Australian Government
Department of Finance and Deregulation
Australian Government Information Management Office

June 2010

Web Accessibility National Transition Strategy

The Australian Government's adoption and implementation of *Web Content Accessibility Guidelines version 2.0* (WCAG 2.0)

AUSTRALIAN GOVERNMENT INFORMATION MANAGEMENT OFFICE (AGIMO)

ISBN 978–1–921600–54–8 (Print)

ISBN 978–1–921600–55–5 (Online)

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Foreword

The Web Accessibility National Transition Strategy sets a course for improved web services, paving the way for a more accessible and usable web environment that will more fully engage with, and allow participation from, all people within our society.

Accessibility has been a government priority for a number of years. With the release of the *Web Content Accessibility Guidelines version 2.0* (WCAG 2.0), developed by the World Wide Web Consortium (W3C), the Australian Government is poised to improve the provision of information and services online.

WCAG 2.0 sets an improved level of accessibility, to cater to the needs of a constantly evolving and increasingly dynamic web environment. As the government embraces Web 2.0, and employs more citizen-centric tools to engage with the public, our commitment to accessibility increases.

Indeed, the implementation of W3C guidelines for Australian Government websites is not new; WCAG is the internationally recognised benchmark for website accessibility. However, this is an important milestone for government, and for people accessing government information. Never before have we embarked upon such a significant effort to improve website accessibility, delivered on a whole-of-government basis, with strengthened governance and reporting arrangements in-built.

The next few years present great challenges and opportunities to government, through the implementation of WCAG 2.0. These will be overcome and celebrated in collaboration with our peers across portfolios, jurisdictions and governments around the world.

I hope you will join me on this journey.

Ann Steward
Australian Government Chief Information Officer
Australian Government Information Management Office
Department of Finance and Deregulation

June 2010

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Introduction

1 Introduction

Websites that are developed under principles of universal design, with a focus on accessibility, are more usable for everybody, regardless of age, ethnicity or disability. By improving government website accessibility, we support the objectives of the planned National Disability Strategy and the goals of the recently ratified UN Convention on the Rights of Persons with Disabilities. We also create a more socially inclusive environment in which people can access information and services and engage with government. In Australia, the 2003 Australian Bureau of Statistics survey of disability, ageing and carers found that one in five people (about four million Australians) reported that they had a disability[1].

The requirement for Australian Government departments and agencies to provide accessible information and online services has been a component of each e-Government Strategy since 2000. The initial strategy outlined the requirement for all government websites to comply with the World Wide Web Consortium's[2] (W3C) *Web Content Accessibility Guidelines* (WCAG) version 1.0.

The Australian National Audit Office, the Australian Government Information Management Office (AGIMO) and the Australian Human Rights Commission have supported agencies in meeting their accessibility obligations via the publication of advice recommending the WCAG 1.0 as the accepted standard for Australian Government websites.

With advances in technology for websites and online services, WCAG 1.0 has become outdated and was recently upgraded by the W3C to WCAG version 2.0.

Australian governments at all levels have endorsed WCAG 2.0, and require all government websites (federal, state and territory) to meet the new guidelines at the minimum compliance level (Single A) by the end of 2012. In addition, the Australian Government requires all federal websites to meet the medium conformance level (Double A) by the end of 2014.

AGIMO (part of the Department of Finance and Deregulation) was tasked with developing a whole-of-government strategy, primarily for federal government websites, for transition to WCAG 2.0. AGIMO was also tasked to lead a cross-jurisdictional project, on behalf of states and territories, to coordinate the national implementation of WCAG 2.0 in a unified, consistent and cost-effective manner.

This document, the *Web Accessibility National Transition Strategy*, sets out the strategy and work plan for transition to, and implementation of, WCAG 2.0 over a four-year period.

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[1] Australian Bureau of Statistics 2003, *Disability, Ageing and Carers: summary of findings* cat No. 4430.0, ABS Canberra.

[2] <http://www.w3.org/>

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About WCAG 2.0

2 About WCAG 2.0

Web accessibility encompasses all disabilities that affect access to the web, including visual, auditory, physical, speech, cognitive and neurological disabilities. WCAG 2.0 identifies techniques to create and manage web content (i.e. dynamic and static textual, visual, or audio electronic information) in ways that are more accessible to people with disabilities – for example, through assistive technologies like screen readers. Websites that are more accessible are also generally more user-friendly to everyone.

The difference between WCAG 1.0 and 2.0 is a change in focus from technological and code-specific guidance to user-centric guidance, based on four principles of accessibility. Rather than just meeting specific technical criteria (e.g. noting how tables should be marked up in HTML), WCAG 2.0 stipulates that content should be 'perceivable', 'operable', 'understandable' and 'robust'.

Under these four principles, there are twelve guidelines that further clarify the purpose of each principle. Each guideline has a number of success criteria, which provide a means for checking conformance to each guideline. As the success criteria can be used with different web technologies (e.g. HTML or JavaScript), there will be multiple ways in which a website could prove its WCAG 2.0 conformance. However, a failure against any success criterion would result in a failure for that level of conformance. Agencies must therefore ensure each web page meets WCAG 2.0 conformance requirements.

Both WCAG 1.0 and 2.0 use a three-level rating system to identify the level of accessibility. In WCAG 2.0, level Single A (A) is the basic, moving through Double A (AA) and Triple A (AAA)[3]. Triple A is the most technically difficult level, but is also considered to provide the most accessible environment for a wider range of users. The W3C notes that even at Triple A conformance, some users will still experience some difficulty in accessing content.

[3] The W3C uses the terms 'Level A', 'Level AA' and 'Level AAA'. For ease of reading, we have standardised on 'Single A', 'Double A' and 'Triple A', to avoid repetition or confusion.

3

Mandate

3 Mandate

Authority

At the end of 2009, the Secretaries' ICT Governance Board endorsed the Australian Government's transition to WCAG 2.0. The endorsement requires all Australian Government websites to implement WCAG 2.0 to meet the middle level of conformance (Double A) over a four-year period. The Governance Board's authority applies to agencies managed under the *Financial Management and Accountability Act 1997* (FMA Act). Agencies managed under the *Commonwealth Authorities and Companies Act 1997* (CAC Act) are encouraged to opt-in to the National Transition Strategy as a demonstration of their commitment to accessible websites.

The Online and Communications Council also endorsed WCAG 2.0, requiring all federal, state and territory websites to conform to the guidelines to meet Single A level within a two-year period (by the end of 2012).

Jurisdictions agreed to share resources and knowledge in an effort to save time and money, and to ensure a standardised adoption of the guidelines.

State and Territory jurisdictions may, at their own discretion, elect to conform to a higher level (Double or Triple A) in a revised or extended timeframe. However, in order to harmonise a national transition, all governments should adopt the Double A level of conformance within four years. The National Transition Strategy is based upon a four-year transition to the Double A level.

By early 2015 the target is that all government websites will be more accessible due to their conformance with WCAG 2.0. Subject to their user base, it may be appropriate for some agencies to achieve Triple A compliance. Agencies have autonomy to determine their individual requirement for achieving a higher level of compliance with WCAG 2.0, as long as their basic compliance meets the requirement of the National Transition Strategy.

Governance

The Secretaries' ICT Governance Board is the project sponsor for the Australian Government's transition to WCAG 2.0, while the Online and Communications Council is the project sponsor for the transition in all states and territories. AGIMO is required to provide regular reports highlighting issues and progress status.

At the federal level, the Chief Information Officer Committee will oversee the implementation of the National Transition Strategy. At state and territory level, the Cross Jurisdictional Chief Information Officers' Committee will manage the implementation on a state-by-state basis.

AGIMO will implement and manage reporting for the Australian Government and will seek consolidated reporting from states and territories. A reference group has been established to monitor progress and provide relevant input from an industry and societal perspective. Members include the Australian Human Rights Commission; the Attorney-General's Department; the Department of Families, Housing, Community Services and Indigenous Affairs; the Department of Broadband, Communications and the Digital Economy; and representatives from state and territory jurisdictions.

4

Scope

4 Scope

WCAG 2.0 is applicable to all online government information and services. Conformance is required on all government websites owned and/or operated by government under any domain. This includes external (public-facing or private) and internal (closed community) sites. That is, conformance is required for all internet, intranet and extranet sites.

Agencies are reminded that accessibility is a requirement for all websites even when the audience is known. People who have a disability are not legally bound to disclose it and many do not. Agencies that do not implement WCAG 2.0 for their intranet must accept they may be at greater risk of complaint under the *Disability Discrimination Act 1992* and other anti-discrimination Acts[4]. Agencies are required to report on the conformance of all websites, including departmental intranets and private extranets.

A website is defined by Wikipedia as *"a collection of related web pages, images, videos or other digital assets that are addressed with a common domain name or IP address in an Internet Protocol-based network. A website is hosted on at least one web server, accessible via the Internet or a private local area network"*[5].

Further to this, the W3C provides the following definition of a web page: *"... the term 'Web page' includes much more than static HTML pages. The term 'Web Page' was used in these guidelines to allow the guidelines to be more understandable. But the term has grown in meaning with advancing technologies to encompass a wide range of technologies, many of which are not at all 'page-like'. It also includes the increasingly dynamic Web pages that are emerging on the Web, including 'pages' that can present entire virtual interactive communities. For example, the term 'Web page' would include an immersive interactive movie-like experience that you find at a single URL."*[6]

For the purposes of the National Transition Strategy, a 'government website' is defined as one that:

- is either fully or partly owned and/or operated by a government agency;
- is registered on a domain name, sub-domain or sub-directory; and
- has a distinct look and feel (design), audience and purpose.

Cross-jurisdictional or cross-portfolio websites, with more than one government agency owning or significantly contributing to the website, or websites created under public–private partnerships, should meet the mandated level of accessibility relevant to the main authoring agency, or the highest conformance level applicable to an authoring

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[4] All Australian laws on anti-discrimination are outlined on the National Anti-Discrimination Information Gateway <http://www.antidiscrimination.gov.au/www/nadig/nadig.nsf/Page/Home>. The *Disability Discrimination Act 1992* specifically addresses web accessibility.

[5] <http://en.wikipedia.org/wiki/Website>

[6] <http://www.w3.org/TR/UNDERSTANDING-WCAG20/conformance.html#uc-web-page-head>

agency. Government funded programs (including grants) or initiatives delivered through third-party providers should meet the endorsed accessibility requirements if the information provided is portrayed as, or is considered to be, 'government information'. This is especially important for entities that are funded for information dissemination.

Inclusions and Exclusions

WCAG 2.0 will be implemented in three phases with explicit timeframes. Depending on the type of web content and when it was created, WCAG 2.0 may or may not be applicable. The three phases and respective timeframes are:

1. **Preparation Phase** – July 2010 to December 2010
2. **Transition Phase** – January 2011 to December 2011
3. **Implementation Phase** – Completed by December 2012 (Single A) and December 2014 (Double A).

All websites and web content created **after July 2010** (commencement of Preparation Phase) must meet WCAG 2.0 to at least Single A level by December 2012.

Websites and web content created **before July 2010** that will be archived or decommissioned before December 2012 are not required to meet WCAG 2.0.

Similarly, any web content created before July 2010 that is no longer current, but that is still important and/or popular and not yet appropriate for archival, should remain WCAG 1.0 conformant. Where this type of content is not WCAG 1.0 conformant, agencies should upgrade to WCAG 2.0 (as WCAG 1.0 is technically superseded). A content upgrade flowchart is provided to assist agencies with decision making.

Along with the structure and navigational elements of a website, all information that is required under the jurisdiction's website policy is included within the scope for upgrade to WCAG 2.0. Federal government agencies should be guided by the Web Guide's Online Content Requirements[7]. At a minimum, the following information should always be up to date and conform to WCAG 2.0:

- contact details;
- information about the organisation, including its role, legislation, administered functions, structure, key personnel and services;
- current information that will help citizens to understand their responsibilities, obligations, rights and entitlements (benefits, etc.) in relation to government assistance;
- current public notices, warnings and advice.

[7] <http://webpublishing.agimo.gov.au/Online_Content_Requirements>

4 Scope

Retrospectivity and Legacy Content

Retrofitting accessibility features to a website or web content can be expensive and time-consuming, and such sites are also generally more expensive to manage than those created to conform to WCAG 2.0 from launch. (A similar problem occurs, for example, when accessible ramps and elevators are not planned for during a building's construction rather than at its initial design stage.) A website built from the outset with accessibility in mind is more usable for everyone.

Agencies will therefore need to go through a process to identify all current and relevant information on their existing websites, and should decommission or archive old information where appropriate. To improve the transparency of government information, agencies are encouraged to archive information online, as citizens expect to retain access to electronic information. An archived web page is:

- maintained for reference, research or record keeping purposes;
- not altered or updated after the date of archiving; and
- stored in a digital repository.

An archived web page may be provided on the website, but must be clearly identified as being archived. Agencies should not unnecessarily archive or decommission any content unless it has been identified as outdated, superfluous, irrelevant or replicated elsewhere. Agencies are still liable for complaint under the *Disability Discrimination Act 1992* for all websites that are not accessible, regardless of their proposed archival or decommissioned status.

WCAG 2.0 Single A should be applied where possible. Where no WCAG 2.0 Sufficient Techniques[8] exist to test the conformance of a technology or product, then WCAG 2.0 conformance cannot be claimed.

Along with WCAG 2.0, agencies developing and implementing advanced web technologies and custom widgets are encouraged to consider other W3C guidelines in order to be more accessible – for example, the proposed Web Accessibility Initiative Accessible Rich Internet Applications (WAI-ARIA) guideline and other relevant technical standards.

[8] <http://www.w3.org/TR/WCAG20-TECHS/intro.html>

Exemptions

Temporary exemptions will only be considered on a whole-of-government arrangement where technical solutions cannot be found that sufficiently address WCAG 2.0 conformance. Such arrangements will be subject to a review process and reconsidered as technology advances and further WCAG 2.0 conformance techniques are published. AGIMO will keep agencies informed of solutions.

Opt-out Arrangements (Federal Government Only)

In response to the *Review of the Australian Government's Use of Information and Communication Technology*[9], the Australian Government has changed the system of self-approved opt-in by agencies to whole-of-government ICT arrangements. Under the new system, agencies must seek approval from the Expenditure Review Committee to opt-out from agreed arrangements. Arrangements in this case include the endorsement and implementation of WCAG 2.0 for all federal government websites to Double A level by the end of 2014.

If an agency is unable to conform to WCAG 2.0, it could seek exemption through the opt-out process[10]. However, agencies seeking to opt-out of WCAG 2.0 conformance, either in part or in full, would not negate their responsibilities under the *Disability Discrimination Act 1992* or the UN Convention on the Rights of Persons with Disabilities. Agencies seeking opt-out would need to review the Australian Human Rights Commission's advisory notes to the *Disability Discrimination Act 1992*, to help ensure that their alternative strategies for the provision of information and services online were non-discriminatory.

[9] <http://www.finance.gov.au/publications/ICT-Review/index.html>

[10] <http://www.finance.gov.au/e-government/strategy-and-governance/Whole-of-Government-ICT-Policies.html>

4 Scope

Reporting

The National Transition Strategy will be accompanied by a reporting regime capturing government progress in meeting WCAG 2.0 conformance. For federal government agencies (those subject to the FMA Act), AGIMO will provide a reporting system similar to that used to report progress of implementation under Internet Protocol version 6. Federal agencies (those subject to CAC Act) opting-in to the strategy are encouraged to report using the same system and will need to advise AGIMO of their intention to do so.

For state and territory agencies, reporting will be coordinated by jurisdictional representative agencies, or via existing reporting mechanisms. Jurisdictions will provide consolidated reporting from their state to AGIMO to enable national progress to be monitored.

Resources, Guidance and Tools

AGIMO provides advice and guidance around web accessibility on the Web Guide[11]. Further advice and guidance is being developed to support the National Transition Strategy. It is anticipated that advice, guidance and tools particular to the implementation phases will be made available on the Web Guide.

In addition, states, territories and international jurisdictions have a wealth of web accessibility information that may be useful to both web and business managers during the transition to WCAG 2.0. Where possible and relevant, AGIMO will provide links to this information, creating a centralised repository of all WCAG 2.0 implementation guidance.

AGIMO has established a collaborative space to support a community of expertise for the transition to, and implementation of, WCAG 2.0. If you are interested in participating in this, register your interest via WCAG2@finance.gov.au.

[11] Previously named the "Web Publishing Guide" <http://webpublishing.agimo.gov.au/>

5

Work Plan

5 Work Plan

Phase 1: Preparation – July 2010 to December 2010

The Preparation Phase will assist agencies to determine their readiness to undergo WCAG 2.0 transition and implementation. Agencies should conduct a systematic assessment of their websites and website infrastructure and of their staff's skills and knowledge in readiness to apply WCAG 2.0. Many of these activities are considered a normal part of web management practice. Agencies will be required to report on each stage of the Preparation Phase. AGIMO will consolidate agency information to provide a national picture of the size and complexity of the upgrade, and to develop solutions and materials to assist agencies with their transition to WCAG 2.0. The Preparation Phase should be completed by the end of 2010.

1.1 Agency Website Stocktake

Commencing with an assessment and review of their current websites, agencies are encouraged to use the Preparation Phase to begin archiving or decommissioning non-essential or outdated websites and to plan the amalgamation of content or websites where possible. Agencies must identify the critical information and services required to be maintained on their websites. Federal government agencies must have regard for Web Guide's Online Content Requirements, the Information Publication Scheme[12] and other agency-specific content policies. State and territory agencies should comply with the website content guidelines applicable to their jurisdiction. Agencies are reminded to consider future planned technologies (e.g. use of Web 2.0 technologies) for inclusion. Agencies should complete this stage by compiling a list of websites and web services to be upgraded. Agencies will also need to note all out-of-scope websites, and to report as outlined.

1.2 WCAG 2.0 Conformance Check

After establishing the websites and information to be retained, agencies should assess all in-scope websites for the current level of WCAG 2.0 conformance, and identify areas of non or partial conformance. Agencies have autonomy to decide whether they will self-assess for WCAG 2.0 conformance or require independent assessment. Agencies are reminded that automated tools provide incomplete conformance information, and human assessment is also required. As agencies may not have the necessary knowledge or skill set during the Preparation Phase to self-assess WCAG 2.0 conformance, a set of recommended tools and test methodologies will be developed to help them with this process.

[12] <http://www.dpmc.gov.au/consultation/foi_reform/index.cfm>

1.3 Website Infrastructure Assessment

A review of current and planned websites and web content (and consideration of proposed technologies for future deployment) should identify any infrastructure upgrades required to achieve WCAG 2.0 conformance. This assessment should have regard for the current lifecycle of the website and its associated services, to ensure that WCAG 2.0 is applied during 'refresh' procedures. Current and planned content management systems, publishing processes and website content workflows also need to be reviewed, to ensure that the process of creating web content can be streamlined to meet accessibility requirements. In addition, the assessment should cover all web content and applications provided by third parties.

It is likely that agencies will have a considerable amount of externally delivered content and applications that are not WCAG 2.0 conformant. Where vendors and applications that are commonly used across government are identified, opportunities can be explored for centralised negotiations with vendors.

1.4 Capability Assessment

Agencies should assess their capability in order to determine the level of specific WCAG 2.0 skills they currently have available and identify knowledge gaps. This assessment will assist in identifying future training needs. It is likely that staff will need to undertake specific WCAG 2.0 training programs to enhance the skill set within their agencies. Opportunities exist for the development of whole-of-government training packages.

1.5 Risk Assessment

Agencies will be required to undertake a risk assessment of their ability to meet the required conformance standard within the timeframe. Risks will be calculated on multiple factors: the number of websites within the scope and the current WCAG conformance level of websites, along with current infrastructure and skill capabilities. Agencies will also need to assess risk for websites they consider outside the scope for upgrade, noting planned actions (i.e. conformance testing or archival).

Mitigation Projects led by AGIMO

Risk assessments are likely to identify a range of applications, either existing or planned, for which there is no current technical solution to conform to WCAG 2.0. For example, mapping interfaces (the visual representation of spatial data) will require a project or working group to be developed to seek a solution for government. AGIMO, in collaboration with working groups and the community of expertise, will review these issues, identify solutions for agencies, provide guidance and publish results to assist agencies to conform to WCAG 2.0.

5 Work Plan

Phase 2: Transition – January 2011 to December 2011

The Transition Phase will provide agencies with the time to acquire the skills and foundations to underpin implementation of WCAG 2.0. It also allows time for infrastructure upgrades to follow an agency's regular refresh cycle, or to deploy new technologies and content management systems if necessary. Agencies are expected to complete the Transition Phase by the end of 2011, to allow for implementation of WCAG 2.0 Single A conformance by the end of 2012.

2.1 Training and Education

AGIMO is liaising with agencies and jurisdictions on the viability of a whole-of-government WCAG 2.0 online training module. A number of training needs are anticipated, ranging from the business benefits of WCAG 2.0 for business managers, and basic WCAG 2.0 accessibility information for web content authors, through to more technically specific applications of WCAG 2.0. Agencies are also encouraged to attend specific WCAG 2.0 training courses in addition to any planned packages from AGIMO.

2.2 Procurement Review

Agencies are encouraged to review all procurement policies to ensure that they are updated to require all ICT procurements (especially those relating to websites) to include web accessibility criteria. This work will include revising public procurement documentation and selection criteria to contain specific references to universal design principles and WCAG 2.0 conformance as necessary.

2.3 Infrastructure and Capability Upgrades

Depending on the size, complexity and current level of WCAG 2.0 conformance, a website's upgrade to WCAG 2.0 may be either straightforward or complicated.

All content management systems associated with agency websites should be upgraded to ensure their outputs can meet WCAG 2.0. Through the use of effective content management systems, agencies may be able to rollout technical solutions across multiple websites in a simplified process. Agencies need to self-assess this potential outcome.

Agencies should ensure that their staff are adequately trained on the requirements of WCAG 2.0 and, where possible, that business managers gain an understanding of the business benefits of accessible websites. A number of commercial WCAG 2.0 courses are available, and AGIMO will consider establishing a panel arrangement of service providers.

Progress Reporting

Similar to federal reporting requirements for Internet Protocol version 6, AGIMO will maintain oversight of conformance to ensure agencies are progressing to WCAG 2.0 implementation within approved timeframes.

Phase 3: Implementation – Complete by December 2012 and December 2014

The Implementation Phase should commence as soon as agencies have in place the enabling factors: education and training completed for web authors and website development staff; all procurements reviewed and revised to ensure that new websites and web service developments will meet WCAG 2.0 conformance from launch; and all existing infrastructure and web publishing processes upgraded to ensure outputs will meet the appropriate WCAG 2.0 conformance level.

3.1 Agency Implementation

Agencies are encouraged to develop their own implementation plan that specifically addresses their needs and their web environment, paying particular attention to their level of risk, as identified in the Preparation Phase. For example, some agencies may be commencing WCAG 2.0 assessments from a basis of no conforming websites; others may already be largely conforming to WCAG 2.0. AGIMO will provide guidance on the development of implementation plans to assist agencies.

An agency implementation plan should address, at a minimum, the following issues:

- common issues and fail points of websites;
- priority of implementation – critical services, critical information, obligatory information and business as usual functions; and
- a web accessibility action plan – to address ongoing management of WCAG 2.0 conformance, including regular reviews, monitoring and testing.

Where agencies already have website management strategies in place, these should be reviewed and updated to ensure they include specific references and tasks relating to the National Transition Strategy.

3.2 Conformance Testing

Under WCAG 2.0, conformance with the guideline is deemed to exist when all the success criteria are satisfied at the appropriate level (Single A, Double A or Triple A). Agencies must ensure each web page meets WCAG 2.0 conformance requirements. To establish conformance, agencies will need to implement their own testing regime, and in some cases employ external professionals to assist with testing.

AGIMO will investigate whole-of-government automated conformance testing tools. It must be borne in mind, however, that automated testing tools can only interpret a limited range of criteria, which means that human judgment will also be needed in carrying out the tests. This will require staff skilled in web accessibility who can understand and apply the guidelines.

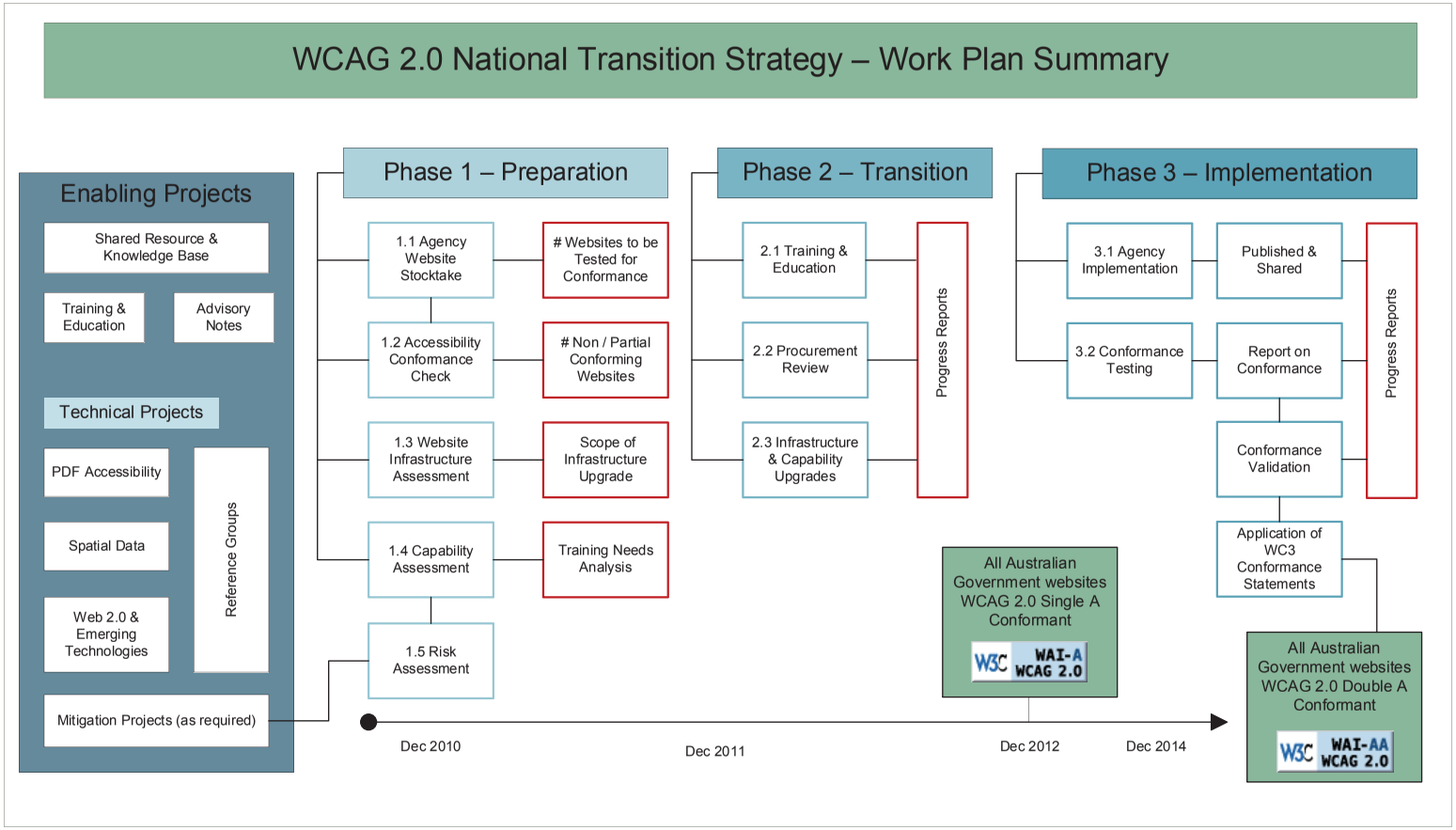
5 Work Plan

For federal agencies, conformance reports should be provided to AGIMO and may be subject to independent validation. Once validated, an agency may apply a conformance statement to its site and /or display the W3C conformance logo for the level of conformance it has attained, in accordance with the W3C requirement.

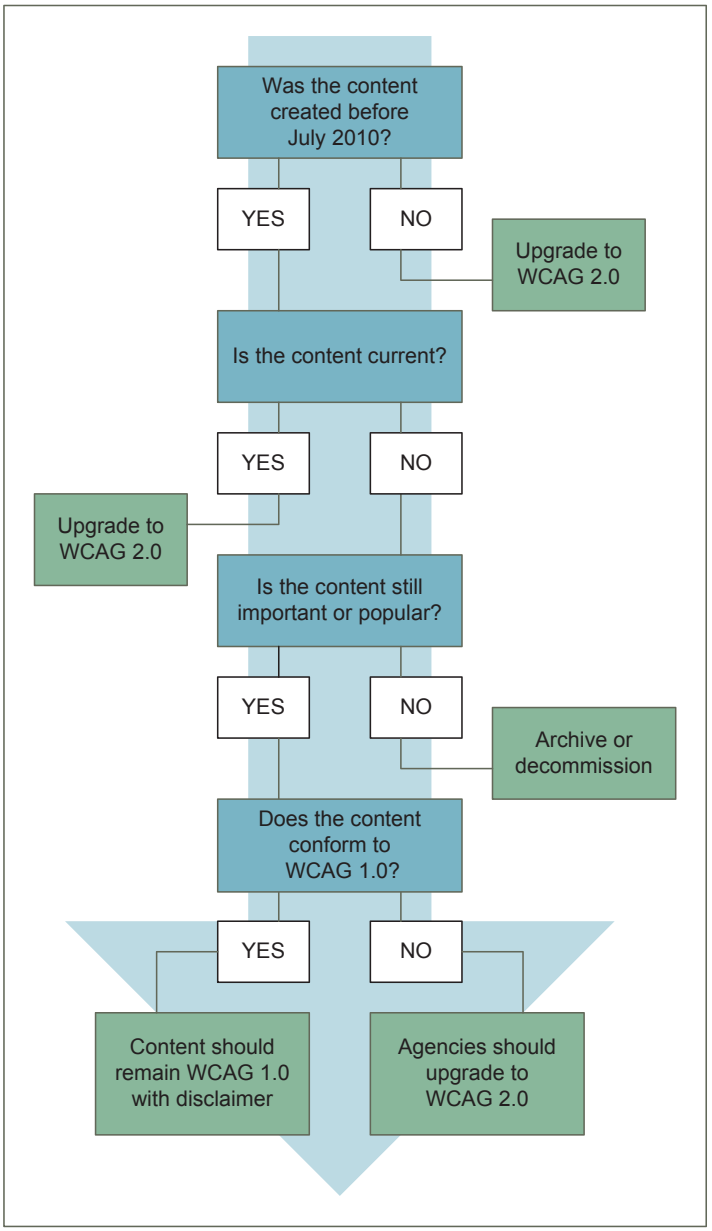
In early 2015, AGIMO anticipates reporting to government through the Secretaries' ICT Governance Board and the Online and Communications Council on the successful completion of the strategy at all levels of government.

WCAG 2.0 National Transition Strategy (Image Format)

Image is described in the Work Plan section of this document.



Content Upgrade Flowchart (Image Format)



Text description: Image describes a workflow for an agency to determine whether content should be upgraded to WCAG 2.0 or decommissioned.

Question 1 - Was the content created before July 2010? If no, upgrade to WCAG 2.0. If yes, proceed to next question. Question 2 – Is the content current? If yes, upgrade to WCAG 2.0. If no, proceed to next question. Question 3 – Is the content still important or popular? If no, archive of decommission content. If yes, proceed to final question. Question 4 (final) – Does the content conform to WCAG 1.0? If yes, then content should remain WCAG 1.0 with disclaimer. If no, agencies should upgrade content to WCAG 2.0.