

When WAD and WCAG come knocking on your door... Or how we learned to stop worrying and love accessibility

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Abstract

For many organisations with large, complex and information heavy websites, the EU Web Accessibility Directive (WAD) and the Web Content Accessibility Guidelines (WCAG) can strike fear into the hearts of the most accomplished webmasters and web editors, project managers, heads of communications etc. Or perhaps more commonly, the urge to bury one's head in the sand, hoping no one will look in your direction and praying no one external will audit your services.

In Statistics Norway, we had a few idealistic employees in the communications department who tried to the best of their ability to make sure we followed the WCAG guidelines on our website and in our statbank. But there was little real understanding of the importance of accessibility among directors and head of divisions, myself included. We paid lip service to the need to follow the guidelines, but it was done with little real follow up in terms of:

- Increasing our competence in the field of accessibility and knowing when something is good enough.
- Building robust systems, processes and guidelines

We would argue that this situation is pretty common in many national statistical institutions. We know the directive is there, our user experience people know the WCAG guidelines, but we are slow to understand that it means we have to change as

an organisation. Accessibility needs to permeate the entire organisation, and it needs to be mandated from above.

In Statistics Norway we are in the middle of building such a necessary culture of accessibility across the organisation. Everyone – from the data collectors, statisticians, developers, UX designers to the lawyers, project managers and heads of divisions need to know why accessibility is so important.

In this paper we present the key initiatives taken, and I would argue that the two main reasons behind this change is:

- Empathy. The need to embrace the moral obligation of making sure everyone, including people with disabilities, are able to perceive, understand, navigate and interact with the Internet.
- The need for some professional outside to help identify where you are as an organisation in terms of accessibility

Keywords: accessibility, user needs, organisational change, WAD/WCAG

1. Introduction

„Official statistics are the nation’s shared factual basis. This is crucial for a well-functioning democracy, and the statistics are thus a public good that everyone should have equal access to.”

This quote is from Statistics Norway’s strategy (2021-23). In this strategy we aim to be the leading supplier of facts about Norwegian society. Many or all of our Nordic neighbours have similar aims and goals in their strategies. Our own statistics tells us that some 8 per cent of the working age population have lasting disabilities relating to sight, hearing, mobility, reading- and writing difficulties and more. If you include the population over 66 years of age and those under 16, this number rises. If you also include all those who have temporary disabilities, such as a broken arm (or a situational one like baby on your arm) the number rises further. If you include those of us who have reached an age where the arm simply isn’t long enough to check your phone without reading glasses, the number goes up again.

In order to meet our goal to provide statistics that everyone have equal access to, statistical organisations need to make sure our statistics is accessible. One important facet of this is making sure the forms we use in data collection, e-mails, our videos and PDFs, websites, microdata solutions – that they all are in accordance with the WCAG guidelines. It sounds easy enough, but our experience in Statistics Norway shows you that it is anything but. Our bread and butter, table and graphs, especially complex ones, are among the most difficult things of getting „right” in terms of accessibility.

Knowing about the accessibility rules and paying lip service to them is a far cry from:

- Knowing how to interpret the rules, knowing what is good enough - and perhaps more importantly – what is not good enough
- Knowing what kind of competences are needed to ensure our solutions and channels are accessible
- Accepting the time and resources it takes to provide accessible solutions and robust systems, processes and guidelines

We would argue there are five stages an organization go through when it comes to accessibility:

1. Apathy and resentment
2. Enlightenment and fear
3. Acceptance
4. Action
5. Empathy – a culture of accessibility

Our goal is to try to get Statistics Norway to stage 5 where we have a culture of accessibility in the organisation and a real understanding of why we are doing this. Because unless we get there, we fear that our work now will only be what we Norwegians refer to as a „skippertak” (A one off event very close to a deadline). And that we will slide back into apathy - burying our heads in the sand - and resentment („This graph is not meant to be understood be blind people anyway”. „It is too costly to make this solution meet new accessibilty rules”). And once new rules emerge, we will have to start all over again to rebuild the necessary competences, guidelines, process descriptions and so on and so on. We worry that we will be governed by fear

and resentment, rather than being governed by real empathy and understanding of all users of official statistics.

2. About our work with creating a culture of accessibility

2.1 Our phase of apathy and resentment

Going back a few years, we would argue that accessibility guidelines in Statistics Norway were to a great degree looked upon as something of a killjoy, something we had to do, but didn't really want to do, and something we weren't even sure we were doing right. More often than not, we used the guidelines to say no to something, rather than to let them inspire us to improve our dissemination.

Accessibility was in reality something more of a theoretical concept. Yes, we had checklists that stipulated that the IT developers should make any new functionality “accessible”. Yet there was no follow-up. Did the developers know the accessibility rules? Did they have the proper tools? And if so, did they know how to make the website accessible? Did the testers in the communications department know what the rules were? And did they have the tools and knowledge to test if what was developed was in accordance with the rules?

A few people in the communications department attended short courses on the WCAG guidelines, yet more often than not, there were disagreements as to what the rules really meant – in reality – on our website.

We knew we were in trouble, but where to start?

2.2. Our phase of enlightenment and fear

Our phase of enlightenment began with realising we weren't really sure of what the status quo actually was. We realised we weren't doing enough in terms of accessibility, we didn't really know where to begin, and most importantly, realising we needed professional help. Accessibility is a complex field to master, and even with employees with user experience design experience, it is difficult knowing how the rules and regulations impact the whole of the organisation (accessibility is about so much more than font size on your website). Getting professional help to perform a gap analysis –

comparing our actual performance with our needed and desired performance in the field of accessibility – was a stroke of genius from some of our colleagues in our division. We didn't get an WCAG-audit of our website (that came later), but we learned how we fared as an organization.

2.2.1 Recommendations from the Gap analysis

The gap analysis provided us with a list of recommendations, chief among them, to get the upper management invested and involved.

The recommendations were:

- **Establish who has the overall responsibility for universal design in the organisation**
Without ownership and formal responsibility higher up in the organisation it will become challenging to establish universal design in the whole organisation.
- **Establish an official team which will act as an expert group on accessibility**

The responsibility for the actual work on accessibility must be divided across the organisation and someone must have the time, resources and mandate to secure progress.

- **Establish a quality assurance method for universal design**
 - **Identify** potential threats and opportunities.
 - **Prioritise activities.** Define your core processes and core documents, what is most important, what must be updated, what needs follow-up.
 - **Update materials.** Make sure new documentation is available and remove whatever is no longer sufficient.'
 - **Follow up.** Verify every year that the proper guidelines, documentation etc is being used.
 - Two lawyers should be familiar with laws, rules and regulations on accessibility.

This is especially important when it comes to procurements. All ICT-procurements must follow accessibility rules, and all agreements should be written so that any vendor is responsible for fulfilling regulations.

Define processes to ensure accessibility

It is necessary to define how universal design should be handled in different situations and processes, f.ex.:

- Development
- Procurements
- Edited content
- Onboarding of new employees

Research universal design and data visualisations

Update your visualisations tools so that they meet WCAG rules. Try to solve existing problems without sacrificing functionality.

Document rules and processes related to universal design

- What is the definition of done?
- Which tools should be used?
- Who is responsible for universal design in this process?
- Etc.

Establish common checklists

Work on increasing your competence in accessibility

Create a forum to discuss accessibility

Make a complete analysis of your website, intranet and create an accessibility declaration

- **Establish user test routines**
- **Start including accessibility in your internal work**

The gap analysis concluded that Statistics Norway was a long way off from being able to adhere to the laws and regulations regarding accessibility.

Having outside professionals tell us that were we to be audited by the Norwegian Authority for Universal Design of ICT, we would be sorely lacking and potentially liable to pay big fines, is a powerful wake-up call. Never underestimate the power of fear to inspire action.

2.3 Our phase of acceptance

Acceptance can mean different things to different organisations when it comes to accessibility. And come at different times in different parts of, and among different people in, the organisation. It is about accepting, on different levels, that this is actually my responsibility, or it needs to be my responsibility, because no one else is going to step up. It is about a mind shift; from mentally resisting the idea of universal design to embracing it. Maybe not loving it, but accepting it is there to stay.

We would argue that in our communications department we finally got to a point of acceptance in 2021 – even if we had been working for years to among other things get our statbank in accordance with the WCAG demands. We accepted that we needed to take action in our own department and on behalf of the whole organisation.

2.4 Our phase of action

Having a list of recommendations and suggested activities was of course a big help when it came to taking proper action. Our plan of action went in two directions:

1. Establishing the necessary insight, checklists, roles, tools etc in relating to our premier dissemination channel, our website ssb.no
2. Establishing the necessary ownership of the need for accessibility in the management group and across the organisation

When it came to establish all the necessary competencies, routines, checklists etc in our own department, and to some degree among developers from the IT department, we opted to redirect funds so that we could get outside professional help. This enabled us to move quickly with:

- Digital introductory courses in universal design and accessibility for everyone involved in either publishing content, website development, content production etc in our department
- Courses aimed at specific groups: Designers, publishers, content producers – such as article producers, video producers and pdf-producers, developers etc.
- Establishing checklists and the necessary tools
- A website audit to establish the need for further web development to meet WCAG-rules, especially when it came to graphs and other visualisations

Secondly, we anchored the need for action on accessibility in our management group. Afterwards, we got accessibility into a revised version of Statistics Norway's long term plan.

The management group later approved the proposal that Statistics Norway establish a cross-department expert group on accessibility with the mandate to push, inspire, monitor and inform. The actual responsibility for adhering to accessibility rules lies with the department or division responsible for the relevant solutions or processes.

This group is headed by the Communications department. Members include a lawyer from the administration department and people from IT, data collection, publishing (Com) and web development (Com). This group will also provide top management with a short annual report on the work done, status and proposals for further action needed.

3. Where learning to love accessibility has gotten us so far

Statistics Norway is still some way off our goal to reach a stage of empathy and an accessibility culture. In the communications department we are still very much in the taking action phase. Some parts of the organisation are still in the apathy and resentment stage, some are in enlightenment and fear, some in acceptance.

Even after outside professional help and employees getting certified in accessibility, we still struggle some to agree how to interpret the rules. Some interpret them more literal than others. And which content should follow which rules? What level of accessibility should we settle for? How strict should we be?

And what does it mean when government officials say accessibility rules should not create undue burdens on the organization? What is an undue burden? Spending three days texting a seminar someone in the organisation wants to put on Vimeo?

And what about third party vendors which has provided Statistics Norway with systems and solutions that don't meet the requirements and who on business ground refuses to make them accessible? It is not as if we can switch data collection systems at the drop of a hat. Creating new forms in an accessible system takes a lot of time and resources.

The more we learn, the more competent we are, the more difficult at some level accessibility becomes.

Still, we are mostly proud of our accessibility gains so far:

- Our statbank would now pass an accessibility audit
- Ditto the new parts of our website, not so much our archived material
- Our lawyers are becoming much more versed in the web accessibility directive and our Norwegian regulations
- We would argue that we have managed to wean ourselves off our dependence on outside help
- We are in the process of getting a few people properly certified in accessibility
- We have a much clearer understanding of which systems and which parts of the organisation that needs to adhere to the rules and regulations
- We have the necessary tools and checklists available
- Accessibility needs are filtered down to a large part of the organisation due to our work on decentralized publishing processes. This is demanding, but also an opportunity.

- We keep ourselves informed and updated to changes to the rules and regulations and how they should be interpreted.

But most importantly, we see signs of a culture of accessibility – both in our own department, but also elsewhere. It is no longer just the people with a specific role relating to universal design who discuss and talk about this. As we encounter challenges and differences of opinions about whether something is within the rules or not, people check out the guidelines themselves and argue their case. No one is disputing whether we should indeed follow the rules – the discussion now is about how to best adhere to them. We aim to meet user needs, but without being more catholic than the pope himself when it comes to the WCAG rules. As mentioned before, even experts struggle with how to best make graphs – which by nature is a visual product - available to all in a manner that does not defeat the purpose of the graph in the first place.

In other parts of the organisation, we see that discussions about the best way to meet user needs in terms of accessibility has also moved away from just a very few concerned individuals to a larger group of people.

We would argue that we are in a far better place at Statistics Norway when it comes to accessibility than just a year ago. But we still have some ways to ensure that we have a system in place that is robust enough to withstand accessibility fatigue, losing central people in our work with accessibility etc. To get there we continue to need to foster empathy for our users with permanent og situational disabilities.