MINISTRY OF SOCIAL DEVELOPMENT
TE MANATŪ WHAKAHIATO ORA

2 2 JUN 2021

Tēnā koe

On 5 May 2021, you emailed the Ministry of Social Development (the Ministry) requesting, under the Official Information Act 1982 (the Act), the following information:

- *Reports, briefings, memos, written advice, and Aide-mémoire's relating to the accessibility of MSD's online services.*

On 7 May 2021, the Ministry contacted you to clarify your request, you confirmed that you would like to proceed with the following:

- *Reports, briefings, memos, written advice, and Aide-mémoire's relating to the accessibility of MSD's online services both internally and that sent to the Minister from the period 2017.*

In 2018, the Ministry signed the Accessibility Charter which is a commitment made by Government agencies to enable disabled people to experience the same access to information as other New Zealanders.

A core component of the Ministry's accessibility work is to ensure existing online services are compliant with the New Zealand Web Standards for usability and accessibility. This means the Ministry will use appropriate language, design, and formats for its intended audience.

More information about the Accessibility Charter be found here: www.msd.govt.nz/about-msd-and-our-work/work-programmes/accessibility/the-accessibility-charter.html.

The following documents are enclosed in response to your request:

- Document 1 - *Web Standards Self-Assessment 2017/18 Report*
- Document 2 - *MSD Self Service Portal Accessibility Evaluation Report*
- Document 3 - *Information for six-monthly report to Minister for Disability Issues*
- Document 4 - *MyMSD Baseline Accessibility Audit*
- Document 5 - Work and Income Accessibility Audit Report
- Document 6 – Report - *Report for Social Development Data*
- Document 7 - *Report for Studylink Connect*
- Document 8 - *Accessibility Management Team Meeting*

Please note that for document 2 - *MSD Self Service Portal Accessibility Evaluation Report,* the testing was completed before the launch of the new kiosks, the critical and severe issues were addressed before the live launch of this service.

You will note that some information has been deemed to be 'outside of scope' of your request, as this information related to Ministry staff names and contact details who are below tier 4 and/or who are not decision-makers. A small amount of information was also administrative in nature.

One Report which has been identified as being in scope of this request has been withheld in full under section 9(2)(b)(ii) of the Act as, if released, it would be likely to prejudice the commercial position of the person who supplied or who is the subject of the information. The greater public interest is in ensuring that the commercial position can be maintained.

The principles and purposes of the Official Information Act 1982 under which you made your request are:

- to create greater openness and transparency about the plans, work and activities of the Government,
- to increase the ability of the public to participate in the making and administration of our laws and policies and
- to lead to greater accountability in the conduct of public affairs.

This Ministry fully supports those principles and purposes. The Ministry therefore intends to make the information contained in this letter and any attached documents available to the wider public. The Ministry will do this by publishing this letter and attachments on the Ministry of Social Development's website. Your personal details will be deleted, and the Ministry will not publish any information that would identify you as the person who requested the information.

If you wish to discuss this response with us, please feel free to contact OIA_Requests@msd.govt.nz.

If you are not satisfied with this response regarding the accessibility of the Ministry's online services, you have the right to seek an investigation and review by the Ombudsman. Information about how to make a complaint is available at www.ombudsman.parliament.nz or 0800 802 602.

Ngā mihi nui

Felicity Drader
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Client and Internal Communications

Web Standards Self-Assessment

2017/18 Report

Prepared by
Senior Business Analyst
Web and Applications Team
Ministry of Social Development

This report should be read in conjunction with the test results recorded in the spread sheet sent with this document.

Introduction

The Ministry of Social Development (MSD) owns numerous websites, web applications, intranets, and extranets, known collectively for the purposes of this document as the websites. The Department of Internal Affairs (DIA) Web Standards Self-Assessment (WSSA) requires each government agency to report back to DIA with an assessment on how well their websites conform to web standards compliance and WCAG2.

The WSSA Methodology is not intended to comprehensively test against all requirements of the Web Standards, nor will it deliver a formal compliance score or ranking. Rather, it outlines a series of tests whose results are an actionable indicator of how well our web content is meeting the intent of the Web Standards.

The 2017 WSSA Methodology focuses on the most common issues identified by agencies in the 2014 Self-Assessments. These results will help to identify and measure web standards improvement over time.

The WSSA Methodology will not tell us if these websites are fully accessible or usable.

It is recommended that a full assessment be done and all the websites tested against all requirements of the Web Accessibility and Web Usability Standards.

Page selection

Using the WSSA methodology, our agency has determined that the most visited websites from the 29 websites whose analytics we track, for the period 1 Nov 2016 - 1 Nov 2017 and based on page views, are:

- MyMSD (67,010,433 page views)
- MyStudyLink (38,147,353 page views)
- Work and Income (22,862,911 page views)
- Doogle, MSD's intranet (15,310,802 page views)
- StudyLink (13,312,032 page views)
- MAP Intranet (6,322,640 page views)
- Work and Income – My Account (2,970,663 page views)
- Ministry of Social Development (2,216,332 page views)
- Working for Families (2,088,494 page views)

Three websites were chosen for the WSSA based on:

- Google Analytics most visited websites
- A representative from external, internal, and an external site accessed via a login page

- Anecdotal feedback on inaccessible components of MyMSD, which is a high-profile website
- Two websites were completely revamped in 2016 and 2017, which were not targeted (StudyLink and Work and Income)
- Work and Income – My Account has since been retired and is part of MyMSD.

The websites chosen were:

- MyMSD - Outside of scope
- Ministry of Social Development (corporate website, MSD) - http://www.msd.govt.nz/
- Doogle (MSD's intranet) - Outside of scope

Pages selected for testing were representatives of a cross-section of templates, and included tables, forms, lists, images, non-HTML links, videos, and calendars, as set out in the WSSA Methodology.

MyMSD is accessed using secure login either directly via the site using a client number and PIN, or via login with RealMe.

Due to the nature of the sensitivity of the information within MyMSD and the constraints of testing with live data in a production website, testing was undertaken on the stubbed, Bluemix MyMSD training environment, which is production-ready.

One of the reasons MyStudyLink was not chosen, was the difficulty of testing on the production site, due to similar issues faced with testing on the MyMSD production site.

Doogle, the corporate Intranet, consists of a mix of different backend solutions: the core content management system uses TeamSite but also uses a separate module for the online forms, as well using Confluence for news content. Templates for the online forms, the TeamSite backend solutions, and news items on Confluence have been used in this assessment.

Testing tools

Google Chrome version 64.0.3282.140, with the Web Developer and aXe extensions installed, was the browser used for testing the websites. IE11 version 11.0.9600.18920 was used for testing keyboard use, as set out in the WSSA Methodology section *Prerequisites for the Self-Assessment*.

WAVE (Web Accessibility Evaluation Tool) was also used as part of the testing.

Risks and consequence of failure

Tests that had the most failures

There was a high number of test failures across all 3 sites tested. Images, captions and transcripts, and contact details had a 100% failure rate, with headings (95%), keyboard (85%) and links to non-HTML files (75%) also having a very high failure rate.

Table 1: % of failure rate for accessibility and usability tests across all 3 sites tested.

Test	% of failure rate
Headings	95%
Lists	21%
Tables	37.5%
Keyboard	85%
Images	100%
Captions and transcripts	100%
Homepage	33%
Contact details	100%
Links to non-HTML files	75%
Printable pages	45%

aXe tests

The automated aXe tests indicated a number of violations and areas needing review.

MyMSD

The main violation on each page tested in MyMSD was an insufficient colour contrast on a version number below the copyright information in the footer. This issue is very minor and would have no impact on the user is it is not user information.

To address the colour contrast of this issue would be a simple resolve. However, it is not known why the version number is required on each page of the website. If the colour of the text of the version number was changed or the text removed completely, there would be no aXe violations on this site.

MSD – Ministry for Social Development

There were a number of violations on the MSD website which consisted of:

- Insufficient colour contrast
- Frames not having title attribute
- Form elements not having labels – Critical risk
- Page not containing a main landmark
- Image not having alt text
- Links not having discernible text
- ARIA attributes don't conform to valid values
- <html> element does not have a lang attribute
- ARIA roles not containing particular children

The majority of the issues on the Homepage (colour contrast and links not having discernible text) are to do with the embedded Facebook page plug-in which is out of the control of MSD.

The search box on each page contains a form element which does not have a label. This makes it difficult for screen reader users to discern what this form box is for. This is a *critical risk* that needs to be addressed to ensure screen reader users can discern what the search box is and use it.

The majority of pages have no main landmarks. This is a moderate issue that should be addressed, as this ensures that a screen reader user can navigate the primary content on the page.

Many of the violations can be resolved with simple code fixes or content editor training.

Doogle – corporate intranet

There were a number of violations on Doogle, MSD's intranet, which consisted of:

- Accesskey attribute not being unique
- Insufficient colour contrast – Serious risk
- ID attribute value not unique
- <html> element not having a lang attribute
- Form elements not having labels – Critical risk
- Page not containing a main landmark
- Radio inputs have the same name attribute value
- <object> element not having alt text
- Links not having discernible text

There is a problem with an Accesskey not being unique on each page, which could affect users, such as returning to the homepage.

The embedded Twitter widget on the home page is the source of the majority of the colour contrast issues, which is out of the control of MSD. Other colour contrast

issues are on the online forms page, and are associated with the red asterisk designating mandatory fields. No other information on the page alerts the user to the importance of these fields. The form fields are difficult to distinguish from the background. This is a **serious issue** that needs to be addressed.

Form elements on all pages do not have labels, such as the search box, the global staff directory, and the poll on the homepage. This is a ***critical risk*** that needs to be addressed to ensure screen reader users can use the search box, the global staff directory, and participate in the online poll.

On the Confluence news page, none of the image icons have alt text and the thumbnail images all have the same alt text of "Article Thumbnail Image". These are ***critical risks*** which need to be addressed. However, the image icons may be part of the out-of-the-box functionality of Confluence that may not be able to be addressed.

The majority of these violations can be resolved with simple code fixes or content editor training.

Areas for improvement

MyMSD

MyMSD is a fairly new website and it was surprising that it contained a number of failures against Web Standards compliance.

The testing was a "best guess" based on the author's understanding of WCAG2 and limited knowledge of the backend build of the site. Some of the content was marked-up with the class="u-accessibility" or used WAI-ARIA features which may not be widely supported by screen readers on all web browsers.

There is room for improvement across all areas of MyMSD when it comes to applying Web Standards requirements. This largely requires a web designer to relook at the issues for a resolve, as content is dynamically driven by prescribed sets. This includes:

Headings

- Incorrect use of headings (major issue)
  - H1 either not being visible or looks like a breadcrumb
  - H2 marked up correctly but do not look like headings
  - Summary text larger than both H1 and H2
  - Text appears to be a heading but is not marked up as a heading
  - H2 hidden by accordion
  - Additional H1 on page for mobile view but not marked up correctly
  - H1 and H2 have the same title

Lists

- Majority of lists are marked up correctly but there are some instances of unordered list marked up incorrectly:
  - "Terms of use" modal – unordered lists marked up incorrectly

Tables

- Very few layout or data tables used, but some instances of incorrect use of table styles
  - Layout table in the left-hand navigation and other content does not use the "role" attribute
  - Data table used for calendar – it is not known if this is marked up correctly as it uses <header class>. Further investigation is required.

Keyboard

- Visible focus/keyboard issues
  - MyMSD logo was not in focus but changed colour and could be missed
  - "Dashboard" links were not in focus, but may have been hidden "skip links" but were not marked up as such
  - Phone numbers don't look like links but have focus on desktop view, but on smartphone view phone numbers look like links
  - On Login pages there are a number of keyboard issues
    - Incorrect "Skip to main content" link
    - Overlay containing Home link is bypassed
    - Incorrect keyboard link structure
    - Misses out some links
  - Home links at bottom of page on mobile view has misleading URL of ../contact#
  - Navigation links do not have unique URLs/IDs
  - On Letters page, the modal window for "Stop sending letters by post" sends a user into a loop as the keyboard functions do not allow user a resolve

Images

The main issue with images on the MyMSD site was the alt text on both MSD's logo and the NZ Govt logo (both contain links) which did not describe the purpose or destination of each link. This can be easily fixed by a developer.

While not an error, it is recommended that [Alt role = "presentation"] be changed to [role="presentation" alt=""], ie add alt null for presentation images. This is because the WAI-ARIA feature is not as widely supported by screen readers on all browsers as using a null alt attribute is.

The site contains a number of SVG sprite icons. While some are purely decorative, others are linked "Help" icons. I was unable to test the XML sprites for accessibility without further information and advice on the accessibility of sprites.

Captions and transcripts

There were no videos on this website.

Contact

There were several failures relating to contact information which require amending:

- No postal address
- No clear contact information for asking questions about the website
- Contact link takes a user to different website (MSD's corporate site)
- No email addresses only phone numbers for client-based queries
- Phone numbers are for NZ-based users only, no number of users based overseas
- Link to services for the deaf is given, but link takes the user to another website (Work and Income) which provides information on how to contact MSD

Links to non-HTML files

Most pages do not have links to non-HTML files. The "Letters" page contains PDF documents for clients to download. Each document has the file size indicated next to it but not the file type. The instructions above all of the documents states that the documents can be viewed or downloaded as PDFs, however.

There have been numerous complaints about these PDFs as they are not accessible for screen reader users or people with low vision. The content could easily be made into HTML with a print-friendly stylesheet so the users can download the content if they wish.

Printable pages

There were a number of issues with printing the pages, including printing the modal pop-ups, which contain important information such as phone numbers and contact details:

- Title of page does not print
- Pages do not have a unique title
- Content in accordions do not print unless accordion is expanded on the screen
- "MyMSD –Terms of use" modal only prints the first of four pages of content.

Recommend:

- Print the URLs as absolute links as link text on the printed page has not value
- Where login buttons are on the screen, adjust the printed screen to remove them from the printed page.

MSD website

The Ministry of Social Development's corporate website was launched with its current format and design, using the TeamSite platform, about 10 years ago.

There is room for improvement across all areas of MSD's website when it comes to applying Web Standards requirements. The website is old and tired and is in need of a redesign, a content cull and a navigation restructure. The majority of accessibility issues can be remedied by a web developer and web designer, as these issues are largely of a technical nature.

Areas that don't comply with the Web Standards include:

Headings

- Navigation items that look like headings as they use the same styling as H2s elsewhere on the page
- Heading order doesn't follow logical content hierarchy - H3 comes before H1
- Headings not styled as headings

Lists

- Numerous unordered lists that use icons as bullets, which are marked up as div class, but CSS does not include ul, ol or li.

Keyboard

- Numerous keyboard failures:
  - Access key navigation content is not in focus
  - When using Alt-back arrow to return to Homepage, user ends up at the address bar and not at the link that was clicked
  - Homepage: A number of issues with Twitter feed and Facebook feed
  - Homepage: Image slider has no focus (slider since been replaced with Facebook feed)
  - Homepage: User can get stuck in Facebook feed using keyboard (keyboard trap)
  - Contact page: Google map can be navigated with a keyboard, but only the basic keys. Need to open a larger map for better keyboard usage
  - Online form: Initially skips all navigation content and jumps straight to the second form field

- Online form: When clicking "Browse" to browse to attach a document, the enter key is activated and an error message appears. Only activated by use of a mouse
- Video page: not all keyboard controls work as set out in JWPlayer documentation
- Video page: When clicking to download the mp4 video, unable to activate the Open; Save; Cancel controls using keyboard (in IE only, not on other browsers)

Images

- Numerous image failures:
  - MSD and NZ Govt logo have inappropriate alt text. It uses tool tip instead to give directions on these images
  - Decorative and background images do not contain the alt attribute or have inappropriate alt text
  - Contact page: The Google map contains MSD offices. When images are disabled, there is no alt text.
  - No alt text on video still images which contains useful information such as click to play, the file size or the length of the video
  - Complex image alt text is the same as the caption. It should have a long description

Captions and transcripts

- Captions and transcripts were an issue, particularly for older videos. Newer videos usually had a transcript and some were captioned. The page tested was published in 2013:
  - No captions
  - No transcripts. Message on page stating that transcripts will soon be available and gives and email address. Page was last published in 2013.

Contact

- Contact page had no email address. The email address on the page is actually a link to a form on another page
- It is not clear that the "Contact us" information is for enquiries related to the website.

Links to non-HTML files

- File size of video is given but no indicator of file type for downloadable video (eg MP4)

- PDFs on pages not tested generally had file size and file type, though content needs thought as the titles are often repeated or used the word "here".

Printable pages

- Homepage: Some of the core information is not printed, eg promotional information about social housing
- Contact page: Some of the core information on the page is not printed, eg the "Contact us by email" information which contains a link and 2 phone numbers
- Contact page: The map prints but is of no value as it is a search tool
- Online form: Page does not have a unique title
- Video page: Does not display a video placeholder, just a blank space where the video should be. There were 6 videos on the page, each viewed as a blank space on the printed page

Doogle intranet

The Ministry's intranet, Doogle, was launched with its current format and design, using the TeamSite platform, about 12 years ago. Some of the news content uses Confluence, which is not a fully accessible product out-of-the-box. Pages published in Confluence performed poorly compared to pages published on TeamSite.

There is room for improvement across all areas of our intranet when it comes to applying Web Standards requirements. The intranet is old and tired and is in need of a redesign, a content cull and a navigation restructure. The majority of accessibility issues can be remedied by a web developer and web designer, as these issues are largely of a technical nature.

Areas that don't comply with the Web Standards include:

Headings

- Numerous H1s on the page (TeamSite templates)
- No H1s on page (Confluence template)
- Top level navigation items look like headings but are not marked up as such

Lists

- News and views content on homepage looks like a definition list, but does not use <dl> element tagging
- Summary list on the Forms template has an unordered list that is not marked up correctly
- There are some pages that has documents and links which look like they're in a list, but are not marked up as such and in some instances double chevrons ">>" are used but are not marked up as lists

Tables

- Generally tables are marked up correctly, but there are some instances where data tables in body content do not have the <th> row header element

Keyboard

- Unable to navigate to dropdown top level menu using keyboard. It's only available on hover
- Hidden navigation, content and access keys do not focus

Images

- Numerous image failures:
  - The intranet banner logo is a link. The Alt text should be "Go to Doogle's homepage". Instead, it repeats the words in the image which is in Te Reo.
  - NZ Govt logo is a link – Alt should be "Go to NZ Govt website
  - Arrow dropdowns have empty alt text but are not marked up correctly
  - Inappropriate alt text on images used with news stories – alt text repeats the title of the article
  - Inappropriate alt text on decorative images which should be "null" alt tags
  - Image links do not state where the link will go to as alt text repeats title words
  - On the forms page there is no NZ Govt logo
  - Bullet point navigation arrows are images but do not have any alt text (should be null) and sometimes represented by chevrons ">>"
  - No image still of videos and no alt text if video does not display.
  - On the Confluence template:
    - Empty alt text on banner icon which is a link to the news homepage
    - No alt text on "comment" icons (should be null)
    - Incorrect alt element ("alt title") used on thumbnail images (should be null)
    - No "null" alt text on background images

Captions and transcripts

- No captions on video on page last updated in May 2017 (some newer videos do have open or closed captions)
- No transcripts on video on page last updated in May 2017

Homepage

- Does not contain the name or logo of the organisation responsible for the site (MSD)

Contact

- No visible link to the "Contact us" page. This is a link to a "Site feedback" page which is on every page, however. The Feedback page does contain 2 email addresses, which are clearly for website and technical enquiries. There is no phone number of postal address.

Links to non-HTML files

- Video does not contain file type (mp4 and Flash) but does contain the size of the mp4 version.
- Generally, Word, PDF, etc, documents contained file type and file size, though there were a few instances where documents did not contain either.

Printable pages

- Text does not print out in black and white by default
- Poor colour contrast on news items on the homepage, even when forced to print in black and white
- Not all text from homepage news items is printed, as content is hidden
- Change of font colour in print stylesheet – Headings and summary text print in red, while they are viewed in blue onscreen; email links are dark green on screen but bright green in print
- Primary and secondary navigation print, and while not a failure, is not considered good practice
- Breadcrumbs present on printed page
- On the form, field names do no print next to each text box but in a group together above the text boxes
- No placeholder image of video but blank space
- Links on decorative images print out which is the same link as on the title of the article, making the printed page rather cluttered with links

Risks

Risk assessment

There is significant room for improvement for all websites, particularly in regards to technical build and design, eg adding correct heading styles for static content, addressing keyboard issues, adding correct alt text on informational images and decorative images, adding the ability to add captions to videos and allowing space in templates for transcripts. Issues with content design and content writing will be addressed through training.

A comparison was done against the results of the web standards failures that were previously identified in the *2014 Web Standards Self-Assessment Report*. Many of those 2014 failures have not yet been addressed across all websites, such as:

- Captions missing from videos
- Incorrect alt text on images
- Inconsistent and incorrect keyboard navigation functionality
- Colour contrast issues
- Homepages with incorrect content.

A plan is in place to fully assess all of MSD's websites against the Web Standards, and to address and fix as many failures of compliance as possible within the next 12 months. Discussions will be had with the various Business Owners of the websites to educate and champion the importance of web standards compliance.

All new websites will be monitored, where possible, against the Web Standards prior to any future builds and go-live.

References

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Mitigation plan

In most instances, a Web designer or Web developer will be required to fix the identified points of failure.

Website	Points of failure	Mitigation
MyMSD	Colour contrast issue	Find out from Business owner as to why a version number is required on each page. Either remove or make contrast complaint.
MyMSD	Use of WAI-ARIA features which may not be widely supported by screen readers or all browsers, including mobile browsers	Ensure all mark-up is supported by screen readers and adjust if required. Ideally, native HTML features should be used to provide the semantics required by screen readers. Use WAI-ARIA only as an enhancing tool. See WAI-ARIA Screen reader compatibility https://www.powermapper.com/tests/screen-readers/aria/
MyMSD	Incorrect use of headings and text styles	Engage with web designer and ensure site is structured with correct heading and text styles
MyMSD	Incorrectly marked-up lists and table styles	Mark-up lists correctly Add "role" attribute to layout tables
MyMSD	Visible focus/keyboard issues	Fix incorrect "Skip to main content link" Review all modal windows and ensure no keyboard traps Update URLs where required

MyMSD	Images: • Incorrect alt text on logos • WAI-ARIA feature on decorative images • Decorative and informational SVG sprites	Describe the purpose of the link and the destination in alt text of logo links Update alt text on decorative images to be [role="presentation" alt""] Research accessibility of sprites
MyMSD	Contact details not clear	Update contact details to include: • Postal address • Clear contact information regarding the website • Add contact details natively on MyMSD • Add email addresses for client-based queries • Add number for overseas clients • Links to services for the Deaf to be natively on MyMSD
MyMSD	Non-HTML files: • Presentation needs updating • Use of PDFs without an accessible alternative	Update presentation of non-HTML files so that each document contains file size and file type Consider making PDF content available as HTML with a print-friendly stylesheet

MyMSD	Pages do not print content required	Review print stylesheet and add/remove: • Title of page (make sure page title is unique) • Content in accordions must print, even if hidden when print is selected • Ensure all content in modals print • Print URLs as absolute links • Remove login buttons
MSD website	Technical failures: • Insufficient colour contrast • Frames with no title attribute • Form elements without labels • Pages with no main landmark • Images without alt text • Links with no discernible text • ARIA attributes don't conform to valid values • <html> element does not have a lang attribute • ARIA roles not containing particular children	Some issues are out of the control of MSD, such as colour contrast and links without discernible text on the embedded Facebook plugin Engage with web designer/web developer to make code fixes: • Add correct label to the search box and other form elements • Add main landmarks to pages • Add lang attribute • Update ARIA values and roles • Add appropriate alt text Train editors to add links with discernible text
MSD website	Headings not styled as headings Headings don't follow logical content hierarchy	Web designer to review heading styles and update Provide training to content editors on logical content hierarchy

MSD website	Lists that use icons as bullets are not marked up correctly	Wed designer to review use of icons as bullets
MSD website	Keyboard failures: • Online forms • APIs not accessible • Image slider focus issues	Fix logic of keyboard navigation Update JWPlayer for keyboard controls to work as expected on videos Explanation on page for users on how to navigate APIs, eg Facebook, Twitter, Google Maps Remove image slider or update for accessibility
MSD website	Images: • Inappropriate alt text on logos • Decorative and background images don't have alt attribute • Google Map needs text alternative • Video still images require alt text • Complex image alt text is the same as the caption	Update alt text on logos Add appropriate alt attributes on decorative and background images Provide text alternative for Google Map (location of regional offices) Add still images with appropriate alt text for videos Add long desc for complex image alt text Train authors in adding appropriate alt text to images where possible
MSD website	Inadequate contact details	Add email address, not a link to a form Update information about contact details
MSD website	Non-HTML files don't have correct information	Add file size and file type for all downloadables and documents correctly for all non-HTML files
MSD website	Some core information of the page is not printed	Update Print stylesheet to include all core information on the page

MSD website and Doogle Intranet	Videos without captions and/or transcripts	Invest in software that allows easy captioning of videos Rebuild template on CMS to allow for separate caption file Cull old videos no longer required on websites Write and get approval for a video policy for MSD Educate and train content authors in the importance of adding captions and transcripts to videos Ensure all existing videos have transcripts Ensure all new videos are captioned and have transcripts
Doogle Intranet	Technical failures: • Accesskey attribute not unique • Insufficient colour contrast • ID attribute value not unique • \<html\> element doesn't have lang attribute • Form elements do not have labels • Pages don't contain main landmark • Radio inputs have the same name attribute value • \<object\> element doesn't have alt text • Links don't have discernible text	Some issues are out of the control of MSD, such as colour contrast issue on the embedded Twitter plugin Engage with Web developer to update Accesskey attributes Engage with Web designer to: • Review the online forms page to use an alternative indicator to mandatory fields • Add label elements to all form elements (eg search box, global directory) Engage with vendor to see if image icons can have the alt text updated

Doogle intranet	Headings not styled as headings Too many H1's on a page (TeamSite) or no H1's on the page (Confluence)	Web designer to review heading styles and update (TeamSite) Work with Confluence vendor to add H1 styles on news templates
Doogle intranet	Lists and tables not always marked up correctly	Work with Web designer to mark up lists on Forms template and fixed content on intranet (TeamSite) Train content authors in marking up data tables correctly
Doogle intranet	Unable to navigate to dropdown on top level menu using keyboard	Work with Web designer to amend dropdown menus for keyboard accessibility
Doogle intranet	Numerous image failures: • Inappropriate alt text on logos and news stories • Inappropriate alt text on decorative images • Missing logos • Bullet points and arrows that are images have incorrect alt text • Incorrect alt elements on thumbnail images (Confluence) • No image still of videos and no alt text if video does not display	Work with Web designer (TeamSite) and Vendor (Confluence) to improve alt text on fixed content Train content authors how to mark up alt text correctly
Doogle intranet	Name or logo of organisation responsible for the intranet is missing	Work with Business Owner and Web designer to add in missing logo

Doogle intranet	No visible link to the Contact page	Work with Business Owner and Web designer to add in link to Contact page
Doogle intranet	Links to non-HTML files do not have file types and size	Work with Web designer to allow adding file type and size to mp4 video downloads Train content authors how to mark up file types and size where it is not automatically added by the system
Doogle intranet	Issues with print stylesheet: • Poor colour contrast • Missing key text • Change of font colour from online page to printed page • Navigation is printed out • Breadcrumbs present on printed page • No placeholder image of video, only blank space • Links on decorative images print out as is the same link as on the title of the article • On the form, field names do not print next to each text box but in a group together above the text boxes	Work with Web designer to develop a Print stylesheet that matches Web Usability Standards

MSD Self Service Portal (Kiosk) Accessibility Evaluation Report

This document presents a recommended format for communicating results of the evaluation of website accessibility according to Web Content Accessibility Guidelines (WCAG) 2.1.

Table of Contents

1. Executive Summary

This report describes the conformance of the MSD Self Service Portal (Kisok) test site with W3C's Web Content Accessibility Guidelines (WCAG) 2.1. The review process is described in Section 5 below and is based on evaluation described in Evaluating web accessibility.

Based on this evaluation, the MSD Self Service Portal (Kiosk) test site does not meet WCAG 2.1 at Conformance Level AA. Detailed review results are available in Section 6 below.

2. Background about Evaluation

Conformance evaluation of web accessibility requires a combination of semi-automated evaluation tools and manual evaluation by a reviewer. The evaluation results in this report are based on evaluation conducted on the following date(s): 13-14 September 2019 and retested on 18-19 September 2019. The Kiosk may have changed since that time.

3. Scope of Review

- MSD Self Service Portal (Kiosk) test site
  - Purpose of this site is to provide service centre clients with quick and easy access to MSD information; to help find a job; provide assistance with housing; check email; create CVs and other documents needed for finding a job; information about student loans, etc.
- Base URL and Welcome page Outside of scope
  - Home page Outside of scope
  - Create a document Outside of scope
  - Check your email Outside of scope
  - Self-Service Kiosk content Outside of scope
  - About the kiosk https://workandincome.govt.nz/online-services/kiosk/about.html
  - Contact https://workandincome.govt.nz/online-services/kiosk/contact.html
  - Privacy and copyright https://workandincome.govt.nz/online-services/kiosk/privacy.html
  - Search results page, eg https://www.workandincome.govt.nz/s/search.html?collection=msd-all-web&profile=_default&Submit=Submit&query=work
- No URLS excluded from review.
- Testing was conducted initially on 12-13 September and retested on 18-19 September 2019
- Natural language of the website is English.

4. Reviewer(s)

- Outside of scope Senior Business Analyst, Web Team
- Ministry of Social Development
- Outside of scope @msd.govt.nz
- Reviewer's areas of expertise – web technologies; validation tools for web technologies; approaches for evaluation web accessibility; use of a variety of evaluation tools for web accessibility; disability barriers, assistive technologies, and adaptive strategies; involvement of people with disabilities in evaluation (members of the Association of Blind Citizens NZ (ABCNZ) provided feedback).

5. Review Process

- WCAG 2.1 Level tested at Conformance Level AA

- Accessibility tools used for testing: aXe; WAVE; Web Developer; ARC Toolkit; Colour contrast analyser
- Manual reviews - keyboard testing
- JAWS was used by ABCNZ and feedback given separately

6. Results and Recommended Actions

- Summary of review results
  - This portal appears to not meet WCAG 2.1 AA
  - The recommended priorities for addressing inaccessible features of site which have been highlighted a **Serious** by the accessibility tools are:
    - Add focus to "?" help icon on start page. Keyboard users and screen reader users unable to navigate to help
    - ARIA hidden elements must not contain focusable elements – this is on the "close" button on the modal items:
      - Correct (on "Use a USB" link):

        ```
        <button class="close-button" data-close="" aria-label="Close Modal" type="button" wiid="C146">

                <img src="/images/svg/cross.svg" alt="Click the X button to close the popup window and return to the Kiosk landing page" wiid="C147">
        </button>
        ```

      - Incorrect (on "Help with housing"):

        ```
        <button data-close="" aria-label="Close Modal" type="button" aria-hidden="true" class="modal-close-cross" id="close_accommodation" wiid="C122">

                <img src="/images/svg/cross-white.svg" alt="Click the X button to close the popup window and return to the Kiosk landing page" wiid="C123">
        </button>
        ```

    - Elements must have sufficient colour contrast – this is on the text links on the "Create a document" page and on the images containing text
    - "Home" icon on "Create a document" page must have appropriate alt text, eg "Go to home" and remove redundant title text

- Inappropriate alt text on svg image icons – if decorative, icons should be hidden but should also contain appropriate alt text
  - Incorrect (on "Find a job"):

    `<img src="/images/svg/find-job.svg" alt="Small brown briefcase with a magnifying class sitting in front">`

  - Corrected:

    `<img src="/images/svg/find-job.svg" alt="" aria-hidden="true">`

    Some accessibility test tools may pick this up as an error as image contains empty alt tag.

    OR better:

    `<<img src="/images/svg/find-job.svg" alt="Find a job" aria-hidden="true">`

    Do not use the words "icon, graph, button, image", etc in alt text.

- Multiple h1 on a page or inappropriate page structure – as screen reader user will find it difficult to navigate a page
- Title attributes are redundant and should be removed – creates verbal clutter for a screen reader user and cannot be seen on touch screen devices
- Videos must be captioned (no captioned videos) and a transcript provided (no example of where a transcript may go)
- Search results LH nav contains inappropriate elements
- Detailed results structured according to WCAG 2.1 for other non-conformant items and contain moderate and low issues:
  - See the attached Kiosk Accessibility Test for September – second tab, "Kiosk Retest Final" for detailed results.

7. References

- Web Content Accessibility Guidelines (WCAG) Overview
  https://www.w3.org/WAI/intro/wcag
- Web Content Accessibility Guidelines 2.1
  https://www.w3.org/TR/WCAG21/
- Techniques for WCAG 2.1
  https://www.w3.org/WAI/WCAG21/Techniques/

- [Accessibility Evaluation Resources](http://www.w3.org/WAI/eval/)
  http://www.w3.org/WAI/eval/
- [Web Accessibility Evaluation Tools List](https://www.w3.org/WAI/ER/tools/)
  https://www.w3.org/WAI/ER/tools/
- [Using Combined Expertise to Evaluate Web Accessibility](https://www.w3.org/WAI/eval/reviewteams)
  https://www.w3.org/WAI/eval/reviewteams
- [Web Accessibility Standard 1.1](https://www.digital.govt.nz/standards-and-guidance/nz-government-web-standards/web-accessibility-standard-1-1/)
  https://www.digital.govt.nz/standards-and-guidance/nz-government-web-standards/web-accessibility-standard-1-1/
- [Web Usability Standard 1.3](https://www.digital.govt.nz/standards-and-guidance/nz-government-web-standards/web-usability-standard-1-3/)
  https://www.digital.govt.nz/standards-and-guidance/nz-government-web-standards/web-usability-standard-1-3/

8. Appendices

- See the attached Kiosk Accessibility Test for September - second tab, "Kiosk Retest Final" for detailed results.

  KioskAccessibilityTe
  stSept2019v3.xlsx
-

Information for six-monthly report to Minister for Disability Issues

Your agencies progress towards an inclusive State sector.

Organisation: Ministry of Social Development

Leadership commitment	
Do you have a member of the Senior Leadership team who sponsors this work?	Yes Stephen Crombie – Deputy Chief Executive, People and Capability
Success stories We are often asked what other agencies ask us what other agencies are doing. Please send any success stories on: • Implementing the Lead toolkit • Accessibility charter • Effective engagement with the disability sector • Effective data for us to share.	Three sessions of cross-agency Accessibility Charter Monthly Training were run successfully via Zoom during June, July and August. Unfortunately, the March, April and May sessions were cancelled due to COVID-19 lockdown. All sessions were fully subscribed and further sessions via Zoom are scheduled until December with two of those sessions fully booked. Continuing regular collaboration meetings with DPOs (Disabled Persons Organisations) and across agencies have been held via Zoom to actively progress the Lead Toolkit and Accessibility Charter work. Successful meeting with the Lead Toolkit Implementation Group via Zoom with a presentation by Dane Dougan from Autism NZ. There has been better engagement with MSD business owners at beginning of projects to ensure

	accessibility requirements are met. This is a result of promoting accessibility through IT channels.
	Second IT accessibility specialist appointed to the Accessibility Charter workstream.
	Finalised Terms of Reference for an All of Government Virtual Accessibility Expert Group.
	Numerous alternate formats of government information about COVID-19 have been made available through coordinating work with the Ministry of Health, MSD and the DPOs.
	Worked successfully in partnership with the DPOs, Ministry of Health and MBIE to create a process for government agencies to request alternate formats. MSD became lead agency for coordinating the AoG management of alternate formats in May 2020.
	The AoG process for accessibility and alternate formats was published on MSD's website.
	Engagement with the Digital Council representatives to provide accessibility advice, plus providing a presentation on the Accessibility Charter to the Digital Council Board Members.
	Accessibility Guide published on MSD's corporate website. Accessibility Charter content on the website was updated.

Lead Toolkit

HR commitment

Do you have a person or team who is responsible for Diversity and Inclusion including Disability in your organisation? If yes, can we please have the contact details?	Yes – MSD also has a cross-functional Diversity & Inclusion Steering Group who meet every 6-8 weeks, includes the Principal Advisor (Disability). Outside of scope Senior Advisor People Culture and Inclusion, Outside of scope @msd.govt.nz
Are they part of the Lead Toolkit Implementation meetings	Yes

Outside of scope

Policies and practices

Recruitment practices and tools are accessible	In development

Outside of scope

Dissemination and Training

Do you have a plan for disseminating the Lead Toolkit material to both line managers and hiring managers?	Yes - Disability awareness package will become part of MSD's induction pack.
Is it included in: • Induction material • Training material	Yes - Disability Responsive Training is in the pipeline. A follow-up Masterclass on accessibility for Chief Executives was held. Discussions are being had with SSC about this as part of MSD's leadership role in Papa Pounamu. Accessibility Charter and Lead Toolkit training is also in development. This is cross-agency work currently underway and will be enhanced by train the trainer approach. Specialised training, particularly regarding IT, will be provided by DIA.

Disability Network

Do you have a Disabled employee's network?	Yes – meets monthly

Accessibility Charter

Senior Leadership commitment	Yes
Accessibility Charter signed?	Yes. Accessibility Charter has been signed and is displayed in our

	Reception area on Level 1 of our National Office, 56 The Terrace, Wellington
Signing has been communicated to staff.	Yes - Signing of the Charter has been communicated to staff by way of Intranet posting, Leadership Team meetings, and through MSD's Disabled Champions.

IT and Communications commitment

Who is the • IT champion • Communications champion Can we please have the contact details?	IT – Outside of scope Outside of scope @msd.govt.nz Communications – Outside of scope Outside of scope @msd.govt.nz
Summary of key actions to date	Appointed second IT accessibility specialist to support the Accessibility Charter work, to provide education and training programme of work, to develop an accessibility report for the five highest priority resources, and to do a stocktake of all our it resources. Lead Toolkit content has been updated on MSD's corporate website and will go live in Sept 2020. Assist with AoG monthly Accessibility Charter training sessions and other inhouse and external presentations on the Accessibility Charter. Working on a procurement accessibility checklist to ensure our vendors understand accessibility

	and provide evidence of the accessibility of their products prior to purchase.
	Engaged with MSD's Value Office to work with how the Charter can be introduced to more IT teams and workstreams.
	Provided accessibility guidance and advice on MSD's IT products (this is on-going).
	Developed Accessibility Action Plans for MSD (internal) and AoG.
Summary of future actions and agreed timeframes	Because of COVID-19 delays and delays with IT accessibility recruitment, the original timelines have been extended.
	1. Identify the current state of existing Communications and IT resources (ie website, applications, etc) and develop a prioritised plan to address the findings of that review:
	a) Accessibility review of MyHR by December 2020
	b) Accessibility review of MyMSD by December 2020
	2. Identify current projects that are in train and identify if accessibility has been considered in the design of the projects and the resulting tools, resources and communications by March 2021
	3. Provide a checklist for the Portfolio Management Office (PMO) and project owners to use as a basis for identifying and planning to

	meet the requirements of the Accessibility Charter by December 2020
	4. Provide an accessibility checklist for Procurement by December 2020
	5. Resources and processes are easily available internally: a) Develop content for internal consumption on Intranet by January 2021
	6. Resources and processes are available externally: a) Content on Lead Toolkit published by September 2020
	7. Develop a communications plan by December 2020
	8. Build an Accessibility Office at MSD by June 2021
	9. Develop an accessibility training plan by December 2020.

Engagement with disabled people and their organisations

Do you include as a matter of course, engagement of Disabled People's Organisations in: • Policy development • Service development	 Yes Yes
If yes, please outline how?	MSD works collaboratively with key members of DPOs regularly on progressing the Accessibility Charter and Lead Toolkit work.
Do you have engagement guidelines?	MSD has developed a contract with the Association of Blind Citizens of New Zealand to help with testing

and to identify any issues before information is disseminated.

MSD worked in partnership with the DPOs to coordinate an AoG management of alternate formats. Guidelines have been provided about the new centralised service.

Disability data and evidence

Do you record the number of disabled people who use your service?	Yes
Are you gathering data on how your organisation policies and services are working for disabled people? If yes, please outline how?	Yes – through focus groups.

Innovation

Can you provide details of an innovation in serving disabled people?	MSD will establish a virtual network for disabled champions to support each other and to get consistent advice across the public sector and to establish a Centre of Expertise. MSD is setting up an Accessibility Summit working with the DPOs, DIA and key vendors such as Microsoft. Plenary sessions will be run as well as workshops based around interests for web designers; comms designers; developers. There would also be a Lab where people could showcase assistive technologies and technological solutions. The summit is for government agencies and

	private businesses. Up to 500 people could attend. The aim is to increase the skill and capability around digital and print accessibility. The Summit is tentatively scheduled for May 2021. MSD will investigate the use of e-pubs and how they fit with our technical system. We will work with the Association of Blind Citizens and Blind and Low Vision NZ with a strategic approach. MSD will develop an accessible e-learning training module on accessibility for staff.

![Ministry of Social Development / Te Manatū Whakahiato Ora logo]

MyMSD Baseline
Accessibility Audit

February 2021

Author

Outside of scope — Business Analyst (Accessibility)
Ministry of Social Development — Te Manatū Whakahiato Ora

Acknowledgements

Overview

This report has a comprehensive audit of MyMSD's conformance to the New Zealand Web Accessibility Standard 1.1.

This report also has solutions for many of the issues found.

The Ministry of Social Development is a signatory to the Accessibility Charter. This means the Ministry has committed to supplying accessible information to disabled people.

To meet the Accessibility Charter, we must audit our services for accessibility. These audits will let us know if we have accessibility issues, and how to solve them.

Since 2003, Cabinet has mandated that the Ministry of Social Development meet the New Zealand Government Web Standards, which includes the New Zealand Web Accessibility Standard, and New Zealand Web Usability Standard. The Web Accessibility Standard includes Web Content Accessibility Guidelines (WCAG) 2.1 Level AA conformance.

MyMSD is a crucial part of New Zealand's welfare system. Our clients use it for applying for benefits, emergency food assistance, checking payments, updating details, and declaring changes. According to the 2019 Welfare Expert Advisory Group report, 53% of working-age MSD clients identify as disabled – so we must ensure MyMSD is accessible for disabled people.

This report will form the foundation upon which we work towards an accessible digital welfare system for all New Zealanders, regardless of their disability status.

Part 1 – Methodology and Limitations

Methodology

The plan this audit followed is described in Part 4 of this document.

A full list of the pages I audited is in the Audit Checklist Excel file.

Limitations

This audit does not have 100% coverage of all pages within MyMSD due to resource/time constraints. Instead, analytics data targeted the audit at the top ~25 most visited pages of MyMSD.

The audit does not have 100% coverage of all assistive technologies. A selection of the most common assistive technologies was used.

Audits using a switch device were not performed, as I did not have access to a switch device. Keyboard testing is an acceptable substitute, so I do not consider this to be a large issue.

Audits using voice control were not performed, as I did not have access to Dragon Professional. Most voice control issues will be found through screen reader testing, so I do not consider this to be a large issue.

Audit Phase 2 (Narrator) was not carried out, because it was quickly discovered that Narrator was returning many false positives.

Audit Phase 7 (TalkBack) and Audit Phase 8 (ChromeVox) were not carried out, as there were issues accessing a modern Android device and Chrome OS device to test with. It was decided by Callum McMenamin and Jo Orange that the webpages within the audit sample had already been thoroughly tested using several other methods, and it would be unlikely that additional accessibility issues would be detected by running Phase 7 and 8 in the Audit Plan.

Part 2 – Results

Total Issues Identified

~649 instances of accessibility issues were identified.

Figure 1: Issue Frequency Analysis (top 10)
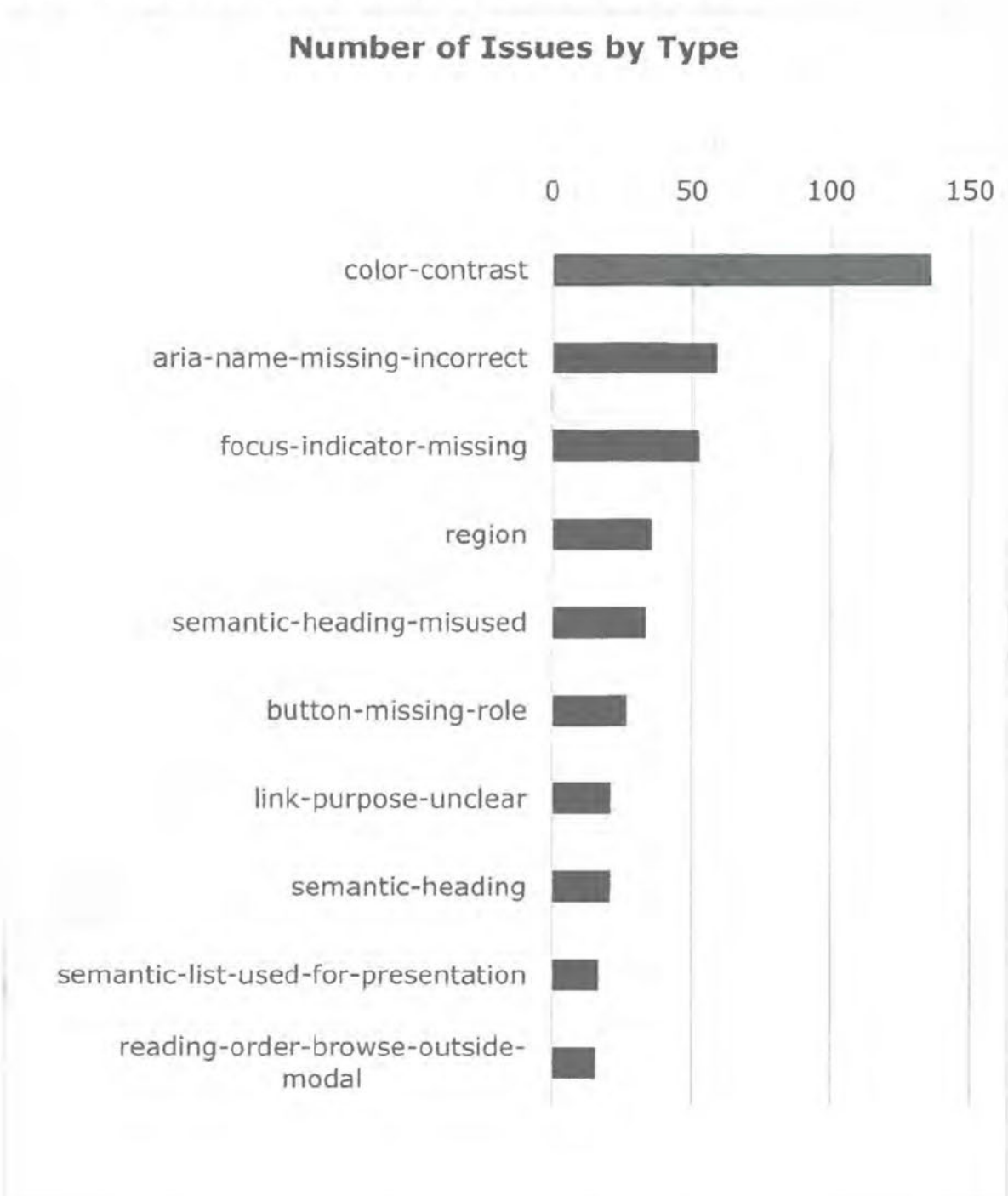
Number of Issues by Type

Figure 1 Interpretation

From **Figure 1**, there are 4 general issue categories:

- Style (caused by CSS)
- Non-semantic HTML
- WAI-ARIA
- Content

Issues such as colour contrast and missing focus indicators are both examples of stylistic accessibility issues that a designer can fix through changes to MyMSD's CSS.

Issues such as a lack of regions, the misuse (or lack) of semantic headings, or misuse of semantic lists, are all related to MyMSD's non-semantic HTML. These issues can be fixed by a developer.

Issues such as the misuse (or lack) of ARIA names is related to WAI-ARIA attributes a developer has used incorrectly.

Some issues, such as link purposes being unclear, are a result of poor content writing.

We can fix many of the accessibility issues found in this report through small, and simple changes to MyMSD's HTML, CSS, and content.

Part 3 – Recommendations

The accompanying set of Excel spreadsheets and CSV files with this report has a comprehensive listing of every single issue found. I have classified each issue with an impact level.

Most of the ~649 issues found prevent full conformance to the New Zealand Government Web Standards, including our commitment to WCAG 2.1 Level AA conformance, and the Accessibility Charter.

I recommended that:

1. a programme of work is started to fix the issues in this audit
   o The Accessibility Team is to provide advice and measure success when resolving all accessibility issues
2. enterprise-scale periodic automated accessibility auditing is implemented
3. MSD staff engage in internal accessibility training courses
4. front-end developers add accessibility checks into all their work
5. testers add accessibility checks into front-end testing
6. designers add accessibility checks into all their work
7. manual accessibility audits are periodically carried out on MyMSD by the Accessibility Team
8. the Accessibility Team is consulted for future interface changes to MyMSD

These recommendations will help MSD on its journey to supplying accessible digital services to all New Zealanders, regardless of their disability status.

Part 4 – Audit Plan

Accessibility Support Baseline

This is the combination of user agents and assistive technologies that MyMSD will be tested with. Some combinations of assistive technologies and operating systems were not included in the audit and are struck through due to a reduction in the scope of this audit, as explained in *Part 1 Methodology and Limitations.*

Windows

1. Chrome
    a. JAWS
    b. NVDA
    c. ~~Narrator~~
    d. Keyboard/~~Switch~~
    e. ~~Voice Control~~

2. Firefox
    a. NVDA
    b. ~~Narrator~~
    c. Keyboard/~~Switch~~
    d. ~~Voice Control~~

macOS

1. Safari
    a. VoiceOver
    b. Keyboard/~~Switch~~
    c. ~~Voice Control~~

iOS

1. Safari
    a. VoiceOver
    b. ~~Keyboard/Switch~~
    c. ~~Voice Control~~

Android

1. Chrome

    a. TalkBack
    b. Keyboard/Switch
    c. Voice Control

Chrome OS

1. Chrome

    a. ChromeVox
    b. Keyboard/Switch
    c. Voice Control

Audit Sample – Top 25 Pages

Rank	Page	Page Views
1	/login	5566531
2	/	4136783
3	/dashboard	3242767
4	/something-changed	1736625
5	/apply-new-business/entry-screen	1736280
6	/letters	1633951
7	/apply-new-business	1628078
8	/logged-out?reason=manual	1529781
9	/something-changed/cost-one-off	1324661
10	/profile	1002805
11	/verify-device	849871
12	/debt	668280
13	/something-changed/what-has-changed	611420
14	/cards	607096
15	/?I website=	589931
16	/finance	461305
17	/appointments/book/service-centre-availability	442683
18	/benefits/31	441158
19	/register	300854
20	/income/declare/wages	293795
21	/logged-out?reason=timeout	282375
22	/benefits/33	248285
23	/my-eligibility	234704
24	/something-changed/cost-what-kind	218037
25	/upload-document	213548

MyMSD Baseline Accessibility Audit

Phase 1: General Audit

The General Audit phase will perform the following types of testing upon each page specified in the **Audit Sample**:

a. Automated audits using the aXe browser extension on Chrome
b. Visual inspections for inaccessible content using **Windows** with browsers specified in the **Accessibility Support Baseline**
c. Keyboard testing using **Windows** with browsers specified in the **Accessibility Support Baseline**

~~Phase 2: Narrator Audit~~

~~The Narrator Audit phase will involve inspecting each page in the **Audit Sample** using **Narrator**.~~

Phase 3: NVDA Audit

The NVDA Audit phase will involve inspecting each page in the **Audit Sample** using **NVDA**.

Phase 4: JAWS Audit

The JAWS Audit phase will involve inspecting each page in the **Audit Sample** using **JAWS**.

Phase 5: iOS VoiceOver Audit

The VoiceOver Audit phase will involve inspecting each page in the **Audit Sample** using **VoiceOver** on **iOS**.

Phase 6: macOS VoiceOver Audit

The macOS VoiceOver Audit phase will involve inspecting each page in the **Audit Sample** using **VoiceOver** on **macOS**.

~~Phase 7: TalkBack Audit~~

~~The TalkBack Audit phase will involve inspecting each page in the~~ **~~Audit Sample~~** ~~using~~ **~~TalkBack~~** ~~on~~ **~~Android~~**~~.~~

~~Phase 8: ChromeVox Audit~~

~~The ChromeVox Audit phase will involve inspecting each page in the~~ **~~Audit Sample~~** ~~using~~ **~~ChromeVox~~** ~~on~~ **~~Chrome OS~~**~~.~~