MeAC - Measuring Progress of eAccessibility in Europe

Summary of outcomes of the workshop entitled “eAccessibility-related Monitoring”

Brussels, 10th November 2008

Introduction

This document summarises the outcomes of an international workshop held at the premises of the European Commission, DG Information Society & Media on 10th November 2008. The event was organised in the framework of the "MeAC - Measuring Progress of eAccessibility in Europe" study funded by the European Commission.

The MeAC study generated two sets of eAccessibility indicators, one to reflect the implementation of eAccessibility-related policies and the other to reflect levels of eAccessibility achieved in different ICT domains. One key purpose of this endeavour was to create a global benchmark of the eAccessibility situation across Europe and internationally with the aim to support policy making in the field on the European level. The workshop aimed to assess, with the help of relevant policy makers and experts from the Member States, whether the MeAC indicators (as well as other current EU and Member State indicators) could be useful for an ongoing monitoring of eAccessibility. To this end, workshop participants were provided with a short briefing document in advance highlighting a number of more specific questions for discussion at the event:

- To what extent could the monitoring framework developed through MeAC feed into the development of an EU-wide eAccessibility monitoring framework?
- How well do the MeAC indicators and methods work to monitor eAccessibility on an ongoing basis? Are there any important eAccessibility issues that would need to be monitored further to these? If so, what would need to be monitored and in what way?
- What other data sources exist in the EU and beyond which measure eAccessibility on an ongoing basis? How can these be exploited for the purposes of ongoing eAccessibility monitoring at the European level?

In procedural regard, the workshop included:

presentation and discussion of the MeAC measurement approach and indicators,

presentation and discussion of selected examples eAccessibility related monitoring at the level of the Member States

discussion of transferability of current monitoring approaches.

The reminder of this document presents the main outcomes of each of these aspects of the workshop.

Presentation and discussion of the MeAC measurement approach and indicators

To set the scene, the study team presented the measurement approach and indicators developed for the purpose of the MeAC benchmarking exercise. A key aim of MeAC was to assess the status of eAccessibility and progress in the field across the 25 EU Member States and three comparison countries (AU, CA, US) with a view to producing benchmarking data to support eAccessibility-related policy making at the EU level (as a follow-up to the 2005 eAccessibility Communication). Since eAccessibility covers a wide range of different ICTs and related eAccessibility issues, the MeAC study focused on a number of important areas, selecting status indicators according to their measurability, policy linkage, suitability for benchmarking and feasibility within the scope of the study. The resulting indicator set is the first framework of that kind to have ever been developed and covers five key ICT areas: telephony (fixed-line, mobile, and a special focus on relay services and accessibility of emergency services), television (primarily the provision of TV access services, i.e. subtitling, sign-language interpretation, audio description), World Wide Web (according to W3C's WCAG1.0), computer hard- and software, and self-service terminals (with a special focus on accessible ATMs). Data on all these indicators was collected in the 28 countries under

observation in 2007 with the help of national correspondents in each country. The outcomes were presented in a benchmarking report and in the form of online country profiles via an online repository available at http://www.eaccessibility-progress.eu.

The presentation of the MeAC approach raised a number of questions and statements from the attendees directed towards a better understanding of what was monitored and how data where gathered.

Beyond this, a discussion arose around the monitoring of relay service provision in particular. Here, the issue was raised that monitoring whether such a service was available or not may not be sufficient. Rather "deeper" indicators which also reflect the quality of a given service may be required to provide a more accurate picture to what extent a given relay service provides a functional equivalent to ordinary voice telephony.

More generally, it was felt that text telephone relay services have been implemented in a number of countries, but that much less existed for users of sign language (such as video relay) and the issue of how such schemes could be funded was raised. It was reported that this seems to be a problem in some countries. It was noted that different approaches have been implemented in different countries, for example, direct public funding in Sweden and levies on phone bills in the US.

In one country video relay service was being set up on a trial basis and this was seen as an important step in showing the need and benefits of the services. The pilot service is used by only 350 people, and it was felt to be important to discover why the uptake is low when in countries such as the U.S.A a high and consistent demand has been shown.

Examples of Monitoring the eAccessibility situation in Member Countries

A number of presentations were given to illustrate eAccessibility-related monitoring efforts in various ICT domains

Web accessibility

Steven Sintini from CNIPA presented how web accessibility monitoring is being carried out in Italy. There proactive monitoring is carried out through various methods and there is a benchmarking scheme and logo available for the more accessible websites. There is also a centre that has been set up to promote web accessibility where webmasters can be trained in accessibility and have links with experts who can provide audits of sites.

A key finding of the work has been that one can have a comparatively large impact through relatively small and inexpensive dedicated informed groups. From a practical point of view, in some cases it seems important to look at what is feasible under given circumstances, and to encourage the best level of accessibility that can be achieved rather than compliance with a full set of existing requirements. It was felt that there may always be a need for exceptions, but it is important to look at how these are made or you can quickly reach the situation where everyone feels they have a reason to not be accessible. Various solutions currently used were put forward including a formal system for vetting reasons.

More generally, the efforts pursued so far have uncovered various problems around monitoring websites.

1) How do you define what is accessible
2) Just having guidelines does not guarantee an accessible website
3) Measuring accessibility of a website can depend on many factors including technical, structure and the skill level of the visitor.
4) Automatic testing is limited and you do need human assessors
5) The sheer number of websites makes it hard to conduct ongoing monitoring.

It was suggested that there may be a need for reflection on the Riga target of 100% accessibility for public websites - whether this is worth the cost or even possible at all. Obviously there are public websites where it is vitally important to provide full accessibility, but what should be done about old, rarely visited websites where the cost of redeveloping them to be more accessible might be high. It was suggested that it might be worth considering prioritising the most visited sites and let users know when there is a problem with a website.

From these points, a debate arose concerning whether automatic testing was sufficient, and it was felt by several participants that manual testing was required as well to adequately reflect the level of accessibility a web site has achieved. On the other hand, the issue was raised that quite a large number of web sites may be required to be monitored on a continuous basis in relation to compliance with relevant national legislation, and that combined automatic and manual testing may be difficult to achieve from a practical point of view. There was also mentioning of flanking monitoring activities covering people responsible for the creation of websites, i.e. webmasters, with a view to better understanding how web accessibility is implemented in practical terms.

More generally, the issue arose whether simple metrics that are currently used for web site monitoring may be discouraging for many web site owners as they may not give recognition to improvements that may have actually been achieved. More differentiated metrics may be required here, e.g. a border-line fail could be presented as a certain percentage of full compliance and not simply as “fail”. On the other hand it was argued that existing legislation may require a clear “yes” or “no” answer when it comes to compliance monitoring.

One other thought to come out of the session concerned how far accessibility rules can be pushed out from public sites to private companies, people’s personal websites and closed forums. This often varies according to a country’s individual implementation of eAccessibility.

TV broadcasting and telecommunications

Katie Hanson presented the state of access services in broadcast and relay services in the UK and the role of the regulator, OFCOM. In the UK, access service levels in broadcast have been set through legislation. All channels that have an audience share of 0.05% are expected to provide access services as long as the cost is no more than 1% of annual turnover. By 2013 targets have been set for 80% subtitling, 10% audio description and 5% sign language. Annual interim targets have been set for the channels affected.

The presentation emphasised the importance to have independent monitoring of channels to ensure targets are met and that users are involved in the monitoring process. As targets in the UK become higher, with some channels now aiming for 100% subtitling, users are now starting to look more at the quality of services rather than just quantity as was previously the case. Attendees felt this is something they had also seen and would expect to see more of in the future as targets continue to rise.

OFCOM monitors the actual levels of access services provided by all channels and is in regular communication with services providers. It has the power to ensure broadcasters meet their targets and if they fall below these targets they can introduce penalties. Instead of financial penalties broadcasters that have not reached their targets are most often required to meet an even higher target (not just to catch up) than they would otherwise have had to in the following quarter. There are also rules for electronic programme guides (EPGs) to ensure that there are standard indications for access services so users can easily identify those programmes most likely to meet their needs. OFCOM has recently changed the way that smaller channels can provide sign language by allowing them to pay an amount similar to the cost of providing sign translated material to a trust which will provide signed programmes on their behalf. One area that is still a problem in the UK is about informing users of the services available. Audio description is a hugely valued service but many users simply do not now it is available or how to get it.

As regards telecommunications services, OFCOM also monitors relay services provided in the UK under the Universal Service regulations. Monitoring includes looking at areas such as response times, dropped calls and call quality.

A debate following the presentation touched on which programmes should have subtitles and also on how to assess quality. Issues identified included how to define what meaningful dialogue was and providing a text equivalent for sounds, for example some children's programs just have sounds but no actual spoken words.

More generally, it was felt that mutual exchange of experience with monitoring of eAccessibility in the area of broadcasting and telecommunications would be helpful. It was noted that there is currently not much exchange on that matter among regulators in the variouse Member Sates. At least in part, this may be due to the fact that national monitoring activities seem to be closely related to the given legislative situation (i.e. requirements imposed by relevant regulation/legislation) which varies considerably across countries. It was for instance discussed that legislation in the UK does not just enable OFCOM to monitor any given legal quota for provision of TV access services, but also to develop secondary legislation in the form of regulation, e.g. in terms of standards. This has been used to develop quality standards for TV access services, which are now monitored as well.

Cross-sector Monitoring

Natividad Enjuto García from Dirección General de Coordinación de Políticas explained the situation in Spain and the legal framework under which this operates (see Appendix 4). In Spain there is a law concerning accessibility requirements and a strict procedure to be followed in the case of non compliance. If a person feels that they have a problem they first have to approach the company involved and see if it can be resolved directly. If this is not possible then the complaint is escalated and may be taken to arbitration. If this is still not successful then the route is open for the case to go to court where the possibility exists for financial penalties.

From 1 January 2009 all government websites must be accessible to all, so if there is a problem, people can complain then. Accessibility of TV in Spain is still not directly regulated, but it is hoped that it will be in the future.

Transferability of current monitoring approaches

A discussion was held about the suitability of current monitoring approaches for purposes of ongoing monitoring in the future. It was highlighted that over-simplistic monitoring should be avoided. More generally, it was noted that there are many ICT areas not yet covered, so the question arose how these could be addressed and how cross-country methods could be made comparable?

One challenge for the implementation of comprehensive eAccessibility policy and monitoring (to cover all of the sectors and issues of relevance) is that in most countries there does not seem to be a single "place", e.g. a Ministry, where eAccessibility as a whole is covered. Overall, much of the eAccessibility monitoring activities that can be found in the Member States seem to focus on accessibility of web sites rather than other ICT domains, and this may reflect the fragmented overall situation when it comes to eAccessibility related policies more generally (e.g. in terms o eAccessibility themes addressed and approaches used). In this context, the issue of the relationship between eAccessibilty and eInclusion was raised, and the possibility to build future eAccessibility monitoring within the wider eInclusion context. In several countries policies and related monitoring efforts are directed towards eInclusion which is broader than eAccessibilty. eAccessibilty is quite a large field in its own right but eInclusion can be considered to be even broader, looking at wider areas of society.

Another issue that was raised concerns the question how exactly to define what should be monitored. Especially with areas such as web sites do you only look at government/public services and where do you draw the line? Related to this, a discussion emerged on how to compare results between different countries. The discussion suggested that web accessibility has up to now received most policy/legislative attention, but every country appears to approach monitoring in a slightly different way and it is difficult, if not impossible, to compare results between countries. If possible it would be good to have a set of defined criteria that would allow direct comparison between countries. This direct comparison would potentially become a useful tool in encouraging those countries which are falling behind to improve.