

Case Study Information Table	
Case Study Title	Development of Accessibility Statement templates
Name	Ryan Teevan
Abstract	This project looked at the development of accessibility statement templates that could be adapted to all digital solutions deployed across the university. The project involved working with an accessibility consultant in the development of the statement and provides a solid base for the review and publishing of digital solution accessibility statements within the University.
Unit/School/Area	UCD IT Services

Introduction and Context

In line with the Accessibility of Websites and Mobile Applications of Public Sector Bodies Act, all public sector bodies are required to provide accessibility statements for their software to demonstrate commitment to Universal Design (UD) and Universal Design for Learning (UDL).

UCD IT Services, is the central IT Support unit within UCD and supports all aspects of the centrally managed IT infrastructure and software management within the University. IT Services is composed of circa 90 technical, support and administrative staff and is led by the Chief Information Officer who is supported by the IT Leadership Group (ITLG). The ITLG consists of the Director of Infrastructure, Director of Customer and Academic Services, Director of Enterprise Applications and Head of IT Programme and Risk Management. ITLG has responsibility for the different verticals who support the University across circa 90 critical systems to support university operations, teaching and research as well as the web which supports marketing and communications. The different IT Services teams are:

- Customer & Academic Services Group (CASG)

- Customer Services
- Educational Technology Services
- Research IT
- Enterprise Applications Group (EAG)
- Finance & HR Group
- Infrastructure Group
- Partnership Group
- Programme & Risk Management Group

This case study saw the development of an accessibility statement template that could be utilised by the University across different software applications or websites and tailored to each end user. While accessibility checks have formed an integral part of the procurement process for new systems, there is now a requirement for public sector bodies to publicly make available information related to the accessibility of websites and software solutions for end users. This project involved working with a third party to develop and create an accessibility statement template and provide key insights into the areas of UD that should be highlighted to end users and considerations for the composer to take into account when developing.

Secondary to this, we also organised for AbilityNet to review our knowledge base Support articles across IT Services and provide an upskilling session for knowledge base creators within IT Services.

Design and Implementation Description

Approach and Implementation

In accordance with the European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2025 Act, public sector bodies must demonstrate their commitment to inclusive design by publishing clear accessibility statements. This project aimed to support this legal and ethical responsibility by developing a customisable, university-wide accessibility statement template. This accessibility statement helps university staff liaise with software providers, highlighting how different technologies support inclusive access.

The project involved a collaborative design process:

- We partnered with a third-party accessibility expert Alistair McNaught Consulting to co-create and review the accessibility statement template. A number of key “self-checks” were created within the template and provided suggestions on website layout that best supports accessibility. For example see the check below.

Note for Author

The content below might be best created as a suite of expandable accordions so the user only needs to open the one relevant to their own needs. If this approach was taken then the table cells would be transposed so the **accordion title** would be the User affected (eg “Keyboard only user”), an appropriate heading level would read “Keyboard issues” for the content in left hand cell and another same level heading would read “WCAG guideline (Keyboard)”.

- The template was designed for reusability and adaptability, allowing each business owner within the University to tailor their statements while maintaining consistency.
- The statement is delivered as a web page, moving away from the University preference of publishing similar documents in PDF form, allowing for a more accessible user experience. University webpages have built-in accessibility checks for the content and PDFs are generally not considered an accessibility mechanism to sharing information.
- Once we have become more adept at creating accessibility statements, we will create a composer guidance document that explains how to fill in the template in line with accessibility best practices.

To broaden the project’s impact, we also arranged for AbilityNet to audit IT Services’ Knowledge Base (KB) articles. This included:

- A formal review of our articles.
- A live, interactive upskilling session for IT staff responsible for Knowledge Base content creation.

A sample of the areas covered in this upskilling session by AbilityNet can be found below and was tailored specifically to the UCD IT Services Knowledge base www.ucd.ie/ithelp.

Bespoke Webinar:

Introduction to accessibility and inclusive content authoring – p2.

- **Introductions**
- **What is accessibility**
 - Changing perspectives
 - Social model
 - Digital accessibility
 - Example of someone using a screen reader
 - Ethics
 - Legal context
 - General laws in Ireland
 - Public sector and HE/FE specific considerations
 - Impairments
- **Inclusive design**
- **Accessibility standards**
 - Web Content Accessibility Guidelines (WCAG)
- **Images**
 - Informative, functional, decorative images
 - Graphs and charts
 - Images of text
 - Infographics
- **Multimedia**
 - Captions, transcripts, audio description
 - Flashing and moving content
- ***Break***
- **Colour contrast**
- **Use of colour**
- **Other senses**
- **Links**
- **Readability and formatting**
- **Inclusive language**
- **Information and relationships**
 - Heading structure and descriptiveness
 - Lists
 - Tables
- **Final Q&A**
- **Resources**

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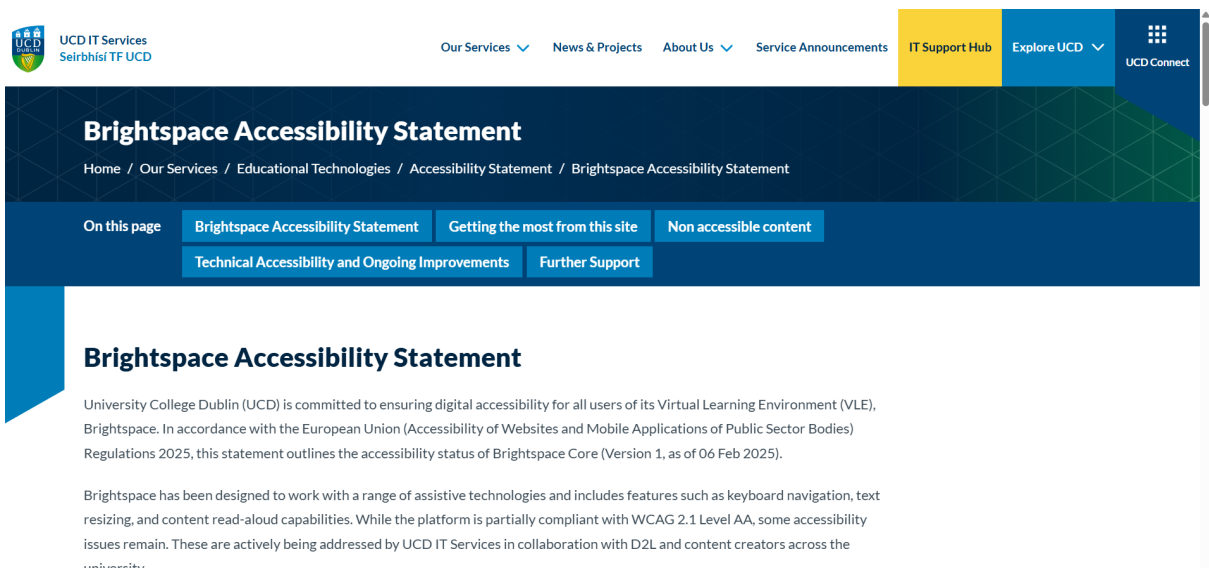
How it adheres to Universal Design

The initiative was grounded in Universal Design (UD) and Universal Design for Learning (UDL) principles, focusing on inclusivity, usability, and clarity from the outset. For example:

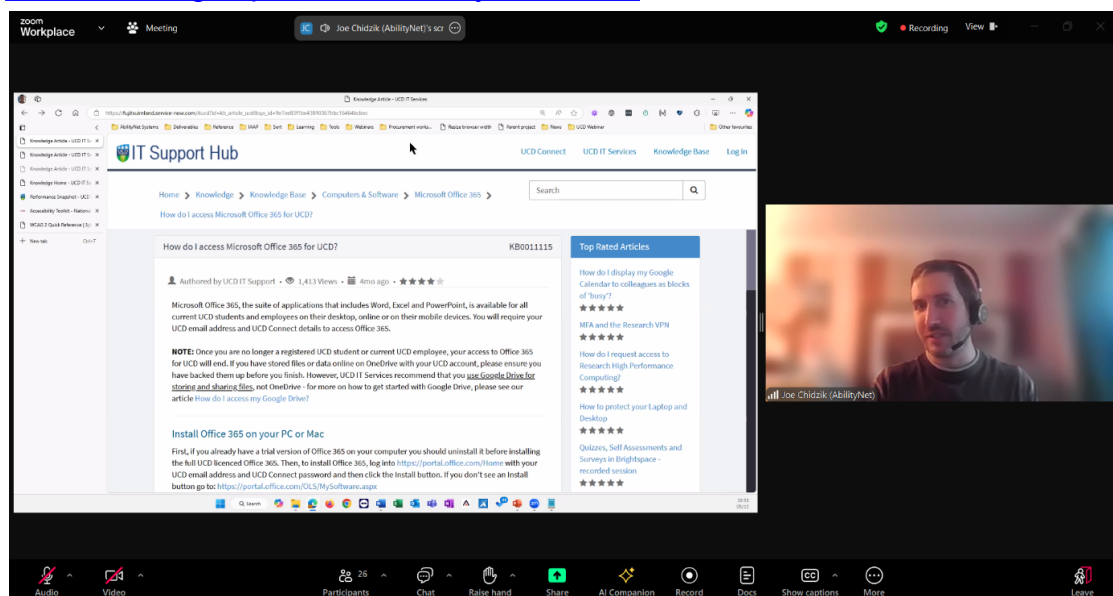
- **Equitable use:** The template ensures accessibility information is consistently communicated, regardless of the software's audience.
- **Flexibility in use:** The template is customisable for a variety of platforms and services.
- **Simple and intuitive design:** Instructions and examples in the guidance support easy completion by non-experts.
- **Perceptible information:** Template content and structure meet WCAG standards to ensure compatibility with screen readers and other assistive technologies.
- **Tolerance for error:** Composer guidance includes examples of common pitfalls and how to avoid them.

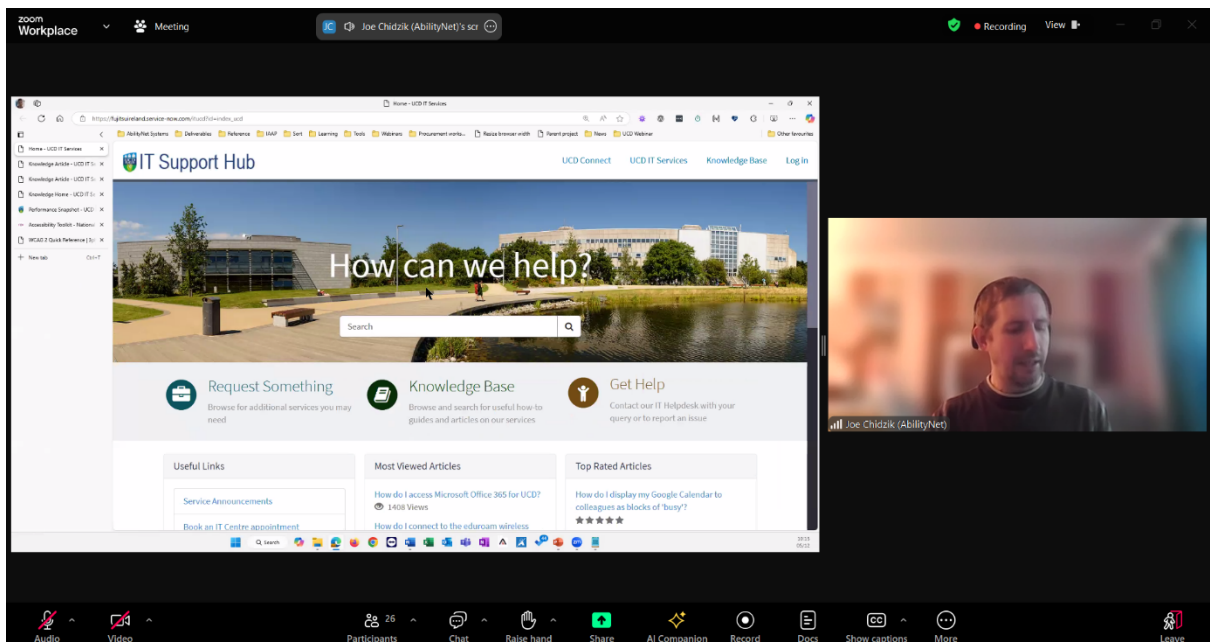
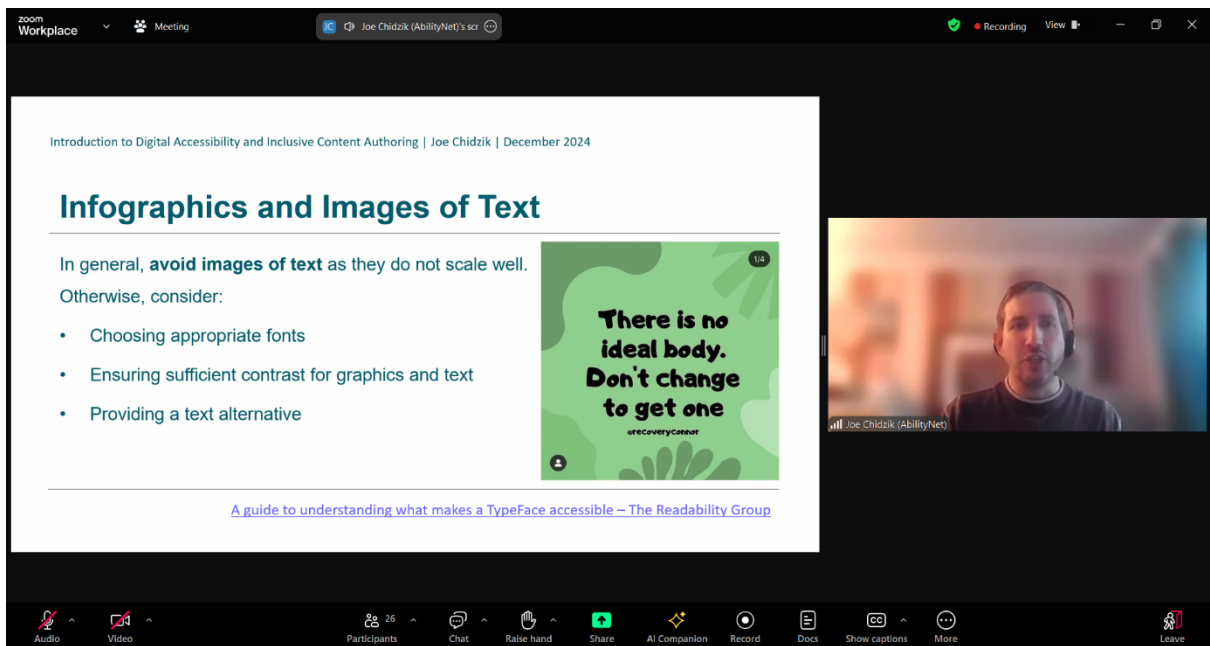
In the Knowledge Base review, UD principles were applied by:

- Encouraging multiple means of representation (e.g. adding text descriptions to images).
- Promoting clear navigation and logical content structuring.
- Ensuring readability through accessible formatting (headers, lists, plain language).



Screenshot of the accessibility statement template using a real live example - <https://www.ucd.ie/itservices/ourservices/educationaltechnologies/accessibilitystatement/brightspaceaccessibilitystatement/>





Photos from the AbilityNet upskilling session

Results and Impact

Goal Achievement

This project successfully delivered on its goals by:

- Creating a standardised, legally compliant template adopted across multiple university systems.
- Equipping content creators with clear, accessible documentation and training support.

- Raising awareness of accessibility best practices across technical and editorial teams.

Evidence of Impact

Formal indicators:

- **Template adoption:** The creation of the accessibility statements has been formally adopted within the IT Services Change control process and is a key project item that must be completed ahead of new systems going live from September 2025 onwards. Working with the IT Services Project Management Officer (PMO) to ensure adoption and highlighting the benefit to the IT Services Leadership team through the Services and Project Meetings, which are attended by all Directors and Head of Services within IT Services and endorsed by the same.
- **Training engagement:** 24 staff members attended the upskilling session with AbilityNet with positive feedback.
- **Anecdotal insights:** IT teams noted they were previously unsure of accessibility requirements; the project helped clarify expectations while creating support information.

Over the summer, a summer intern was hired to review the knowledge base and provide a consistent approach to over 500 knowledge base articles published. This included taking the lessons learned from the training and ensuring all knowledge base articles meet accessibility standards for example, ensuring ALT text in on all images and where appropriate, that videos are available along with text instructions.

Challenges and Lessons Learned

Challenges:

- **Template adoption:** There are some elements of the template that are not easy to understand and can make the author a bit hesitant to move forward with creating the template.
- **Ownership:** For software solutions eg the VLE Brightspace and those solutions already in situ it is also noted that in most cases, it should be the Business Owner who completes the Accessibility statement, similar to the Privacy Statement for GDPR requirements and there has been little engagement in this space currently.
 - It is unclear as to who is responsible for ensuring each solution has an accessibility statement in place at University level, where the Data Protection Office would have responsibility for the Privacy Statements as an example for GDPR.

- **Understanding the non-compliant aspects:** It can be difficult to understand the non-compliant aspects of a solution and the impact these have on the end user without specialist knowledge.
- **Time:** It can be time consuming to review solutions' accessibility statements and tailor UCD's accessibility statements to ensure compliance.

Lessons Learned:

- **Start small:** Using the plus one approach involved focusing on one system first – Brightspace our Virtual Learning Environment and then applying the learning as we move forward. D2L had done some work in this space with UK universities and kindly shared their work with us, which was a great assistance in getting started. They also advised against undertaking a separate accessibility test by the university as most, if not all solutions must undertake their own.
 - **External expertise adds credibility:** AbilityNet and Alistair's involvement helped secure senior leadership support.
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Recommendations and Advice for Implementation

Steps for Implementation

1. **Identify key stakeholders** (Business owners, legal team, UCD Access and Lifelong Learning).
2. **Collaborate with accessibility experts** early to ensure templates meet WCAG and legal requirements.
3. **Develop clear and friendly composer instructions**, with examples of good practice.
4. **Pilot the template** with a small group of willing teams to gather feedback.
5. **Provide training or support sessions** to demystify accessibility and build skills.
6. **Build into procurement requirements:** Review accessibility statements as part of the procurement process.
7. **Track impact** by monitoring template adoption

Key Considerations

- **Make compliance easy:** Pre-filled examples and structured formats reduce user resistance.
- **Provide ongoing support:** Offer a support contact for accessibility statement queries, particularly in terms of understanding companies' accessibility non-compliance and impacts.
- **Link accessibility to user experience:** Staff are more motivated when they see the real-world impact.

Conclusion

This project allowed me to engage with several subject matter experts to develop an accessibility statement template that can be adapted across the University. The project itself was pretty straight forward, but several challenges in terms of competing priorities, knowledge gaps and stakeholder engagement, from my side, could have been improved. The project allows for key central units to provide a template to assist the University in fulfilling legal requirements in terms of the publishing of accessibility statement but in order for this to be successful, further support and guidance needs to be provided as to how to interpret third party providers accessibility statements and in particular the non-compliance elements and how this impacts UCD users, as without specialist knowledge, I don't believe this can be done and has remained a challenge for us internally here as to how we move forward with the publishing of other statements.

Appendices

Appendix 1 - Accessibility Statement Template

Accessibility Template (Bright space platforms)

University College Dublin (UCD) is committed to making its [Software solution accessible, in accordance with the European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020 which comes into force on 28 June 2025.

This accessibility statement applies to the Brightspace Core learning platform (*Version ... as on Date ...*) and the learning content hosted by University College Dublin.

Site owner reality check:

- Who is responsible for providing information on any accessibility barriers of content **created** on the site or **uploaded** to it?
- What **quality assurance processes** exist to provide users with accurate information on content accessibility?
- How is this **communicated** to users (see suggestions in subsequent sections)?

Getting the most from this site

Brightspace has been designed to be compatible with a wide range of assistive technologies but it is also highly adaptable “out the box”. For the majority of the site, you can navigate by mouse or keyboard. Pages can be magnified by zooming up to 400% (Ctrl & +) or by increasing text size up to 200% through the browser settings. Text and background colours can be personalised. Page content can be read out loud by using the Edge browser or appropriate plugins for other browsers.

Compliance status

Brightspace is partially compliant with the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA due to the non-compliance(s) listed below:

Non accessible content

Non compliance with the accessibility regulations

The Brightspace platform

The table below indicates potential issues that may be experienced by some users along with the relevant Web Content Accessibility (WCAG) guideline. Subsequent sections explain how to get help or report an issue. Within each user need, the issues are listed in relation to likely impact.

Note for Author

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Users affected	WCAG guideline
Keyboard-only users. The Learner Experience component does not have a skip navigation link.	2.4.1 By pass blocks
Screen reader users - Forms and headers on the following pages can be confusing due to unlabelled input fields or headings: Quiz Stats; Survey page; Grade schemes. Administrators may also struggle with the Manage courses and Account settings pages. - Page title is not unique in the tabs in Survey and Reports Set up pages. - Input errors give visual feedback only in the All grades page. - Language attributes are missing on the Manage courses page. - There is an empty link on the My Awards page	1.3.1 Info and relationships. 4.1.2 Name, role, value. 2.4.2 Page titled 3.1.1 Language of page. 3.3.3 Error suggestion 2.4.4 Link purpose in context.
Users magnifying text or spacing - At 400% zoom, the following do not reflow effectively: The Welcome centre widget, the Calendar tool, the Manage courses page and the Add learning object option in the Files page. - There are infrequently used tools and admin workflows where changes in text spacing could result in content overlapping or being cut off.	1.4.10 Reflow 1.4.12 Text Spacing
Users needing colour contrast - Inadequate text-to-background colour contrast in the form field placeholder in the Lesson Content My Awards page, Table of Contents page, Build your Course Landing page, Media Library page, Edit Quiz page, Class Progress page, Grades/Grade Schemes page, Manage course Exclusions page, Calendar page, All Grades page, Search User page, and Homepages page. - There is inadequate non-text colour contrast in the Calendar page.	1.4.3 Contrast (Minimum) 1.4.11 Non-text Contrast

[Suggested accordion titled Advanced Technical Information]

For a detailed technical report see the Auditor-certified Accessibility Conformance Report as of **January 1, 2024**, is published on **D2L's website** at <https://www.d2l.com/accessibility/standards/>. This report lists the accessibility exceptions as on that date.

Brightspace content

Your experience as a user also depends on the accessibility awareness of the people creating content on the platform or uploading content (for example documents or presentations). There may also be legacy content that we have not yet replaced or improved.

The following are known issues with content that we are actively seeking to address via training and quality assurance.

[Delete as appropriate]

- Brightspace pages and uploaded or embedded documents are not always well styled to aid navigation using assistive technologies.

Disproportionate burden

[List non-accessible section(s)/content/function(s) for which the disproportionate burden exemption, within the meaning of the accessibility regulations is being temporarily invoked. This will vary on different sites but needs to be “an assessment of the extent to which compliance would impose a burden.” This assessment shall include: “(a) the size, resources and nature of the public sector body concerned;
(b) the estimated costs and benefits for the public sector body concerned in relation to the estimated benefits for persons with disabilities.]

Content not in scope of legislation

[Delete all that do not apply:]

- (a) office file formats published before 23 September 2018, not required for active administrative processes ;
- (b) pre-recorded time-based media published before 23 September 2020;
- (c) live time-based media;
- (d) online maps and mapping services;
- (e) third-party content that is neither funded nor developed by, nor under the control of, the public sector body concerned;
- (f) reproductions of items in heritage collections that cannot be made fully accessible
- (g) content of closed extranets and intranets, published before 23 September

2019, until such websites undergo a substantial revision;
(h) content of websites and mobile applications qualifying as archives.

Preparation of this accessibility statement

This statement was prepared by [site owner] at University College Dublin on [Date]

The statement was last reviewed on [insert date of latest review]

Site owner reality check:

- **What** is the process for annual review and update?
- **Who** is responsible for reviewing and updating? Do they know? Do they have appropriate training? Is it in their job description?
- **How** are improvements identified (for example via ALLY scores)?

Feedback and contact information

Brightspace platform

If you have any concerns in relation to how the Brightspace platform is compliant with the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA we would appreciate it if you could contact UCD IT Services as a first port of call to discuss any concerns about the protection of your privacy rights by logging a call via www.ucd.ie/ithelp and selecting “Get Help”.

IT services reality check:

- **When** can the user expect to have an acknowledgement?
- **Who** in the team will own the issue and take it forward? Do they know? Do they have appropriate training? Is it in their job description?
- **How** is this communicated to the original poster?

Brightspace content

If you have concerns relating to the content created, embedded in or uploaded to the platform please contact [Add contact person here]

Contact person reality check:

- **When** can the user expect to have an acknowledgement?
- **Who** in the team will own the issue and take it forward? Do they know? Do they have appropriate training? Is it in their job description? Do they have the authority to require improvements?
- **How** is this communicated to the original poster?
- **What** is the process if alternative formats are required? Whose budget do these come from? Do they know?

Enforcement procedure

If you experience barriers in accessing this platform or its content and are not satisfied with the way we respond to support your access, you can contact,

- The Office of the Ombudsman - [Contact Ombudsman](#) | Advice on [making a complaint under the Disability Act](#)
- The Workplace Relations Commission - [Contact Workplace relations](#) | Advice on [making a complaint under the Equal Status Act](#)

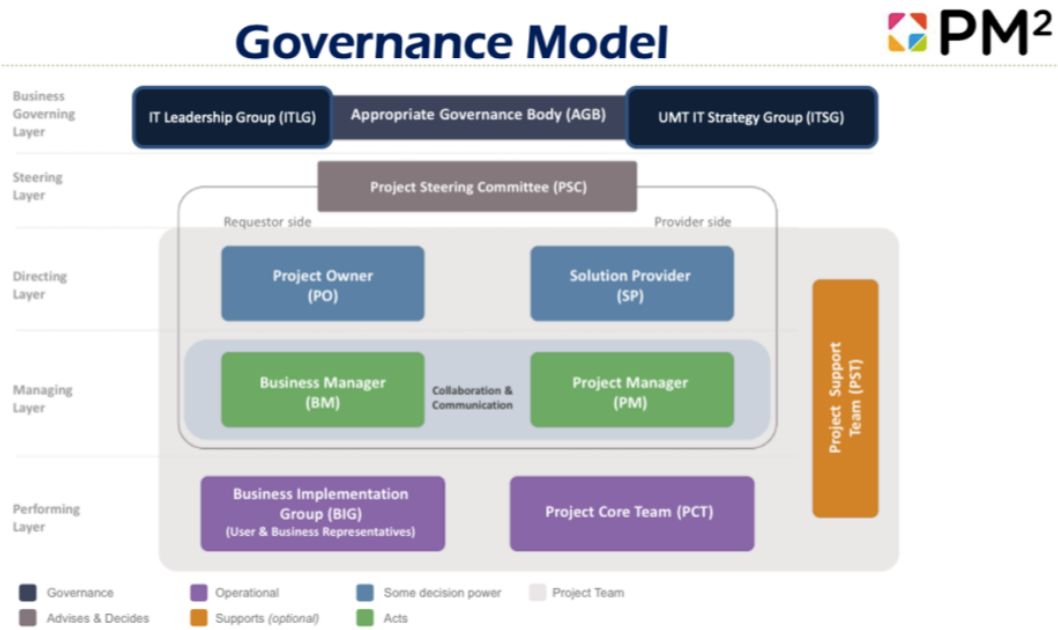
How we are improving accessibility

[PLEASE DELETE (OR EDIT) THOSE THAT DO NOT APPLY]

University College Dublin has invested in digital accessibility in the following ways.

- Ensuring accessibility is a key criterion in all digital procurement.
- Providing quality assured course templates with optimised accessibility
- Investing in the ALLY system to provide automated accessibility checking and reporting of both our digital platforms and the content uploaded to them.
- Digital accessibility benchmarking and reporting is part of our quality assurance process at faculty / school / subject level.
- Optional staff training and development in digital accessibility practices.
- Mandatory staff training in accessibility basics.
- An accessibility champions network making recommendations to senior managers.
- A named accessibility lead in the senior management team.

Appendix 2 - UCD PM2 Roles and responsibilities



Roles and Responsibilities

Requestor Side - In this case Dean of Undergraduate Studies / Institutional Research

Project Owner (PO): The unit being the main beneficiary of the project usually nominates a person as the owner of the project, namely the Project Owner (PO). The Project Owner (PO) is the *client of the project*, who *chairs the Project Steering Committee* (PSC) and is the *key-decision maker*. As the key Directing Layer role from the requestor side, the Project Owner (PO) is *accountable for the overall project's success*. Usually the PO *becomes the owner of the project's outputs (product or service)*, but in case IT Services will take over this role post pilot.

Business Manager (BM): The Business Manager (BM) *represents the Project Owner (PO) on a daily basis* and collaborates closely with the Project manager (PM). The Business Manager (BM) *manages the client-side activities and roles (e.g. user and business representatives)*, assuring that the required business resources are made available. The Business Manager (BM) ensures that the project's deliverables fulfil the business and user needs, and *leads organisational change management activities for the implementation of the business changes (e.g. user training)*.

Roles and Responsibilities

Provider Side - IT Services

Solution Provider (SP): The *unit that will execute the project* and will be *accountable for the deliverables requested by the PO*, will nominate a person to act as the Solution Provider (SP). As the key Directing Layer role from the provider side, the Solution Provider (SP) *appoints the Project Manager* (PM) and *represents the interests of those who design, manage and implement (or outsource) the project's deliverables*. The Solution Provider (SP) is always a UCD employee and for outsourced activities, the Solution Provider (SP) becomes accountable for the contractor's performance.

Project Manager (PM): The Project Manager (PM) *oversees the project on a daily basis* and is responsible for delivering high-quality results within the identified objectives and constraints, ensuring the effective use of the allocated resources. More widely, the Project Manager's (PM) responsibility also includes risk and issue management, project communication and stakeholder management.