



**Internet Professional Association**

**Submission to Legislative Council Panel on  
Information Technology and Broadcasting on  
New Strategy for E-government Service Delivery**

**February 2006**

**Policy Committee, Internet Professional Association**

## **Internet Professional Association's Submission to Legislative Council Panel on Information Technology and Broadcasting on New Strategy for E-government Service Delivery**

### **Introduction**

1. The Internet Professional Association (iProA) is pleased to provide the following submission to the Panel Committee on issues relating to the new strategy for e-government service delivery.
2. The Association welcomes the initiative to develop a new One-stop Access Portal (OSP) as a single gateway to all e-government information and services, and adopt a service clustering approach to better meet the needs and expectations of citizens by segments.
3. Being a key advocate of e-inclusion in Hong Kong, the Association would like to offer its view on the accessibility of the proposed OSP to assist the government in achieving its vision of developing the OSP as a citizen-centric portal.

### **Significance of Accessibility of E-government Services**

4. E-government services serve as gateways to government bureaux/departments and services. The Association takes the view that if commonly recognized accessibility standards are not complied with at this level, then various user groups, especially those with disabilities, would be limited from accessing Hong Kong's most basic information that should otherwise be available to them. This would defeat the Government's objective of developing citizen-centric, accessible online government information and services for the general public in a user-friendly manner. <sup>1</sup>

### **The Global E-government Accessibility Landscape**

#### *United Nations' Survey*

5. The *United Nations Global E-Government Readiness Survey 2005* <sup>2</sup> evaluated all 191 Member States' national website homepages or their equivalent for standard accessibility compliance as defined by the World Wide Web Consortium's Web Accessibility Initiative's Web Content Accessibility Guidelines (WCAG) 1.0 <sup>3</sup>.

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<sup>1</sup> Cf. para. 8 "*Intangible Benefits*" of *New Strategy for E-government Service Delivery*, Office of the Government Chief Information Officer, Commerce, Industry and Technology Bureau, January 2006.

<sup>2</sup> *UN Global E-Government Readiness Report 2005: From E-government to E-inclusion*, Department of Economic and Social Affairs, Division for Public Administration and Development Management, United Nations.

<sup>3</sup> Definitions of the different conformance levels can be found at <http://www.w3.org/WAI/intro/wcag.php>.

6. The accessibility assessment revealed that 20 percent of all websites surveyed passed the Priority 1 (which is the basic level of compliance) test without any errors. Passing the test without errors implies that the website was accessible for people with disabilities.

7. In the Asia Pacific region, Australia, Japan, New Zealand, and Republic of Korea were among the surveyed countries which had accessible national websites (please refer to Appendix A for the complete list). Since Hong Kong is not a Member State of the United Nations, its performance was not specifically reported in the survey.

#### *Hong Kong's Situation*

8. The Association has recently conducted a survey on the accessibility of the 30 popular e-government services on the Government's flagship website Electronic Service Delivery (ESD) portal <sup>4</sup> which is a public-private partnership project between ESD Services Ltd. and the Government (please refer to Appendix B for the details of the survey).

9. Based on the Association's Web Care Award <sup>5</sup> judging criteria which follow the WCAG 1.0 conformance guidelines, at the time of the survey only 2 out of the 30 e-government services passed the Primary Level standards of the Web Care Award. This translates into 93.3% inaccessibility rate among the surveyed services. This is the case despite the fact that guidelines for producing and developing websites for bureaux and departments are available internally within the Government. <sup>6</sup>

10. Even though the surveyed e-government services represents only 15% of the approximately 200 services currently offered on the ESD portal, as they are the most popular services, in the Association's opinion the current ESD portal as a whole is not very accessible for people with various disabilities. In this connection, Hong Kong is unfortunately deemed to be lagging behind some of the advanced countries in the region, such as Australia, Japan, New Zealand, and Republic of Korea.

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<sup>4</sup> The URL of the ESD portal is <http://www.esd.gov.hk>. A list of the 30 services can be found in the ESD portal's 'Popular Government Services' section ([http://www.esdlife.com/ga/pop\\_app/eng/default.asp](http://www.esdlife.com/ga/pop_app/eng/default.asp)).

<sup>5</sup> The iProA Web Care Award is the longest-standing yearly award of its type in Hong Kong which recognizes websites achieving defined levels of accessibility. Three categories of prizes will be awarded in 2006: Silver Prize (Primary Level), Gold Prize and Excellence Prize. Apart from objective compliance validation against accessibility standards, websites are also reviewed for usability by a judging panel consisting of representatives from different organizations (e.g. non-government organizations for the disabled) before the final decisions are made. Web Care Award is a key constituent of the iProA e-Inclusion Campaign (formerly the Web Care Campaign) whose major sponsor is the Office of the Government Chief Information Officer (OGCIO) (formerly the Information Technology Services Department, ITSD) since 2001.

<sup>6</sup> The *Guidelines on Dissemination of Information through Government Homepages* can be found at <http://www.info.gov.hk/digital21/eng/knowledge/guide/index.htm>. OGCIO (the then ITSD) had also produced and distributed a CD-ROM on web accessibility design considerations in 2003 to raise awareness of web accessibility among the public.

## The Road Ahead

### Opportunity

11. It is found that currently the popular e-government services on the ESD portal in general have low accessibility. It is not impossible for these services to be made more accessible in a short period of time, nevertheless there is still the question of the control of the accessibility assurance process that remains to be answered.

12. The Association believes that the OSP initiative gives the Government a golden opportunity to meet this accessibility challenge. By gradually replacing the ESD portal with the OSP which will be riding on the central e-government infrastructure, <sup>7</sup> the Government will be able to drive the accessibility assurance process, and thus be better poised to realize constantly high accessibility levels.

### Recommendations

13. The Association has produced a number of recommendations for the Government to capitalize on this opportunity and make sure that the proposed OSP will be accessible, which are prioritized as short-term, medium-term, and long-term recommendations to coincide with Stages 1, 2, 3, and 4 of the OSP programme phasing as proposed by the Government. <sup>8</sup>

#### 14. Short-term Recommendations (by mid-2006)

- a. Devise an action plan to address the OSP accessibility issue in a progressive manner with a clear target. Aim to achieve full compliance with the basic standards (WCAG 1.0 Conformance Level A) in the medium term, and then the advanced standards (WCAG 1.0 Conformance Level Double-A) in the long term. Priority should be given to the most popular e-government services.
- b. Review the *Guidelines on Dissemination of Information through Government Homepages* <sup>9</sup> to keep it up to date with the latest accessibility standards (WCAG Conformance Levels or iProA Web Care Award standards). A practical style guide with common 'look and feel' standards should also be specifically produced for the OSP and made available to e-government services web designers.

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<sup>7</sup> Cf. para. 4(d) "Riding on the central e-government infrastructure" of *New Strategy for E-government Service Delivery*, Office of the Government Chief Information Officer, Commerce, Industry and Technology Bureau, January 2006.

<sup>8</sup> Cf. para. 5 "Programme Phasing" of *New Strategy for E-government Service Delivery*, Office of the Government Chief Information Officer, Commerce, Industry and Technology Bureau, January 2006.

<sup>9</sup> The *Guidelines* can be found at <http://www.info.gov.hk/digital21/eng/knowledge/guide/index.htm>.

- c. Maintain close liaison with the relevant professional bodies for sharing of best practices.

15. Medium-term Recommendations (mid-2006 to the end of 2007)

- a. Designate a champion (an individual or an institution) for accessibility with the authority and responsibility to ensure that the objective of achieving accessibility compliance of the OSP is being met.
- b. Regularly measure and review the accessibility of the OSP. Participate in the yearly iProA Web Care Award with a view to verifying the OSP's accessibility. A standard set of automated and manual evaluations should be used for constant accessibility monitoring. This is important observing that website designs tend to change over time.
- c. Develop mechanisms for effective collection of user feedback. These may include conducting user surveys and focus groups in conjunction with non-government organizations for the disabled.
- d. Set up a cross-departmental centre of excellence for accessibility that will provide expertise, standards, and resources for improving accessibility.
- e. Ensure that all service owners of e-government services are properly trained in the importance of accessible content design and the means of its delivery.

16. Long-term Recommendations (after January 2008)

- a. Adopt effective measures to secure strong commitments from the various bureaux/departments to the provision of accessible e-government services, especially in view of the limitations of the existing internal accessibility guidelines which are not legally binding.<sup>10</sup> The Association suggests that a progressive approach be taken, i.e. starting from the imposition of less formal requirements and then completing with legislation which is the ultimate goal:
  - i. Revise the Government's public procurement policy to incorporate the requirements of the relevant conformance guidelines (WCAG or iProA Web Care Award guidelines) into all procurements in relation to e-government services, particularly outsourced website designs; and

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<sup>10</sup> Experience can be drawn from the European Union, where the current drivers behind the provision of accessible e-government services range from legal requirements (e.g. in France, Germany, Italy, Ireland) to a peer-group approach (e.g. in Austria, Denmark, Malta, UK).

- ii. Encourage and work with the industry to incorporate the relevant conformance guidelines (WCAG or iProA Web Care Award guidelines) into industry codes of practice; and finally
- iii. Enforce compliance with accessibility standards in both the private and public sectors through legislation. This could take the form of an amendment to an existing Ordinance or an enactment of a new Bill, depending on the appropriateness of the situation.

## **Conclusion**

17. The Association has observed that to a large extent the popular e-government services currently offered on the ESD portal are not very accessible for people with various disabilities. Hong Kong is therefore deemed to be falling behind some of the advanced countries in the region. This situation is contrary to the Government's vision of developing a citizen-centric portal for the general public.

18. Even if these popular e-government services are made more accessible, the Government still lacks a fundamental control of the accessibility assurance process. The Association therefore sees the OSP initiative which aims to replace the ESD portal with the OSP as an excellent opportunity for the Government to drive the accessibility assurance process, and achieve higher levels of accessibility.

19. This submission makes a number of short-term, medium-term and long-term recommendations for the Government to ensure that the proposed OSP will be accessible. These range from non-legislative measures such as accessibility standardization, leadership provision, performance monitoring, procurement policy revision, and codes of practice development to legislation which is the ultimate goal. It is hoped that the Association's recommendations will provide helpful insights for the Government to make the delivery of inclusive, citizen-centric government services a realistic possibility.

*Dyson W. C. Yu*  
*Policy Committee*  
*Internet Professional Association*

*February 2006*

## **Appendices**

### *Appendix A*

#### *United Nations' Global E-Government Readiness Survey 2005 - Countries with Priority I Website Accessibility*

Antigua and Barbuda, Australia, Austria, Azerbaijan, Botswana, Cambodia, Canada, Chile, Czech Republic, Dominica, Eritrea, Finland, France, Iceland, Ireland, Japan, Mali, Micronesia (Federated States of), Morocco, Nauru, Netherlands, New Zealand, Norway, Republic of Korea, Saint Kitts and Nevis, Saudi Arabia, Slovakia, Slovenia, Sweden, Switzerland, The former Yugoslav Republic of Macedonia, Tonga, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, and Yemen.

*Appendix B*

*Internet Professional Association's Survey on the Accessibility of the ESD Portal (ESDlife)  
Top 30 E-government Services*

Test Date

- 2<sup>nd</sup> - 3<sup>rd</sup> February, 2006

Testers

- Luk Kin Wai (Project Assistant, Internet Professional Association)
- Larry Hui (Event Coordinator, Internet Professional Association)

Methodologies

- A representative set of e-government services offered on ESDLife were selected:

A list of 30 services which were classified by ESDlife to be popular was retrieved from [http://www.esdlife.com/ga/pop\\_app/eng/default.asp](http://www.esdlife.com/ga/pop_app/eng/default.asp) on 2<sup>nd</sup> February, 2006.

- The set of services were tested against the Web Care Award Primary Level (Silver Prize) criteria as follows:
  1. Pop-up windows
    - Provide description at the very beginning of a new window's HTML code to inform the user that it is a new pop-up window
    - Provide means for the user to close a pop-up window, e.g. via a 'Close this window' button.
  2. Alternative text description for images and banners
    - Provide alternative text to describe diagrams, pictures, photos and banners
- A service will be marked as 'Passed' if all the above criteria are met, otherwise it will be marked 'Failed'.

Test Platform

- Operating System: Windows XP Home Edition (Traditional Chinese)
- Browser: Internet Explorer 6.0 SP2
- Language Settings: Big-5



Test Results

ESDlife Popular e-Government Services	Internet Professional Association's Web Care Award - Primary Level	
	Passed	Failed
1. Leisure Link (Leisure Link Users Tips)		✓
2. Appointment Booking Service for Hong Kong Smart Identity Card Replacement Exercise (FAQ)		✓
3. Appointment Booking for Registration of Identity Card		✓
4. Bankruptcy / Compulsory Winding-up Search		✓
5. Vehicle Annual Examination Appointment Booking and Re-scheduling		✓
6. Immigration Information Lookup (and Application Forms on Request) (Users Tips)		✓
7. Appointment Booking for Giving of Marriage Notice (Users Tips)		✓
8. Business Registration Number Enquiry and Application for Supply of Information on the Business Register		✓
9. Easy Change of Address		✓
10. Government Bookstore		✓
11. Application for Reservation of Unassigned Non-special Registration Mark for Auction		✓
12. Application for Certificate of Particulars of Motor Vehicle		✓
13. Statistical Bookstore, Hong Kong		✓
14. Hong Kong Examinations and Assessment Authority Bookstore		✓
15. Change of Address ( Transport Department )		✓
16. Change of Address (Inland Revenue Department)		✓
17. Filing or Viewing of Tax Return		✓
18. Application for Volunteer Schemes Registration		✓
19. Change of Address of Registered Voters		✓
20. Registration for Public Examinations (Users Tips)		✓
21. Interactive Tax Enquiry		✓
22. Change of Business Particulars		✓
23. Application for Voter Registration		✓
24. Application for Search and Copy of Birth/Marriage/Death Certificate		✓
25. Change of Address (Official Receiver's Office)		✓
26. General Enquiry on Electoral Affairs	✓	
27. Business Licence Information Service	✓	
28. Small and Medium Enterprises Information Centre		✓
29. Information on Technology Funding Schemes		✓
30. General Enquiries (Rates and Government Rent)		✓