Action Plan

Accessible Leibniz University Hannover

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1. Introduction

As an attractive employer in Hannover Region, Leibniz University Hannover (LUH) is committed to equal opportunities and the holistic inclusion of persons with disabilities or long-term health conditions. This *Action Plan Accessible Leibniz University Hannover* with its fields of action and measures is a further step on the path to an accessible and inclusive Leibniz University Hannover by 2031.

With its diversity management, LUH already comprehensively and actively promotes a university culture based on diversity and equal opportunities, where people learn and teach, conduct research and work in a spirit of mutual recognition. The Diversity Concept 2025 names the "Creation of an Accessible University" (2018, p 20) as a key objective. It thus conforms to the ratification by the German Federal Republic in 2009 of the UN Convention on the Rights of Persons with Disabilities (UN-CRPD) and the Lower Saxony Inclusion Offensive[1] of 2019/2020 for an accessible Lower Saxony.

Currently 3 per cent of employees at LUH have a severe disability or are being reintegrated into employment. According to the best2 study of 2019, 9 per cent of students have a disability or health condition that makes studying more difficult.[2]

Statutory regulations for disadvantage compensation or supporting work equipment are often not sufficient to enable persons with disabilities or long-term health conditions to participate independently in their studies or at work. The provisions of the *Action Plan Accessible Leibniz University Hannover* identify fields of action where further measures need to be taken.

The six fields of action - Accessible Wayfinding; Accessibility in Buildings; Digital Accessibility; Accessible Course Materials; Advice; Accessible University Culture – identify measures with timelines and responsibilities. Implementing the measures in the fields of action is a long-term, and in many areas university-wide, commitment.

The Working Group Accessible University set up in 2019 compiled this action plan and presented it to the central university facilities, committees, institutions and interest groups. The Presidential Board adopted the action plan for Leibniz University in July 2020.

It is normal to be different! The term *Inclusion* refers to the task of shaping society in such a way that everyone is included and valued in their individuality. Accessibility is the basis for implementing inclusion.

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[1] Cf paper by the state government of Lower Saxony of 21.12.2018 with recommended action on accessibility and further aspects of inclusion.
[2] Study: Studying with a Disability – best2. Special evaluation for Leibniz University.

2. Fields of Action

The Action Plan Accessible University has identified six fields of action

- Field of Action I: Accessible Wayfinding
- Field of Action II: Accessibility in Buildings and Room
- Field of Action III: Digital Accessibility: Websites, Mobile Applications and Online Documents
- Field of Action IV: Accessible Course Materials
- Field of Action V: Advice
- Field of Action VI: Living and Shaping Accessible University Culture

For each field of action, the most important topics are described, needs for action identified and objectives and measures formulated. Furthermore, responsibilities and a timeline are defined.

Questions concerning the resources required for these measures are agreed with those responsible.

2.1 Field of Action I: Accessible Wayfinding

It is of crucial importance for students, employees and guests at Leibniz University to receive detailed information on the accessibility of buildings and rooms as easily as possible. This applies especially to people with reduced mobility, sensory impairments, or long-term health conditions, or people with prams.

Information on the accessibility of teaching rooms at LUH has so far been available only in separate documents.[3] The objective is to integrate the topic of accessibility in as differentiated a way as possible into existing analogue and digital wayfinding systems.

Measures:

- Integration of information on the accessibility of buildings and rooms into existing analogue and digital wayfinding systems at LUH.
  This affects e.g. the Computer-Aided Facility Management System (CAFM-System) and, in that context, the room-info system, the location finder, the seminar room finder etc on the website.

  Information on the accessibility of buildings and rooms should be supplied in as differentiated a way as possible to cater for different needs. It should cover the following areas: accessibility of buildings and rooms, lifts in the building, e.g. with voice announcements, accessible WCs in the building, flexible seating in the room, lecture-room induction loops for people with hearing impairments. Priority should be given to entering information on seminar/lecture rooms.

- Development of a digital accessible navigation system (Indoor Navigation), e.g. Campus-Navigator as an app for mobile devices. Cf. e.g. the navigation system at TU Dresden.

Measures in Field of Action I: Accessible Wayfinding	Responsibility (suggestion of working group	Timeline
Information on the accessibility of buildings and rooms in existing analogue and digital wayfinding systems at LUH	Dep. 3 Buildings Management Leibniz University IT Services (LUIS) (technical issues)	Start 2020
Development of a digital accessible navigation system (Indoor Navigation), e.g.as a project	Chief Information Officer (CIO) Communication and Marketing and Leibniz University IT Services (LUIS) (advisory role)	Start 2021

Table 1: Measures in Field of Action I: Accessible Wayfinding

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[3] Cf. E.g. Übersicht zur Barrierefreiheit der Gebäude und Seminarräume an der LUH - an overview of the accessibility of buildings and seminar rooms) by the officer for students with disabilities

2.2 Field of Action II: Accessibility in Buildings and Rooms

The objective is that in the planning of new and renovated buildings attention should be paid to a greater extent to barrier-free access and facilities.[4] Transparency of methods and procedures for accessible (re) building is required here.

Measures:

- Liaison Officer for accessible building and renovation
  LUH will nominate a Liaison Officer responsible for issues concerning accessible building and renovation. Their tasks are:
  o To establish current needs of students and staff;
  o To convey requests and needs to those who will respond to them;
  o To supply information on options and the state of implementation;
  o To compile an annual report on requests and measures taken
- Coordination of accessibility needs
  The most urgent needs for renovation to provide accessibility are to be agreed annually by sec. 33 buildings; the Vice President for Finance and Administration, the Liaison Officer and the Working Group Accessible University.
- Implementation of a pilot project on accessibility
  As a pilot project, LUH is planning to adapt the buildings Schloßwender Straße 1 and 55[5], and the Service Centre with regard to accessibility, taking such measures as
  o Easier access to land and buildings,
  o Signage to accessible entrances,
  o Electric door openers (with longer opening times),
  o Wayfinding with tactile floor markings and further wayfinding measures, protection against moving under obstacles (e.g. with open staircases),
  o Lifts with braille and voice announcements,
  o Induction loops in lecture rooms for persons with hearing impairments,
  o Wheelchair-compatible tables in seminar and lecture rooms, and student workplaces,
  o Additional quiet and family rooms and
  o Fitting freely accessible, barrier-free toilets.
- Establishment of a financial pool for immediate measures to guarantee accessibility
  o Such a financial pool will enable response at short notice e.g. fitting an induction loop system in a seminar room, installing a mobile ramp, exchanging obsolete lifts, converting an accessible WC or widening a door.

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[4] With new buildings, LUH follows current DIN norms for access to public buildings (c.f. Laws and Guidelines in appendix 4.5).
[5] Reason: the pilot project should be a model project for other faculties. The time and financial effort for renovation seems to be attainable for this property.

Measures in Field of Action II: Accessibility in Buildings and Rooms	Responsibility (suggestion of working group	Timeline
Nomination of Liaison Officer for accessible building and renovation	Vice President for Finance and Administration	2020
Agreement on most urgent needs for renovation to provide accessibility by sec. 33 buildings; VP for Finance and Administration, Liaison Officer and Working Group Accessible University.	Vice President for Finance and Administration Dep. 3 Buildings Management, sec. 33 buildings Working Group Accessible University	2021
Pilot project on accessibility Schloßwender Straße; Service Centre	Dep. 3 Buildings Management, sec. 33 buildings Faculty; Leibniz University IT Services (LUIS)	2023
Establishment of financial pool for immediate measures	Dep. 3 Buildings Management, sec. 33 buildings	2021

Table 2: Measures in Field of Action II: Accessibility in Buildings and Rooms

2.3 Field of Action III: Digital Accessibility

Digital information technology plays a central role in both work and studies. For public sector bodies, barrier-free access to websites, mobile applications and software is enshrined in the amendment to the Lower Saxony Disability Equality Act (NBGG) of 25.10.2018. The NBGG thereby transposed the EU directive 2016/2102 on the "accessibility of the websites and mobile applications of public sector bodies" into state law. Particular attention should be paid to art. 9a NBGG, which requires public sector bodies to phase in accessible websites and mobile applications by 23 June 2021. This states that "all electronically supported administrative procedures, including procedures for electronic transaction processing and **electronic record keeping**" are to be accessible (NBGG article 9a (1.2). Digital Accessibility is thus a comprehensive topic that reaches far beyond the website, affecting many university areas and work processes. LUH will thus also make its websites, mobile applications and its intranet services for employees accessible.

Background Information on Digital Accessibility

Digital accessibility means that digital content is accessible and designed in such a way that people can adapt it flexibly to their respective needs. This is crucial for e.g. persons with visual impairments when they are using software for voice response. Screen readers read out texts from top left to bottom right. Other persons require e.g. scalable fonts or transfer to a braille keyboard.

All objects included in digital content such as pictures, frames, tables etc should thus be displayed in an additional structure. Only in this way can content be reproduced correctly and in a sensible sequence.

2.3.1 Public Websites and Employee Portal

The technical framework of the new LUH website is designed to be accessible. Under the relaunch project, all university facilities are receiving the new design successively (2018 – 2020). Technical deficiencies by third parties are being tested and corrected. The LUH web guidelines already contain a passage on accessibility for website editors. The regular workshops on websites (web editing / TYPO3 team) partly focus on the topic of accessibility.

Measures:

- Establishment of quality assurance:
  Quality assurance procedures are being established to ensure the quality of accessible web content. First measures are:
    o Review of LUH website by an external testing body for conformity with the Web Content Accessibility Guidelines (WCAG 2.1)
    o Publication of Declaration on Accessibility according to NBGG article 9a.
- Extension of web guidelines:
  The LUH web guidelines are being extended to include more detailed information on accessibility of websites (e.g. formatting of texts and titles, lists, tables, pictures/videos and text alternatives etc).

Special training measures:

In view of future requirements for accessibility of websites, dedicated special training measures for web editors have been developed and offered. The special training measures will include the following content: an overview of the legal requirements of the Web Content Accessibility Guidelines (WCAG)[6], an insight into assistive technologies, barriers in the web, and practical tips for web editors.

Measures in Field of Action III: Digital Accessibility: Websites/Employee Portal	Responsibility (suggestion of working group	Timeline
Review of LUH website by external testing body for conformity with WCAG 2.1	Communication and Marketing Leibniz University IT Services (LUIS)	Start 2020
Publication of Declaration on Accessibility according to NBGG	Communication and Marketing Leibniz University IT Services (LUIS) Equal Opportunities Office	Start 2020
Extension of web guidelines	Communication and Marketing	Start 2020
Extension of training measures	Communication and Marketing Leibniz University IT Services (LUIS) Dep. 1 Organisational and HR Development, ICT	Start 2020

Table 3a: Measures in Field of Action III: Digital Accessibility - Websites/Employee Portal

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[6] International guidelines on web content accessibility. Cf laws and guidelines in the appendix.

2.3.2 Mobile Applications and Desktop Applications

Also affected by digital accessibility are the graphical user interfaces of applications that have been natively installed on a mobile device or a workstation[7]. Software solutions installed at Leibniz University must thus be unrestrictedly usable by staff and students with disabilities or long-term health conditions.

Measures

- Inventory and evaluation of existing software
  Leibniz University will conduct an inventory of all mobile applications and software solutions (desktop applications) installed at LUH. It will clarify the options for accessible graphical user interfaces with the respective software providers.

Measures in Field of Action III: Digital Accessibility: Mobile Applications and Desktop Applications	Responsibility (suggestion of working group	Timeline
Conduct inventory and evaluation; introduce measures where required	Chief Information Officer CIO Office	2022

Table 3b: Measures in Field of Action III: Digital Accessibility - Mobile Applications and Desktop Applications

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[7] Cf EU Norm 301 549: "European Standard for the Procurement of Accessible ICT Products and Services."

2.3.3 Online Documents

In future, all online documents of Leibniz University, regulations, circulars, forms and templates etc that are provided centrally must be accessible.

Measures

- Central Office for the Creation and Quality Assurance of Online Documents
  A high degree of specialisation is required for the creation of accessible online documents. Knowledge both of the accessible properties of the documents and of the software to be used is necessary. Here, a central office will be established to take over the quality assurance of central online documents.
- In-service training on designing accessible documents
  Staff will be trained for this new task. Specialised training courses and tutorials will focus on setting up and preparing documents in common office applications so that accessible PDF documents can be created.

Measures in Field of Action III: Digital Accessibility: Online Documents	Responsibility (suggestion of working group	Timeline
Central Office for the Creation and Quality Assurance of Online Documents	Dep. 1 Organisational and HR Development, ICT	Start 2021
In-service training on designing accessible documents Creation and use of tutorials	Dep. 1 Organisational and HR Development, ICT	Start 2021

Table 3c: Measures in Field of Action III: Digital Accessibility: Online Documents

2.4 Field of Action IV: Accessible Course Materials

In Field of Action IV: Accessible Course Materials, the focus is on the design and provision of accessible course materials. This enables students with disabilities or long-term health conditions to participate on equal terms in their studies. Teaching staff should see the systematic inclusion of the particular needs of students with disabilities or long-term health conditions as part of their remit (cf. HRK 2009 p 7). The aim of Field of Action IV is thus to enable teaching staff to design accessible teaching materials (e.g. power point presentations, scripts, teaching materials, videos etc). The topic of accessible teaching is already integrated into existing educational training at the university and is to be expanded.

Measures

- Expansion of educational training on accessible teaching in the form of workshops, in-service training, coaching, webinars.
- Publication of guidelines
  creation and publication of guidelines for university teaching staff on the topic of accessible teaching.
- Inventory of existing e-learning provision with respect to accessibility; if required expansion of e-learning provision.

Measures in Field of Action IV: Accessible Course Materials	Responsibility (suggestion of working group	Timeline
Expansion of educational training on accessible teaching, e.g. workshops, in-service training, coaching, webinars	Dep.1 HR Development Centre for Quality Enhancement in Teaching and Learning (ZQS)	Start 2020
Creation and publication of guidelines for university teaching staff on the topic of accessible teaching	Dep.1 HR Development Diversity Management	2020
Inventory of existing e-learning provision with respect to accessibility; if required expansion of e-learning provision.	Centre for Quality Enhancement in Teaching and Learning/E-learning Service (ZQS/elsa)	2021

Table 4: Measures in Field of Action IV: Accessible Course Materials - an Overview

2.5 Field of Action V: Advice

With good general conditions, persons with disabilities or long-term health conditions can cope well in their daily lives. Knowing what is available to persons with disabilities or long-term health conditions at LUH helps them to succeed in their studies or work.

LUH has a wide variety of advice centres with various advisory formats and information channels. These include in particular the central facility of the Representative for Students with Disabilities or Long-term Health Conditions. Here, personal advice and extensive information material both in print and on the website are provided. For staff, the Disability and Inclusion Representatives are there to answer questions and provide clarification. Furthermore, the following facilities provide support with questions and needs: The Equal Opportunities Office, Psychological Therapeutic Counselling (PTB), anonymous online counselling by PTB, the Graduate Academy, Student Advisory Services, the Ombudsperson for Studying and Teaching, the Arbitration Board of the Graduate Academy, the Staff Council, Health Management, Integration into the Workplace Management (BEM), Health and Safety, Writing and Learning Guidance, the Career Service of the Centre for Quality Enhancement in Teaching and Learning (ZQS), and the Student Council (AStA). These facilities advise, inform and support not only persons with disabilities or long-term health conditions but also teaching staff, superiors, colleagues, prospective and current students.

The work of these advisory bodies has room for improvement e.g. by strengthening the transparency of the facilities and establishing quality assurance networks.

Measures

- Strengthening public relations concerning the transparency of the advisory bodies by providing cross-facility information.
- Establishing a round table for the advisory bodies
- Creating an information app for inclusive studies (WEB-APP)

Measures in Field of Action V: Advice	Responsibility (suggestion of working group	Timeline
Increasing the transparency of the advisory bodies - cross-facility information in the internet	Communication and Marketing	2022
Establishing a round table for the advisory bodies	Diversity Management	2021
Information app for inclusive studies (WEB-APP)	Chief Information Officer (CIO) Student Advisory Services (ZSB)	2022

Table 5: Measures in Field of Action V: Advice - an Overview

2.6 Field of Action VI: Living and Shaping Accessible University Culture

Transparency and knowledge are essential requirements for inclusion and participation. To supply these, events open to university members will support staff and students in fostering a respectful and appreciative, accessible university culture. These include lectures, panel discussions, symposia, teaching and research projects, in-service training, and an active accessible culture of communication.

Information material at the university will draw greater attention to barrier-free access to buildings and rooms and list contact persons for those affected. As far as visual language is concerned, importance is attached to persons with disabilities or long-term health conditions being represented as a matter of course in their roles as students, staff, researchers etc in target-group specific publications.

Measures

- Introducing topic of accessibility on public website, with content on contact persons.
- Introducing topic of accessibility on employee portal
- Drawing up LUH-specific recommended action on accessible design of events
- Including information on barrier-free access to buildings and rooms in the relevant print products (flyers and brochures)
- Name contact persons for persons with disabilities or long-term health conditions in the relevant print products
- Use sign-language interpreters at events, e.g. Welcoming Ceremony for first semester students, **New Year's Reception**. Requirements always to be established in advance
- Activities to foster accessible university culture e.g. symposia, promotional stands, articles in PR info and uni-intern
- Offering relevant websites in easily understandable language

Measures in Field of Action VI: Living and Shaping Accessible University Culture	Responsibility (suggestion of working group	Timeline
Introducing topic of accessibility on public website	Communication and Marketing	2021
Introducing topic of accessibility on employee portal	Dep. 1 Organisational Development	2021
Drawing up LUH-specific recommended action on accessible design of events	Office for Alumni, Fundraising and Event Management	2021
Including information on barrier-free access to buildings and rooms in (print) media	Office for Alumni, Fundraising and Event Management Further bodies involved	Start 2020
Name contact persons for persons with disabilities or long-term health conditions in the relevant media	Communication and Marketing Further bodies involved	Start 2020
Use sign-language interpreters at events Accessibility requirements always to be established in advance	Communication and Marketing Office for Alumni, Fundraising and Event Management various university facilities	Start 2020
Activities to foster accessible university culture e.g. symposia, promotional stands, articles in PR info and uni-intern	All	Start 2020
Offering relevant websites in easily understandable language	Communication and Marketing	Start 2020

Table 6: Measures in Field of Action VI: Living and Shaping Accessible University Culture - an Overview

3. Quality Control

Leibniz University is one of the leading technical universities in Germany. It owes its success to the wide diversity of people with their varied professional, cultural, social, biographical and individual backgrounds. In implementing the Action Plan Accessible Leibniz University Hannover, LUH is taking a further significant step on the path to greater equal opportunities and inclusion.

The action plan will run for five years until 2025. The implementation and realisation of the fields of action is a long-term objective for the university as a whole. The recommended measures, responsibilities or timelines could thus be adjusted during implementation.

Overall responsibility lies with the Vice President for Finance and Administration (HVP). The Working Group Accessible University supports the HVP in reviewing the implementation of the action plan and draws up an annual report on the status of the implementation of the action plan. The working group may consult independent experts and propose amendments to the action plan.

4. Appendix

4.1 List of Abbreviations

Abbreviation	Meaning
AGG	Allgemeines Gleichbehandlungsgesetz (Equal Treatment Act)
BGG	Behindertengleichstellungsgesetz (Equal Treatment of Persons with Disabilities Act)
BTHG	Bundesteilhabergesetz (Federal Participation Act)
CAFM System	Computer-Aided Facility Management System
CAM	Communication and Marketing
GdB	Grad der Behinderung (Degree of Disability)
NBGG	Niedersächsisches Behindertengleichstellungsgesetz (State Disability Equality Act)
UN-CRPD	UN Convention on the Rights of Persons with Disabilities
WCAG	Web Content Accessibility Guidelines

4.2 Working Group Accessible University

Head of the Working Group:

Helga Gotzmann, Chief Equal Opportunities Officer

The Working Group consists of experts from the following areas:

- Dep. 1 Organisational and HR Development, ICT
  - Christina Barraß
- Dep. 3 Buildings Management
  - Jutta Schmuck
  - Kristina Wolff
- Equal Opportunities Office
  - Dr. Isabel Sievers, Diversity Management
- Communication and Marketing
  - Luca Emanueli
- Staff Unit Occupational Safety
  - Jaqueline Thomas
- Staff Council
  - Jörg Schollbach
  - Regina Garcia
- Representative for Students with Disabilities and/or Long-term Health Conditions
  - Christiane Stolz, Student Advisory Services (ZSB)
- Disability Representatives
  - Ulrike Hepperle, Ombudsperson for Persons with Disabilities
  - Frank Dielitzsch, Disability Representative
- Inclusion Representative of Employer
  - Uwe Barkow
- Student Representative in the Senate
  - Kimberly Haarstik

4.3 Model Declaration on Accessibility

Declaration on Accessibility

(Date as of Declaration)

Leibniz University Hannover strives to make its internet presentation accessible in accordance with the Lower Saxony Disability Equality Act (NBGG) on the implementation of EU Directive 2016/2102 of the European Parliament and Council.

Each organisational unit at Leibniz University Hannover providing content via its own website shall publish its own Declaration on Accessibility.

This Declaration on Accessibility applies to website https://www.uni-hannover.de [8]

This website and the content published on it comply in part with the harmonised European norm EN 301 549 V2.1.2 (08-2018).

Non-accessible content:

The following listed contents are not yet accessible:

- PDF documents contained on the website
- Videos contained on the website
- Graphics contained on the website

Statement of reasons

- In view of the large number of available PDF documents created before 23.09.2018, it has not yet been possible to transfer these to an accessible format. They are being successively adapted.
- It has not yet been possible to provide videos with an audio description. Adaptation is to follow also here.
- Documents supplied by third-party organisations are in some cases not accessible.

Drawing up this Declaration on Accessibility

Assessment of published content is based on self-evaluation. This declaration will be updated annually. The template underlying the website has been tested by an external testing body for conformity with WCAG 2.1, conformance level AA.

Feedback and Contact Details

Deficiencies in meeting accessibility requirements can be reported to the Liaison Office:

Leibniz University Hannover
Hochschulbüro für ChancenVielfalt
Wilhelm-Busch-Str. 4
30167 Hannover

E-Mail: barrierefrei@uni-hannover.de

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[8] Placeholder – to be adapted accordingly for decentralised websites

Arbitration

If the Liaison Office named above is unable to supply a satisfactory answer, you may apply to the Arbitration Board set up by the State Officer for Persons with Disabilities in Lower Saxony for arbitration procedures to be set in motion under the Lower Saxony Disability Equality Act (NBGG).

Under § 9 d NBGG, the Arbitration Board has the remit of settling disputes between persons with disabilities and public bodies of the State of Lower Saxony, concerning the topic of IT. Arbitration is free of charge. Legal assistance is not required.

The Arbitration Board can be contacted directly under the telephone number: 0511/120-4010 or by E-Mail at:

schlichtungsstelle@ms.niedersachsen.de.

4.4 Laws, Guidelines and Action Plans

UN Convention on the Rights of Persons with Disabilities CRPD (2009): comprehensive human rights treaty on realising full participation in society for persons with disabilities or long-term health conditions (inclusion)

National Government Action Plans on the UN Convention on the Rights of Persons with Disabilities (2011; 2016) with packages of measures under the under the guiding principle of inclusion.

Action Plan Inclusion in Lower Saxony (2017/2018): steps towards implementing the UN Convention on the Rights of Persons with Disabilities in Lower Saxony

Action Plan Inclusion in Lower Saxony (2019/2020) steps towards implementing the UN Convention on the Rights of Persons with Disabilities in Lower Saxony

Recommendations of the Lower Saxony Ministry for Science and Culture concerning accessibility and other aspects of inclusion of 21.12.2018

Lower Saxony Disability Equality Act (NBGG)

Web Content Accessibility Guidelines (WCAG) 2.0: https://www.w3.org/TR/WCAG21/. Authorised German translation available online at http://www.w3.org/Translations/WCAG20-de

Deutsches Institut für Normung e.V. DIN18040-1. Barrierefreies Bauen -Planungsgrundlagen -Teil 1: (Accessible Building - planning principles part 1. Buildings open to the general public). For further information on the current status of the new DIN 18040 on Accessible Building see www.din.de or www.din18040.de

EU Norm 301 549: European Standard for the Procurement of Accessible ICT Products and Services EU-Norm 301 549 specifies the functional accessibility requirements for ICT products and services. Apart from the accessibility requirements it also contains a description of test procedures and assessment methods. Requirements for non-web documents are based on the guidelines of the WCAG2ICT Task Force. For software in general please refer to EN ISO 9241-171:2008 etc.

EU Directive 2016/2102: requires compliance with EN 301 549, (European Standard for the Procurement of Accessible ICT Products and Services). As far as websites, including data formats from office applications (e.g. PDF files), and intranets are concerned, the above norm refers to the international standard Web Content Accessibility Guidelines (WCAG) 2.0, conformance level AA.