State Comptroller's Report – Cyber and Information Systems | May 2023

Systemic Topics

Accessibility of Government Services in the Digital Age to Persons with Disabilities and Non-Users of Digital Media

Accessibility of Government Services in the Digital Age to Persons with Disabilities and Non-Users of Digital Media

Background

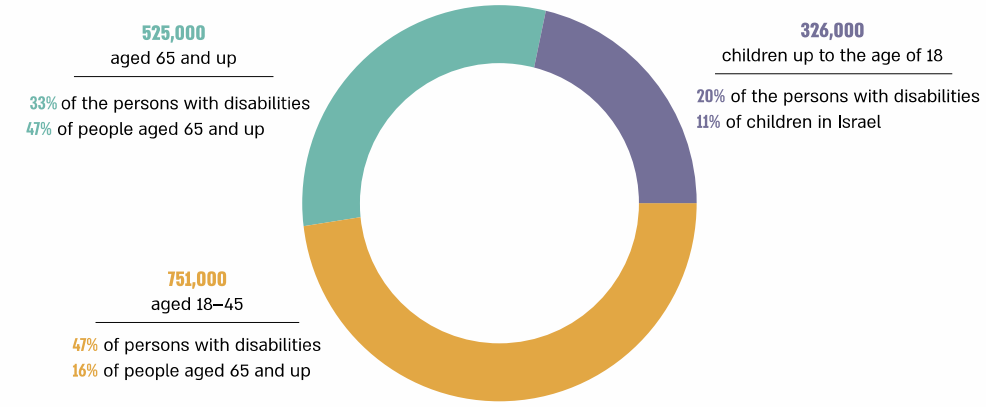
Government bodies provide services to the public through various channels, including public reception bureaus, service call centers, and digital channels (their websites and apps). Technological development has led to the public's increased use of digital means when consuming information and services and contacting public bodies through digital service channels. The use of digital channels enables the government to optimize service to the public and save labor inputs since the cost of face-to-face service is 50 times higher than the cost of digital service. This use also reduces the bureaucratic burden imposed on the public, making the government service more available, convenient, and consumed from anywhere and at any time. The Equal Rights For Persons With Disabilities Law, 1998 (the Law), and the regulations promulgated thereunder, establish provisions for service accessibility for persons with disabilities, including the service provided through digital channels. Various entities that provide services to the public, including government bodies, should make the information and the services they provide to the public through digital channels accessible for persons with various types of disabilities. Full accessibility to the extent possible of the digital government service is necessary for the public as a whole, particularly for persons with disabilities, so that they, too, can use it in a dignified, equal, and independent manner. The need for making digital services accessible to the public, and in particular to persons with disabilities, becomes even more critical during times of emergency, for example, during a pandemic such as the Covid-19 pandemic or in times of war, as in such times the digital channel becomes the main channel where information and services can be obtained.

Another aspect that government bodies should address in the current era, characterized by the expansion of digital services, is the need to preserve non-digital service channels – service at public reception bureaus, by phone and by mail, to allow people and population groups that rarely use the internet nor consume government services through digital channels, or even avoid doing so, also to receive the services in an available and convenient way. At the same time, government bodies should identify the barriers that prevent such people from using their digital service channels and remove these barriers for them or at least minimize them.

Persons with Disabilities in Israel, Triennial Estimates (2018–2020)

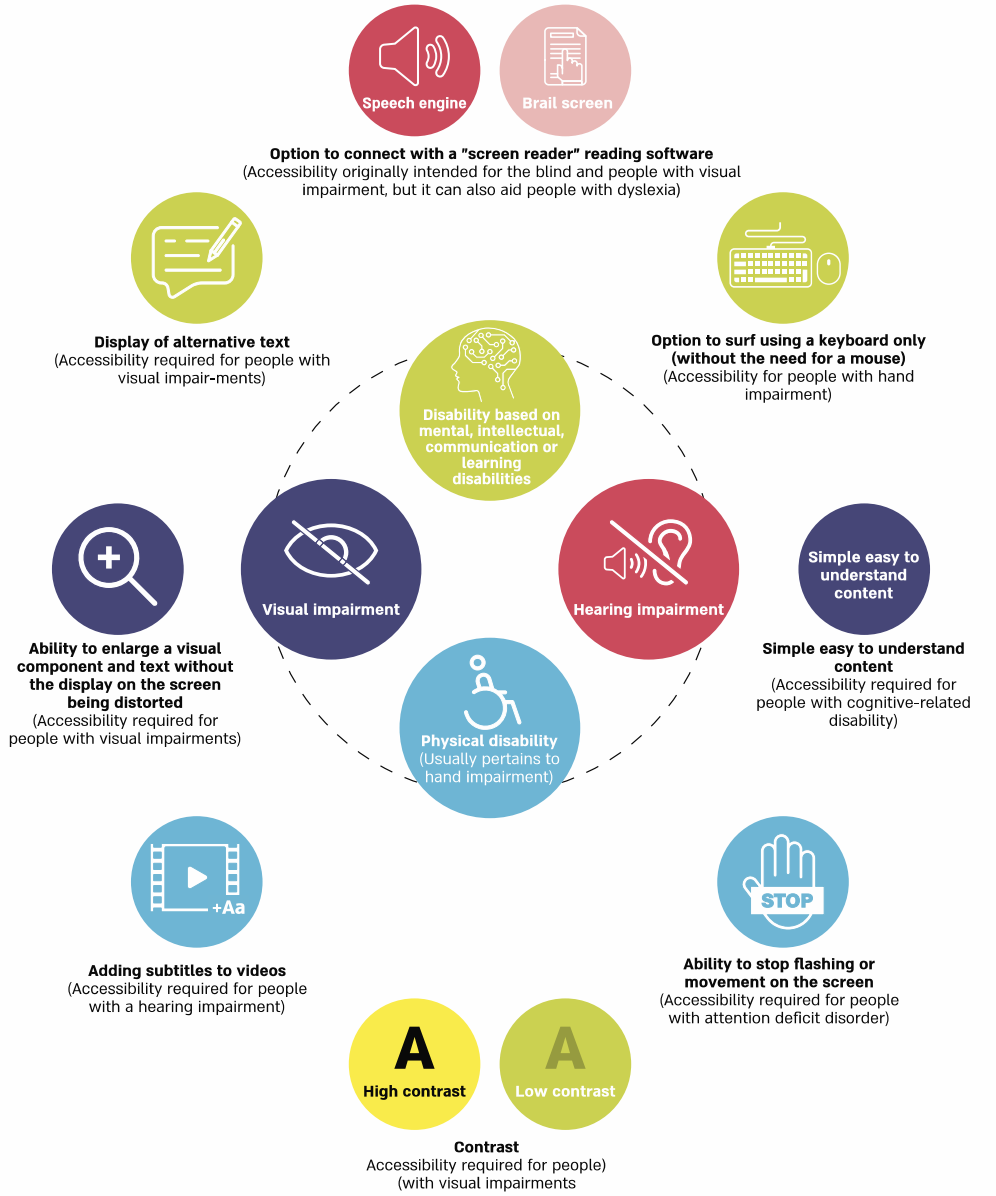
In Israel there are about 1.6 million persons with disability

Triennial estimates based on the Social Survey after non-response corrections and the addition of popula-tions not included in it



According to the Myers-JDC-Brookdale Institute data processed by the State Comptroller's Office.

Types of Disabilities that Require Digital Accessibility and the Main Accessibility that can be Provided



Key Figures

57%

of the 23 government bodies that participated in the State Comptroller's Office survey (13 bodies) reported that they did not make accessible all the required content and services on their main website

43%

of the 23 government bodies that participated in the State Comptroller's Office survey (10 entities) have not yet performed an accessibility check of their website, once every five years, as required

in 100%

of the 15 websites of 14 government bodies, which the State Comptroller's Office sampled and checked accessibility, found items that were not made accessible to persons with various disabilities, as required by the Law

about 50%

of the government bodies that participated in the State Comptroller's Office survey (12 out of 23 bodies) made available on their public websites, only part of the required documents under the provisions of the Law

100%

in each service process in the 16 digital government service pages most viewed, the State Comptroller's Office found at least two items that were not adequately accessible to persons with disabilities

39%

of about 520 persons with disabilities who use the internet in their daily lives reported in the State Comptroller's Office survey that they encountered inaccessible items on websites or applications (apps) of government bodies, as required

31%

of the people who rarely consume government services online or who refrain from doing so reported in the State Comptroller's Office phone survey that they encountered instances where they wished to receive a government service through non-digital channels (public reception bureaus, phone or mail), and it was not possible because they were required to have a means they did not have, such as an e-mail, an internet connection or a credit card

38%

of about 520 persons with disabilities reported in the State Comptroller's Office survey that they encountered instances where it was impossible to receive service from government bodies except digitally (I.e., they could not consume the service by phone or at a public reception bureau)

Audit Actions

From January to October 2022, the State Comptroller's Office audited the accessibility of digital services to persons with disabilities and the response provided to non-users of digital media or to people who seldom do so for the receipt of government services. Below in the diagram is a breakdown of the audit topics, the types of audited bodies, and the methodology used in this audit.

Government bodies in which the State Comptroller's Office conducted accessibility checks on their websites or who responded to its survey are the National Insurance Institute, the Ministry of Religious Services, the Small and Medium Enterprises Authority (ISMEA) – the Ministry of Economy and Industry, the Central Election Committee, the Israel Knesset, the Courts Administration, the Israel Police, The Ministry of Defense (the Rehabilitation of Disabled Veterans Department website), the Ministry of Construction and Housing, the Ministry of Health, the Ministry of Foreign Affairs, the Ministry of Education, the Ministry of Agriculture and Rural Development, the Ministry of Justice, the Ministry of Interior, the Ministry of Welfare and Social Security, the Ministry of Transport and Road Safety, the Ministry of Tourism, the IDF (Meitav Unit website)[1], Israel Railways, the Enforcement and Collection Authority, the Population and Immigration Authority, the Nature and Parks Authority, the Tax Authority, the Israel Land Authority, the Securities Authority, the Airports Authority and the Employment Service.

1 Meitav is a unit engaged in recruiting, screening, placement and deployment issues. https://www.mitgaisim.idf.il

The Audit Topics, the Types of Audited Bodies, and the Methodology, 2022

2022

October — January

The audit topics

The response given to non-users of digital media

Accessibility of the digital services of government bodies to persons with disabilities

Audited Bodies

03

Government Bodies

1. An audit was carried out on the websites of 14 government bodies
2. A survey was carried out in which a questionnaire was sent to 23 government bodies who answered it

02

Commission for Equal Rights of Persons with Disabilities

(Ministry of Justice)

01

The National Digital Agency

(Ministry of Economy and Industry)

The audit was carried out at the MyGov Unit and at the Improvement of Government Service to the Public Unit

Methodology

Audits in government bodies

Examination of accessibility on the bodies' websites

15 websites of government bodies

Examination of accessibility to the service pages most viewed by the public

16 online government service pages

Survey concerning accessibility on websites and apps

23 government bodies responded

Public participation processes for receiving information on customer experience

Phone survey

Among people who do not consume government services online or who do not use the digital service channels at all

301 people aged 60 and up responded | Ultra-orthodox and Arab

Online survey

The survey was distributed to persons with disabilities using the internet

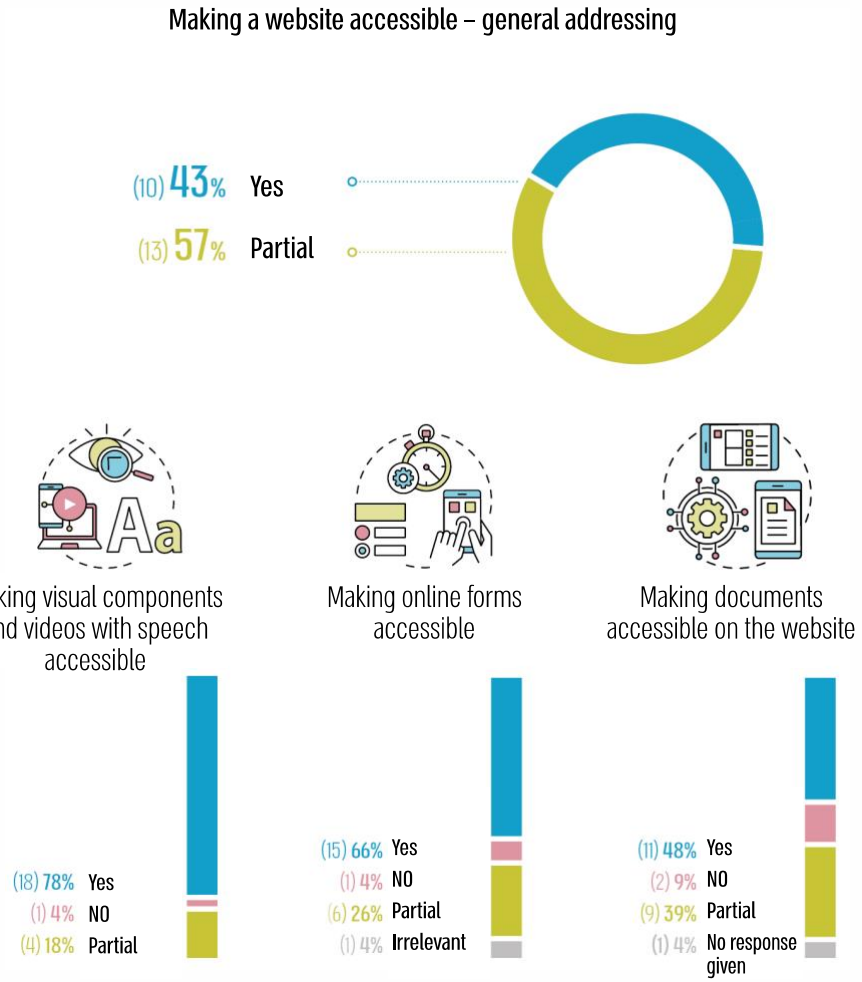
527 people responded

Part One: Digital Accessibility for Persons With Disabilities

Key Findings

- **Survey Findings – Accessibility of Government Bodies Websites –** the State Comptroller's Office survey findings among 23 government bodies raised that the websites of 13 of them (57%) do not meet the accessibility requirements prescribed by law. Some items are not accessible to persons with various disabilities, even though making them accessible is required. The websites belong to the following bodies: the Nature and Parks Authority, the Ministry of Interior, the Ministry of Transport and Road Safety, Israel Railways, the Enforcement and Collection Authority, the Ministry of Health, the Ministry of Education, the Courts Administration, the Central Election Committee, the Israel Land Authority, the Ministry of Religious Services, the Ministry of Foreign Affairs and the Ministry of Tourism.

Reports by Government Bodies on their Websites and some Items Accessibility*



* "Yes" – Fully accessible (all items included in this category have been made accessible); "Partial" – Only some of the items belonging to each component (category) were made accessible; "No" – No actions for making it accessible were carried out; "No response given" – The body did not provide information in its answer to the survey; "Irrelevant" – The component type does not exist on the entity's website.

Periodic Accessibility Checks – 10 out of 23 government bodies (43%) that participated in the State Comptroller's Office survey – the Ministry of Welfare and Social Security, the Israel Land Authority, the Ministry of Construction and Housing, the Ministry of Religious Services, the Enforcement and Collection Authority, the Ministry of

Agriculture and Rural Development, the Courts Administration, the Ministry of Foreign Affairs, the Israel Police as well as the Tax Authority – have not yet conducted a periodic accessibility check of their main websites that provide information and service to the public. This check is required once every five years, and the first check must be performed no later than November 2023. Of the ten bodies that did not perform an accessibility check, four reported that their websites have been accessible for at least five years.

- **Appointing an Accessibility Coordinator –** out of the 23 government bodies that responded to the survey, three (13%) indicated that they did not appoint an accessibility coordinator – the Ministry of Interior, the Ministry of Religious Services, and the Central Election Committee. The appointment of an accessibility coordinator is required by law from a body that provides a service to the public and employs over 25 employees, for the promotion of its activity and to address public inquiries.

- **State Comptroller's Office Accessibility Checks –** the State Comptroller's Office checks of 15 websites of 14 government bodies – the National Insurance Institute, the Ministry of Religious Services, the Courts Administration (the Net Ha'Mishpat website, and the Supreme Court website checked), the Central Election Committee, the Israel Knesset, the Israel Police, the Ministry of Defense – the Rehabilitation of Disabled Veterans Department, the Ministry of Health – the Call Health website, the Ministry of Interior, the IDF – the Meitav Unit website, the Population, and Immigration Authority, the Enforcement and Collection Authority, the Nature and Parks Authority and the Employment Service – raised in each of them items that were not accessible as required by law for persons with various disabilities. As part of the checks of all these websites, documents, online forms, or visual elements were found not as accessible as required.

The Rate of Proper and Defective Accessibility of Items in each of the 15 Websites Examined *

* As part of the check, a limited number of items were sampled and examined at each website. The rates shown in the diagrams do not always equal 100% as they have been rounded.

Accessibility Checking of Service Pages – in checking the accessibility of the service processes of the 16 most common online service pages, providing information about a digital service on the websites and sometimes even links to online forms to receive the service, at least two items were found not accessible as required by law. Below is a breakdown of the service pages that were checked:

The Service Examined	The Government Body
Producing a land registration extract from the land registries	Ministry of Justice, Land Registry and Settlement of Rights Authority
Payment of traffic fines	Israel Police
Declaration of a passenger entering Israel before a flight (for the covid-19 period)	Ministry of Health
Car registration renewal	Ministry of Transport and Road Safety
Disabled parking tag	Ministry of Transport and Road Safety
Issuing a driver's license	Ministry of Transport and Road Safety
Driving license renewal	Ministry of Transport and Road Safety
Transferring ownership of vehicles	Ministry of Transport and Road Safety
Passport application	Population and Immigration Authority
Application for an ID card	Population and Immigration Authority
Information on withholding tax certificates and bookkeeping	Israel Tax Authority
Checking the processing status of an application for a job grant	Israel Tax Authority
Applying for a job grant	Israel Tax Authority
Tax adjustment online	Israel Tax Authority
Real estate information	Israel Tax Authority
My ILA (information from the Israel Land Authority)	Israel Lands Authority

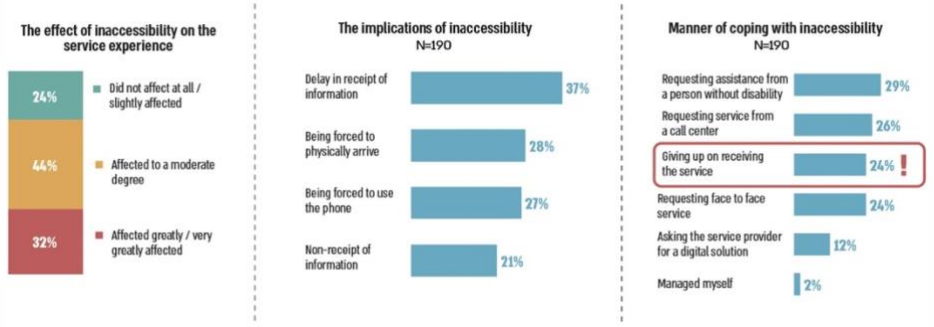
Public Participation Among Persons with Disabilities

Preference for Traditional Service Channels – in the State Comptroller's Office public participation survey among persons with various disabilities, a representative sample of persons with disabilities who use the Internet, it was raised that a significant rate of the respondents – 44% – prefer to physically come to the public reception bureaus

to consume the government services or use the phone service and not through the digital channels.

The Impact of Accessibility Problems in Digital Service Channels – 39% of the respondents to the public participation survey stated that they had encountered items that were not accessible as required on government bodies' websites or apps. Below is the diagram of how these respondents cope with accessibility difficulties on the digital channels and the implications for their service experience.

The Implications of Accessibility Difficulties in Digital Service Channels and Their Coping with them*



* The sum of the percentages in the sections "Manner of coping with inaccessibility" and "Implications of inaccessibility" exceeds 100% because each respondent could indicate more than one possible answer.

Supervision by the Commission for Equal Rights of Persons with Disabilities – the Commission for Equal Rights of Persons with Disabilities checks in 2019–2021 found accessibility deficiencies in the websites of 14 government bodies. The Commission alerted each body of the deficiencies it found but did not follow up on rectifying them in five bodies (36%).

Accessibility Instructions for Healthcare Providers – until the audit completion, November 2022, no regulations was imposed on healthcare providers, (including health maintenance organizations and hospitals) that provide service to the general public in Israel, to make their websites or apps accessible to persons with disabilities. Without a legal requirement, it is impossible to force health service providers to make accessibility adjustments on the websites.

Measuring the Quality of the Digital Government Service for Persons with Disabilities – even though about 17% of the population in Israel are persons with disabilities, the Improvement of Government Service to the Public Unit in the National

Digital Agency did not measure the quality of the government digital service provided to the public regarding accessibility to persons with disabilities. Therefore, no relavant information can be found in the annual reports it published.

Consolidated Infrastructure for the Government Bodies Websites – the National Digital Agency provided the government bodies with a consolidated infrastructure for the websites that provide information and services to the public. In this infrastructure, some accessibility adaptations that must be provided in the websites for persons with disabilities, such as connecting with screen reading software and contrast at the required level, have been implemented.

Key Recommendations

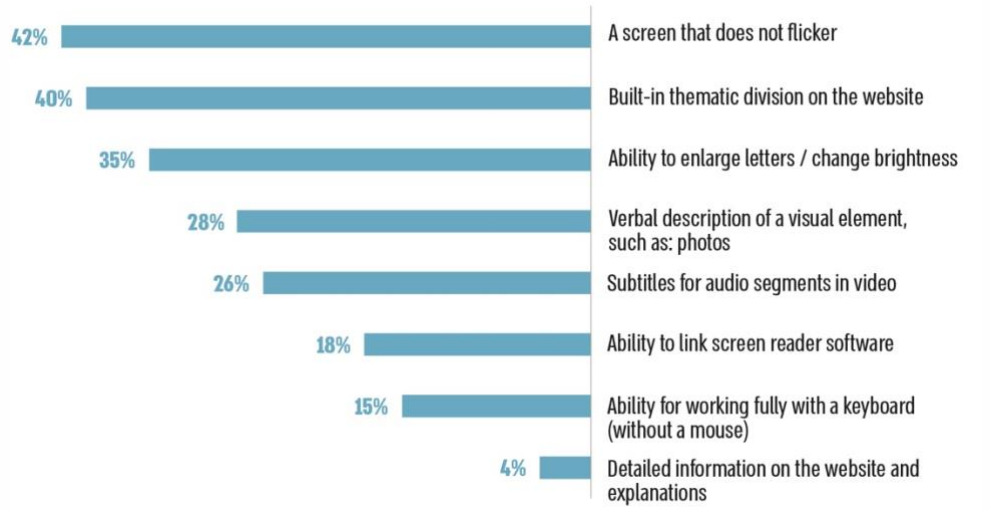
- Government bodies should systematically make accessible to persons with disabilities all the content and public services on their websites. In this framework, among other things, every document prepared since October 2017 and uploaded to the website and all the online forms used to receive service should be accessible. Government bodies should also provide alternative text for visual items and prepare subtitles for videos and audio segments containing speech.
- Government bodies should periodically check every website intended for public service to ensure that all the items requiring accessibility have indeed been made accessible generally and to all types of disabilities. If the check raises deficiencies in the accessibility or items that were not made accessible as required, the deficiencies should be rectified as soon as possible.
- Each of the bodies whose websites were checked by the State Comptroller's Office for the accessibility of items should rectify the deficiencies found during the check – the National Insurance Institute, the Ministry of Religious Services, the Courts Administration (the Net Ha'Mishpat website and the Supreme Court website), the Central Election Committee, the Israel Knesset, the Israel Police, the Ministry of Defense (the Rehabilitation of Disabled Veterans Department website), the Ministry of Health (the Call Health website website), the Ministry of Interior, the IDF (the Meitav Unit website), the Population and Immigration Authority, the Enforcement and Collection Authority, the Nature and Parks Authority and the Employment Service.
- Regarding digital service pages, the bodies whose service pages have been inspected by the State Comptroller's Office, whether their service pages are under the purview of the National Digital Agency or if their service pages direct to computer systems under their responsibility, should make the necessary rectifications and regulate the accessibility of

these pages so that persons with disabilities will be able to receive service on the websites like the rest of the public, as required by law. They should do it themselves or in collaboration with the National Digital Agency.

- It is recommended that the Commission for Equal Rights of Persons with Disabilities periodically monitor, ensureing full compliance with the requirements of the law regarding the accessibility of government bodies websites to persons with disabilities. It is further recommended that the Commission annually survey persons with various types disabilities and obtain information about the accessibility deficiencies they encounter when consuming government services through digital channels. This will help it focus the accessibility checks it does on government bodies.

- It is appropriate that the Ministry of Health establish provisions to regulate the accessibility of internet content and services provided by health services to the public.

The Findings of the State Comptroller's Office Public Participation Procedure Among a Representative Sample of Persons with Disabilities – the Rate of Respondents Requiring a Certain Type of Accessibility on the Internet, According to the Types of Accessibility



Summary

Government bodies provide the public with many services through websites and apps. This has advantages both for the bodies themselves in terms of efficiency and economy and for the citizen, to whom the service is generally available anywhere and at any time, without waiting for his turn at the public reception bureaus or on the phone. Apart from the advantages of using digital service channels, they become essential in times of crisis, such as a pandemic or war, because at such times, they may become the main channels through which the public can receive information and service. After the outbreak of the covid-19 crisis in 2020 and its aftermath, the need for digital communication channels to connect the public and government bodies increased, and the government accelerated the development of its digital services. In 2022, as part of this audit, the State Comptroller's Office checked the accessibility of the digital services of government bodies to persons with disabilities of various types, 17% of the population in Israel. The findings indicate that the government bodies' websites have thus far been made partially accessible. The lack or partial accessibility of information and service make it difficult and even prevent a person with a disability from consuming the government service on the digital channel in an independent and dignified manner. The right to receive an accessible service from a government body, including through digital channels, is essential for every person, particularly for persons with disabilities, as some have frequent interactions with government bodies due to the need to exhaust rights arising from their disabilities. This right is anchored in Israeli law and is even presented in the International Convention on the Rights of Persons with Disabilities, which the State of Israel signed in March 2007 and ratified in September 2012.

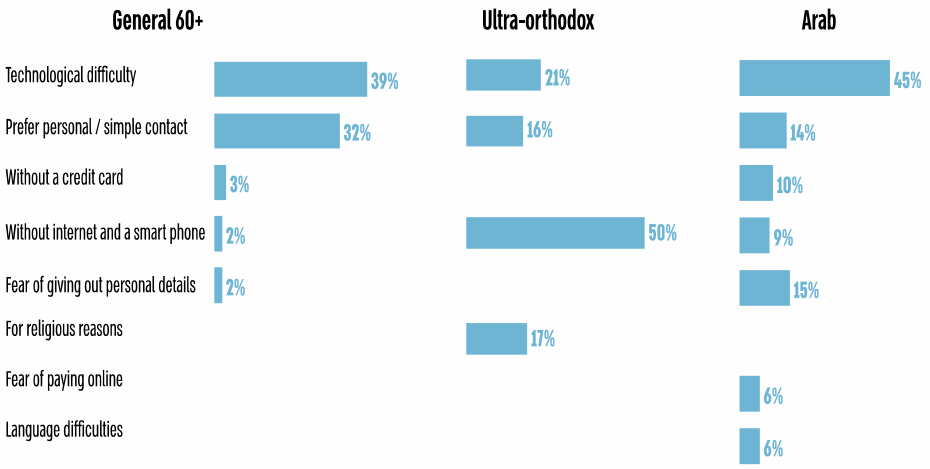
In this report, in-principle recommendations were given to all government bodies to perform accessibility checks in their digital services and rectify deficiencies. Recommendations were also given to the regulating bodies – the Commission for Equal Rights of Persons with Disabilities in the Ministry of Justice and the National Digital Agency – to promote digital accessibility of government services. Individual findings found as part of the State Comptroller check on government bodies websites and their service pages were transferred during the audit to each of the bodies so they could as soon as possible rectify them. The more the government bodies use the audit findings to rectify deficiencies found and address the digital service channels' accessibility, the more they will be able to improve the service they provide to persons with disabilities, which may motivate many more of them to use these channels and benefit from the advantages inherent therein.

Part Two: The Government's Response to Non-Users of Digital Media in the Digital Age

Key Findings

- **Three Population Groups that Seldom Consume Online Government Services –** according to the CBS data for 2021, in Israel, there were about 5.9 million people aged 20 and over. Of these, nearly 3 million people belong to three population groups that rarely, compared to the general public in Israel, consume online government services – people over 60, the ultra-orthodox society, and the Arab society. These groups comprise about a third of the total population in Israel (which in that year was about 9.5 million people) and almost half of the adult population. The findings of the State Comptroller's Office survey among people from these three groups indicate that they face barriers that make it challenging to use these channels, and therefore, they prefer not to use them. These barriers originate from the lack of appropriate means or technological difficulties in operating the service on the digital channel. Under these circumstances, the traditional channels (public reception bureaus, phone, and mail) are the only alternatives for them to receive the service.

The Reasons for Not Preferring Digital Channels for Receiving Government Service



Findings of a phone survey conducted by the State Comptroller's Office.

- **Need for Digital Means and a Credit Card in Traditional (non-digital) Service Channels –** 31% of the respondents to the State Comptroller phone survey among people who rarely consume services on the internet or refrain from it, stated that they encountered cases where they wished to receive a government service through a traditional channel but did not receive a response because they were required to use means they did not possess, such as a smartphone, e-mail or credit card. About 13% of the respondents who stated that they encountered difficulties consuming services through the traditional channels do not have a smartphone, which requires them to receive a password for identification purposes. This means is required in the phone service channel. 9% stated that when they asked to receive service at the bureau, they had to make an online appointment, placing a barrier in front of them. Furthermore, 4% of the respondents stated that they did not have a credit card and, therefore, asked to pay at a register using cash but were refused.

- **Response Exclusively Through the Digital Service Channel –** of the 520 respondents to the State Comptroller's Office online survey, among persons with disabilities who use the Internet, 199 respondents (38%) stated that they encountered cases where it was not possible to receive service from government bodies except through digital means. That is, they could not consume the service at a public reception bureau or through the phone service. It should be noted that according to the respondents' answers, sometimes the referral to the digital service as an exclusive channel for receiving the service was already done at the initial stage, where they wished

to make an appointment to receive the service and were directed to the digital service that was the only way to make the appointment.

- **Digital Service Stations at Public Reception Centers –** digital service stations at public reception bureaus of government bodies can help citizens who do not have a means of connecting to the internet to consume information and services digitally. However, in the State Comptroller's Office survey among 23 government bodies, only six bodies indicated that they had placed such stations in their public reception bureaus.

- **Making the Government Digital Service Accessible to the Arab Culture and Language –** to make the government service accessible to the Arab culture and language, in October 2021, the government decided (Resolution 550) that at least 50% of the relevant digital government content and services will be linguistically and culturally accessible to the Arab population by the end of 2025. The audit raised that as of August 2022, the Arabic translation of the online forms in the ten most common government services (defined by the National Digital Agency) has not been completed.

Key Recommendations

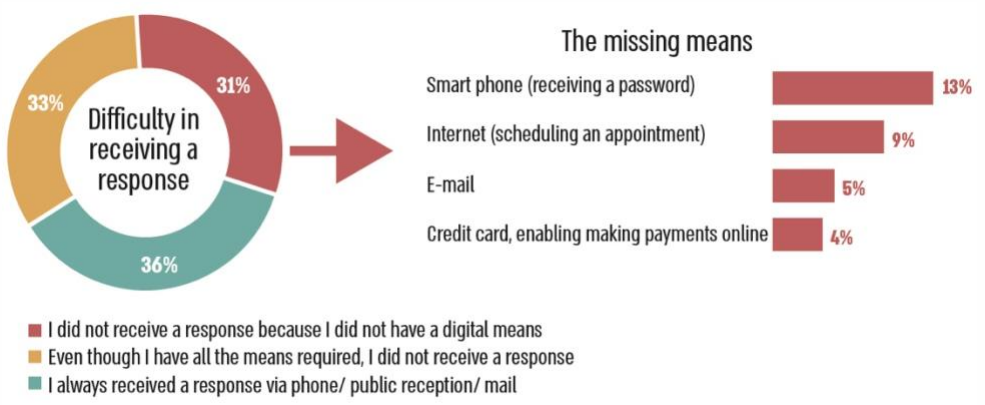
- It is recommended that the National Digital Agency and the government bodies study the findings of the State Comptroller's Office public participation surveys, analyze the barriers or reasons for the relatively low use of the digital channel among the ultra-Orthodox and Arab population and those aged 60 and over, for the consumption of government services, and consider improving the government service for such large groups in the Israeli public, which together make up about a third of the population. Concurrently with the development of digital services, making them optimally accessible to the general public, the government bodies should continue providing a complete response through traditional channels for those who prefer or are forced to use them.

- Government bodies should provide service through traditional channels – public reception bureaus, phone, and mail – without making it conditional on using digital means, such as e-mail and smartphones. Likewise, a person who wishes to pay a government fee at the register in a public reception bureau should be able to do so without making it conditional on using a credit card since some people do not use this means.

- It is recommended that the National Digital Agency, in cooperation with each government body that provides digital services to the public and has not yet placed digital service stations in their public reception bureaus consider their placement. Thus, making the information and services in digital channels accessible to the general public, including people who have difficulty using technology or lack the appropriate means.

It is appropriate that the National Digital Agency and the government bodies complete the translation into Arabic and publish service pages currently on the consolidated government website not published in Arabic. Thus increasing the government services accessibility to the Arab-speaking population according to the government's resolution purpose.

The Respondents Rate who Encountered Difficulty in Receiving Service from Government Bodies by Phone or at a Public Reception Bureau due to a lack of Digital Means or a Credit Card



Findings of a phone survey conducted by the State Comptroller's Office.

Summary

There are three main population groups that, compared to the general population, rarely use the Internet in general and for the consumption of government services in particular: those aged 60 and over, as well as those aged 20 from the ultra-Orthodox Jewish society and the Arab community. These groups together are over 3 million citizens – about a third of the population in Israel and about half of its adult population. The State Comptroller's Office conducted a public participation phone survey. 300 people who belong to these three groups who participated in the survey stated that they prefer not to use the digital government service channels and noted the barriers that make it difficult for them to use these channels. The main barriers are low digital literacy and not having a means of connecting to the internet. These barriers, as well as other barriers noted, are also related to personal preferences and cultural and social reasons, such as refraining from possessing a smartphone or a computer connected to the internet among people from ultra-orthodox communities and the relatively limited use of credit cards among the Arab society.

In this current era, characterized by the transition from traditional service to digital service, government bodies should address the barriers that prevent certain population groups from reducing the gap to the digital age. Actions to increase digital literacy among these three groups have been carried out in recent years by the National Digital Agency, following government resolutions, and these should continue even more vigorously. Placing digital service stations in the public reception bureaus of government bodies, with attendants who will assist their users, can help populations that do not own digital means and people with low digital literacy to consume government services in this way. Along with such actions, the government bodies should maintain their traditional service channels and even improve them to enable people who need them to consume the services and exercise their rights. This is also necessary to minimize the gap between them and those who use a government service on the digital channel. This is of significant importance as the socio-economic status of people from these population groups is usually lower than that of the general population. Therefore, they are more in need of the service provided by the government bodies. In this context, it is recommended not to stipulate the receipt of the service in a traditional service channel on the need to use a digital means (or a credit card to pay at the register) since some of the people who turn to the traditional channels do not use these means. They should not be denied service but rather be assisted in receiving the service and help.