Comments to the GIGW

To the National Informatics Centre

30-April-2015

We the undersigned would like to commend the NIC for taking a leadership role in promoting e-accessibility through the notification of the Guidelines for Indian Government websites (GIGW) in 2009. Undoubtedly, web accessibility plays an ultimately crucial role in enabling and enhancing citizen participation and access to information. The development of assistive technologies- both hardware and software has increased the potentiality of the constituency of persons with disabilities and elderly to become one of the largest consumer groups on the Internet. We use the word 'potentiality' because the current information ecosystem on the Internet, comprising information through text, electronic documents, audio, video and other multimedia presented through Indian websites are inaccessible for persons using screen readers and other technologies.

Despite the passage of 6 years since the GIGW, there has been negligible progress on the front for making Indian government websites conform to the notified standards. An evaluation of accessibility of government websites carried out in 2012[1] demonstrated that the majority yet remained inaccessible, with very slow improvement in the situation thereafter. Our interaction with government departments and government web developers revealed that there was still a relative lack of awareness of the need to conform to these guidelines coupled with an absolute lack of knowledge on how to implement them. Given this background, we submit our recommendations as below:

1. **Mandatory**: Since experience has demonstrated that voluntary compliance has not worked to bring about accessibility in government communication through the Internet, it is necessary that these guidelines be made mandatory with a strict deadline beyond which noncompliance becomes an offence, to ensure that it is taken seriously. This is now partly in place since the notification of the National Policy on Universal Electronic Accessibility[2] by the DEITy in Oct 2013. The legal mandate around this will only strengthen once the Rights of Persons with Disabilities Bill comes in force. Hence, the present recommendation.

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[1]

Accessibility of Government Websites in India: A Report (by CIS and Hans Foundation): http://cis-india.org/accessibility/accessibility-of-government-websites-in-india

[2] Available at http://www.ncert.nic.in/announcements/notices/pdf_files/Nationalpolicyonuniversal.pdf

2. **WCAG 2.0 level AA compliance:**We recommend that WCAG 2.0 level AA be specified as the standard for minimum level of compliance in the guidelines. This is recommended for several reasons.
   a. These are globally accepted standards which have been well researched
   b. These have assigned success criteria for each guideline, which is not present in the current draft of guidelines, thus enabling a developer to know whether the criteria have been adequately met.
   c. The task of review is a constant one which is being undertaken by experts around the world through various study groups and technical committees, which will ensure that updates are timely and keep abreast of new developments. Hence the burden of review will not be upon us. At present, we also do not have the domain expertise on this subject which is available with W3C and elsewhere globally.
      Instead, efforts may be focused upon making any additions to the WCAG 2.0 which are required to make them more comprehensive in the Indian context.

3. **Meeting success criteria:** For each accessibility checkpoint / guideline, there should be defined success criteria to ensure that the implementation meets acceptable levels. There should be Objective measures in place to have technical validation of all the websites. There needs to be a process defined to validate all websites on WCAG accepted tools to ensure compliance to technical standards. The recommended procedure provided by the W3C for evaluating websites known as the Website Accessibility Conformance Evaluation Methodology 1.0[3] (WCAG-EM) may also be followed in this regard.

4. **Onus of implementation:** The onus of complying with the Guidelines must be placed on the top management in an organisation/ department/ ministry. Someone like a board member or other senior person.

5. **Accessibility audit:** There should be an accessibility audit after the development of a website by a 3rd party entity independent of the website developer and website owner.

6. **Accessibility audit agency:** There must be a provision to setup an entity which can perform access audit for all government websites. The agency may include government officials from various departments, ministries or autonomous bodies, leading accessibility firms and must include end users.

7. **Content updation:** To ensure the accessibility of new content that is added to a website on a regular basis, there should be a defined accessibility process so that an existing system that is accessible is not broken.

8. **Clarity in the specifications:** There should be clear guidelines to make it easy to comprehend for all and not just a technical person. At present, some of the guidelines are ambiguous and may not be easily discernible even to an experienced developer or website development

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[3] Available at http://www.w3.org/TR/WCAG-EEM/

agencies who are not domain experts. For example, guideline5 states: 'Information structure and relationship is preserved in all presentation styles'.

This guideline could be clearer if it specified that tabular information should be specified with table tags, labels should be marked with label tags, Headings should be marked with heading tags. Etc. This reiterates the earlier point that adherence to WCAG 2.0 is best since it provides developers with resources such as Understanding WCAG 2.0 and Techniques for WCAG 2.0 documents.

Another example is guideline 19- 'There is adequate contrast between text and background colour'. However, it is unclear as to what is meant by 'adequate'. WCAG 2.0 on the other hand, specifies the contrast for each level. IT specifies acceptable colour combinations for background, foreground and text which increase accessibility.

9. **Stress on implementation:** A lot of attention should be given to implementing the guidelines. The fact that there has been minimal success in adoption of the guidelines makes out a clear case for a stronger awareness strategy and adoption action plan, with a dedicated team or department in place within NIC which can work towards supporting training and retrofitting efforts with different government departments and agencies around the country. This also calls for a two tier team approach, one at the central level, with contact points set up for each state which are responsible for this implementation, with the time limit for enforcement of these guidelines. For this purpose, partnerships may be sought with private players and organisations serving the disabled and accessibility experts.

We are available to help this endeavour and are happy to provide support whether in the form of clarifications, feedback or any other manner. Our contact details are given at the end of this submission.

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