Web content accessibility guidelines

Third party document exemption from WCAG requirements

31 March 2014

AHPRA and the National Boards have made an undertaking to publish documents and content on their websites that are accessible to all users regardless of potential impairment, in accordance with the World Wide Web Consortium's (W3C) Web Content Accessibility Guidelines (WCAG).

As the W3C have found that PDF documents do not meet the requirements of the guidelines, in almost all instances we are required to publish the content of PDFs in alternative formats, such as an HTML page, which is the preferred method, or otherwise in a Microsoft Office file type such as Word, Excel or Powerpoint.

However, when AHPRA or the National Boards are obliged to publish content that has been prepared and provided by a third party, and an accessible format of the file is not available, we are able to publish PDFs as standalone content.

Suggest recasting sentence: Wherever this method is applied, a statement to explain noncompliance must appear with the content or at the top of the page.

The following information provides guidance on when and how this exemption can be applied.

Further information on web content accessibility is available on our Web Content Accessibility page.

The Web Services team are also available to assist with any questions you may have about WCAG or this exemption rule.

Contents

Background

What is web content accessibility?

Web content accessibility refers to the design and format of all functions, navigation and content of websites with the intent that they will not impede users of the web, including people with disabilities, in utilising content and interacting online in an equal manner.

The World Wide Web Consortium (W3C) are an international community who work to develop Web Standards. Their guidelines on web accessibility – the Web Content Accessibility Guidelines (WCAG) – are widely viewed as best practice.

The web content accessibility resource page on the AHPRA intranet contains further information on WCAG, our commitment and who is affected by this commitment. This resource also includes a video explaining web content accessibility.

Who is affected?

This commitment affects all web content owners, approvers and authors. Anyone making a contribution to web content on the AHPRA website or Intranet or Board websites is required to follow our WCAG-compliant procedures.

How long has this been a requirement?

Since the 17th December 2012 the Web Services Team has requested original format files to accompany published PDF documents. Documents not supplied in original file format will not be published. Where an alternative to a PDF is not available the request to publish will be referred to the Web Services Manager for consideration.

The Web Services team are available to advise on whether your content meets the requirements of the accessibility guidelines and to assist you in making it user friendly and available to all.

When are documents exempt from our accessibility requirements?

As a web content author it is important to be aware of the need to write copy and present documents in a way that improves web users' experience and assists them to understand and engage with your message. Our content should also comply with the Web Content Accessibility Guidelines.

Our step by step guide on how to prepare web documents, on the AHPRA intranet, provides guidance on how to apply the following principles:

- **Content should be converted to HTML (web) pages wherever possible.** HTML pages are considered to be the most accessible format of content on the internet.

- **If a document is an AHPRA or National Board document, it should be accompanied by an accessible format document.** Where possible, this should be the original format of that document, created to meet WCAG requirements. For example, most PDFs we create are originally Word documents. If you provide us with the Word version of the file, we will check it for accessibility compliance and convert it into a PDF for you.

- We'll also work with you to make sure your documents are accessible when we publish them as links to the web page.

Exemptions from the WCAG for some third party documents

On occasion we are required to publish documents that are provided by third parties. In some cases they are in non-accessible formats such as PDFs. If we are unable to obtain an accessible format of the file, we can claim an exemption from the Web Content Accessibility Guidelines.

We have received the following advice from Vision Australia:

- If documents are 'third party' they can be considered uncontrolled content, and therefore we can claim partial conformance for pages where we are required to publish this content

- Where possible, we should provide guidance and templates to those making the submissions to encourage the use of an appropriately created Word template to create these PDFs or encourage them to supply a Word document. In situations such as consultations, the template should be made available at the time that feedback is required to encourage use by the third party.

This advice is based on the Web Content Accessibility Guidelines' Statement of Partial Conformance – Third Party Content.

An example of this in practice is available on the consultation submission page of the DEEWR website.

A document IS exempt if:

- it has been supplied by a third party

- the document was not created by or branded as an AHPRA or a National Board document

- it is only available as a PDF, and

- it is not appropriate to request the document in an accessible format, **or** an accessible format document has been requested and is not available.

A document is NOT exempt if:

- the document was created by or branded as an AHPRA or a National Board document

- an alternative, accessible format of the document is available, or

- it is feasible and appropriate for the content author to recreate an accessible unbranded version of the document in an accessible format.

Publishing requirements for WCAG-exempt PDF documents

Any page that contains documents that are exempt from WCAG also requires a disclaimer that includes the following points:

- This page does not conform, but would conform to WCAG 2.0 at level AA if the stated parts from uncontrolled sources were removed.

- It is not content that is under the author's control.

- It is described in a way that users can identify (e.g., they cannot be described as 'all parts that we do not control' unless they are clearly marked as such.)

An example of this exemption statement for consultations:

Public submissions have been made available on this website for the purpose of facilitating consultation and discussion of important policy decisions being made by *[insert AHPRA or name of Board]*. Submissions are published in their original format as made by the submitter. If you have difficulty accessing a submission, please contact AHPRA at webservices@ahpra.gov.au, and we will attempt to contact the submitter to seek an accessible version of their submission.

[Insert AHPRA or name of Board] notes that all submitters were asked to provide their submissions in accessible formats, and guidance was provided on how this could be achieved. *[Insert AHPRA or name of Board]* will update inaccessible submissions on this website when accessible format versions of files become available.

An example of this exemption statement for official documentation:

The following documents have been made available on this website in compliance with the National Law and also in the interest of transparency. Wherever possible, *[insert AHPRA or name of Board]* provide web content in accessible formats. However in cases where the documents have been provided by other parties, accessible format files may not be available or be approved for use.

If you have difficulty accessing one of these documents, please contact AHPRA at webservices@ahpra.gov.au, and we will attempt to provide you with an accessible version.

[Insert AHPRA or name of Board] notes that wherever possible, third party organisations are asked to provide documents in accessible formats, and guidance is provided on how this could be achieved. *[Insert AHPRA or name of Board]* will update documents on this website when accessible versions become available.

Need more information?

For more information:

- Read the web services procedures and resources on the AHPRA intranet.

- Contact the Web Services team via the service desk portal or call the Web Services manager directly on (03) 8708 9366.