

# **Accessibility Compliance Strategy (WCAG)**

**imc Learning Suite**

# Accessibility Compliance Strategy (WCAG)

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# 1 Accessibility guidelines

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The Web Content Accessibility Guidelines (WCAG) are recommendations and guidelines provided by the World Wide Web Consortium ([W3C](#)) Web Accessibility Initiative ([WAI](#)). The goal of these are to make web applications accessible to people with disabilities. The latest standard is [WCAG 2.2](#) released on 05 October 2023, which also covers most requirements from the [Section 508](#) and [ADA](#) guidelines. imc AG tries to meet the accessibility requirements with the [WCAG \(Web Content Accessibility Guidelines\) 2.1](#). While our LMS complies with WCAG 2.1 AA, it also meets several new success criteria introduced in WCAG 2.2:

- Focus Appearance (Minimum) (AA): Ensures better visibility of focus indicators.
- Dragging Movements (AA): React-based pages support alternatives to dragging for accessibility.
- Target Size (Minimum) (AA): Improves usability by ensuring interactive elements are appropriately sized.

The WCAG 2.1 guidelines consists of 4 principles and 13 guidelines:

- **Perceivable** - Information and user interface components must be presentable to users in ways they can perceive.
  - Guideline 1.1 Text Alternatives
    - Provide text alternatives for any non-text content so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language.
  - Guideline 1.2 Time-based Media
    - Provide alternatives for time-based media.
  - Guideline 1.3 Adaptable
    - Create content that can be presented in different ways (for example simpler layout) without losing information or structure.
  - Guideline 1.4 Distinguishable
    - Make it easier for users to see and hear content including separating foreground from background.
- **Operable** - User interface components and navigation must be operable.
  - Guideline 2.1 Keyboard Accessible
    - Make all functionality available from a keyboard.

- Guideline 2.2 Enough Time
  - Provide users enough time to read and use content.
- Guideline 2.3 Seizures and Physical Reactions
  - Do not design content in a way that is known to cause seizures or physical reactions.
- Guideline 2.4 Navigable
  - Provide ways to help users navigate, find content, and determine where they are.
- Guideline 2.5 Input Modalities
  - Make it easier for users to operate functionality through various inputs beyond keyboard.
  
- **Understandable** - Information and the operation of user interface must be understandable.
  - Guideline 3.1 Readable
    - Make text content readable and understandable.
  - Guideline 3.2 Predictable
    - Make Web pages appear and operate in predictable ways.
  - Guideline 3.3 Input Assistance
    - Help users avoid and correct mistakes.
  
- **Robust** - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.
  - Guideline 4.1 Compatible
    - Maximize compatibility with current and future user agents, including assistive technologies.

## 2 Accessibility in the imc Learning Suite

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imc Learning Suite supports to setup a WCAG 2.1 AA compliant learning environment. Accessibility features are implemented across core learner workflows to ensure an inclusive experience for all users.

## 3 Accessibility as a process

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The imc Learning Suite has been built to be WCAG 2.1 AA compliant wherever possible. Currently, a number of elements are compliant, and our focus and commitment is to continuously improve and add features to ensure the learner experience is more accessible.

We welcome and encourage feedback via the Suggestion for Improvements (SFI tickets). This ensures that user insights contribute to improving accessibility.

## 4 Accessibility of content

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Accessibility of a platform can only be achieved if both the system and the content are accessible!

The accessibility of the content (e.g. courses, WBTs, files) is dependent on the content provider. Content that is created by customers or external parties needs to be ensured that either their content itself fulfils the accessibility guidelines or that they provide additional support such as captions or alternative, accessible content.

To support content accessibility, imc recommends using **imc Express**, a tool specifically designed for creating accessible content. Learn more about imc Express [here](#).

## 5 Accessibility scope (White list)

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The focus of imc is to provide an accessible learning experience. Therefore, we ensure accessibility can be reached in the areas of the imc Learning Suite which are core for the learner's experience. This whitelist is valid for imc Learning Suite 14.22.

We can assure that the following areas are compliant with accessibility guidelines [WCAG \(Web Content Accessibility Guidelines\) 2.1 \(AA\)](#):

- Navigation
- Common areas
  - Login
  - Registration
  - Profile (View/Edit)
  - Personal data
  - Change password
  - Delete profile
  - Imprint
  - Terms of use
  - Privacy policy
  - Inbox
- Catalogue
- Course syllabus with the configurable layout
- Media pages for
  - File
  - Link
  - Multimedia file
  - WBT (HTML/AICC/SCORM/xAPI)
  - Event
  - Activity
  - 3<sup>rd</sup> party content
  - External LTI tools (1.1/1.3)

- Test and feedback with the following question types
  - Free text
  - Yes/no
  - Multiple choice (1 of n/n of n)
  - Matrix (single and multi selection)
- Dashboard with the following panels
  - Course panel
- My experience area
- My calendar
- Channels
  - Channels Manager
  - Channels Learner
  - Channels Contents

### **Compliance Measures**

Compliance with WCAG 2.1 AA involves rigorous measures:

- Internal Testing: Regular testing with screen readers and other assistive technologies.
- External Validation: Conducted via Voluntary Product Accessibility Templates (VPAT).

The VPAT document, detailing our accessibility compliance, can be provided upon request.

## **6 Accessibility limitations**

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- Screen reader support is limited to JAWS 2019 in Chrome
- WCAG 2.1 AA can only be achieved, if the agreed customer design applies with the contrast and size requirements of WCAG 2.1 AA
- To ensure WCAG 2.1 guideline Enough Time (2.2), timing in tests needs to be disabled
- There are limitations regarding advanced configurations in the areas white listed above
- For features not on the white list, accessibility cannot be ensured. The administrative frontend is not compliant to accessible standards.

## 7 Key accessibility regulations and standards

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As a software company based in Germany with international clients, IMC needs to comply with several accessibility regulations and standards. These ensure that our products are usable by people with disabilities. Below are the key regulations:

- European Union
  - EU Web Accessibility Directive (Directive (EU) 2016/2102)
    - This directive applies to public sector websites and mobile apps, requiring them to meet accessibility standards. The Web Content Accessibility Guidelines (WCAG) 2.1 Level AA are the benchmark.
  - European Accessibility Act (Directive (EU) 2019/882)
    - Expands accessibility requirements to cover private sector services and products like software, e-commerce, and electronic devices. This law will become fully enforceable by June 2025.
  - WCAG 2.1 (Web Content Accessibility Guidelines)
    - While not legally binding on its own, WCAG 2.1 is widely adopted across the EU, and it is the basis for many local laws and directives, including the ones above. Aim for Level AA compliance.
- Germany
  - Barrierefreie-Informationstechnik-Verordnung (BITV 2.0)
    - The German equivalent of the EU Web Accessibility Directive, requiring public sector websites and apps to be accessible. It is based on WCAG 2.1 Level AA standards.  
  
BITV 2.0 goes beyond the general WCAG 2.0/2.1 guidelines by requiring additional measures specific to Germany. These requirements include:
    - General explanations of content and navigation must be provided in German sign language. (Content providers are responsible for this standard)
    - Easy-to-read versions of content must be available for users with cognitive disabilities. (Content providers are responsible for this standard)
    - Accessibility statements must be published and kept up-to-date, ensuring transparency.

- A machine-readable format of the accessibility statement must be available on the homepage and all pages. (LMS is not complaint)
  
- Behindertengleichstellungsgesetz (BGG)
  - A broader law promoting equality for people with disabilities, indirectly impacting digital accessibility requirements.
  
- United States
  - Americans with Disabilities Act (ADA)
    - Although not a law specific to websites, courts have interpreted the ADA to apply to websites and digital platforms. WCAG 2.1 Level AA is generally seen as the benchmark to meet ADA compliance.
  
  - Section 508 of the Rehabilitation Act
    - Applies to federal government websites and contractors. Requires conformance with WCAG 2.1 Level AA.

#### Best Practice for International Clients:

Since IMC serves clients worldwide, it's safest to ensure that our products comply with WCAG 2.1 Level AA standards. This standard is widely accepted and serves as the basis for many accessibility laws around the globe.