COUNCIL WEB PAGE

Preamble

In days past, Council used to be an instrumentality hidden behind the closed doors of the Town Hall. For many residents their only interactions with Council were the payment of rates and the emptying of rubbish bins.

With the advent of the internet Council has had the opportunity, via its webpage, to inform and consult with the residents in its area in a manner never available before.

It is consequently a responsibility of Council to ensure that its webpage is both structured so that it is available to all residents including the disabled and that it contains the information needed by residents, some of which provision is prescribed by the *Local Government Act*.

History

Not all the history of the current webpage is in the public domain.

The Council meeting of 12 May 2011 passed a Project Definition Form for a new webpage. The amount concerned was $25,000 (originally $20,000 applied for). While the form mentioned the word "accessible" three times there was no clarification on the form of the meaning of "accessible" in the context of a new webpage nor indication of what standards were to be met.

For example, the form stated the web page would provide:
- An accessible, easy to navigate website for the community to readily find relevant information regarding the Council and the services which we offer (including the opportunity for online feedback and consultation during community engagement periods);
- Improved online presence to promote the City of Norwood Payneham & St Peters as an ideal place to live, work and play; and
- A mechanism for fulfilling the legislative requirements of Local Government (eg. Display of Council Meeting Agendas & Minutes).

In late July 2013, a new Council website appeared. It was certainly more visually attractive than the previous site, but unfortunately an extensive examination of the site over a period of weeks revealed numerous deficiencies both for the able and the disabled. Many affect both.

It could be argued the new page is less easy to navigate for all users and that it fulfils fewer of its legislative requirements than it did before.

How accessible should Norwood, Payneham and St Peters website be?

The current standard for accessible web pages is WCAG2 (Web Content Accessibility Guidelines) which has been recommended since 2008.

Our new website is labelled as WCAG1 compliant i.e. we are running behind from the start.
See http://webguide.gov.au/accessibility-usability/accessibility/
and http://www.visionaustralia.org/business-and-professionals/digital-access

It is also noted that the Royal Society for the Blind (see Attachment 2) has indicated our website should meet WCAG 2 standards, as has Purple Orange, the organisation charged with developing Council's new Access and Inclusion Plan, in their *Issues and Opportunities Report* to Council.

> Web Content Accessibility Guidelines (WCAG) 2.0 covers a wide range of recommendations for making Web content more accessible. Following these guidelines will make content accessible to a wider range of people with disabilities, including blindness and low vision, deafness and hearing loss, learning disabilities,

cognitive limitations, limited movement, speech disabilities, photosensitivity and combinations of these. Following these guidelines will also often make your Web content more usable to users in general.

http://www.w3.org/TR/WCAG20/

How accessible is our web page?

In simple terms, not very.

How do we know?

Creating a webpage is a complicated coding task demanding the services of a skilled web person.

The success of the webpage is measured, however, not by the apparent precision of the code, but by the accessibility of the page to **all** users in practice.

Our page, I am told by Council staff, was tested for compliance against *Fangs*, an add-on to *Firefox*.

As well as *Fangs*, I have further tested it against a number of other tools to assess its compliance with accessibility standards. These tools included:

> http://www.w3.org/WAI/eval/preliminary.html
> http://achecker.ca/checker/index.php
> http://www.cynthiasays.com/?
> http://try.powermapper.com/demo/ViewScan/ebdcb295-0b48-4f43-83c2-
> e75f6a38eef3
> http://www.nvaccess.org/

The last of these is a screen reader for those who are blind. The others essentially evaluate the code to determine whether there are errors which might create problems for those who are variously disabled.

All of the tools indicated there were problems of various types.

Examples

It is not the intent of this document to list all the deficiencies in our webpage. For those sufficiently interested there is a more detailed list in Attachment 1.   But here a couple of examples to illustrate the point.

> **Council Minutes and other documents**
>
> A number of documents including minutes of Council meetings are not accessible to many users because:
> 1. Minutes prior to 2011 have been removed from the new webpage i.e. they are not accessible to anyone! Previously they were available back at least to 2004. (Being available in print form at Council offices does not meet the needs of some who are physically disabled and who may not be able to access the print medium.)
> 2. Most of the minutes have been placed online in an image-based pdf format, rather than a text-based format. **This is both fuzzy to read and unsearchable**. It is a physical strain for those who are visually-impaired and searching must be done by browsing, sometimes through hundreds of pages.
> 3. **None** of the minutes in an image-based format can be read by screen readers i.e. they are **totally** inaccessible to those who are blind.
> 4. No alternative format such as HTML has been provided as required.

This is one of those issues which affects all users in a variety of ways.

Images

It is noticeable when accessing a webpage that most pictures are labelled if the mouse is moved over the picture. This label is a "text alternative" which tells a blind/visually impaired person the content of the picture. Obviously the nature of this content is missing without the text if the user cannot see.

But further, pictures often act as links to other connected pages and, without the text supplied in such a way that a screen reader can read the link, it will be unavailable to the user. Pictures must be "Accessibility Supported" which they are not on our webpage.

What needs to be done?

While it is easy enough to ring or email Council staff with respect to minor corrections, the fact is that the problems with the webpage are such that it needs a thorough assessment by an expert followed by an overhaul, something which will require both time and money.

Unless Council tackles this situation it risks losing communication with residents, but further it risks action through the Human Rights Commission under the Disability Discrimination Act.

See: http://www.humanrights.gov.au/world-wide-web-access-disability-discrimination-act-advisory-notes-ver-40-2010

It is essential Council moves to provide a page which not only meets the needs of the ordinary able resident, but also those of the full variety of disabled: "including blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity and combinations of these."

Suggested course of action

1. Approve sufficient funds to carry out the following course of action
2. Contract an expert firm of consultants on web accessibility e.g. Royal Society for the Blind, to assess the current webpage to determine where it is deficient in accessibility for all residents, both able and, in particular, disabled. RSB has indicated a willingness to be involved.
3. Develop an Action Plan which clearly delineates the criteria for a Council webpage which is truly accessible to both the able user and the variety of the disabled. Report back to Council.
4. Contract a firm capable of delivering a webpage which meets these criteria.
5. Fully assess the page for accessibility including assessment by potential users.

Conclusion

- Thanks to Council staff who have carried out some corrections on the new webpage and supplied some information.
- Thanks to those from the RSB who have engaged willingly in conversation and provided a brief report for this document.

Please take the time to read the attachments and then move towards addressing the problem of an inadequate webpage.

It is the wish of Disabled in Norwood, Payneham and St Peters that our webpage not only is visually attractive but meets the criteria for accessibility for all, including the information needed by residents. This is also supported by Norwood Residents Association Inc.

Marcia Nicholl
Disabled in NPSP

ATTACHMENT 1

This assessment has been performed by me over a period of some weeks. I have assessed the page both as a user and from the point of finding potential difficulties for users who might be hampered by poor or no eyesight, or a need to use their computer from the keyboard because of inability to use the mouse, users who might have difficulties with English as a language, or might have limited reading capacity, users with colour blindness or who might need heightened colour contrast, and the general everyday user with no specific problems.

The page has been assessed both manually and by the use of online tools as previously indicated.

I have the ability to create very simple web pages, and have spent a number of years teaching computer use to seniors. In using the internet myself, I am, because of rheumatoid arthritis, limited to typing with one finger!

It is hoped the following assessment is couched in language which is understandable by most, but does not require technical skill.

Searchability

- An advanced search engine is needed e.g. a search for "Parade Precinct" brings up as the first option "Media releases 2012" which includes nothing whatsoever about the Parade Precinct, although later results are more specific.
- A search for "signs" fails to bring up any result which provides access to Council By-laws on Moveable Signs. (The By-laws document is in an image-based format which cannot be searched.) The document is effectively lost to the general user.
- A search for "Italian" brings up 7 results – only two of these links contain "Italian" at all.
- The "What are you looking for?" box is positioned so that the user must scroll down to find the box. It is also difficult for blind people using a screen reader to find. **It needs to be placed near the top of the home page and optimally would be placed on every page in a prominent position.**

Scrolling images at bottom of home page

- There are too many of these and they are time consuming to move through.
- The pictures have no labels which means they cannot be used as links by screen readers.
- The "Read more.." link text at the bottom of the item is repetitive, again difficult for screen readers. Further, if the user has text at all enlarged the link text disappears outside the box – all of them disappear if the user is visually impaired and has text size set at maximum in their browser.

Dates

- Ensure that all documents now added to the page are dated. It has often not been possible to determine which is an earlier or which a later document on the old web page.

More on Council Minutes and other documents

> *I note the Local Gov. Act 1999, Section 132, Access to documents says:*
> A council must make the following documents available for inspection on the Internet within a reasonable time after they are available at the principal office of the council:
> (a) agendas for meetings of the council or council committees;
> (b) minutes of meetings of the council or council committees;
>
> Council's *Code of Practice: Access to Meetings and Documents* is in conflict with this section of the Act:

Public Access to Documents
…... The Council may also make a document available in electronic form and place it on the Internet for access

The loss of these documents from Council's web page means links in other organisations' web pages have become invalid. Unfortunately this means whole web pages must be re-drafted and results in the loss of information in the public arena.

Simply providing print copies to the public on request does **not** resolve the problem:
1. There is no way of knowing which archival document is required
2. Print copies may not be suitable for some disabled people because of visual impairment or inability to handle physical copies.

This loss of archival material is also inconsistent with the practice of other SA Councils which maintain Minutes, etc. in general for about 8-10 years.

Contacting Council

- It is pleasing that some committees, etc. now have accessible lists of members, with phone and email contacts.
- Emails sent to Townhall@npsp.sa.gov.au very often disappear for some time, if not forever, which leaves the sender not knowing what to do, where the email has gone, etc.
- A specific list of staff members responsible for particular areas, with their phone nos. and email addresses, would ease these concerns.

PDF documents

- Some pdf documents inc. Minutes and Agendas are saved in an image-based pdf format which means the documents cannot be searched internally and neither can they be Googled. To find a particular set of Minutes it is necessary to open multiple files and then browse through to find the wanted material. If the index says an item is on a certain page, it is possible it might actually be 100s of pages further down because of the intrusion of attachments. This is an extremely frustrating process which would not be needed if the file had been saved in a text-based pdf format.
- **These documents should also be available in html or other accessible format.**
- These documents are fuzzy and difficult to read.
- For the visually-impaired, assistive technology i.e. reading the pdf page aloud does not seem to work for minutes of council meetings although it does for DAP minutes.

Pdf – Image-based and unsearchable

RECOMMENDATION

That having regard to the relevant provisions of the Norwood, Payneham and St Peters (City) Development Plan and pursuant to Section 33(1) of the Development Act 1993, Development Plan Consent be **refused** to Development Application No 155/0463/13 by Mr J K Barrington to vary the Development Plan Consent granted in respect to Development Application Number 155/0550/12 (to increase the height of the roof mounted solar panels, alterations to building materials and windows, an additional balcony, internal layout amendments, and a sliding vehicular gate within the front fence), at 267 Portrush Road, Norwood, for the following reasons:

Reasons for refusal

1. The proposed raised solar panels will result in a dwelling with an excessive bulk and scale when viewed from adjacent and nearby land and will be unreasonably prominent in the context of the streetscape, which is contrary to City Wide Principles of Development Control 30 and 31.

2. The proposed raised solar panels effectively create a roofed area over the proposed roof top terrace, which is considered to be a third storey. This is contrary to Residential Zone Principle of Development Control 7, which allows for two-storey building heights within the Zone.

3. The proposed side balcony will result in an unreasonable loss of privacy to the occupiers of the adjacent dwelling at 14 Henry Street, which is at odds with City Wide Principles of Development

Pdf – Text-based and searchable

Easy English summaries

> *The Adult Literacy and Life Skills Survey (ALLS) was conducted in Australia in 2006 by the Australian Bureau of Statistics (ABS). Participants in the studies were rated on their skill level, graded from 1 to 5.*
>
> *Individuals with a skill level for prose literacy below 3 are considered to lack the minimum skills required to meet the complex demands of everyday life and work in the emerging knowledge-based economy. ALLS showed that almost half (46%) of all Australians aged 15 and over did not meet this requirement.*
>
> ***ABS Year Book Australia 2012***

There is no evidence of any consideration of meeting the needs of those in the community whose literacy skills are insufficient to access the webpage in a manner we would hope they would be able to do.

Sample Easy English Summary:
http://www.yarracity.vic.gov.au/services/Disability-services/Disability-Action-Plan/

3. Facilities and Events

Make sure the Council facilities and events are accessible.

Show others how to make facilities and events accessible.

Actions

• Check the signs at the Council's main facilities. For example, town halls, leisure centres

See also:
http://odi.dwp.gov.uk/docs/iod/easy-read-guidance.pdf

Alternative languages

• Well done on alternative language information on the Kitchen Organics page. It would be better however if the **links were moved to the top of the page** as the links get lost at the bottom unless the user scans down the page.
• More please in other areas where it is important to deliver information to the public.

Le seguenti informazioni forniscono una panoramica sulle cose da fare e da non fare con i rifiuti organici della cucina – quali rifiuti inserire nel vostro cestino dell'organico e quali NON inserire.

Access to computers and the internet

- **47% of the disabled do not access the internet.** This includes people across a range of ages. The cost is often prohibitive for people who might well be on aged or disability pensions.
- While council libraries can provide access it would help if council offices could also install computers with internet access at customer service points across the Council area. Provide empathetic assistance to enable the disabled to access information.

Making a Payment or the KISS Principle

- Making a payment requires either chancing on the fact that this is hidden under the "Our Services" tab or searching, neither of which processes is easy for all users. I would suggest a link near the top of the Home page to go directly to this. One would imagine making payments easy would be a priority for Council.
- Yes, there is a direct link, but it is at the bottom of the page.
- Once into the process, the various pages are slow to load
- The Norwood, Payneham and St Peters icon does not take the user back to the home page as it does on other pages.

Use of CAPTCHA

- This in particular discriminates against people with visual and hearing impairments and should be replaced.
- While it is understood there are audio alternatives, these may also be incomprehensible.

See http://www.w3.org/TR/turingtest/ for example.

Home button
- On some computers this text button requires scrolling to find. It should be clearly visible at the top of the page.
- It is not on some pages at all
- It is too small. For navigation purposes it should be prominent. The contrast between the Home button and its background next to "About Council" is inadequate as are the text and icons next to it.
- Not all users including in particular the visually impaired will be able to use the visual buttons, as the image of the Norwood, Payneham and St Peters logo is not labelled and therefore does not register as a link on screen readers.

Page Structure

- There are coding errors e.g. h2, an instruction for a level 2 heading, moves to h4, for a level 4 heading, instead of its next logical place, i.e. h3. This makes it difficult for screen readers.
- On a more visible level, the page is far too complex and needs simplification, which would probably reduce the size of the page.
- Many items are repeated unnecessarily e.g. **Libraries** occurs under **Culture and Lifestyle** and has its own separate section under **Libraries**, etc. All these things make finding information difficult.
- The most helpful and logical device for finding information is the **sitemap.** Unless the user has a moment of inspiration and enters this in the search engine, or happens to scroll to the very bottom of the Home page, this is unlikely to happen for most users.

Tab Order

Tab order is inconsistent for users reliant on the keyboard. The order at the top of the Home page goes from **Culture and Lifestyle** across to **Planning and Development.** It then moves to the **Culture** sub-division **Shopping and Dining,** to **Events and Festivals** and back to **Shopping and Dining.** Then to **Our Services/Venues and Facilities,** and back to **Culture!!**

ATTACHMENT 2

Email received from Fred Storbeck, Royal Society for the Blind, on 4 October 2013.

Hi Marcia,

I have reviewed the City of Norwood, Payneham and St Peters website and based on your observations I agree, there are a few accessibility concerns that need to be addressed.

According to the Australian governments' web guide site, the Government has endorsed the Web Content Accessibility Guidelines (WCAG) version 2.0 for all government websites. This requirement supersedes the previous mandate for compliance with WCAG 1.0.

Advice on how to meet the new standard, including the full scope of the upgrade, is detailed in the Web Accessibility National Transition Strategy (NTS), published on the Department of Finance and Deregulation (Finance) website. The previous Minister for Finance and Deregulation, the Hon. Lindsay Tanner, with the previous Parliamentary Secretary for Disabilities and Children's Services, the Hon. Bill Shorten, MP, detailed endorsement of the new guidelines in a media release on 23 February 2010, and announced the release of the NTS on 30 June 2010.

According to http://www.npsp.sa.gov.au/accessibility , The City of Norwood, Payneham & St Peters website has been designed to meet Level A of the Web Content Accessibility Guidelines 1.0 of the W3C (World-Wide Web Consortium). This standard is a fantastic starting point, but we need to build on to ensure that the site is accessible to all council members.

The RSB would be more than happy to work with the City of Norwood, Payneham and St Peters to further develop the website to WCAG 2.0 conformance and allow for testing at our Adaptive Technology center.

For more information on how to meet the standards, please contact me on (08) 8417 5555 or send an email to mail@rsb.org.au.

Regards,
Fred

Fred Storbeck

Application Developer

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Document prepared by:
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for
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6 October 2013