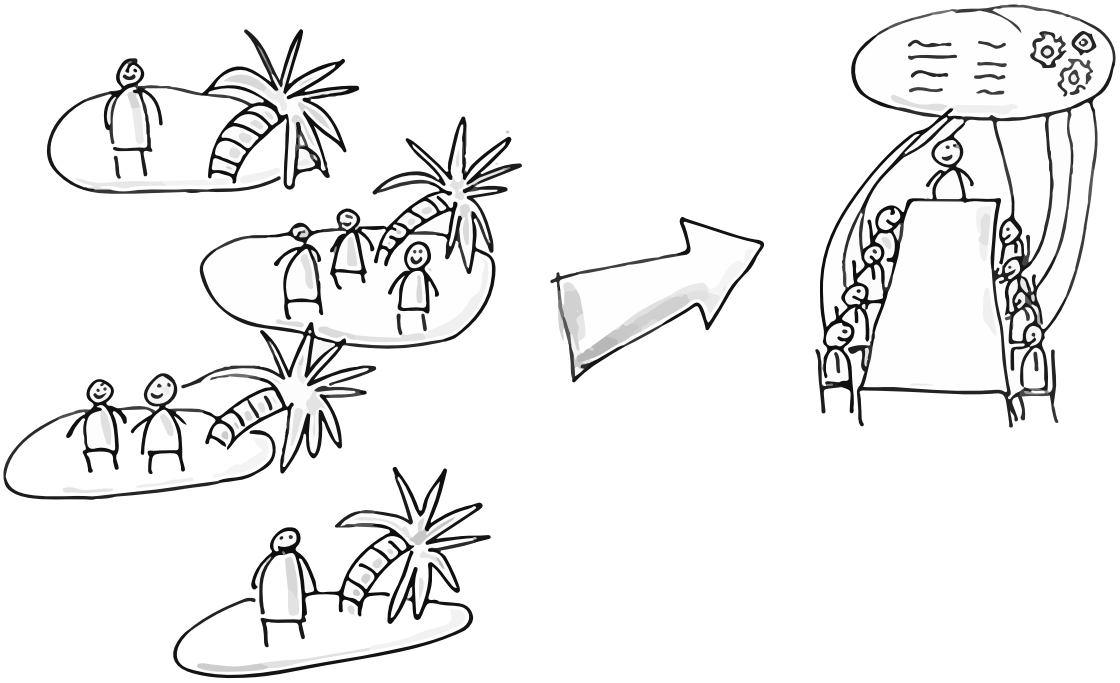
What does an HR adviser or training consultant have to do?

- ☐ Make sure that knowledge and experience in the field of digital accessibility is embedded in job profiles. Find out for which positions accessibility is already part of the job profile and for which positions this still needs to be included. Ensure that meeting accessibility targets forms part of performance reviews.
- ☐ Make all labour market communications (such as online vacancies) and the onboarding programme accessible for people with a functional disability.
- ☐ Investigate whether the content of existing training courses dovetails with the organisation's accessibility objectives. Examples of training courses include those on the use of CMS, Office and comprehensible writing. Liaise with the purchasing department on training course requirements and with internal experts on content analysis.
- ☐ The intranet needs to be made accessible as well (either when it is first launched or when it is redesigned). Make sure that you are aware of how digital information can be shared in an accessible way. Liaise with the purchasing department if the intranet needs to be redesigned.
- ☐ Prepare an overview of the training courses required to achieve the organisation's objectives, such as a meeting to raise awareness among all employees who work with digital information and role-playing exercises for people in various positions. Maintain a record of who has taken the training courses and when a repeat or update is necessary. Make sure that all new employees receive basic training.
- ☐ Ensure that online training courses and materials are accessible for everyone.

Useful links

- digitoegankelijk.nl/onderwerpen/wat-is-digitale-toegankelijkheid
- digitoegankelijk.nl/beleid/wat-is-verplicht
- w3.org/WAI/roles/trainers
- rijksoverheid.nl/onderwerpen/rechten-van-mensen-met-een-handicap

Work together to safeguard digital accessibility!



Managing digital accessibility: a joint effort of various departments and roles

Illustration: Iacobien Riezebosch, Firm Ground

The web team, the communications department or the ICT department cannot ensure digital accessibility on their own. This requires an effort on the part of the entire organisation, from upper management to legal experts, buyers, designers, HR advisers, trainers, editors and testers. This publication offers government organisations in the Netherlands practical tips to deal with this topic and comply with legislation. Find out how you can contribute to accessible information and services in your role.

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