

ACCESSIBILITY

POLICY

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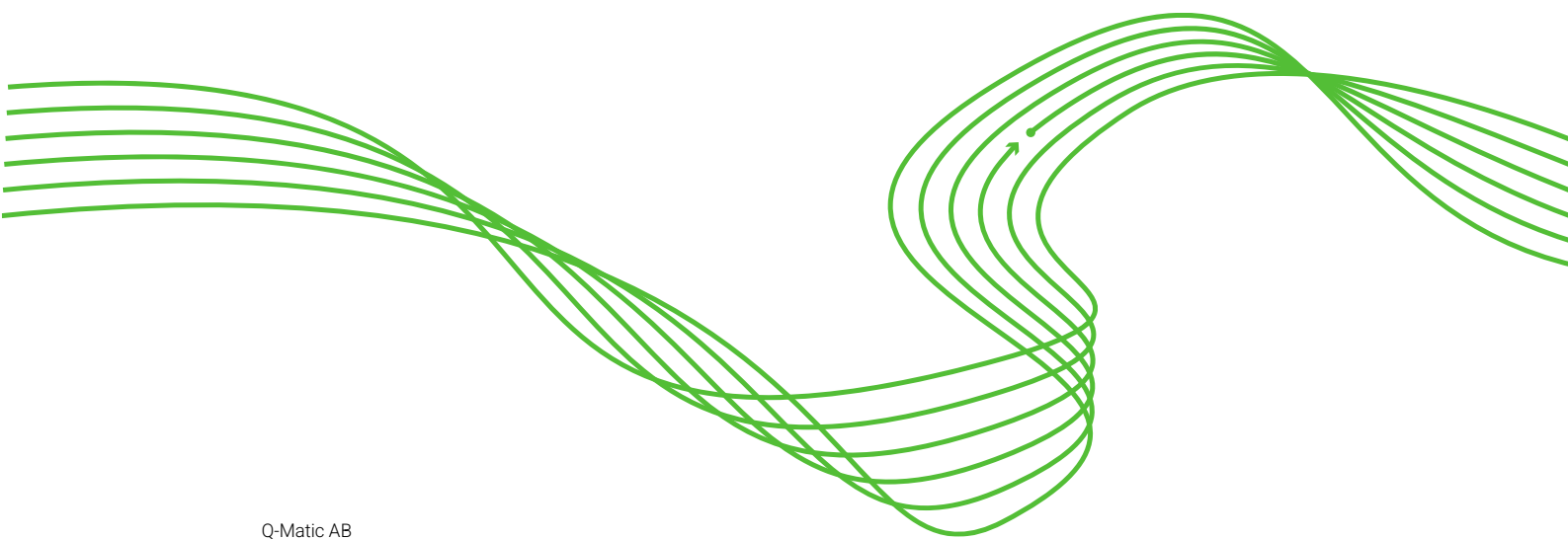


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WHAT IS ACCESSIBILITY?

Accessibility is about all people, regardless of ability, being able to participate in society in an independent way. This means everything from being able to move and orientate oneself in the physical environment to absorbing information and performing services, but also being treated well and having a chance to communicate on one's own terms. Accessibility is about the whole of life, and the whole person.

Digital accessibility

Digital accessibility is about you taking people's differences into account when designing and developing services. When accessibility works, we do not think about it, it becomes invisible. We only mark it if it does not work. There is no need to develop products and services that are difficult to understand or use.

Society's rules, laws and guidelines

Laws, regulations, guidelines and recommendations govern what applies to the public sector.

UN Convention

The Convention on the Rights of Persons with Disabilities and its Optional Protocol (A/RES/61/106) was adopted on 13 December 2006 at the United Nations Headquarters in New York and was opened for signature on 30 March 2007. There were 82 signatories to the Convention, 44 signatories to the Optional Protocol, and 1 ratification of the Convention. This is the highest number of signatories in history to a UN Convention on its opening day. It is the first comprehensive human rights treaty of the 21st century and is the first human rights convention to be open for signature by regional integration organizations. The Convention entered into force on 3 May 2008.

[Convention on the Rights of Persons with Disabilities](#)

European standard for accessibility requirements when procuring IT products and services, EN 301 549

The European procurement standard contains technical and functional requirements for IT in a broad sense. In addition to the web, the standard covers, among other things, vending machines, telephones and computers. It is probably the most comprehensive standard for IT accessibility, and it has been developed in close collaboration with US Accessboard in the USA to correlate as far as possible with the American requirements. With the tightening of the Public Procurement Act, EN 301 549 applies as a minimum requirement for procurement. In Chapter 9, the standard points to WCAG 2.1, level AA, for the web. When the public sector procures IT and the web, it is thus from 1 January 2017 a MUST requirement to set requirements for accessibility. EN 301 549 is a minimum requirement, which means that you can set higher and / or additional requirements, see below.

Subject Policy for accessibility

qmatic.com

[EN 301 549, English \(PDF-file\)](#)

Web Accessibility Directive, WAD

As of September 23, 2018, the Web Accessibility Directive entered into force for EU Member States. The Web Accessibility Directive has been transposed into Swedish legislation and has been named the Act on Accessibility to Public Digital Services. The law covers the entire public sector and applies to websites, intranets, documents and apps. There are also requirements for website owners to publish a so-called accessibility report, where any accessibility problems must be documented. It must also be possible for users to receive support in the form of alternative formats. The requirements that the various interfaces must meet are the requirements in EN 301 549, chapters 9, 10 and 11.

Note: Example of country that has gone further than the minimum legal requirements are Finland that has included also bank and insurance in the included sectors that needs to follow WAD.

Section 508, of the Rehabilitation Act

Section 508 is part of the US Rehabilitation Act, which requires US federal agencies to make their information and communications technology accessible to people with disabilities. It states that access must be in a “comparable manner to the access experienced by employees and members of the public without disabilities.”

Section 508 compliance affects all federal agencies and the vendors, contractors, and partners of those agencies.

In 2018 Section 508 was updated to align with the Web Content Accessibility Guidelines 2.0 (Level AA).

Section508.gov provides guidance to Federal agency staff who play a role in IT accessibility.

<https://www.section508.gov>

HOW DOES THIS AFFECT QMATIC?

Qmatic's has an ambition of being a supplier of accessible system and solutions. Even if the law doesn't apply to us, it applies to many of our customers.

This applies to Qmatic

Digital services covered by the law must meet the requirements to be:

- Possible to perceive
- Possible to handle
- Possible to understand
- Robust

What is covered:

- Websites
- Intranets and closed systems such as extranets.
- Documents, PDF-files for example

Exceptions that also apply to Qmatic:

- Live broadcasts of film or audio.
- Film and sound published before 23 September 2020.
- Maps not intended for navigation
- Maps intended for navigation, if essential information about their contents is provided in an accessible digital way
- Documents not used for administrative purposes published before 23 September 2018.
- Reproductions of objects from cultural heritage collections that cannot be made fully accessible without significant obstacles.

What is required if the digital service is covered by the law:

- By complying with a specific European standard (EN 301 549 V2.1.2), which in turn is based on WCAG 2.1, websites and mobile applications can live up to the requirements.
- The law also contains provisions that public actors must provide a so-called accessibility statement, which must, among other things, describe how the relevant website or application meets the requirements.
- This means that our customers and their organization need to know how well our digital services meets the requirements.

See Appendix 2 for a checklist of what is required to comply with the law.

Qmatic policy

Qmatic is committed to providing accessible products and works continuously toward improving accessibility. Support for assistive technologies is regularly reevaluated and appropriate product changes added to the development stream. As a result, we are constantly striving to make products easy to use and exceed the expectations of the legal requirements.

Declaration of accessibility level

Qmatic’s software generally falls under the WCAG 2.1 AA rules.

Qmatic hardware falls into groups:

- Entry point devices such as kiosks and printers which customers and employees can initiate a customer visit – sometimes involving printing a paper ticket.
- Customer notification devices when customer ticket numbers are call fall into two categories; audio announcements and visual LED displays. All information is repeated in both.
- Other items are largely provided as connection hardware and there is no day-to-day user activity for them.

Qmatic software products fall into several broad categories.

1. Software created webpages used by end customers, generally the public. These are pages that typically allow a customer to make an appointment.
2. Software that is intended for our client’s staff to use the system. These are typically people serving customers in a face-to-face environment, such as a public office, retail store, or healthcare facility.
3. Software that is used by administrators of the system (usually restricted to one or two people in the client headquarters). Several of the utilities require functionality that would render them a disproportional investment burden to be fully accessible.

Internal inventory of websites and systems

The first step is to map which websites, services, apps and other digital services are provided by Qmatic.

Then you need:

- Identify if the site/system is covered by the law for our customers
- Identify if there are accessibility issues on the website
- Develop an action plan
- Prepare an accessibility report

Identify if the website/system is covered by the law

Website means one or a number of web pages that are held together in some way, for example by having the same domain name, a common appearance or some systematic way of navigating between the pages.

Is the website covered by the law?

- Is the website an external web that is accessible to the public?
- If so, then the website is covered by the law.
- Is the website an internal information-based system for the employees, a so-called intranet?
- If so, then the website is covered by the law.
- Is the website a closed system aimed at, for example, students, other organizations or partners, a so-called extranet?
- If so, then the website is covered by the law.
- Is the website an e-service accessible to the public?
- If so, then the website is covered by the law.

Validating if there are accessibility issues

If the website is covered by the law for our customers, the next step is to identify the shortcomings. Each page needs to be inventoried, and the inventory needs to include both technology, pedagogy and content.

Check for defects by:

- self-monitoring of the website
- independent party control
- automatic monitoring (NOTE: most requirements cannot be measured automatically)

With self-inspection, it is easier if there is a clear breakdown of the requirements that must be met. The requirements to be met shall be based on the accessibility level that Qmatic shall follow. It is difficult to refer only to a WCAG point, as WCAG is written by experts for experts, and requires interpretation. Some WCAG points need to be broken down to be applicable to different types of content and features. Develop requirements lists with a definition of the requirements that Qmatic must comply with and the approval level for these. Get help from experts if there is uncertainty.

Group the shortcomings based on technology, content and pedagogy to know in which area and role the shortcomings need to be remedied. But keep in mind that the different areas often go hand in hand and there needs to be communication between developers, editors and designers when the shortcomings are remedied.

Evaluate if there are exceptions (disproportionate burden)

The law states exceptions regarding accessibility requirements if it is unreasonably burden to meet the requirements.

If the assessment is made that a certain digital service should be exempted from the adaptation because it requires a disproportionate burden, this shall be stated in the accessibility report.

When an assessment of an adaptation of the website requires a disproportionate burden, the size, nature of the tasks and resources of the public actor must be taken into account. But also estimated costs and benefits for the actor in relation to the benefits for people with disabilities.

Set up an action plan

Once the shortcomings have been identified, a plan needs to be set for how these are to be remedied.

- Prioritize the shortcomings
- Set a schedule
- Decide whether shortcomings should be remedied internally, see also the chapter How do we work with accessibility in internal development?
- Decide whether deficiencies should be remedied with the help of an external supplier, see also the chapter How do we order accessibility from an external party
- Test and check accessibility

Prioritizing what to correct

If several shortcomings are discovered, the work may need to be prioritized, and a step-by-step plan put forward. This can be done, for example, by identifying which shortcoming provides the greatest benefit to the users, for example by:

- Is it a service that many of our visitors use?
- Is there any user group that is completely excluded from the service?
- Is there a shortcoming that affects several user groups?

Preparing accessibility reports

The accessibility statement is a self-declaration from website owners about how accessible the website is. It should primarily be for the end user, but it should also facilitate supervision for the supervisory authority.

The accessibility statement must be:

- In an accessible format
- Easy to find

The accessibility statement can be placed in the footer or header, then it can be accessed regardless of which page the user is on. Alternatively, it can be placed a maximum of two clicks away for the user, for example under "About the website". For apps, it can be located where you download the app so that it can be viewed in advance.

The accessibility statement must describe and contain:

- Which and what
 - Organization
 - Website
 - Law

- Compliance status
 - Fully compliant, partially compliant, not compliant
 - Describe which accessible issues are present:
 - Address the end user in the descriptions
 - Do NOT refer only to WCAG Success Criteria.
 - Indicate if there are alternatives
 - Describe the timeline for fixing the issue.

- Method
 - Date of the report
 - How the accessibility validation has been performed

- Feedback function where the user report accessibility issues and ask for alternatives.
 - Describe how function works, response time and so on.
 - Feedback mechanism, for example form or email.

- Supervision and complaint's function
 - If the user is not satisfied with the feedback, there should be a link to the complaints function at enforcement body

- Update the accessibility statement regularly, at least annually.
 - Enter the date when it was last updated

See Appendix 3 for a checklist regarding the preparation of an accessibility statement.

HOW DO WE WORK WITH ACCESSIBILITY IN OUR INTERNAL DEVELOPMENT?

Organization regarding the accessibility work

Accessibility is everyone's team responsibility. It is difficult as a single person to run all the accessibility work in an organization. Not all employees can know everything about everything, therefore one or a couple of people from each team / group should be appointed to be the driving force in the accessibility work. These people can then be part of a cross-functional accessibility group where the members work together with the organization's accessibility and support each other. The people then take the knowledge with them and spread it in their own team.

Accessibility must be part of all phases of the development work, and also part of the retrospective. When new employees are added to the organization, they will be made accessible as part of their onboarding. Accessibility should be a natural part of the business.

Training

Review the general level of knowledge regarding accessibility. One goal of the organization should be to increase the general level of knowledge regarding accessibility. This can be done through training and certification. When it comes to what training the employee should attend, it is important to think about the target group. For example, editors should attend a training course aimed at them where they can learn more about how to publish accessible content.

By giving employees increased knowledge, it leads to the organization being able to improve its digital services, which in turn leads to the user getting a better experience.

Knowledge is also important in the process of ordering accessibility. If you understand the need for an accessible service, it is easier to search for products or set requirements that meet the standard.

Set accessibility requirements in projects

To know what we are going to develop or develop for websites, documents, films or other formats, we need to define clear requirements regarding accessibility. The requirements shall be based on the level of accessibility that we have decided to follow, see the chapter Declaration of accessibility level.

A good way to set accessibility requirements is to produce requirements lists that are adapted based on the organization's goals and conditions. Requirement lists must be available for:

- Web solutions
- Document
- Content

Start from standards but break apart and concretize the requirements based on our business. It does not work to write "comply with WCAG" or only refer to WCAG points. WCAG is written by experts for experts and requires interpretation, see more under the chapter Following standards.

By breaking apart and detailing the various WCAG points, it facilitates both setting requirements, self-control and as a basis for procurement. As far as possible, there should be no room for interpretation, for example it should be possible to answer yes or no if a point is met or not.

Validating and testing

To carry out your own tests and checks of accessibility, knowledge is required. If you are above, get help from experts.

There are different ways to test accessibility:

- Automatic tools
- Manual tests
- Practical tests with aids
- User tests

Automatic tools vs manual tests

There are a lot of automated tools on the market, which can be useful in identifying problems and giving an idea of how accessible a website is. These tools can be used to find problems, but keep in mind that an automated tool can never verify that there are no problems.

A concrete example applies to alternative text for an image. Automatic tools can identify if there is an alt attribute and check that it is not blank, but it cannot determine if the text is suitable for the image or if the image is decorative. It requires a manual assessment.

It is important to distinguish between automated tools that try to determine if a web page is accessible or not and the tools that can be used to manually control various aspects of a web page.

User testing

To understand what actually works and does not work, there are no shortcuts, but users must be involved. Bring in different users with different conditions and let them test the solution. To avoid that adjustments, need to be made at a late stage, users should be involved in all development phases from concept to finished product, thus it is easier to detect potential problems early.

HOW WE PURCHASE ACCESSIBILITY FROM EXTERNAL PARTY

There are two things that are important to you as a customer:

- Make clear demands
- Follow up

If you do not set requirements that the supplier understands or do not follow up that the delivery is correct, you cannot count on getting an accessible solution. There are an enormous number of good suppliers on the market, but few have accessibility as their focus. Therefore, it is important that you as the customer are very clear about what you want. Otherwise, it will be too difficult for the supplier to interpret, and there is a great risk that you will not agree or be disappointed.

To set accessibility requirements

Depending on what it **is** you are ordering, different requirements are relevant. Basically, your requirements should be based on current standards and regulations. But there are often reasons to design specific requirements for your particular organization, which both complements and tightens the requirements further. What you ultimately buy in depends on whether your internal policy is to only follow the law or go beyond the law. See the chapter Declaration of accessibility level for what applies to Qmatic.

To set requirements on a web solution

If you are going to buy or build a web solution, you must set the accessibility requirements concretely. For large and medium-sized organizations, it is very resource efficient to have complete requirements lists for accessibility that are adapted to the organization's goals and conditions. The requirements list should include web solutions, PDFs and other formats that you often procure or order.

That way, you can ensure that both external and internal suppliers know what applies. The alternative is to design requirements based on current standards for each procurement or purchase.

Meeting a standard

What does not work is to write "follow WCAG" or similar. The global standards are written by experts for experts and must be interpreted locally. This is called "accessibility supported" and has to do with the fact that prescription of aids, internet penetration, access to different devices and so on are very different around the world.

A standard that is technology-independent and should work just as well in Sweden as in Uganda must simply be interpreted differently depending on the users' different conditions. The 50 success criteria contained in WCAG 2.1 at level AA thus need to be clarified in order to function as requirements. For example, WCAG states that each interactive object (such as links and buttons) should have a description for severely visually impaired users showing what it is doing.

This can be done in a variety of ways, for example with different html attributes, with wai-aria or by using standard components in the techniques. But not all methods work equally well with all browsers or all aids. The aids and browsers used in a particular country or region thus determine the way in which we must specify the function of the object.

Another concrete example of this is links. A link should describe where it leads, it can be done with a good link text or by adding a title text (description set in the html attribute "title"). But the tools always used today do not capture the title attribute unless the users have been deep in the settings and changed, something that few users are aware of. So today this is not a good solution. Determining it requires in-depth knowledge of the users, tools and technologies, something that a regular web agency does not have.

Requirements for Documents

In order for a website to be considered accessible in all respects, the content must also be accessible. A website can thus not be called accessible if there is a cross-stop for some users when they try to read PDF files, no matter how good the website is otherwise.

When ordering PDF files, require that the PDF file must follow the techniques from the organization W3C (Word Wide Web Consortium) which are described in the document "PDF Techniques for WCAG 2.0".

To be able to work with the accessibility of PDF documents and to be able to check the accessibility of PDF documents, a license with Adobe Acrobat Pro is required.

[PDF Techniques for WCAG 2.0](#)

Requirements on Content

Whether it is a website or a document, it is relevant to make demands on the content. Information must be presented in a way that suits as many people as possible. Many times, it can mean a film or illustration.

Film can be a great way for many to share content. In order to meet WCAG 2.1 level AA, films must be subtitled, so that, for example, users with hearing impairments can take part in the content. There must be visual interpretation so that users with visual impairment can take part in the content shown in the film.

Accessibility requirements in contracts and procurement

When you demand that a new website or document be accessible, you should include a clause that a solution that does not comply with the requirements should be seen as a delayed delivery. It is only when the solution meets the set requirements that it should be considered complete. If there are delays, you as a customer should receive compensation from the supplier.

If you encounter a situation where there is no solution that meets the requirements, you can ask the suppliers to explain what deviations there are and what the schedule is to remedy the shortcomings that exist. After that, you can enter a requirement that the improvement work also takes place according to schedule.

To follow up

It is not enough to make demands. Many providers click "yes" on the question of whether they can offer accessible solutions, without really understanding what it means. You as a customer already need to ask for references in the procurement that prove that the supplier has actually delivered accessible before. Also be clear that you will check that the delivery complies with the set requirements. In this way, you are clear that you take accessibility seriously and that the supplier will not be able to cheat through the assignment.

If you have set clear requirements, you must measure against precisely these requirements. Keep in mind that it is a complex area to test and verify accessibility. You do not become an expert just by reading about how it should work. You have to build an experience around the questions and test with many different users to become really sure of what works and does not work in practice. If you have the opportunity, you should bring in expert help until you have built up the competence internally. You can read more in the section "Checking accessibility"

APPENDICES

Appendix 1 – Exceptions in the law

Note: examples are given out of the European law

Internal systems

The internal systems that are deemed to be covered by the law are intranets that are designed as internal information-based websites aimed at the organization's employees.

Content on websites that are only accessible to closed groups and not to the public as such, which were published before 23 September 2019 until such websites undergo a comprehensive review are excluded.

In the case of internal systems such as case management systems, personnel administration systems or other internal web-based systems designed or used by a limited number of persons, these are not covered by the fees.

But with that said, there are other provisions, for example in the Discrimination Act regarding accessibility. In order for people with a disability to have access to equal conditions in working life or education, various internal systems and services used need to be possible to use.

Third part digital services

Digital service provided by the organization through a website or mobile application that is under the control of a third party shall comply with the accessibility requirements as far as possible. This may, for example, be a digital service provided through social media.

Third-party digital services that have neither been funded nor developed by the organization or are under its control are exempt from the law.

That being said, this includes, for example, third-party products that are purchased by the organization, and thus these need to be accessible. Then it is important to make a claim to the supplier or request to see an accessibility declaration of the service, see more under the section "How do I order accessibility?".

Maps

In the case of maps, they are not covered by the law unless they are intended for navigation. The law is also not applicable to maps intended for navigation if essential information about the content of these is provided in another accessible digital way. In practice, this can mean that if you have a map to show where the campus is located, provide the full address in text outside the map.

Documents

File format for documents published before 23 September 2018, if such content is not needed to carry out the active administrative procedures resulting from the tasks of the public actor concerned.

Media

Media format refers to the following types: audio only, video only, combination of audio and video and audio and / or video only combined with interaction.

Live broadcast time-dependent media is exempt from the law. Pre-recorded time-dependent media is not covered by the law on it published before 23 September 2020.

Historical material

Reproductions of objects from cultural heritage collections that cannot be made fully accessible without significant obstacles.

Old content

Content that is neither necessary for active administrative procedures nor updated or edited after September 23, 2019.

User generated content

The website owner is not responsible for the content created by visitors in comment functions or the like being accessible.

Appendix 2 – Checklist to live up to legal requirements

- Inventory of websites, apps and other digital services.
- Identify if the site is covered by the law
 - Is the website an external web?
 - Is the website an intranet?
 - Is the website a closed system, such as extranets?
- Identify when the site is covered by the law for our customer.
 - External websites must meet the requirements since 23 September 2020
 - Intranets published after 23 September 2019, must meet the requirements on 23 September 2020.
 - Intranets published before September 23, 2019, must meet the requirements only after they have undergone a comprehensive audit.
- Identify the shortcomings of the website.
- Identify if there are other formats such as PDF documents and movies on the site.
- Live up to the requirements of accessibility.
 - Follow the European standard (EN 301549).
 - For web solutions based, the international standard WCAG 2.1 level AA applies.
 - Based on our declared level of accessibility
- Customize accessibility documents.
- Customize accessibility movies.
- Publish an accessibility report.
- Establish a feedback function
 - Including an organization that takes care of the feedback.
- When new features and content are to be published, ensure that they meet the requirements before publication.

Appendix 3 – Checklist for creating accessibility statements

What

- Enter the name of the authority.
- Enter the name of the national law.
- Enter the site name.

Status

- Current status (Meets the requirements completely, Meets the requirements partially or Does not meet the requirements at all)

Accessibility issues

Indicate what is not accessible and why.

- Describe shortcomings (Write to the end user)
- Offer alternative solutions or formats.
- Timeline for fixing the issue

Feedback

- Describe and link to your feedback function.
- Describe how you work with views.

Supervision

- Describe and link to the complaint function at the supervisory authority in the appropriate country.

About the report

- Enter the date of publication and updates of the report.
- Describe which method has been used to produce the report.
- Publish in an accessible format.
- Place the accessibility report in a prominent place, preferably globally in the header / footer.

Appendix 4 – Checklist for internal development projects

- Define clear requirements for accessibility, use requirements lists, preferably both for the entire project and specific roles in the project.
- Review the level of education regarding accessibility in the team / teams.
 - Does the competence need to be increased?
- Appoint people responsible for accessibility work.
- Create forums to discuss accessibility.
- Intended time to test the accessibility and to ensure competence to test accessibility requirements.
- Plan for user tests.
- Follow up the accessibility work on the retrospective.
- Document routines
- If necessary, seek the help of external experts.

Appendix 5 – Checklist for accessibility when purchasing from an external party

- Set requirements based on our declared level of accessibility.
- Develop and start from concrete requirements lists for
 - web solutions
 - PDFs
 - other formats that are often procured or ordered
- Set requirements for documented competence regarding accessibility.
- Request references on other projects from the supplier that meet the requirements of the law.
- When ordering, clarify that a delivery that is not meet accessible requirements will not be considered complete and thus as a delayed delivery.
- Check and test the delivery against the set requirements