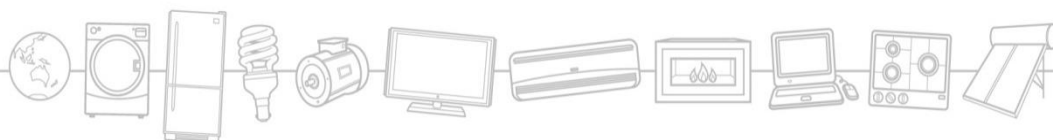




Energy Rating Website Disability Action Plan

energyrating.gov.au

July 2015



Document History

Document History

Date	Author	Version	Description
24/05/14	GW	01	First draft, added sites
26/05/14	GW	02	Adding goals and strategies
26/05/14	GW	03	First draft sent to client
25/06/14	GW	04	DOI comments
10/07/14	GW	05	Second draft
1/08/2014	NJ	06	Endorsed by Chief Information Officer
17/04/2015	LB	07	Updated time frames, for: <ul style="list-style-type: none">- Publication on the Energy Rating Website- Lodgement to the Australian Human Rights Commission
6/05/2015	LB	08	Update commitment timeframes for the Registration System and Calculator
3/07/2015	LB	09	Published to the Energy Rating Website and lodged with the Australian Human Rights Commission

Introduction

Introduction

The Equipment Energy Efficiency (E3) Program is delivered by the Appliance Energy Efficiency Branch of the Department of Industry. The Department of Industry is committed to the principles of open government, including accessibility to all Australians regardless of disability, culture, or environment. This commitment is demonstrated through this Disability Action Plan, and the adoption of the Web Accessibility National Transition Strategy (NTS) for the E3 Program's website, energyrating.gov.au.

In May 2014, the Appliance Energy Efficiency Branch engaged AccessibilityOz to develop a Web Accessibility Action Plan for energyrating.gov.au. This is to meet the requirements of the [Disability Discrimination Act 1992 \(DDA\)](#) and the Australian Government's Web Accessibility National Transition Strategy (NTS). The NTS requires all Government websites to comply with the World Wide Web Consortium's [Web Content Accessibility Guidelines, Version 2 \(WCAG2\)](#).

- Level A compliance was required by 31 December 2012
- Level AA compliance was required by December 2014

The purpose of this Action Plan is to outline the strategies that the Branch will implement to ensure energyrating.gov.au meets compliance with WCAG2. It will also outline how the Branch plans to respond to accessibility feedback, requests and complaints.

What is an Action Plan?

The [Disability Discrimination Act 1992 \(DDA\)](#) requires agencies to ensure that people with disabilities have the same fundamental rights to access information and services as others in the community.

At the end of 2009, the Secretaries' ICT Governance Board endorsed the Australian Government's transition to the World Wide Web Consortium's (W3) Web Content Accessibility Guidelines (WCAG) version 2.0. This endorsement requires all Australian Government websites implement WCAG 2.0 Level AA conformance.

Why is it required?

Compliance with Disability Discrimination Act 1992

The implementation of an Action Plan helps your department meet the requirements of the [Disability Discrimination Act 1992 \(DDA\)](#). Websites hosted in Australia are required by the DDA to ensure the information and services provided are accessible by people with disabilities. This includes disabilities which are physical, intellectual, psychiatric, sensory and neurological. According to the Australian Human Rights Commission,

The Disability Discrimination Act 1992 (DDA) makes it unlawful to discriminate in the provision of goods, services or facilities against people on the basis that they have, or may have a disability.....A person who believes that he or she has been discriminated against on the basis of disability may make a complaint to the Australian Human Rights Commission (the Commission).

The Act applies to all Commonwealth Government departments and agencies, including the Department of Industry's E3 Program. The Human Rights Commission recommends that government departments develop an Action Plan to reduce the risk of having complaints made against them.

The DDA allows, and the Commission encourages, service providers to prepare Action Plans indicating the provider's own strategies for eliminating discrimination in its services. Any Relevant provisions of such an

Action Plan are required to be taken into account in considering a complaint against a provider that has submitted its Action Plan to the Commission.

An Action Plan will be effective in ensuring compliance with the DDA if it convinces complainants and ultimately a Hearing Commissioner or the Federal Court that it

- demonstrates commitment to eliminating discrimination
- shows clear evidence of effective consultation with stakeholders
- has priorities which are appropriate and relevant
- provides continuing consultation, evaluation and review
- has clear timelines and implementation strategies and
- is in fact being implemented.

Required by the National Transition Strategy

The National Transition Strategy requires all Government websites to conform to WCAG2 Guidelines.

- Level A compliance is required by 31 December 2012
- Level AA compliance is required by December 2014

As part of its Work Plan for Phase 3: Implementation, the NTS recommends that an Action Plan be developed to address the “ongoing management of WCAG2 conformance, including regular reviews, monitoring and testing.”

Supports Department of Industry and Whole of Government principles

This Disability Action Plan supports the following documents:

- Website Accessibility Strategy – Department of Industry
- E-Government and the Digital Economy – Whole of Government
- Disability Vision – Department of Industry
- ICT Strategic Plan – Department of Industry

Objective

It is the Appliance Energy Efficiency Branch’s objective to provide an environment that best positions it with the capability to achieve ongoing WCAG 2.0 level AA compliance as part of Business as Usual, for all online content or services owned, managed or delivered by the E3 Program, where technologically possible.

This complements the Department of Industry position of open government, with an emphasis for pro-disclosure of public sector information; and to achieve this while giving consideration to the Financial Management and Accountability Act 1997 (FMA Act) that promotes proper use of Commonwealth resources.

Scope

Scope

This Disability Action Plan focuses on web accessibility. It deals specifically with accessibility of content in websites and web applications of the E3 Program. The strategies can be added to any wider Disability Action Plan devised by the Department.

Web sites / applications included in this Disability Action Plan

The current websites and web-based applications included in this Action Plan are detailed below.

Websites

- Energy Rating site
- Energy Rating Registration System
- Energy Rating Calculator
- Energy Rating Data
- E3 Committee
- E3 Review Committee

Web applications

- Energy Rating mobile / web app

Web sites / applications not included in this Disability Action Plan

- Other Department of Industry sites

Details of the relevant web sites and applications

Energy Rating site

Website / System	Comments
URL	www.energyrating.gov.au
Description	E3 Program site
CMS used?	Wordpress
Programming languages used	HTML, JavaScript
User type:	Industry, Consumers, Academics, E3 Committee
Approximate number of pages	4,000 pages (including publications)
Approximate audience	568,868 sessions last year
Age of system	Redeveloped 2012
Edited by (internal or external)	Internal
Third party? Open source?	Third party: WSP Digital
Redevelopment priorities	Redevelopment – Mid 2015
Archive / decommission date?	None
Additional comments	<p>2014</p> <p>Accessibility audit conducted May 2014 resulting in a compliance report which identified all non-conformances.</p> <p>Accessibility fixes to the top ten pages and calculator completed June 2014</p> <p>2015</p> <p>The website will be redeveloped for launch in September 2015, and will address usability and accessibility weaknesses. To accompany this work, an audit of all website content is underway to assess relevancy and WCAG compliance.*</p> <p>As at March 2015, there were 1843 documents available on the website. As at May 2015, an internal audit had identified 242 documents to be retained, 520 to be archived online (remaining available through a search function), 1004 to be removed, and 77 yet to be audited.</p>

*A strategy has been developed for the audit of all documents on the website. This strategy complies with all elements of WCAG2.0 AA and NTS requirements, with one exception:

An Archive section of the energy rating website will host all documents that have been identified as no longer current, but still important and not yet appropriate for removal. They will be archived for reference, research or recordkeeping only, and will not be altered or updated after the date of archiving. Of these 520 documents to be placed in the archive, 204 documents were published post July 2010. The E3 Program will endeavour to make the 204 documents WCAG compliant pending our financial ability to do so.

There is no plan to upgrade the 316 documents that were published pre July 2010 to WCAG2.0 AA on the basis that it would not be cost effective to do so. The E3 program has limited budget and given the expected low volume of usage it is considered that it would not be an effective use of Commonwealth and States funds. The Department of Industry and Science notes that agencies are still liable for complaint under the Disability Discrimination Act 1992 for all websites that are not accessible, regardless of their proposed archival or decommissioned status. To address this risk, the E3 Program will implement procedures to make these archived documents WCAG2.0 compliant where an individual raises accessibility issues.

Energy Rating Registration System and Comparison Tool

Website / System	Comments
URL	reg.energyrating.gov.au
Description	Registration system for industry (password protected) Compare appliances and running costs
CMS used?	Django
Programming languages used	HTML, JavaScript, Python
User type:	Main: Industry (Registration) Secondary: Consumers, Academics, Students (research)
Approximate number of pages	1,000 pages
Approximate audience	27,065 registrations Approximately 4,500 registrations last year
Age of system	Built 2011/ 2012
Edited by (internal or external)	External – WSP Digital
Third party? Open source?	Third party: WSP Digital
Redevelopment priorities	Update registration interface and accessibility updates 2014 / 2015 and 2015/2016, including adding context-sensitive help – starting with administrator access pages and working into registrant pages and comparison tool pages. Managed within context of Registration system re-scoping 2015/16. Registration user guide provided in accessible Word and tagged PDF.
Archive / decommission date?	None

Energy Rating Data

Website / System	Comments
URL	standbydata.energyrating.gov.au
Description	Closed site providing public information on request only
CMS used?	Wordpress
Programming languages used	HTML, JavaScript
User type:	Public (on request only)
Approximate number of pages	1 dataset
Approximate audience	Under 10 requests in 2 years
Age of system	Built 2012
Edited by (internal or external)	Internal
Third party? Open source?	Third party: WSP Digital
Redevelopment priorities	The relevance of the dataset will be reviewed. Content may be deployed on data.gov.au instead of a specific E3 site.
Archive / decommission date?	Review for decommission – August 2015.
Additional comments	

E3 Committee

Website / System	Comments
URL	e3committee.energyrating.gov.au
Description	Closed, password protected site for E3 committee (meetings and reports)
CMS used?	Wordpress
Programming languages used	HTML, JavaScript
User type:	E3 Committee
Approximate number of pages	100 pages
Approximate audience	30 Committee members and internal staff
Age of system	Built 2012
Edited by (internal or external)	Internal

Website / System	Comments
Third party? Open source?	Third party: WSP Digital
Redevelopment priorities	Content to be reviewed for relevance and possibly archived – August 2015.
Archive / decommission date?	None
Additional comments	

E3 Review Committee

Website / System	Comments
URL	e3review.energyrating.gov.au
Description	Closed, password protected site for industry and community working group.
CMS used?	Wordpress
Programming languages used	HTML, JavaScript
User type:	None
Approximate number of pages	4 pages
Approximate audience	None
Age of system	Built 2012
Edited by (internal or external)	Internal
Third party? Open source?	Third party: WSP Digital
Redevelopment priorities	None.
Archive / decommission date?	To be decommissioned – September 2015.
Additional comments	

Energy Rating mobile / web app

Website / System	Comments
URL	energyrating.gov.au/for-consumers/energy-ratings-mobile-app/
Description	Mobile / web app comparison tool. Comparison of appliances and running costs, optimised from mobile with customised searches.

Website / System	Comments
CMS used?	Feed from data.gov.au
Programming languages used	HTML, JavaScript
User type:	Consumers (predominantly), Industry
Approximate number of pages	5 pages and generated results
Approximate audience	Consumer – purchasing appliances
Age of system	Built 2014
Edited by (internal or external)	Internal
Third party? Open source?	Third party: Stripy Sock
Redevelopment priorities	Iterations on user feedback
Archive / decommission date?	None
Additional comments	WCAG 2.0 compliant

Goals and Strategies

Goals and Strategies

Raising awareness of web accessibility

Goals	Actions	Timelines	Responsibility
Staff with web responsibilities have a basic understanding of the importance of accessibility.	All Energy Rating team members involved in managing, developing or maintaining web pages attend training on accessibility basics.	Ongoing	Appliance Energy Efficiency Branch Manager
Web accessibility is included in policies and procedures relating to the online environment	Include compliance to WCAG2 in policies and procedures dealing with online environment	Ongoing	Appliance Energy Efficiency Branch Manager
Web accessibility is included as a performance measure for the Chief Information Officer.	Include accessibility as a Key Performance Indicator (KPI) for Chief Information Officer (CIO).	Ongoing	Department of Industry Chief Information Officer

Fixing accessibility errors in current websites and web applications

Goals	Actions	Timelines	Responsibility
Current public websites and web-based applications that will not be archived in the next twelve months, meet minimum Level AA compliance to WCAG2	Conduct Level AA Accessibility Audits and address any errors found	Registration System and Calculator - mid-2016 All other sites – September 2015	Appliance Energy Efficiency Branch
Users of assistive technology are involved in accessibility evaluations of web content for high profile public sites and	Seek guidance from internal staff with disabilities. If none are available, seek assistance from a web accessibility	Ongoing	Appliance Energy Efficiency Branch

Goals	Actions	Timelines	Responsibility
applications	consultant or conduct user testing with people with disabilities		

Developing new web sites and web-based applications

Goals	Actions	Timelines	Responsibility
Newly developed web sites and applications comply with WCAG2 Level AA guidelines.	Use WCAG 2 Level AA Guidelines when developing the web site/application	By launch	Appliance Energy Efficiency Branch
Accessibility requirements are identified early in the design process.	Seek input from an accessibility specialist when gathering functional specifications and user requirements.	As required	Appliance Energy Efficiency Branch
All new web sites/applications are checked for accessibility as part of their development.	Conduct Level AA Accessibility Audits of early designs and subsequent iterations.	By launch	Appliance Energy Efficiency Branch
Errors found in audits are addressed	Fix errors found in Level AA accessibility audits	Within a month of receiving errors.	Appliance Energy Efficiency Branch
Any new templates comply with WCAG2 Level AA guidelines.	Seek input from an accessibility specialist at the earliest possible stage of template design.	As required	Appliance Energy Efficiency Branch
Templates for web content are checked for accessibility as part of their development.	Conduct accessibility evaluations of templates and address any errors found.	By launch	Appliance Energy Efficiency Branch

Using external developers

Goals	Actions	Timelines	Responsibility
External developers are able to implement WCAG guidelines	Ensure contracts include web accessibility criteria	Ongoing	Appliance Energy Efficiency Branch

Maintaining accessibility of web content

Goals	Actions	Timelines	Responsibility
Accessibility level of web content is maintained.	Re-audit web content to ensure ongoing compliance to WCAG2 guidelines	Every 3 months	Appliance Energy Efficiency Branch
Developers and content authors produce accessible web content.	Provide training on creating accessible HTML, PDF and Word documents.	Ongoing	Appliance Energy Efficiency Branch
Content Management System produces accessible web content.	Redeveloped Content Management System is capable of producing accessible content.	September 2015	Appliance Energy Efficiency Branch

Training developers and content authors

Goals	Actions	Timelines	Responsibility
All web developers are trained in developing accessible code before given access to Energy Rating websites.	Train web developers on developing accessible content.	Ongoing	Appliance Energy Efficiency Branch
All content authors are trained in producing accessible content before given access to Energy Rating web sites.	Train content authors in how to write accessible web pages.	Ongoing	Appliance Energy Efficiency Branch

Procuring and using 3rd party web products

Goals	Actions	Timelines	Responsibility
Procurement policies relating to websites or web applications include web accessibility criteria	Update procurement policies to include web accessibility criteria	Ongoing	Department of Industry Chief Information Officer
Any new Content Management System meets WCAG2 Level AA Guidelines	Contact an accessibility specialist for advice on choosing an accessible content management system.	As required	Appliance Energy Efficiency Branch

Publishing documents online

Goals	Actions	Timelines	Responsibility
All new documents published on the web are provided in multiple formats.	PDF documents are also provided as Word or HTML documents. Word documents are made accessible (and not saved as 'Read only').	Achieved December 2014, commitment for ongoing compliance	Appliance Energy Efficiency Branch
All new PDFs are correctly tagged.	Tag PDFs according to WCAG 2.0 Guidelines.	Achieved December 2014, commitment for ongoing compliance	Appliance Energy Efficiency Branch

Addressing accessibility feedback, requests and complaints

Goals	Actions	Timelines	Responsibility
All web content can be used by people with disabilities	Create a policy that any Energy Rating web page identified as being inaccessible by a user with disabilities will be made accessible in a timely manner	Response to user within 24hrs	Appliance Energy Efficiency Branch

Goals	Actions	Timelines	Responsibility
Staff with web responsibilities recognise accessibility issues	Staff with web responsibilities are trained to recognise accessibility issues in user complaints, requests and questions	Ongoing	Appliance Energy Efficiency Branch
Staff act on accessibility related user complaints, requests and questions.	Create a procedure for staff to address accessibility related user complaints, requests and questions.	Ongoing	Appliance Energy Efficiency Branch
Users can request an accessible format of a PDF (Word, MP3 or Text)	Where there's a PDF, provide name of person responsible, with email address	Response within 24 hours, new format in within 2 weeks.	Appliance Energy Efficiency Branch
Users know who to contact for an accessibility issue.	Contact details on web pages are kept up to date	Ongoing	Appliance Energy Efficiency Branch

Promoting the Energy Rating's commitment to online accessibility

Goals	Actions	Timelines	Responsibility
The Action Plan is available on the Energy Rating website	A copy of the Web Accessibility Action Plan is placed on the Energy Rating website	July 2015	Appliance Energy Efficiency Branch
The Action Plan is lodged with the Australian Human Rights Commission	The Plan will be sent to the Australian Human Rights Commission	July 2015	Appliance Energy Efficiency Branch

Monitoring the implementation of the Action Plan

Goals	Actions	Timelines	Responsibility
Action plan is being implemented	Action Plan is periodically reviewed and updated	Reviewed in December 2015, and annually thereafter.	Appliance Energy Efficiency Branch

Contacts

Contacts

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www.energyrating.gov.au