

Accessibility statement instruction

Helsinki

Index

What is an accessibility statement?	3
Requirements of the accessibility statement	4
Provisions governing the statement	4
Proposal for preparing a statement	5
Preparing a statement	6
Requirements for preparing the statement	6
Assessment of accessibility	7
Who will prepare the statement	7
Accessibility in practical work tasks	8
Visual design	9
Technical implementation	10
Content production	12
Documents and attached files	13
Programmatic audit	14
Use of audit tools	14

What is an accessibility statement?

An accessibility statement informs a third person of how well the website in question meets the accessibility requirements. Therefore, the statement as such does not determine the target level of accessibility; it only describes in what ways and to what extent the site is accessible. The statement must also explain why and to what extent the goals have not been reached and where the information is available in an accessible format.

Preparing an accessibility statement requires evaluating the accessibility of a website (through self-evaluation or an audit by a third-party expert) before writing the statement. The statement describes the results of these evaluations.

The target level for accessibility is set by the 'Act on the Provision of Digital Services, Section 7'. In reference data published by the European Commission, Level AA of the Web Content Accessibility Guidelines provided by the W3C Consortium is referred to as the applicable standard.

Act on the Provision of Digital Services:

<https://www.finlex.fi/fi/laki/alkup/2019/20190306>

The Commission's Communication:
celex number 52016PC0484

Preparing an accessibility statement requires evaluating the accessibility of a website.

Requirements of the accessibility statement

Provisions governing the statement

The accessibility statement is not just any document required by the EU and the Commission; the Directive, the Commission's enforcement order and Finland's national legislation lay down specific provisions for what the statement shall contain, how the content shall be verified and how it shall be published.

Directive on the Accessibility of Websites and Mobile Applications

The requirements are based on the EU Directive (EU) 2016/2102 on the accessibility of websites and mobile applications of public sector bodies, adopted on 26 October 2016.

Article 7 (Additional measures) provides on the accessibility statement. The directive sets the following requirements for the statement:

- the statement shall be regularly updated, detailed, comprehensible and clear
- the statement shall be provided in an accessible format
- the statement shall be available on the website in question
- the statement shall be available on each page through means such as the header or footer (a standard URL address may be used)
- the statement shall include an explanation concerning those parts of the content that are not accessible
- the reasons for that inaccessibility
- the accessible alternatives provided for
- a feedback mechanism (a description of and link to how to report and request for unavailable information)
- legal remedy (a link to the enforcement procedure you can have recourse to)

Commission Implementing Decision on the model accessibility statement

The Commission Implementing Decision (EU) 2018/1523 *on the model accessibility statement*, adopted on 11 October 2018, provides as follows:

- public sector bodies provide the accessibility statement using a model accessibility statement established by the Commission
- public sector bodies regularly review and update their accessibility statements at least once a year
- the statement shall be available on each page of the website and in the mobile application
- the accessibility statement should be available, where appropriate, in a machine-readable format
- statements on compliance with the requirements provided in the accessibility statement are accurate and based on one of the following:
 - actual assessment
 - self-evaluation
 - audit performed by a third party
 - other measure deemed appropriate by the member state, which provides similar certainty on the accuracy (no such measure exists)
- at least the mandatory statement content requirements, referenced in the Implementing Decision, shall be met
- and any requirements exceeding the voluntary content, determined by the member state itself

Proposal for preparing a statement

Statement content

According to the EU Directive and the Commission Implementing Decision as well as the Act on the Provision of Digital Services, the statement shall address accessibility comprehensively. The statement requirements have been provided for very briefly in Finnish legislation, but the law refers to the Implementing Decision enacted under Section 2 of Article 7 of the Accessibility Directive. The decision partially refers to the Accessibility Directive. The related requirements have been comprehensively listed above.

Accuracy of statement content

An accessibility statement is required to provide detailed explanations on the degree of compliance with the accessibility requirements, with references to the requirements that have not been met, the related reasons and the measures taken to address the issue.

This requires correct interpretation of the results of certain audits made during self-evaluations as well as the ability to assess the actual significance of the results. Furthermore, one must be able to verify whether the reports generated by automatic technical audits are accurate and to interpret the content of the audit reports in the statement or carry out appropriate corrections based on the audit.

Some deficiencies reported by machine audits may not necessarily genuinely hinder accessibility, but they must at least be verified. Such errors should also be corrected because they have unfavourable effects on the site functionality and third-party views on the accessibility of the website.

Due to these reasons, separate guidelines have been created

- presentation of various auditing tools
- interpretative guidelines for audit reports
- auditing accessibility
- audit tools
- assessment of audit results
- task lists for different roles
- model texts for the accessibility statement

Preparing a statement

Preparing an accessibility statement requires expertise. The statement and its drafting process are associated with peremptory provisions, and determining its content requires certain expertise on accessibility and web technologies. Preparing an accessibility statement is not a task suited for everyone working on a web publication. Each organisation and unit must have an appointed entity (field of activity or enterprise) responsible for accessibility. This entity must also be referenced in the statement (part of the mandatory information in the statement). Preparing and maintaining the

statement is the responsibility of the field of activity or enterprise.

There must be more to the work process than meetings with the audit organisation; the organisation has to learn to maintain and produce everything in accessible format. Accessibility is part of the process.

Requirements for preparing the statement

Content requirements for the statement are listed in the EU Commission Implementing Decision (EU) 2018/1523.

The Commission Implementing Decision establishes that the claims in the statement are accurate and based on an actual assessment of compliance with accessibility requirements. Accessibility requirements are based on the general Web Content Accessibility Guidelines (WCAG) and their updated version. These guidelines list success criteria that must be met with regard to the

content and technical implementation. Evaluation of accessibility under these criteria requires that the assessor has sufficient expertise related to the general principles of accessibility, requirements of the WCAG success criteria and web technologies. In particular, they must be able to interpret the accuracy of HTML markings and use of WAI-ARIA attributes utilised by assistive technologies. Meetings held with the auditing organisation are not enough for this process; the organisation itself must learn to maintain and produce all its content in an accessible form. Accessibility is part of the process.

Assessment of accessibility

Compliance with the accessibility requirements is assessed based on objective indicators as well as subjective evaluations. The measurable criteria include solutions related to publishing technology, the assessment of which requires expertise related to accessibility technologies. The criteria to be assessed involve interpreting requirements related to the perceivability and understandability of content.

Technical evaluation

An evaluation of a website's technical accessibility can only be carried out competently by a person who is sufficiently familiar with the functionality of the web and assistive technologies. Usually, this person represents a unit for technical system

maintenance or is a third-party expert. Fields of activity and enterprises supplement the guidelines with an operating model.

Content-based evaluation

The person in charge of the publication content is best suited for evaluating the accessibility of the content. Third-party experts may also provide a statement on the coherence and understandability of the content.

Evaluation results

The results of the evaluations indicated above are recorded in the accessibility statement.

Who will prepare the statement

The person in charge of technical implementation and the person responsible for the publication content must both participate in the evaluation of accessibility.

The statement is prepared by a person appointed for the task or several such persons together. These persons must have adequate knowledge of accessibility requirements and web technologies. A third-party expert may also prepare the statement or part thereof, but the organisation will have to approve the statement.

Everyone must be familiar with the accessibility requirements within the scope of their own role.

Accessibility in practical work tasks

Everyone is responsible for ensuring that a publication and its content are accessible within the scope of their own role. Accessibility cannot be outsourced, nor can the responsibility for it be transferred to another operator. Everyone must understand which aspects of their own work are significant in terms of accessibility compliance. With regard to achieving compliance, some of the tasks affecting the outcome are non-recurring while some remain a constant part of content production.

Non-recurring tasks

Non-recurring tasks include, e.g. Style choices made when designing the visual look of the site as well as technical solutions used in the publication and HTML markups used on the site.

Design phase tasks include, for example, the colours used on the site, sufficient colour contrast, positioning of content, typographic decisions, interface element design, etc. Formatting decided in the design phase is used in site implementation and content production. Similarly, solutions regarding code generation are made during technical implementation. The code is repeated across all pages in the same way and can no longer be edited by the content producer.

Continuous tasks

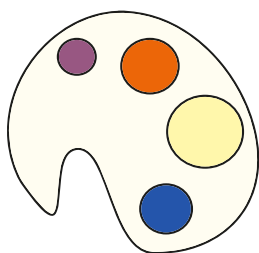
The requirements for accessibility are fulfilled by the visual look and technical implementation of a high-level publication intended to be accessible. For such a publication, continuous accessibility work involves verifying the accessibility of the content on a continuous basis. Ensuring the accessibility of the content involves, for example, following the given graphical instructions, correct use of publication system features, creating clear content and producing alternative content such as adding alt text for images.

Ensuring accessibility

Everyone working with the visual look, technology or content of a publication must ensure in their own work that any changes and additions made will not compromise accessibility.

Procurements

When ordering services or implementations from external suppliers, ensure that the requirements listed herein will also be followed by the external supplier in their implementations.



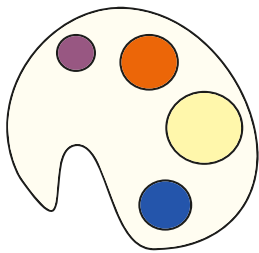
Visual design



Technical implementation



Content production



Visual design

Issues affecting accessibility and thus the preparation of the statement are listed below.

Page content layout

- has the page content been divided into distinct and logical entities, which can be represented by means of HTML structural elements
- is content on the page laid out logically and is it easy to perceive the content visually on screens of different sizes
- is the distance between the elements sufficient to distinguish them from each other
- is the distance between elements that belong together small enough to indicate that the contents belong together
- when content elements have different levels of significance, can they be distinguished visually
- are the elements positioned according to customary design solutions
- are the elements positioned consistently across all pages

Colours and contrasts

- are the used colours clear and distinguishable (from each other)
- colours are not too strong or garish
- colours are distinct also when users have different degrees of colour blindness
- the front and the contrast between background colours is sufficient
- links stand out from the rest of the text visually, not just by means of colour
- the focus element is highlighted visually when the site is used with a keyboard
- information is not highlighted solely through colour

Typography

- the used font type is clear and legible
- the used font size is large enough
- the line length of text paragraphs does not exceed 80 characters
- spacing is at least 1.5 times the font size
- paragraph spacing is at least 2 times the font size
- contrast between the text and background colours is at least 4.5 in normal text and 3 in large text
- text is aligned to the left
- all HTML heading levels are taken into account in the design

Images and icons

- if images have captions, they are presented clearly in connection with the image
- images and icons used for decorative purposes are useful and informative
- the selected images serve their purpose and are functional in terms of content and colour sphere (for the colour blind as well, if possible)

Forms

- All form fields have a title text that is always visible
- titles of form fields describe the content of the input field
- the distance between the title and input field indicates whether they belong together
- buttons in the form are clearly placed in conjunction with the form or function
- form error notifications stand out visually, and erroneous information is highlighted adequately
- message sent after the form has been submitted successfully stands out and is clearly highlighted



Technical implementation

The topics listed below are accessibility success criteria related to publishing technology. They must be taken into account when assessing compliance with accessibility requirements. The technical requirements are based on the Web Content Accessibility Guidelines (WCAG) provided by the W3C Consortium.

Persons responsible for site technology must ensure that the technology supports site accessibility and make it possible for site users and content producers to publish content in an accessible format. Technology includes all features whose implementation has been specified in the system source code and which cannot be altered by users. Such features include, for example, the possibility to provide alt text for images and displaying the site language in the `<html>` root element through the lang attribute.

It is preferable to use an HTML element applicable for this purpose, if any are available, for all the implementations of site technology. Site content should always be implemented using the standard HTML markup. The recommended Hypertext Markup Language (HTML) level is 5 (HTML5), and HTML5 semantic elements should be used in the implementation.

For example: to create a button, you need to use the HTML button element and not a self-made div element with CSS formatting and functionality implemented with JavaScript. The built-in elements automatically provide the correct functionality and are, as a rule, accessible to assistive technologies without requiring any extra settings.

With regard to the features listed below, when they generate notifications during accessibility evaluations (audits or automatic checks), these notifications must be inspected manually and directed to the party responsible for site technology for correction.

Site structure and correct use of elements (semantics)

- page `<title>`
- indicating page language: lang attribute
- indicating the language of a page section when there are parts in different languages on the page (lang attribute)
- correct use of headings (partly the responsibility of the content producer)
- landmark elements (it is recommended to create the site structure using these)
- `<header>`, `<nav>`, `<main>`, `<footer>` or the corresponding ARIA codes `role="banner"`, `role="navigation"`, `role="main"`, `role="contentinfo"`
- Lists
- Tables
- iframe embedding
- HTML accuracy

Links, navigation and usage of the site

- ‘Skip links’, links directing immediately to the start of the `<body>` element, directly to the navigation, main content, site map
- links:
 - always contain a machine-readable label and clearly communicate where the link directs to
 - consistent site navigation across all pages
- internal page navigation
 - focus order
 - focus order between elements is logical and harmonious
 - no positive `tabindex` values (greater than zero)
 - visually and clearly highlighting a focus element
- all parts of the site are accessible without a mouse, using only a keyboard
- are all elements in accordance with general and expected functionality
- new element `focus` does not cause content changes or moving to new content

Images and visual appearance

- images accompanied by feedable [alt](#) text
- images with decorative purposes either provided with applicable [alt](#) text or hidden from screen readers
- colours and contrast follow the set requirements
- text styles are legible
- page size changes are in accordance with the *Reflow* and *Zoom* success criteria with regard to the positioning of page content
- adaptable content, position indication

Multimedia, animations, motion

- audio files
 - the necessary replay and sound volume controls are accessible to users
 - sound volume must be capable of being adjusted separately using the general system volume controls
- video files
 - the necessary replay and sound volume controls are accessible to users
 - the possibility to add captions for video files using the *Closed captions* technology, in which captions are provided as separate machine-readable text instead of using ‘burnt-in’ captions
- animations
 - no disruptively large and powerful motion effects
 - no intense and contrasting colours
 - no quick flashes (more than 3 times a second)

Timed functions

- users have enough time to perform a function
- users receive a notification when time is running out and are given an easy way to ask for more time

User input: forms

- device-independent input: user must be able to switch the input method during a function (mouse, keyboard, touch screen)
- all form fields have a visible and programmatically readable [label](#)
- form input field type always corresponds with the content that is being entered
- [input type](#) according to content, whereby touch-screen devices are able to select the correct ‘on-screen keyboard’
- the form includes sufficient and clear instructions for the user
- form validation (input check)
 - clear notifications for erroneous input and instructions for fixing it
 - when the form is submitted successfully, the user receives a visible and permanent notification
 - notifications must also be provided in a format perceivable to screen readers
- avoid CAPTCHA or provide an accessible version of the audit

Custom controls

- do all custom controls, script components etc. have the appropriate ARIA [role](#) and [name](#) values to indicate the purpose of the control



Content production

The following topics are important in terms of creating accessible content. Use the available ready-made models and styles in content creation.

Coherence and intelligibility of content

- present your content in an understandable and logical order
- use plain language that is understandable to the user
- avoid jargon and administrative terminology if generally understood equivalents are available
- say one thing in one sentence
- use examples and expressions that clarify the topic
- provide all information related to the topic as comprehensively as possible on the same page
- avoid references to other sites if you can say the same thing in your content
- avoid using attached files where possible

Text

- do not determine the colour or other properties of the text yourself, although the publication system would enable this
- do all the formatting related to the visual appearance of the site using preset styles (technical implementation with CSS styles)
- do not use capital letters in the text
- avoid **boldface** and *italics* in text formatting
- do not create 'headings' by changing the font size or other styles always use selectable heading styles

Headings

- use enough sub-headings in the text
- select the heading level according to the heading hierarchy
- only use heading levels [H2–H6](#); heading level [H1](#) is reserved for the main heading of the page, which should be created automatically from the page title
- do not bypass heading levels the sub-heading for [H2](#) heading must be [H3](#), etc.
- make sure that the heading text corresponds with the content and purpose of the paragraph below

Links

- make sure that the link text clearly describes the destination and purpose of the link

Images

- add alternative text for images ([alt text](#))
- [alt](#) text must describe the content of the image
- do not use the word 'image', 'the image displays', etc.
- do not simply list 'keywords'
- [alt](#) text can be an actual sentence approximately 200 characters in length
- end the [alt](#) text with a full stop
- if the image is infographics etc. containing plenty of information, explain the content of the graph in text elsewhere on the page and refer to this explanation in the [alt](#) text
- do not add [alt](#) text for icons etc., which have been added for decorative purposes
- do not use text embedded in an image. All text must be provided as readable text in the page content – not within the image

Documents and attached files

Documents distributed as attached files must also be created in an accessible format, for the most part. An accessible document refers to a document that can be read using screen reader software and follows the general principles of accessibility in other respects as well. When creating documents intended for public or client distribution, you should use styles available in the application and document template as well as the application's built-in accessibility features.

WORD

- images and graphs have alt text
- document headings and sub-headings have been created using styles
- links contain text that describes the destination

POWERPOINT

- slides created with styles and elements
- content slides are in the order in which they are intended to be read

EXCEL

- give tabs labels that describe their content
- remove empty tabs
- use a clear table structure
- use descriptive column headers

ADOBE PDF FILES

- select the option '*Best for electronic distribution*' from the PDF options

Reviewing a finished page

Use the browser's built-in review tools or an external service that checks the accessibility of the page. Read through the report generated by the review and correct any deficiencies that can be corrected by altering the content.

Always use the built-in styles and features of the application in question.

Programmatic audit

Accessibility of websites can be assessed by performing a programmatic audit using either a third-party service or a built-in or installed review tool in the browser. However, programmatic audit tools are not capable of drawing correct conclusions from everything, so any ambiguous notifications

Accessibility testing carried out by content producers requires that they have appropriate software at their disposal.

Use of audit tools

Programmatic audit tools in browsers are easy to use and highly automatised. Their use is based on programmatic reading of the content of the page under evaluation.

1. open the page to be audited in the browser
2. open the browser developer tool by selecting
 - keyboard shortcut Ctrl + Shift + i (Windows) or Cmd + Option + i (Mac)
 - right mouse button on top of the page and, from the menu that opens, 'Inspect' or a similar command depending on system settings
3. select the tool tab from developer's tools and start the inspection

The tools will display the result of the inspection on the developer tool tab. Reports may be slightly different depending on the tool. Still, they explain very clearly which tests did not pass the accessibility requirements and which you will have to check yourself, because the software cannot deduct everything.

Based on the test results, you can correct the site's shortcomings yourself or direct the correction request to a party who is able to perform the correction.

On the next page, Chrome Lighthouse, Axe and Siteimprove inspection results are provided as an example.

Auditing tools

Many browser features and installable browser extensions for auditing the accessibility of websites are available for free. More features will become available for auditing when you purchase a fee-based version of the tool.

Browser development tools

All of the important browsers provide access to developer tools and features for auditing accessibility. For example, Google Chrome and Mozilla Firefox include a comprehensive set of easy-to-use features.

Lighthouse auditing in the Google Chrome browser

The Google Chrome browser has a built-in auditing tool realised by Google, which can also conduct audits focusing on site accessibility. As a result of the audit, Lighthouse scores the site 0–100 and lists

- any accessibility deficiencies observed
- passed tests
- items to be checked separately
- contents included in the audit that are not on the website

Axe browser extension for auditing

Axe is an accessibility auditing tool created by the Deque Systems. Deque's tool gives an overview of the site's accessibility features and visually indicates the elements that were highlighted in the audit. You need to install this extension to your browser separately.

Axe auditing rules are available as a list with explanations on

<https://dequeuniversity.com/rules/axe/3.3>

Siteimprove browser extension for auditing

The Siteimprove extension enables the easy filtering of auditing results based on the user's role.

Possible roles (areas of responsibility) include

- editor
- webmaster (tasks requiring coding of site content)
- developer, tasks requiring coding of global changes in the publication system

This way, editors are able to print a more concise checklist. Some of the objects allocated for inspection require understanding of coding and technology.

Siteimprove enables the selection of the desired level of compliance (A, AA or AAA). Furthermore, users may select issues for reporting based on the severity of the errors..

Other useful tools

SIMULATING FUNCTIONAL IMPAIRMENTS

It is often beneficial to have an idea of how a certain functional impairment affects the way a person perceives content on a page. Many simulators are available for this purpose, by means of which you can examine how visual impairments affect your perception of the content.

Such a tool would be, for example, the *NoCoffee* extension, which can be used to illustrate several sight-related issues.

REVIEWING IMAGE USE AND SIGNIFICANCE

Images often play a key role in website content. An easy and practical way to check alt text for images and the functionality of the site without images is to use the extension Images ON/OFF. Using the extension, you need to press a button to remove all the images from sight. At this point, the browser displays the site without images, with the added alt text in place of the images.

Websites to support audits

Many services are available online to audit website accessibility. Some auditing websites offer fee-based auditing while some audit the site in the same way as the browser auditing tools mentioned above. Auditing tools installed in the browser are the most convenient to use and always available to the publisher. Websites for accessibility auditing include, for example,

<https://webaccessibility.com/>

<https://wave.webaim.org/>

<https://siteimprove.com/fi-fi/accessibility/>

An audit performed by the Siteimprove website only provides a list of possible errors but does not indicate where the error occurred, nor give more specific information on site technology. Such a test result is not useful to the end user. Instead, the browser extension of Siteimprove works well and is recommended for use.

Furthermore, pages focusing on one issue are available for accessibility auditing. Such sites include colour contrast evaluation sites. These include, for example,

<https://webaim.org/resources/contrastchecker/>

<https://contrastchecker.com/>

<https://contrast-ratio.com/>