cumulo9
Digital Communications Transformed

Accessibility Whitepaper
Are You Up with the Play?

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Accessibility across all contact channels has become a top 10 investment priority for the majority of businesses. Are you one of them?

Did you know that more than one quarter of New Zealanders self-identify as disabled, having one or more long-term visual, hearing, mobility or learning impairment? (NZ Govt/ DIA).

If you are not up to speed with the issues facing those with disabilities, you can start your journey here.

Introduction

This whitepaper discusses accessibility in the context of business-generated customer communications, and the requirement for those generating the communications be fully informed and compliant. It might be a bill or a statement, a notification, a policy or other legal document, advertising material or in fact any form of communication. That information might be presented as a PDF, a web form, an online banner or advertisement, a letter, or an email, or even a brochure or magazine article.

Whilst most of the accessibility focus is on online interactions and electronic documents, accessibility is equally relevant to written documents where fonts, layout and the use of colour and graphics all have an impact. As does the use of plain English.

I have been following the advances in the technology that help those with disabilities and this article looks at this aspect, as well as seeking a view from those directly involved.

Organisations like Blind Low Vision NZ, the DIA and Write Ltd, a speciality business that helps businesses create more effective communications.

I have also communicated with Hon Louise Upston, Minister for Disability Issues, about the role of Government and legislation in this space.

David Allen, General Manager, Cumulo9 Ltd

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Why do businesses need to be fully informed?

There are now well-defined standards which allow legislation to be established to create enforcement in respect of accessibility. The Portable Document Format and Universal Accessibility (PDF/UA) is now an ISO 14289-1 standard, which was created to solve the challenge of accessibility and enable universal document access.

While, up until now, the PDF/UA specifications have been treated as guidelines, new laws such as the European Accessibility Act (EAA), which comes into force on 28 June this year, are enforcing the standard with penalties and fines, making compliance mandatory.

In the USA, the PDF/UA standard aligns with regulations such as the American Disabilities Act (ADA), Section 508, and WCAG 2.0, which is the Web Content Accessibility Guideline, established by the W3C or World Wide Web Consortium. Documents that comply with PDF/UA automatically meet the requirements of these standards.

New Zealand ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in September 2008. Article 9 promotes the rights of disabled people to access, on an equal basis with others, the physical environment, transport, public facilities and information communication.

Minister Upston advised that New Zealand will not be following the EU and other countries such as Australia and that she has instructed the Ministry of Disabled People to develop a non-legislative work programme to address accessibility issues and improve the implementation of existing legislation and regulation.

Blind Low Vision NZ advised that they support the introduction of accessibility focused legislation, which in other jurisdictions includes enforceable standards and ensuring accountability to them. However, given the current Government approach, they will work with the Ministry to encourage compliance.

Consequences for being non-compliant

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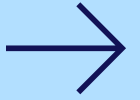
Lost revenue isn't just about sales: there is the financial and reputational cost of accessibility to consider. For example, in the USA, 4,605 web accessibility lawsuits were brought against companies in 2023 and whilst New Zealand might not be following other countries with new legislation, organisations that don't comply are likely to be singled-out, which won't be a good look for them.

In summary, this is not about compliance for compliance sake. This is about dealing with the very real problem being faced by the growing number of people with sight- or hearing-based difficulties, in part brought on by an ever-ageing population as well as the shift of information to digital formats.
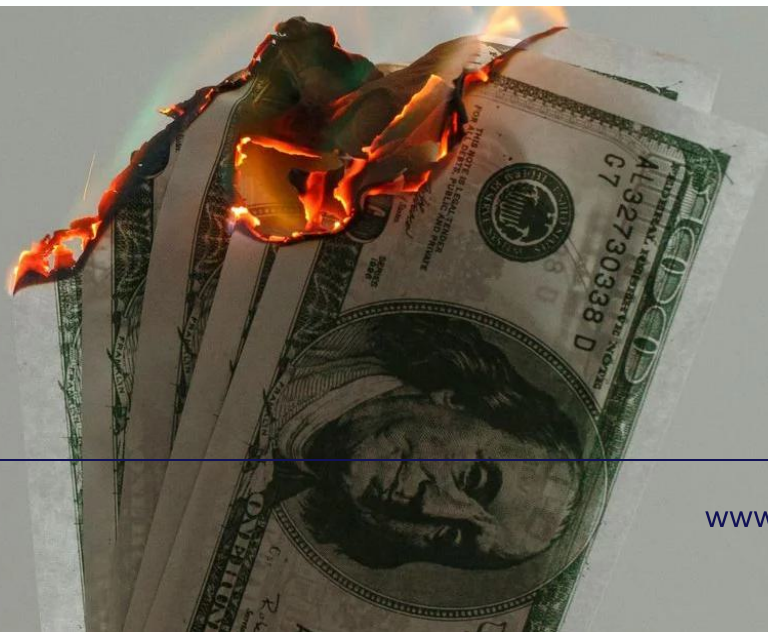
How can businesses make their documents more accessible?

The CX Network recently published an excellent article on accessibility, advising that according to their research, accessibility of contact channels has now become a top 10 investment priority for CX practitioners. They referenced a five–step process to improve accessibility in customer service and CX.

1   Create customer personas with disabilities

2   Test websites with a screen reader

3   Make inclusivity part of the company culture

4   Offer alternative channels for everyone

5   Work with vendors – as they have a role to play

Following a recent combined Litmus / Oracle webinar I sat in on, a 33 attributes checklist was provided, which you can access via the QR code shown to the right.

The below presentation on email accessibility also has some great slides and tips. Please reach out if you want a copy.

Make content accessible with alt text

Images of text: convey the key message or action the image represents

(alt="Apple store button")   (alt="Download the app on the apple app store.")

Decorative vs Informative images: what value is the image bringing to the message — does it represent important concepts and information?

(alt="")   (alt="Shoes in creek")   (alt="Outsmart the weather with Danner Trail 2650 Campo GTX hiking shoes - seen here walking through a riverbed.")

Linked Images: when an image is linked, the alt text should describe both the image content and the destination of the link to guide users effectively.

(alt="")   (alt="Danner Trail 2650 Campo GTX hiking shoes striding through a riverbed – designed to keep you dry, shop now.")

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Looking forward or taking a retrospective look at customer documents

In a recent survey by consultancy business Aspire (USA & Europe), 66% of businesses spoken to plan to address communications accessibility with automatic, on–demand conversion of existing customer communications.

This investment in existing communication conversions, suggests that businesses are aware that conversion technology now exists, and have established budgets, so the work can proceed.

There are now excellent tools which assist with document conversions and I've provided a brief summary of the Quadient product Inspire Adapt at the end of this post.

Where to go to be informed?

NZ Government

The DIA has excellent reference material. Michael Stuart, (Senior Communications Advisor), advised that Internal Affairs (DIA) is committed to enabling accessibility in the provision of digital services, both in the department's own communications and by providing advice and guidance to the public service. Click here for accessible legal requirements.

Mr Stuart went on to say that "Developing digital standards for web and mobile accessibility to support delivery of user–friendly services, is part of the newly released Service Modernisation Roadmap, which aligns effort across government agencies and will drive performance as we move towards a more unified customer experience for government digital services."

DIA / MBIE work closely with Whaikaha – Ministry of Disabled People which came into existence on 1 July 2022 and assists in setting policy and supporting the disabled community.

Follow this link to a very useful web page explaining what the NZ Government is doing to support people with disabilities in respect of the accessibility of information.
https://www.dns.govt.nz/blog/ramping–up–accessibility

There are also numerous other links to DIA information sources, which are provided at the end of this article.

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Accessibility

Where to go to be informed?

Write Ltd

Cumulo9 have been associated with Write Ltd for several years, as they are experts in Government and business-generated communications. We use their services ourselves to assist with the "plain English" writing of our customer facing manuals and other collateral.
I spoke to Eleanor Meecham (Content Services Manager), about the work they are doing, specific to accessibility and documents. Eleanor advised that "Write really care about accessibility and are often frustrated that we cannot do more. We have plenty of influence in terms of encouraging accessible language and layout, but the technical aspects of accessibility are often out of our hands."
Write have gone as far as to create a blog titled "Seven simple steps to better accessibility and inclusion".

Here is a link to the blog: seven steps to better accessibility and inclusion.

Blind and Low Vision NZ

My research would not have been complete withouta meaningful conversation with Blind Low Vision NZ CEO, Andrea Midgen, who suggested that I talk to Dan Shepherd, GM of Community and Inclusion. What I did not know was that Dan has a sight disability himself. He was diagnosed with Retinitis Pigmentosa when he was just 15 years old. I found this out when I asked if he could drop his responses into the Word document that I had supplied him with. He came back with "My adaptive tech (specifically reverse contrast) is picking up the heighted background as glare and is a barrier to my accessing the questions."

Once we had sorted things out via an email exchange, Dan explained the role of Blind Low Vision NZ, which is to work in and with communities to grow awareness and influence and systemic change as it pertains to accessibility and inclusion. This includes structured awareness training/ education programmes available to communities such as the Schools Awareness Programme and the Insight employer education/ awareness programme, as well as partnership with local government and agencies such as Auckland Transport.

I referenced the growth of digital channels, and asked if Blind Low Vision NZ sees a higher level of complexity, and if this was affecting the ability to deliver fully accessible services to the visually impaired? I asked if advances in technology were helping.

Dan responded stating that "In terms of service delivery to clients, advancements in technology and digital channels will continue to provide Blind Low Vision NZ clients with choices relating to how they choose to receive support and services, allowing increased self-determination in the service pathway."

Accessibility

What is happening with advances in technology?

My interest in this subject was sparked following a presentation at a Quadient conference in Sydney, prior to Christmas. The presentation was on Inspire Adapt – more on that later.

We are seeing rapid advancement across all technology fronts which is having a positive impact on the ability to assist people with sight and hearing disabilities. In terms of sight there are two main areas where technology can assist. These aids are often referred to as adaptive technologies.

Examples of adaptive technology

a) For Online Reading:

- **Screen Readers** – Software like NVDA, JAWS, and VoiceOver (Mac/iOS) reads text aloud for visually impaired users.
- **Adaptive Keyboards & Mice** – Modified input devices with larger keys, alternative layouts, or joystick controls for people with limited mobility.
- **Braille Displays** – Devices that convert digital text into Braille for visually impaired users.
- **Hearing Aids & Cochlear Implants** – Devices that assist individuals with hearing impairments.
- **Text-to-Speech (TTS) Tools** – Extensions like Microsoft Edge's Read Aloud, **Google Chrome's Read Aloud, or NaturalReader** convert text into spoken words.
- **Magnification Tools** – Software like ZoomText, Windows Magnifier, or Mac Zoom enlarges text for those with low vision.
- **High-Contrast Mode** – Many devices allow users to adjust colours and contrast (e.g. Windows High Contrast Mode or Mac's Invert Colours).
- **Customizable Fonts & Spacing** – Browser extensions like OpenDyslexic or Read&Write adjust fonts for easier readability.
- –**Speech Recognition** – Tools like Dragon NaturallySpeaking allow users to navigate websites hands-free.
- **Alternative Input Devices** – Eye-tracking systems and switch controls help those with mobility impairments interact with digital text.

b) For Paper Documents:

- **Handheld or Digital Magnifiers** – Devices like CCTV Magnifiers or Pebble HD enlarge printed text.
- **Smartphone Apps** – Apps like Seeing AI, Envision AI, or Google Lens read printed text aloud.
- **Braille Displays** – Converts text into Braille for users who are blind.
- **Large Print Books & Documents** – Using bold fonts, bigger text, or high-contrast printing improves readability.
- **Coloured Overlays** – Helpful for dyslexic readers, overlays can reduce visual stress by changing background colours. Tinted or dyslexia glasses also assist.


Inspire Adapt

This is an automated PDF accessibility solution that reduces the time and expense involved in manual document remediation.

The solution converts inaccessible PDFs into PDF/UA format on-demand or at the batch level via an automated workflow built to support high-volume document remediation. PDFs are automatically mapped and tagged, with tagging structures and rules streamlined into templates that allow remediation to programmatically be applied to large volumes.

Businesses are now focusing on day-forward compliancy, but there are existing documents that continue to be accessed that also required remediation.

My view is that most businesses consider the task of converting the likes of a PDF archive to the required PDF/UA standard just too hard. However new tools, like Inspire Adapt, can make the task a straightforward one, as – once set up – the process can be a fully automated allowing for fast and efficient conversions.
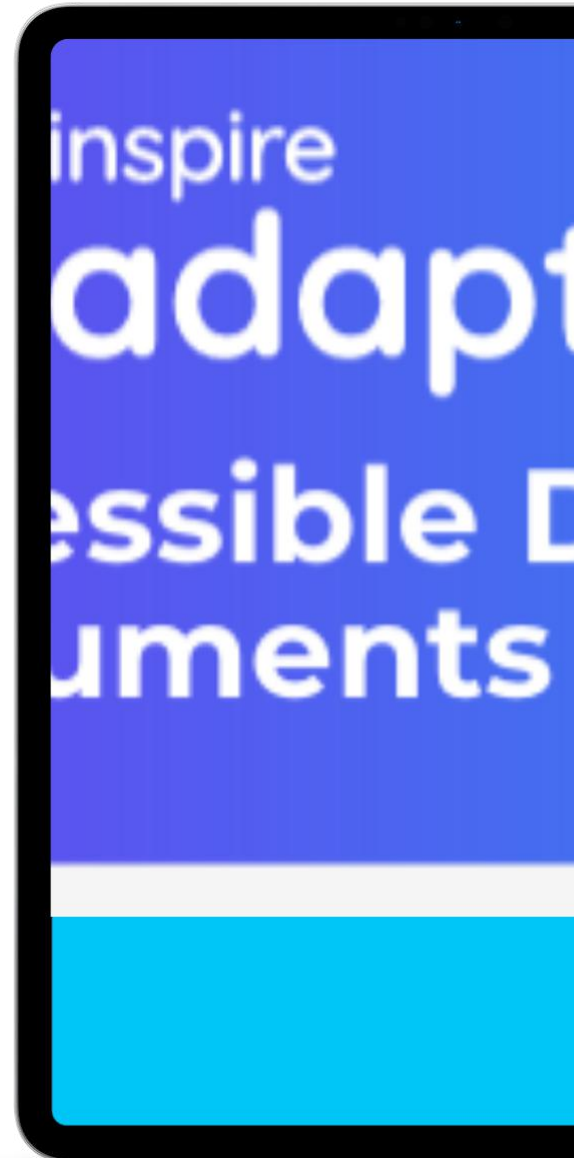
Summary

Many businesses like Cumulo9 are B Corp certified, or if not, intend to be as they evaluate their impact on workers, customers, community, and the environment.

Businesses need to step-up in this area and for those who do not see it as being particularly important, there could be a wake-up call if supporting legislation is introduced. One only needs to reference what is happening in Europe (with the pending EAA), to see that it might to prudent to act now, before compliance becomes mandatory.

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About the writer

David has been involved in the customer communication market for close to thirty years. From a time of courier fonts, mandatory upper-casing, line printing, and limited document formatting. When there was only enveloped mail, no internet as we know it today, and limited acknowledgement of those with disabilities.

David works for Cumulo9 who represent Quadient in the NZ market, and it is the Quadient application Inspire Adapt, that David believes will be of significant benefit to businesses wanting to convert existing documents into a fully accessible format.

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MBIE / DIA useful links

- [Service Modernisation Roadmap | NZ Digital government](#)
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- [Website checker pilot puts focus on accessibility | NZ Digital government](#)
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- [Accessible procurement — save money and lower the barriers to government services | NZ Digital government](#)

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