

# Australian Flexible Learning Framework

## Supporting Flexible Learning Opportunities

### Keys to Access: Accessibility conformance in VET

Researchers: Reece Lamshed, Dr Marsha Berry, Laurie Armstrong

#### Executive summary

Accessibility is the term used to describe the ease that a person with a disability (physical or cognitive) or with a technological or social disadvantage can access online products and services. It is estimated that 19% of the Australian population has some kind disability. If we include the number of people who have low speed Internet access, or use poor quality or old versions of computer technology, constructing inaccessible online products and services may be denying equal access to a significant proportion of the population.

Vocational Education and Training (VET) has energetically embraced the Internet to promote and publicise its services, and uses it to deliver numerous online courses. All TAFE Colleges and most independent providers have web sites. Many teachers are utilising a range of online technologies to deliver their training. Significantly, 39% of those people using the Internet from home use it for education and training purposes.

In this research, we aimed to investigate what VET training providers have achieved in terms of accessibility conformance; to reveal and understand the obstacles that may be blocking conformance and suggest strategies that will speed conformance.

In May 1999, the World Wide Web Consortium (W3C) agreed on a set of Guidelines for online products and services. Called the *Web Accessibility Initiative (WAI) Web Content Accessibility Guidelines 1.0*, these Guidelines specified a number of Checkpoints that an online product or service had to satisfy in order for it to be accessible. Most countries have adopted these guidelines as the standards around which to design and construct online products and services.

In Australia, the *Disability Discrimination Act 1992* makes it is unlawful to discriminate against people with disability. However, the Act is not specific about online accessibility. It does not, for instance, include reference to the *WAI Guidelines* as does the US Section 508 of the *Rehabilitation Act*. Under the *Disability Discrimination Act 1992*, a complainant needs to inform the Human Rights and Equal Opportunities Commission (HREOC) of the issue, and HREOC investigates the complaint and may request that action be taken to rectify the situation before any legal action would be taken against the organisation for non-conformance. All Australian State Governments and Territories are actively promoting accessibility conformance for web sites managed by their departments and agencies. All have policies and guidelines

in place, and some, such as the Australian Capital Territory, have very strict guidelines where they recommend or mandate all of the essential *WAI Guidelines*.

There are numerous resources online about accessibility conformance created in Australia and overseas available to assist practitioners in achieving accessibility. However, according to tests conducted in this research, many TAFE and independent provider web sites are generally not conforming with the *WAI Guidelines*; some even at the most basic levels. Failure can be as simple as not providing alternative text tags for images, which are necessary for the site to be navigated using assistive technologies. We found that the majority of web sites have significant obstacles that would make it difficult for disabled people to use.

This research revealed a number of reasons for this failure to conform, including:

- the lack of specific accessibility policy guidelines and implementation strategies at the provider level;
- insufficient identification and allocation of responsibility to staff to ensure accessibility conformance;
- lack of professional development and training;
- practitioners being unaware of the *WAI Guidelines*;
- practitioners being unsure how to implement the *WAI Checkpoints*;
- web sites using content and learning management systems that may not permit the creation of accessible pages;
- web sites having many old (legacy) pages that were not made accessible;
- the transitory and somewhat confusing nature of the *WAI Guidelines*;
- and
- the use of invalid testing methodologies (tools and techniques).

There is no technical reason why VET provider web sites should not meet the highest levels of accessibility. The accessibility standards need to be considered in the same way as building regulations. In this analogy, the W3C *WAI Guidelines* form the foundations of good design and programming on which attractive and informative web sites can be created.

Unfortunately, it appears that accessibility implementation may often be considered on the basis of a risk analysis (is it likely a person will complain?), whereas it should be seen as providing an opportunity to open up training to people with disability or disadvantage.

Some learning materials also fail to meet accessibility requirements, although at the commissioning level, there has been a determined effort to make them accessible.

Accessibility conformance for learning materials is sometimes more complicated to achieve. Many learning materials require a high degree of interactivity, and depending on how these are developed, may conflict with the

some WAI Checkpoints. There have been different approaches taken across VET to accommodate this conflict, from those who believe that conformance is mandatory to those who are inclined to tailor learning materials individually for students with disability, thereby skirting the accessibility requirements.

This report suggests how specific conflicts that may arise between interactivity and the *WAI Guidelines* may be resolved. It recommends that learning materials should satisfy the highest levels of accessibility, and developers justify which specific WAI Checkpoints they are unable to achieve if these should hinder the pedagogical approach required by the learning outcomes.

In both web site and learning materials development, accessibility conformance is related directly to practitioner awareness and training. The overwhelming demand by practitioners (revealed in this research) was for more professional development. This report recommends a general accessibility awareness course and a specialised practitioner course that focuses on technical aspects in meeting the accessibility requirements.

The process of accessibility implementation needs to be actively managed by the institution, particularly in the larger TAFE colleges. Implementation has cost implications, particularly where there are legacy pages and non-conforming content management systems. This implementation will require:

- policy development and online accessibility guidelines built around access and equity policy;
- independent audits of the current web sites and content management systems (and accommodating the consequent costs of rebuilding);
- a cross-institution unit that monitors and supports accessibility implementation;
- an awareness campaign for teaching staff and practitioners; and
- professional development to ensure that they know how to develop online resources that meet the accessibility requirements.

By attending to principles of universal access, VET will increase the opportunity of those with disability and social disadvantage to participate in their training programs, and thereby, improve potential employment prospects for these people.

## **Recommendations**

*That the Flexible Learning Advisory Group:*

- a) Conduct an awareness campaign about accessibility conformance through a variety of sources and organisations (including ACPET for independent providers).
- b) Commission the development of a generic online national course on Accessibility (based on the course *Web Design and Technology 9560G*).

- c) Commission the development of an online Developers course based on the IT Training package competency (ICAITT183A Confirm accessibility of web site design).
- d) Incorporate into Australian Quality Training Framework Access and Equity policy guidelines the requirement that registered training organisation web sites meet the highest-level W3C accessibility guidelines.
- e) Encourage agencies commissioning tenders for online development projects insist that development teams are 'accessibility qualified'.
- f) Support the development and maintenance of a blog and online newsletter that focuses on accessibility trends.
- g) Commission the development of an exemplar of an accessible Template.
- h) Conduct further research into accessibility issues of learning management systems.

### *2. That VET Registered Training Organisations:*

- a) Formulate online accessibility policy guidelines across the institution, which may be attached to the general access and equity policy.
- b) In larger TAFE colleges, establish an Accessibility Unit that provides publicity, advice and training, and is accountable to appropriate senior governance body in the institution able to influence all levels of the university.
- c) Conduct an awareness campaign about accessibility conformance for practitioners and teachers.
- d) Commission independent audits into the accessibility conformance of local web sites, content management systems and learning management systems.
- e) Publish an accessibility statement on organisational web sites confirming their policy on online accessibility and the level of conformance achieved.
- f) Ensure undergraduate and postgraduate Multimedia and IT courses with training in accessibility conformance.
- g) Encourage teachers using online facilities to complete a generic online course on accessibility conformance (based on *Web Design and Technology 9560G*).
- h) Recruit and promote web administrators and online learning managers with knowledge of accessibility conformance in key selection criteria.

### *3. That online practitioners:*

- a) Design and construct web sites to meet the highest level of accessibility conformance by implementing the WAI Checkpoints correctly.
- b) Complete and maintain accessibility qualification.
- c) Design and construct learning materials to the highest level of accessibility conformance, and explicitly justify where components do not meet stated WAI Checkpoints.

- d) Develop clear testing methodologies and use automated tools as guides only to establish levels of accessibility conformance.

*4. That Learning Materials Development Agencies:*

- a) Set standards of accessibility conformance at the highest levels in all tender specifications.
- b) Commission learning materials from accessibility qualified practitioners.
- c) Specify development pathways that lead to high level accessibility conformance.
- d) Use independent and specialised organisations to conduct accessibility testing on learning products