# Digital Accessibility Procedure

# Section 1 - Purpose

(1) The Digital Accessibility Procedure helps RMIT create online information and services that reflect the diversity of its students, staff and visitors. It does that by setting standards for accessibility of all digital platforms and resources, and outlining roles and responsibilities for compliance.

(2) The Digital Accessibility Procedure is key to ensuring that RMIT meets its anti-discrimination obligations outlined in the Disability Discrimination Act 1992 and the Disability Standards for Education 2005. RMIT complies with this legislation by ensuring that students, staff and visitors can access and use RMIT University's digital information and services.

(3) In its Inclusion, Diversity, Equity and Access (IDEA) Framework, RMIT commits to:

   a. demonstrating leadership commitment to inclusion and diversity, and promoting awareness and appropriate behaviour among staff and students
   b. ensuring the physical, digital and cultural environments are accessible, inclusive, and safe
   c. providing an equitable and inclusive experience for all students and staff with disabilities.

# Section 2 - Authority

(4) Authority for this document is established by the Inclusion, Diversity and Equity Policy.

# Section 3 - Scope

(5) The procedure applies to:

   a. digital technologies provided or supported by RMIT, such as:
      i. digital authoring tools including Adobe Experience Manager (AEM), Canvas and Microsoft 365 applications
      ii. digital service platforms for users to interact with RMIT, such as ServiceNow, WorkDay, myRMIT, myTimetable, StudyLink, SAMS
      iii. information and communication technologies (ICT) with two-way voice communication or video capabilities that may be used for internal and external communication, such as Microsoft Teams or Zoom
      iv. domain-specific software used for the delivery of academic curricula
      v. platforms that enable users to automatically generate content via the use of artificial intelligence (generative AI tools).
   b. digital content and output for which RMIT University is or may be legally responsible under the Disability Discrimination Act 1992, including:
      i. web pages, websites, web applications, mobile and other online applications
      ii. RMIT-supported Learning Management System (LMS), and interactive learning and teaching tools such as

Mentimeter and HSP

    iii.  online communication channels including content published via live chats, chatbots, social media, email and any other form of digital communication

    iv.  non-HTML resources published on the web or distributed electronically, such as PDF documents, PowerPoint presentations, Word documents, and images

    v.  content displayed on campus on digital devices, such as: interactive kiosks, tablets and multimedia screens.

(6) The procedure excludes:

    a.  course-based multimedia resources created by non-digital specialists. Refer to Section 5 below for the definition of a non-digital specialist

    b.  digital authoring tools not provided or supported by RMIT

    c.  student work (e.g. student galleries, reflective journals, blogs), except where:

        i.  other students are required to interact with the work as part of a learning or assessment activity

        ii.  the work is commissioned on behalf of RMIT

        iii.  the work is subsequently used as an official digital resource by RMIT.

# Section 4 - Procedure

## Guiding Principles

(7) Accessibility is a fundamental consideration in the design, development and implementation of digital information, technologies and services at RMIT. Accessibility improves everyone's experience of RMIT, including people with a disability, and eliminates costly and inefficient remediation.

(8) RMIT is committed to continuous systemic improvement. Any accessibility widget, overlay or tool that promises to automatically fix accessibility issues on RMIT digital assets is banned, as these solutions have been found to not be fit for purpose. This ban does not apply to accessibility monitoring tools that may run in the background and scan the RMIT website to identify accessibility issues.

(9) Digital accessibility is progressively implemented to:

    a.  raise awareness of accessibility and build commitment within Colleges, Schools and Portfolios

    b.  achieve widespread integration of accessible design practices

    c.  implement needed changes to policy, standards and processes

    d.  update training and support tools and resources, and roll these out to all areas where they are needed

    e.  evaluate existing digital resources for compliance, prioritise and make any needed changes

    f.  adopt the procedure in all Colleges, Schools and Portfolios.

(10) To ensure progressive implementation of accessibility, RMIT will adopt mechanisms to evaluate its progress and will provide resources to enable digital specialists to deepen their understanding of accessibility. Refer to Section 5 below for the definition of a digital specialist.

(11) RMIT develops priorities for compliance with accessibility standards, particularly for key strategic platforms, such as AEM, Canvas, Salesforce, Workday and Microsoft 365.

(12) Colleges, Schools and Portfolios must implement the procedure where possible within existing resources, with ongoing support provided by a pool of subject-matter experts.

(13) When procuring new digital systems, resources and tools, Digital Accessibility must be one of the dimensions evaluated during the tender process and as a non-functional requirement.

(14) Vendors are expected to provide a Voluntary Product Accessibility Template (VPAT), Accessibility Conformance Report (ACR), third party accessibility evaluations or any other form of evidence of commitment to digital accessibility during the procurement stage.

(15) Accessibility must be considered during the entire relationship lifecycle with vendors. If accessibility information was not provided during the procurement stage, or if a product was adopted without following the tender process, accessibility must be assessed during contract renewal.

(16) RMIT does not accept non-compliant resources on an ongoing basis and advises vendors that improvements need to be demonstrated clearly in a product roadmap or RMIT will seek alternative solutions.

(17) This procedure is continuously amended in response to developments in new technology and to address any existing online resources that may inadvertently have been excluded.

(18) The RMIT Accessibility Working Group makes recommendations to the associated Policy Owner on any amendments to this procedure as external digital accessibility standards and technologies evolve.

(19) RMIT acknowledges that compliance with digital accessibility standards must be complemented with a human-centered approach that includes the perspectives of people with disability and how they use digital systems.

(20) The RMIT Accessibility Working Group must consult with people with disabilities and subject matter experts to ensure its recommendations align with the needs of people with disabilities. This consultation may be mediated through existing accessibility communities of practice, staff networks, or dedicated subject matter experts.

## Standards for Digital Content Accessibility

(21) These standards are based on the Web Content Accessibility Guidelines (WCAG) version 2.2, the latest version of WCAG at the time of publication of this procedure.

(22) This procedure must be updated so that it continues to reflect the latest version of WCAG.

| Resource | Minimum Standard |
| --- | --- |
| Vendor-supplied or licensed resources or systems (e.g. Canvas Learning Tools) and free online resources (e.g. wikis). | WCAG 2.2 Level AA. Additionally, when implementing these resources, any templates and customisations must aim to meet the following WCAG 2.2 Level AAA criteria. 1.3.6 Identify Purpose 1.4.8 Visual Presentation 1.4.9 Images of Text (No Exception) 2.2.6 Timeouts 2.4.9 Link Purpose (Link Only) 2.4.10 Section Headings 2.5.5 Target Size (Enhanced) 3.1.3 Unusual Words 3.1.4 Abbreviations 3.1.5 Reading Level 3.1.6 Pronunciation |

| Resource | Minimum Standard |
|---|---|
| Design templates and components (including branding and common visual and navigational elements for the University's websites). | WCAG 2.2 Level AA, plus the following Level AAA criteria:<br>1.4.8 Visual Presentation<br>1.4.9 Images of Text (No Exception)<br>2.2.6 Timeouts<br>2.4.9 Link Purpose (Link Only)<br>2.4.10 Section Headings<br>2.5.5 Target Size (Enhanced)<br>3.1.3 Unusual Words<br>3.1.4 Abbreviations<br>3.1.5 Reading Level<br>3.1.6 Pronunciation |
| Resources produced by digital specialists (including work commissioned from external parties and, as far as possible, resources produced by consortia or partnerships where RMIT is a member). | WCAG 2.2 Level AA, plus the following Level AAA criteria:<br>1.4.8 Visual Presentation<br>1.4.9 Images of Text (No Exception)<br>2.2.6 Timeouts<br>2.4.9 Link Purpose (Link Only)<br>2.4.10 Section Headings<br>2.5.5 Target Size (Enhanced)<br>3.1.3 Unusual Words<br>3.1.4 Abbreviations<br>3.1.5 Reading Level<br>3.1.6 Pronunciation |
| Resources produced by non-digital specialists (including work commissioned from students).<br>Non-digital specialists are encouraged to avoid using complex design elements such as image maps, dynamic content and scripts unless they are assisted by a digital specialist. | WCAG 2.2 Level A, plus the following Levels AA and AAA criteria:<br>2.4.6 Headings and Labels (AA)<br>3.2.3 Consistent Navigation (AA)<br>3.2.4 Consistent Identification (AA)<br>3.1.3 Unusual Words (AAA)<br>3.1.4 Abbreviations (AAA)<br>3.1.5 Reading Level (AAA)<br>3.1.6 Pronunciation (AAA) |
| Non-HTML resources: PDF documents | PDFs should follow the PDF Techniques for WCAG 2.0. Specifically, they should provide a logical structure and be tagged for accessibility. When possible, an HTML equivalent should be provided. |
| Microsoft 365 suite templates and documents: desktop and cloud (word processor, presentation slideshows, spreadsheets). | Follow best practice guidelines for creating accessible Word and other Microsoft 365 format files, as WCAG 2.2 does not apply to Microsoft documents. |

## Standards for Digital Content Authoring Tools

(23) The minimum standards for digital content authoring tools, i.e. software applications used for creating and publishing digital resources, are detailed in the table below. These tools include:

a. desktop publishing tools that enable conversion to digital format (e.g. Word, InDesign)

b. multimedia authoring tools (e.g. Captivate)

c. content and learning management systems (e.g. AEM and Canvas)

d. online web authoring tools (e.g. social media platforms).

(24) These standards are based on the Authoring Tools Accessibility Guidelines (ATAG) version 2.0, the latest version of ATAG at the time of publication of this procedure, and will be updated whenever needed to reflect updates to ATAG.

| Resource | Minimum Standard |
|---|---|
| Authoring tools developed or commissioned by RMIT | ATAG 2.0 Level AA |

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| Resource | Minimum Standard |
|---|---|
| Third-party authoring tools purchased by RMIT | All authoring tools that individuals must use to create digital content need to meet the ATAG 2.0 level AA standard where possible. But as a minimum, they need to fulfill at least these criteria:<br>a. support the production of accessible content<br>b. fully automatic processes should produce accessible content<br>c. authors should be supported in producing accessible content<br>d. authors should be supported in improving the accessibility of existing content<br>e. authoring tools should promote and integrate their accessibility features<br>e. be accessible to creators with disabilities. |
| Other tools and apps used for creating digital content | Authoring tools that the individuals can choose to use must support the production of accessible content:<br>a. fully automatic processes should produce accessible content<br>b. authors should be supported in producing accessible content<br>c. authors should be supported in improving the accessibility of existing content<br>d. authoring tools should promote and integrate their accessibility features. |

## Supporting Digital Accessibility

(25) Accessibility must be:

a.  inherent within the RMIT Project Framework and the software development lifecycle design, development and testing processes and corresponding documentation and templates

b.  considered when purchasing or licensing digital software

c.  clearly articulated when commissioning or inviting tenders for the procurement or design of digital software

d.  addressed where resources are commissioned from students or where student work is subsequently used as an official RMIT digital resource.

(26) When recruiting digital specialist staff, including contractors, knowledge of digital accessibility must be part of the selection criteria included in the position description, and selection panels must review the candidates' knowledge of accessibility and accessible design techniques.

(27) RMIT must provide professional development and other opportunities for digital specialist staff to supplement any gaps in knowledge they may have regarding digital accessibility. Refer to section 5 below for a definition of digital specialist.

(28) Staff, students and visitors of RMIT use a range of assistive technologies. The following assistive technologies are supported at RMIT and should be referenced by vendors, developers and RMIT staff to ensure accessibility of digital products:

a.  Dragon Naturally Speaking

b.  JAWS

c.  NVDA

d.  ZoomText

e.  ClaroRead

f.  Read and Write Gold.

## Compliance

(29) The standards in the procedure apply to all new resources and authoring tools developed, commissioned or purchased after the date of operation of this procedure.

(30) All reasonable attempts must be made to create, implement, customise, or source resources and authoring tools that comply with the standards.

(31) Where compliance cannot be achieved for digital resources, RMIT provides accessible alternatives as needed. Where accessible alternatives are needed for students or prospective students, the requirements of the Disability Standards for Education must be met.

(32) Where compliance cannot be achieved for authoring tools, RMIT warns creators of digital resources about the limitations of the tools they may be using, and:

a. provides information about workarounds for various resource elements (e.g. data table mark-up) where these exist
b. provides access to alternative solutions, such as seeking assistance from a digital specialist.

(33) Where workarounds or other solutions cannot be used to create a digital resource that meets the specified guidelines, RMIT provides accessible alternatives as needed.

(34) Compliance with this procedure and the RMIT Digital Accessibility Standards contained in it is the responsibility of the Head of School or service group that owns or has operational control of the digital resource.

(35) Compliance with this procedure is monitored by the RMIT Accessibility Working Group through the Digital Accessibility Practice Lead.

## Feedback and Review

(36) This procedure is reviewed every five years in accordance with the Policy Governance Policy.

# Section 5 - Definitions

| Authoring Tools Accessibility Guidelines (ATAG) | A W3C recommendation for building accessible-authoring tools that produce accessible contents. Authoring tools are software applications that people use to create web content. ATAG explains how to: <br>- Make the authoring tools themselves accessible, so that people with disabilities can create web content <br>- Help authors create more accessible web content by enabling, supporting, and promoting the production of content that conforms to Web Content Accessibility Guidelines (WCAG). |
| --- | --- |
| Digital accessibility | The practice of creating websites, applications and documents that can be accessed, navigated and understood by people from diverse backgrounds, including those with disabilities. |
| Digital resources | Digital technologies and content provided by RMIT enabling users to 'do something or know something'. |
| Digital specialists | User interface designers and developers, user experience professionals (including front end developers, mobile app developers, contractors and design firms). Digital content specialists (including content writers, marketing and communication professionals, learning/instructional designers, multimedia designers, contractors, web or multimedia design firms, etc). whose primary occupation or role is to create and publish digital resources). |
| Non-digital specialist authors or content creators | Professional and teaching staff engaged in creating or maintaining digital resources, but whose primary occupation is in some other field. Students commissioned to do work for the University. Users of online communications and collaboration tools. |

| | |
|---|---|
| Web Content Accessibility Guidelines (WCAG) | Internationally recognised standard created by the World Wide Web Consortium (W3C) with the purpose to "… make Web content more accessible to people with disabilities. Accessibility involves a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities.<br>Although these guidelines cover a wide range of issues, they are not able to address the needs of people with all types, degrees, and combinations of disability. These guidelines also make Web content more usable by older individuals with changing abilities due to aging and often improve usability for users in general." |

## Status and Details

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| **Policy Owner** | Fiona Notley<br>Chief Operating Officer |
| **Policy Author** | Mat Lewis<br>Manager, Inclusion, Diversity, Equity & Access |
| **Enquiries Contact** | Digital Accessibility team |