



Within 25 criteria are 70 'responsibilities', many of them either hard to test or untestable. (Zennie/Private Media)

Situation: There are 14 competing standards.

'Fourteen? Ridiculous! We need to develop one universal standard that covers everyone's use case.'

'Yeah!'

Soon: There are 15 competing standards.

This famous comic strip made me giggle back in the 2010s, when I was deep in the standards phase of my own career in technology.

It sprang to mind following the recent announcement from the Digital Transformation Agency (DTA) that it is increasing its suite of mandatory standards for digital services from one to four.



A standard can be a wonderful thing. We all live in an invisible web of standards, from food safety to procurement processes to inter-library loan systems, each one argued out over months or years by people who have more passion about the semantics of a semi-colon than many of us have about our entire careers.

Just such passionate people were responsible for the first-ever Digital Service Standard (DSS), which was created by the UK's Government Digital Service (GDS) in the early 2010s. Its brief was 'revolution not evolution', and its remit was to rebuild every single digital service offered by the UK government. Many of the best technologists from all four nations flocked to GDS, drawn by the promise of changing the fundamental relationship between people and government.

GDS's first DSS was a weighty beast. It had 26 criteria: 'Establish a benchmark'. 'Use open standards'. 'Put a plan in place'. All sensible provisions, but cumbersome. The standard was quickly reduced to a more manageable 18 criteria, and the current version has been slimmed to 14.

The criteria were also mandatory. If any service did not meet them, it would not be hosted on GOV.UK.

2015 saw the creation of Australia's Digital Transformation Office (DTO), which quickly released its own DSS. It was, effectively, the same as gov.uk's — 10 of the DTO's 13 criteria were almost identical to GDS's, a prudent choice given the quality of the source material. The DTO eventually became the DTA (Digital Transformation Agency), and its influence waned. An ambitious proposal for a single 'gov.au' website, equivalent to gov.uk, was nixed in 2017.

The DTA's DSS, like GDS's, was 'mandatory'. Without the threat of denial of hosting, however, the meaning of 'mandatory' became cloudy and the DSS slipped out of use.

So: where are we now?



The DTA has recently released a brand new 'DSS 2.0', which became 'mandatory' in July this year. It covers both citizen-facing and, for the first time, staff-facing services — a thoughtful expansion. The DSS has a tidy 10 criteria, each of which includes 'responsibilities'. The 'responsibilities' are things like 'understand the limits of data' and 'identify the right performance indicators'.

This is the point where the latent nerd in me starts to feel twitchy.

There are two ways to design a standard: listing things you must do (for example, a certain size of screw must have a specific depth to its thread) or things that must be true when tested (for example, a bridge must hold up X many tonnes). In the second instance, the bridge builder can use any design and materials they like, as long as they can show evidence that the bridge will indeed hold up X many tonnes. This kind of outcomes-based standard leaves more freedom for invention and creativity. This is the kind of standard the DTA has created, and the key requirement for this kind of standard is that the criteria must be testable.

'Understand' is not a testable criterion.

Nor is 'identify'. Or 'act'. In fact, many of the responsibilities in the DSS cannot be tested.

That problem aside, the basic criteria are solid. Things like 'know your user', 'do no harm', and 'monitor your service' are all sensible ideas.

Now, however, there are three new standards to go with the DSS 2.0, each with its own 'responsibilities'. There's the 'Digital Access Standard'. The 'Digital Inclusion Standard'. The 'Digital Performance Standard'. Each has five criteria, which on top of the new DSS' modest 10 brings us to a whopping total of 25.

Within those 25 criteria, we find 70 'responsibilities', many of them either hard to test or untestable.



How might an agency provide evidence that they have complied with the Digital Inclusion Standard Criteria 1 and 'considered diverse needs from the outset', for example? It isn't clear. What activities might they undertake to achieve this end? The standard provides a 'suggested activity' for 'consider diverse user needs': it is 'listen to and understand diverse user needs'. The description of the 'suggested activity' provides a bit more detail, recommending that agencies 'consider the different identities, characteristics and perspectives of users'.

How?

It might seem like a small nit to pick, but there's a reason I'm picking it. I am disabled. Design for disability is, for want of a better word, my passion, and has been from long before I both acquired a mobility impairment through injury and found out, like so many adults in recent years, that I'm AuDHD. The 'responsibility' is spot on: you should consider diverse user needs from the outset, including those of disabled people (or for Style Manual devotees, 'people with disability').

What you shouldn't do, ever, is assume you can empathise (or 'consider') your way into guessing what those needs are.

To 'listen to and understand diverse user needs', you can use excellent APS resources like those in the Style Manual. This isn't listed as a resource for the criteria, although websites provided by state governments (Victoria and NSW) are. Ideally, however, you should talk to people. But there are major power imbalances in those conversations, and they require a specialist skillset to do safely.

In disability, there's nobody more dangerous than a person with good intentions and no know-how.

The only other recommended activity for the criteria is to 'conduct usability testing with diverse user groups', which is a sensible piece of advice, albeit one that again requires specialist skills. That advice, however, includes the suggestion to 'adopt inclusive prototyping techniques'.



Again, a nit. Two nits, in fact. Prototyping happens in the middle of the design process; usability testing happens at the end. They're not the same thing. 'Inclusive design', meanwhile, is a disability-first design process for finding and solving important problems experienced by disabled people. It's a process I've both been part of and taught, but I could not tell you for the life of me what an 'inclusive prototyping technique' is. It's not a language we use. It's not a 'thing'.

It's easy for me, as a designer, to spot these incongruities and dismiss them. I, however, am not the person who will be grappling with this standard. There will be public servants who will quite reasonably assume that there is such a thing as an 'inclusive prototyping technique', that it is part of usability testing, and that it is their responsibility to act on both. Public servants who don't know that Style Manual is authoritative for federal government services, and vic.gov.au is not. I'm not the person who will allocate a budget to providing evidence the standard has been met, nor the one who will scramble to work out what, if anything, counts as evidence.

One potential outcome of following the new standard is that an agency could end up doing unsafe user research or co-design with disabled people and hurting them — an all too common occurrence and one that should never happen but regularly does.

I have not read, and do not have the subject matter expertise to assess, all the 70 responsibilities in all the 25 criteria of all the four new standards for digital services. But looking at the ones where I do have expertise leaves me worried.

Standards are the place where you need the nit-pickers. The new standards give the impression of having been written with dedication, enthusiasm, and effort but without the benefit of the cantankerous, curmudgeonly know-it-alls who are determined, at all costs, to get things right.

There is an enormous level of power, freedom, and security that can be brought to a domain through the provision of specific, achievable outcomes documented in a standard. If, however, a standard is misleading, vague, confusing, unauthoritative,  or untestable, it can't achieve that. All standards must, above all else, be

implementable.

If a standard doesn't meet that standard, it doesn't work.

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