

CABINET

DATE OF MEETING: 9 JUNE 2022

TITLE OF REPORT: ACCESSIBILITY REGULATIONS FOR WEB CONTENT

Report of: Change and Digital Manager

Cabinet Portfolio: Digital

Key Decision: No

Confidentiality: Non-Exempt

PURPOSE OF REPORT

1. To seek approval from Cabinet for
 - the recruitment of a temporary project resource to assist in the remediation work required to ensure that the new website is compliant with Web Content Accessibility Guidelines.
 - To seek approval of the provision of a series of awareness and training for staff and Councillors on the importance of accessibility across all forms of publicly available content.
 - To seek approval for the development of an accessibility strategy.

RECOMMENDATION

That Cabinet:

2. approves use of Digital reserves to recruit a temporary resource to conduct a programme of remediation to all published web content currently available on the corporate website
3. approves the creation of a series of training and awareness events for all staff and Councillors across the organisation to embed the principles of accessibility
4. approves the development of an accessibility strategy to embed the workflow and culture required to ensure ongoing compliance with the guidelines.

BACKGROUND

5. It is a requirement of The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 that public sector websites are accessible.
6. The regulations require websites (including intranets) to be completely accessible, no matter the disability that a potential visitor to their website might have.
7. Local authority websites must meet the international Web Content Accessibility Guidelines (WCAG) 2.1 AA accessibility standard. Public sector bodies need to ensure all content is accessible, irrespective of the format it is provided. Digital platforms should have accessibility built in, but Word, pdfs and other document types require specific attention to ensure they pass the guidelines.

8. Many local authorities rely on the publication of portable document format (pdf) to provide current or mandatory information to the public. The pdf will often be created without consideration for digital accessibility. They can be difficult to open, access, read and navigate through the document. This can impact everybody but will significantly affect people with disabilities like vision, hearing, mobility, and cognitive impairment.
9. Cabinet was advised in April's meeting that a project would be set up to consider accessibility issues across all web content that needs to be migrated to the new site.

MAIN ISSUES

10. The Council's published [accessibility statement](#) sets out how it will be measured against WCAG 2:1. It accepts that the current site is not fully accessible. But acknowledges that the issues will be addressed through the adoption of the new version of our website this year.
11. There are however, over 1,000 existing pdfs on the current site, and many will be migrated to the new website, planned for launch in November 2022
12. The commitment is that all published documents on the new website will be accessible. Therefore, a programme of review and remediation and/or conversion to alternative format needs to be designed. A working decision has been taken to ensure all Committee Services published agendas, reports, and minutes dating back to January 2021 are accessible.
13. Each published document requires an assessment to identify any accessibility issues. From this, we need to confirm the course of action to:
 - remove the document from the site as no longer required or out of date. Work is in progress as part of the website content audit workstream
 - remediate to accessible format. This requires the pdf or source document to be reviewed, issues identified and then fixed to ensure the document is accessible
 - convert into alternative format. An alternative is to convert to html (webpage). An example can be found here for Gloucester County Council constitution.
14. Awareness and understanding are key to ensure that all proposed documents that would be available on the website have accessibility built in. Initial training for managers and content editors took place between 2020-21 to ensure Hart could publish its accessibility statement and strive for WCAG 2:1. As part of this work, the intention is to create a programme of awareness and training to be included within the corporate equality and diversity commitment to staff.
15. There is also a need to ensure that digital accessibility is the default choice moving forward. This requires a review of the processes and culture across the Council to ensure that accessibility is owned and managed consistently. The intention therefore is to adopt an accessibility strategy to ensure the continued work to achieve digital accessibility standards for both the public and staff.

ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

16. The website project team does not have the capacity to complete this initial tranche of work. Therefore, two further options have been considered.

- Option 1. Commission an agency to complete the work on our behalf. An assessment of suppliers on the Digital Marketplace indicates that this was cost prohibitive with day rates starting at £60 with estimates of £60,000 for the duration of the programme
- Option 2. Recruit a temporary resource to complete the work. The total cost for this based on Grade E salary = £17,045 with training included. This is the recommended option.

CORPORATE GOVERNANCE CONSIDERATIONS

Relevance to the Corporate Plan and/or The Hart Vision 2040

17. The Corporate Plan sets out “where possible, encouraging customers to use lower cost online services as the service of choice”.
18. Three of the four service areas have committed to the delivery of the new website within their 2022-23 Service Plans. In addition, accessibility is implied throughout all service areas with development of plans, strategies, and policies published on website.

Service Plan

- Is the proposal identified in the Service Plan? **Yes**
- Is the proposal being funded from current budgets? **Yes**
- Have staffing resources already been identified and set aside for this proposal? **No**

Legal and Constitutional Issues

19. The accessibility regulations came into force for public sector bodies on 23 September 2018. The regulations set out how websites should be more accessible by making it ‘perceivable, operable, understandable and robust’. All public sector bodies need to publish an accessibility statement on the website.
20. Organisations that do not meet the accessibility requirement or fail to provide a satisfactory response to a request to produce information in an accessible format, will be failing to make reasonable adjustments. This means they will be in breach of the Equality Act 2010.

Financial and Resource Implications

21. Previous years ear-marked reserves were set aside as part of the Digital Strategy to assist with capital costs associated with the delivery of the new website. While this is a separate project, it is closely dependent and therefore, this request is to use these funds to deliver this project.
22. A detailed resource plan has been created, setting out the anticipated costs for this project. This is available on request. In summary, the costs for the two elements of the project are:
 - Resource to design and deliver on remediation programme (30-week duration) = £17,345
 - Training and awareness programme for staff = £1,900 and ongoing annual commitment for refresher training
 - Consider entering into a commercial arrangement with third party supplier to provide consultancy and training. Smarter Digital Services offer a

membership scheme of £5,000 per year. Training and remediation services can be called off to assist with technical or complex issues.

EQUALITIES

23. An Integrated Impact Assessment has been undertaken as part of the project and is available for review. A full Equality Impact Assessment will be completed in support of the project.

CLIMATE CHANGE IMPLICATIONS

24. No direct carbon/environmental impacts arising from the recommendations. That said, if web content is accessible to more people, this will result in reduced demand to print documents from the website. This can be from visitors to the council offices travelling from across the district or from home.

ACTION

25. Subject to Cabinet approval, the activity in 5.3 can commence to begin work on building the programme of activity outlined in 4.2 and 4.3.

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Appendices: None

Background Papers: None