SCORECARD LAUNCH REPORT

18/05/23

Theme: Accessibility of Government Websites for Persons with Disability (PWDs) Scorecard Launch

Venue: Royal Tulip Canaan Hotel, Hurlingham, Nairobi, Kenya (Hybrid)

Date: 18th May 2023

Time: 8 am - 1.00 pm EAT

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1. Introduction

As part of KICTANet's, celebration of the Global Accessibility Awareness day (GAAD) 2023, on the 18th of May 2023, KICTANet hosted an event to launch the *Accessibility of Government Websites for Persons with Disability (PWDs)* Scorecard Report**.** The event was held in a hybrid format to allow both in-person and virtual attendance. In attendance were stakeholders from the government, civil-society organisations, the private sector, persons with disability organisations (PDO's), Community Based organisations (CBO's) and the media. There were a total of Fifty (50) attendees, Twenty-four (24) on-site and Twenty-six (26) joined online through Zoom.

2. Opening Remarks

Liz Orembo, a KICTANet Trustee, gave the opening remarks on behalf of the CEO, Grace Githaiga. She emphasised the importance of addressing the issue of accessibility for persons with disabilities and highlighted the Kenya ICT Action Network's (KICTANet) commitment to this cause. Liz, said that digital exclusion translates to exclusion from societal progress and stressed the significance of enabling PWDs to participate fully in online platforms.

Overview of KICTANet and Objectives:

In her remarks, Liz Orembo also provided an overview of KICTANet as a multi-stakeholder think tank focusing on ICT policy and regulation. The organisation's pillars, including research, stakeholder engagement, capacity building, and policy advocacy. She introduced the Accessibility and Equality team, Nicodemus Nyakundi and Florence Ouma, led by Judy Okite, all who are the core drivers and researchers of the Scorecard on Website Accessibility of Persons with Disabilities.

She also introduced the Kenya School of Internet Governance (KESIG) Program explaining how it focuses on bringing in new voices into the space through online training annually, preceding the Kenya Internet Governance Forum(KIGF)Liz reiterated that the objective of the research was to evaluate the accessibility aspects of the public websites for PWDs and provide recommendations to ensure inclusion. This research was a pilot project and unique in its nature that it produced individual scores to the public websites in a way that can be easily understood by a lay person.

3. Open contributions from the audience:

After the opening remarks, Judy Okite, the moderator, prompted the discussion by asking two questions;

1. What does website accessibility mean to you?

Responses from the audience:

> "website accessibility involves the ability to access the website easily, read the information provided, and interact with the content effectively."

> "website accessibility also includes consistent features, content, and formatting across various devices. This ensures that users can access all the information without missing any crucial details or experiencing formatting issues."

2. Why is it important for government websites to be accessible to all?

Responses from the audience:

> *"For equal access and opportunity. Accessibility ensures that all individuals, including those with disabilities, have equal access and opportunities to available government services, free flow of information. Accessible government services enable individuals to stay updated on government happenings, policies, and important information."*
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> *"It is crucial to ensure that government websites are accessible, enabling all citizens to engage with essential services and information."*
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> *"By prioritising website accessibility, governments can promote inclusivity, diversity, and the free flow of information for all individuals, regardless of their abilities or circumstances."*
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> *"Website accessibility promotes transparency."*

In this open discussion session , it was emphasised that accessibility promotes equality for all, right to information as a constitutional right, and economic value. For example, service providers are keen to ensure that their services are accessible to all not just for inclusion purposes but also economic value for the company by having more customers. It is imperative that accessibility is factored in, more so now that the government is digitising all its services.

Challenges Faced by Persons with Disabilities and Recommendations:

Fredrick Ouko, a speaker and virtual attendee from the Action on Disability and Development(ADD) International, emphasised the importance of ensuring multi-model accessibility options. He stressed on the need for website content to be accessible for individuals using screen readers, such as persons with visual disability and suggested that options like enabling magnification for users to be able to enlarge content, providing descriptive language, using descriptive labels in forms, and using Alt text for images can greatly improve accessibility to the websites for all persons. Fredrick went further and highlighted the importance of inclusive design, bearing in mind diverse financial backgrounds, locations, and disabilities. He emphasised optimization of websites to ensure that the websites can load faster minimising data usage making it affordable for all users.

4. Presentation of the Research Findings of the Scorecard on Accessibility of Government Websites for Persons with Disabilities (PWDs)

Florence Ouma – Digital Accessibility Fellow at KICTANet

Florence presented herself as a Digital Accessibility fellow of KICTANet advocating for accessibility of Persons with Disabilities (PWDs) and shared her personal experience as a person with disabilities, highlighting the barriers faced by PWDs in accessing ICT. These barriers encompassed economic empowerment, appointment to leadership

positions, and employment opportunities. Barriers for access to websites often led to the exclusion of PWDs from information, services and opportunities.

Florence Ouma introduced the first part of the report. The research team assessed 45 government websites including Nairobi City County Website. This selection of websites was chosen according to the relevance of the services and information they provided to the public. Florence noted that the data collection exercise in 2019 was Kenya's most inclusive attempt so far. This is because the KNBS consulted with organisations of persons with disabilities (DPOs) to train their enumerators. KNBS also adopted the use of the Washington Group set of questions as a means of collecting disability data as opposed to directly inquiring if one has a disability. She applauded this move by the KNBS, pointing out that direct inquiry often leads to concealing disability status for fear of stigma. Definitions of disability according to the constitution of Kenya disability act 2003 and the UNCRPD highlighted the different implications and ways disability is defined.

Key Findings

Florence presented the disability data breakdown according to the 2019 census report. She noted that the overall disability percentage in Kenya's population stood at 2.2% according to the 2019 population and housing census. Men with disabilities were 1.9% of the population while women were 2.5%. In rural areas they were 2.6% against the percentage in urban areas which stood at 1.4%.

She then presented a graph illustration of the prevalence rates of 6 types of disability. The prevalence in descending order included, mobility, seeing, cognition, hearing, self-care, communication and albinism.

Florence noted that the disability data of Kenya's latest census differed significantly from the disability data in 2009. The earlier data had recorded a higher disability prevalence and the disparities could be attributed to different data collection methodologies, difference in the size of administrative areas covered and change in the age groups surveyed for disability. She further said that there's an opportunity to conduct further research on the disparity between the global disability prevalence rate of 15%. The

research team utilised the W3CG international standards for website accessibility principles:Perceivable, Operability, understandable, and Robustness (also known as thePOUR principles) to evaluate the accessibility of government websites. They employed tools such as ACCESSI and WAVE, scanning the websites on Chrome and Firefox browsers. This comprehensive evaluation generated reports detailing the compliance levels of individual websites. Florence noted that the researchers did not rely solely on the tools of evaluation. There were aspects of the study that required observation and focus group discussions. She further noted that the focus group discussions conducted with volunteers with diverse disabilities helped to shed light on how to assess functionality of the websites for other disabilities that the researchers did not have.

The session on the accessibility of government websites for persons with disabilities highlighted the importance of accessibility for promoting equality, economic value, and the right to information. Florence emphasised that addressing these accessibility challenges, governments can ensure inclusivity, empower PWDs, and promote equal access to services and information for all individuals.

Scope of the Research:

She went ahead and explained the scope of the research noting that they focused on government websites and excluded mobile accessibility due to the predominant usage of cyber cafes and physical assistance services from Huduma Centres. The study recognized the disparity in ICT usage among persons with disabilities in rural areas and the ones in urban areas. She noted that there is opportunity for further research on the accessibility aspect using mobile devices.

Reactions from the floor:

During the session, participants raised various questions, comments, and recommendations regarding the research methodology and findings. James Gichuhi; Managing Director of ITAC Consulting Limited questioned the selection of the forty-five (45) government institutions websites included in the study, asking whether Persons of Disabilities had lodged complaints against them or if there was a specific process for

determining the research sample of the websites identified. Florence Ouma explained that they focused on key government institutions and agencies that provide public services, such as the Kenya Revenue Authority (KRA) and the eCitizen platform.

The topic of mobile accessibility was also brought up, with John Wambua from the United Disabled Persons of Kenya (UDPK) noting that quite a number of persons with disabilities rely on their mobile phones to access websites. It was clarified that while mobile accessibility was not completely excluded, the focus of the research was primarily on government websites accessed through desktop platforms.

He also raised concerns about the availability of cybercafes in rural areas and suggested considering mobile accessibility due to its prevalence among persons with disabilities. Florence Ouma responded that mobile accessibility was not neglected entirely but was not the primary focus of this particular study.

Gertrude Kioko, a virtual attendee also raised a question regarding the inclusivity of the 2019 census compared to the 2009 census. Florence Ouma explained that during the 2019 census, enumerators received training to capture data on persons with disabilities. However, there were still discussions and questions about the accuracy and inclusivity of the census data. The Communications Authority of Kenya (CA) representative Godfrey Muhatia suggested using the term "most recent census" instead of "the most inclusive or accurate" to avoid controversy on the matter due to different views and positions. Majority of persons with disabilities have not fully accepted the accuracy of the 2019 census report on the figures of persons with disabilities in Kenya.

The participants highlighted the need for a well informed and improved data collection processes regarding statistics on persons with disabilities in the country. They requested more comprehensive and accurate data from sources such as the Kenya National Bureau of Statistics (KNBS) and the National Council for Persons with Disabilities.

Nicodemus Nyakundi – Digital Accessibility Fellow at KICTANet

The POUR Principles:

Nyakundi, highlighted the importance of the POUR (perceivable, operable, understandable, and robust) principles for web accessibility. The perceivable principle focuses on presenting information in multiple formats to accommodate all users, such as screen readers, colour schemes, braille displays, closed captions, or transcripts. Operable principle relates to interactive elements on websites, such as links and buttons. The Understandable principle involves the presentation of information and content in a clear, concise, and easy-to-comprehend way. That is using simple and familiar language, avoiding technical terms, providing explanations, and using consistent and predictable design elements.. Robust is designing websites and content to work seamlessly with assistive technologies. It focuses on enabling users with disabilities to access and use digital content in a way that is compatible with assistive technology, and other accessibility features.

He further explained the principles into individual indicators, and how they informed the creation of the scorecard. The indicators were rated individually under each POUR principle and averaged to reflect the score of the websites per individual principle.

Moving forward, Nicodemus noted that the POUR Principles outlined in the report can serve as a guideline for improving the accessibility of government websites and ensuring inclusivity for persons with disabilities.

Key Findings from the research:

The analysis of accessibility and compliance revealed that most public websites comply with international accessibility and website content accessibility guidelines at an average level. However, he noted that there is room for improvement, as the goal is to achieve above-average levels of accessibility. According to the research findings and scorecard ratings, the National Transport and Safety Authority (NTSA) received the lowest score in the assessment.

The report identified several areas for improvement, including the establishment of standardised accessibility requirements for compatibility with third-party websites and applications. The high cost of assistive technologies was noted, and the report recommended exploring free and open-source software options. However, it also acknowledged that these alternatives often experience delays in upgrades and may require technical knowledge to use effectively.

The report emphasised the importance of involving and engaging persons with disabilities in the procurement or development processes of websites. Raising awareness and advocacy for web accessibility was also highlighted as a crucial step in improving inclusivity. The challenge of inclusive accessibility was highlighted, emphasising the need for equal access for all individuals, regardless of their disabilities.

Reactions from the floor:

During the session, participants posed several questions key among them being the assessment criteria, dissemination of the report, translation into Swahili and Braille, and the need to approach different organisations or government institutions in regard to sharing these findings.

Liz Orembo clarified that the POUR principles were used to provide standardised assessment since the indicators cut across and apply to all websites.

On the question of avoiding technological bias and involvements of persons with disabilities in the research, Nicodemus Nyakundi added that the assessment process not only involved use of assessment tool like Accessi and WAVE, but also gathered information through focus groups discussions with persons with disabilities to ensure their perspectives and online experience were considered. This was to ensure diversity and inclusivity in the process. He also emphasised that it was in these focused group discussions that the importance of adhering to the POUR principles and recommendations like standardised accessibility requirements, cost-effective solutions, and inclusive procurement or development processes were picked from.

The need for translating the scorecard into swahili and Braille as raised by Neema Mujesia was well captured and the moderator, Judy noted this and asked the attendees of any suggestions of Swahili translators to which the issue was resolved upon Josephine Kaniiru's volunteering.

John Wambua stated that websites with different forms for accessibility might face challenges, but recommendations were made to institutions like the Communications Authority (CA) to improve sensitization efforts.

Further on, participants raised concerns about the accuracy and efficiency of accessibility tools, particularly when it comes to social media platforms. It was noted that while websites often have social media icons, screen readers may only read them as generic links. As such websites should correctly name the links and specify input Alt-text over icons used.

David Indeje, from KICTANet, asked why particular websites ranked high in accessibility scores and yet they did not seem to have information that persons with disability would be looking for.n response ,it was clarified that the evaluation was not about traffic to these websites but how much individuals are able to interact with the content. For example, the Ministry of Petroleum and Mining ranked highly because it had and enabled accessibility features on their website, although it contains less information that can be consumed by the mwananchi. In contrast theMinistry of Health website ranked very low because most of its features were not accessible, but contains very crucial information like ways of mitigating Covid-19 and other public health information.

The scorecard presentation session concluded with plans for disseminating the report, addressing translation needs, and advocating for increased awareness and accessibility efforts within government institutions.

Panel Discussion

Liz Orembo, the moderator of the panel discussion session, introduced and invited the panellists which consisted Godfrey Muhatia from the Communications Authority of Kenya (CA), Sylvia Chelogoi, legal and policy practitioner from the Commission of

Administrative Justice and/or Office of the Ombudsman and James Gichuhi from ITAC Consulting Limited. She asked the panellists to introduce themselves and their organisations and state how accessibility to government websites affect them, directly or indirectly.

Sylvia, provided insights into the impact of accessibility in the context of their work. Godfrey, highlighted the role of CA as the regulator in ensuring equal access to ICT for everyone. He mentioned that they had collaborated with the National Council for Person with Disabilities(NCPWD) in a project to ensure that their website is accessible for all persons and he is glad that those efforts are bearing fruit. Communication Authority are currently creating awareness and sensitising the licensees on the ICT Accessibility standard.

James Gichuhi, shared insights from his personal experience as a distributor of software for persons with disabilities. He highlighted the challenges faced in sustaining the availability of relevant tools and equipment needed for accessibility. He emphasised the importance of minimising the costs associated with using software to ensure long-term sustainability.

Sylvia, Commission of Administrative Justice focused on the right to access information. She mentioned that access to information is guaranteed by Article 35 of the Constitution and is further supported by the Access to Information Act. The Act requires institutions to consider the needs of persons with disabilities and provide information in an accessible format. She highlighted the need for compliance among institutions and government agencies, including at the county level. She pointed out that there is often a lack of awareness, affordability, budget allocation, and prioritisation of accessibility as the government progresses with digitalization.

Liz Orembo emphasised the importance of collaboration to improve policies and drive ICT policy and regulations. She called on civil society to identify barriers, challenges, and positive aspects of service delivery and public inclusion.

The challenges faced by persons with disabilities in accessing tools for government services were discussed. It was noted that individuals with visual disability often rely on screen readers, which can be a challenge if visual interfaces are not compatible.

The affordability of tools, equipment, and software necessary to improve government website accessibility was identified as a major challenge. The challenges and opportunities that the government faces in delivering public services and ensuring accessibility for persons with disabilities were discussed as Godfrey answered some of the questions directed to the government. Some of the challenges identified included the lack of a specific person or department responsible for coordinating accessibility efforts, the need for enforcement of the basic right to accessibility, and the need to ensure compliance among institutions and private companies beyond those regulated by the Communications Authority of Kenya (CA). It was suggested that the CA consider the recommendations presented in the scorecard and lead in implementation within their mandate.

Liz Orembo, asked whether there are basic web accessibility features and at what point they should be considered. Gichuhi, in his response said that, before addressing digital accessibility, it is important to address literacy issues among persons with disabilities, particularly in rural areas and grassroots communities.

Reactions from the floor

David Indeje asked about the role of the Ombudsman in addressing complaints related to accessibility, and it was suggested that the Ombudsman could support efforts to ensure accessibility by working with existing mechanisms and investigating individual complaints.

Godfrey Muhatia clarified that Kenya has an ICT standard in place, what is required is creating awareness around it.

Sylvia, on her part said that the Ombudsman primarily deals with cases that have been reported and individual recurring issues, it will conduct its own investigations, and provide appropriate recommendations.

Godfrey said, it is important that existing standards and regulations are adhered to, this reinforces accessibility. However, it is important to ensure monitoring and evaluation mechanisms are in place.

Standards are normally voluntary, how will you reinforce compliance to it across the digital landscape? In response to this question,Godfrey, said CA, is working with the concerned government agencies to ensure that the standard is embedded within the National ICT policy.

On the question of whether penalties should be imposed for non-compliance with accessibility standards, some attendees felt that such action would prompt stakeholders to begin to address accessibility more seriously. Both Sylvia and Godfrey, suggested that the matter be approached from creating awareness, collaboration, and self regulation before resorting to penalties or sanctions. Sylvia, advised that the goal is to avoid over-regulation and encourage voluntary implementation.

"The importance of inclusive accessibility in both government and private services is to bridge the gender digital divide and ensure accessibility for all individuals", said Liz Orembo.

Closing Remarks and Way Forward

During the closing remarks, several points were highlighted. Liz emphasised that the private sector should not be overlooked in terms of accessibility, as they have a major impact on equality as some of them have become essential goods to everyday life..

Godfrey, from the Communications Authority (CA) clarified that licences are issued in accordance to the law, and the law requires users to first complain to the service provider before approaching the Communications Authority.

Victoria Nyambura from Positive young womens' voices suggested involving the youth and providing them with a platform to voice their perspectives, particularly those from grassroots communities.

The Office of the Ombudsman was encouraged to disseminate information to a wide audience, including government agencies, and to consider the recommendations put forward regarding accessibility to information.

The implementation of accessibility standards for government digital services was emphasised, and it was noted that the Universal Service Fund includes provisions to support initiatives that would improve the lives of persons with disabilities.

Josephine Kaniru, a research assistant from CIPIT, highlighted the importance of addressing technology challenges faced by persons with disabilities and mentioned specific examples of software development for organisations like NHIF and NTSA. She also pointed out communication challenges faced by persons with disabilities when accessing government services over the phone and stressed the need for inclusive technology solutions.

Jedidah Orondo, sign language interpreter, emphasised that persons with disabilities have a right to information and should be provided with accessible means of communication. Elizabeth Otieno, sign language interpreter, called for the establishment of an inclusive platform to find solutions to the accessibility challenges faced by persons with disabilities.

Neema Mujesia highlighted the importance of democratisation and inclusivity in government initiatives. She mentioned the use of technologies such as AI and machine learning, including platforms like Meta, to ensure the accessibility of persons with disabilities in digital platforms and services.

James Gichuhi suggested the establishment of a platform for persons with disabilities to share their experiences with government websites, county websites, and private websites, specifically identifying the challenges they face in order to develop targeted solutions. Not evaluating the iTAX portal was an oversight and he requested the team to look into it.

Conclusion

Judy invited Nicodemus and Florence to their final remarks. Florence emphasised the need to generate afro-centric or rather Kenyan context-oriented disability content and also adhere to accessibility guidelines for these contents. She added that this was because the disability content from the global south and elsewhere are often not contextually suited for the disability discourse in Kenya. On the research findings, Florence emphasised that the goal should be 100% accessibility for all, not just the 80% level of accessibility . 20% of non accessibility means the person with disability has only 80% of the intended information.

Judy Okite, emphasised on the importance of recognizing that accessible content encompasses more than just visual disability. She stressed that accessibility must be part of the website's full development circle. Your first activity as an accessibility advocate is to take the report and share it with your respective institutions and organisations and begin asking those uncomfortable questions. It is the only way that we will bridge this digital divide.

Overall, the event concluded with a call for inclusivity, the adoption of emerging technologies, all inclusive content, youth involvement, implementation of accessibility standards, collaboration between stakeholders, provision of inclusive technology solutions and a multi-stakeholder approach to address the accessibility challenges faced by persons with disabilities. It is hoped that this is not just another research report, but a document that can be built upon going forward. A document that both government agencies and private institutions can use as part of their monitoring and evaluation tool. The event ended after a group photo was taken by all in-person attendees.

PROGRAMME

TIME	SESSION	FACILITATORS
0800-0830	Arrival and Registration	KICTANet
0830-0845	Welcome and Introductions	Judy Okite, KICTANet – Moderator
0850- 0945	Opening Session : Opening Remarks; Grace Githaiga, CEO,KICTANet Mr. Harun Hassan, Executive Director, NCPWD Keynote address; Hon. Florence Bore, Cabinet Secretary, Ministry of Labour and Social Protection	
0950-1035	**Presentation of Research Findings on Accessibility of Government Websites for Persons with Disability (PWDs)**	**Researchers;** Florence Ouma & Nicodemus Nyakundi
1040-1055	Plenary Session	Moderator, Judy Okite
1100-1120	Health Break	
1130-1230	**Panel discussion;** **Public Service Accessibility of Persons with Disabilities** • Web Accessibility for all, what does it mean? • What is the status of the impact of accessibility?	Moderator, Liz Orembo **Panellists:** Government(NCPWD,ICTA) James Gichuhi, ITAC Consulting Ltd.

	● Why the score range on PWDs Accessibility is wide with some of the ministries and institutions having the lowest at 40%. ● What challenges do you face in accessing tools for getting government services? ● What are the challenges and opportunities the Government faces in delivering public services and ensuring accessibility of PWDs?	Frederick Ouko, ADD International Sylvia Chelogoi, Legal/Policy Practitioner Godfrey Muhatia , 'Regulator Representative
1235-1245	Plenary Session	Moderator: Judy Okite, KICTANet
1250-1315	Recommendations, Next steps and Comments, Closing session Photo session	
1330-1500	Networking Lunch	