

TAVISTOCK TOWN COUNCIL

For Budget & Policy Committee Meeting – 8th September 2020

WEBSITE ACCESSIBILITY REPORT

A. PURPOSE OF REPORT

To make Councillors aware of the new Public Sector Website Regulations, the actions already undertaken to move towards compliance, together with what still needs to be done.

B. CORPORATE POLICY CONSIDERATIONS

A widely accessible website links to the following sections of the Town Council's Strategic Plan 2017 – 2021;

- a) Democracy D5 Compliance - 'the Council will meet the regulations and compliance obligations placed upon it'; and
- b) Community C2 Communications – 'the Council will develop communications (including a website, newsletter and social networking options) to meet statutory and other requirements, to communicate key messages'

C. LEGAL AND RISK MANAGEMENT ISSUES

PENALTIES AND ENFORCEMENT FOR NON-COMPLIANCE

The Equality and Human Rights Commission (EHRC) in England, Scotland and Wales will enforce the requirement to make public sector websites and mobile apps accessible (making them perceivable, operable, understandable and robust).

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 and the Disability Discrimination Act 1995.

The EHRC can therefore use its legal powers against offending organisations, including investigations, unlawful act notices and court action.

D. RESOURCE ISSUES

The resource/financial implications arising from this report are set therein.

E. ENVIRONMENTAL ISSUES

There are no identified environmental issues associated with this matter.

F. COMMUNICATION ISSUES

WHAT ACCESSIBILITY MEANS

Accessibility means that all users should have the same level of access to the website, and its documents, regardless of;

- disability, either visual or physical
- learning difficulties
- the type of device used to access the website
- where English is not someone's first language

i. Visual Disability

People with visual difficulties must be able to view the content of a website, and its documents, by being able to;

- increase the size of the font, to a level which allows them to read the page or document themselves, or use magnification aides and screen readers. When font size is increased, the page should still allow the user to read all the content by reflowing the page, so they can read from top to bottom on the same page, without having to move from left to right to see all text
- clearly see the text, so it is important that the contrast in colour between the background and text is suitable, if it isn't for a particular person then the user needs to be able to change the colour contrast themselves. For example, orange is a very difficult colour for visually impaired people to have as a background, so this should be avoided. Red and green are also difficult for those who suffer with colour-blindness
- use a text to speech system if desired, therefore thought must be given to the layout of pages, together with not uploading unnecessary tables and photographs, which if there is no background information embedded in them makes them impossible for someone with sight loss or impairment to understand
- access hyperlinks to documents or other pages, so these must be clear. It is not acceptable to use 'click here' as a link, as a visually impaired person would have no idea what they would be clicking through to. A hyperlink must be descriptive to ensure the person knows they are clicking on the correct link, to find what they are looking for. An example would be for a Grant Application Form, the link would not be '**click here**' it would be '**Grant Application Form**'
- access as many documents as possible. Some document types, such as scanned pdfs, are impossible for some text to speech and similar systems to 'read'. Therefore, their use must be restricted as far as possible.

To avoid overloading and confusing someone who is visually impaired, and possibly using a text to speech device, details should only be added to such items as photographs where it adds value. Adding long descriptions to lots of items on a page should be avoided.

ii) Physical Disability

Not everyone is physically able to use a computer mouse or have full use of a keyboard, to access pages or documents, therefore all pages, headings, sub-headings must be accessible by tabbing through a page.

iii) Type of device

As above, if someone is trying to access a website using a mobile phone or tablet, then as they will not be using a computer mouse/keyboard they must be able to tab through the website.

G. RECOMMENDATIONS

- a) That the Committee endorse the approach currently being taken, as detailed in 'Next Steps', and recommend to Council acceptance of the same.

1. BACKGROUND

The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 create legal obligations for public sector websites. These include having a website which is as accessible as possible, which includes any downloadable content, as well as publishing an Accessibility Statement which;

- clarifies the standards the website reaches
- identifies potential barriers and timelines for fixing these barriers
- provides information to help disabled users mitigate any barriers, for example obtaining information in an alternative format, where a barrier cannot reasonably be overcome

The Accessibility Regulations build on the existing obligations to people who have a disability, under the Equality Act 2010. These state that all UK service providers must consider 'reasonable adjustments' for disabled people.

The Regulations require that any website published before September 2018 must be as accessible as possible, and have published its Accessibility Statement no later than 23rd September 2020.

The Council's website is required to meet Web Content Accessibility Guidelines (WCAG) 2.1 standard which means 'Web Content Accessibility Guidelines (WCAG) 2.1 defines how to make Web content more accessible to people with disabilities. Accessibility involves a wide range of disabilities, including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities. These guidelines also make Web content more usable by older individuals with changing abilities due to aging and often improve usability for users in general'.

WHERE WE WERE

An internal assessment of the Town Council's website was undertaken for non-compliance or guideline failures, and it was found that of the 90 pages within the website;

Front page –

i. Using the "WAVE Evaluation Tool" we established the TTC website Home (including the Headers & Footers which carried across to ALL pages) Page had:

28 errors and 6 contrast errors;

ii. Most documents uploaded to the website are Non-Accessible;

iii. Many images do not contain descriptive detail;

iv. Links to documents, other TTC pages and external websites are not readily distinguishable;

v. No Accessibility Statement;

2. CURRENT SITUATION

- Working with the TTC Website provider, we identified and fixed the errors on the Home Page. This was retested on 14th August 2020 which showed: 0 errors and 0 contrast errors

The Town Hall page was also tested:

0 errors and 0 contrast errors

Further pages will be tested using website statistics showing the most frequently visited pages;

- Compliant templates for all Agendas, Minutes and reports have now been developed and are being used, moving forwards;
- Some links have now been adjusted/re-uploaded where necessary and identified using italics and underlining for example: *Annual Governance Return 2019-20 (Sections 1-2).* However, there are still many links to adjust;
- Draft Accessibility Statement ready for agreement.

EXEMPT DOCUMENTS

Some documents are exempt from the Regulations, these include;

- Heritage collections, such as scanned manuscripts
- PDFs or other documents published before 23rd September 2018, unless users need them to access a service. If that is the case, they must be reformatted as an accessible document and reloaded to the website
- 3rd party content which is under someone else's control, for example if the Council either did not pay for it, or develop it

DISPROPORTIONATE BURDEN

This can be claimed in some circumstances, for example;

- if it would be very expensive to make changes which would either bring very little benefit to users, or would benefit only a very small sector of the community
- if a Council was already planning to publish a new website, and making changes to an existing website would be very expensive and time consuming. However, a deadline for publishing the new, accessible website would need to be published and adhered to

However, a lack of time or prioritisation to undertake the necessary work to a website is not considered justifiable under Disproportionate Burden.

Disproportionate Burden will be used for the following sections:

a. Images

There are over a 1,000 images on the TTC website, most of which do not have embedded detail. It is estimated that it would take over 80 working hours to add the description;

b. Documents uploaded since 23/09/18

Looking at the Meetings section alone there are some 800 documents which would take between 98 & 296 working days to make them accessible;

All Disproportionate Burden claims need to be explained and justified within the Accessibility Statement, which even if a new website was planned, would still need to be published by 23rd September 2020.

ACTIONS TO DATE

- a) The Assistant to the Town Clerk and Office Administrator have both completed two training webinars, to date. Firstly, an overview of the Website Accessibility Regulations, the secondly how to draft Accessible Documents in Word and pdfs. A further webinar will be attended in October, on how to draft Accessible Excel documents;
- b) An extensive review of Tavistock Town Council's website has been undertaken by the Office Administrator, who is now in liaison with the Council's website provider on the fixes which can be made to make the website more accessible. For example, being able to use tab effectively to move between pages, heading and sub-headings, also ensuring all links are working and effective;
- c) The Council's Accessibility Statement is currently being drafted and will be published by the 23rd September 2020, to meet the deadline. Issues are being identified, rectified where possible, but with an explanation given where this is not possible

NEXT STEPS

- All future reports, Agendas and Minutes will be published using the revised templates, with the use of tables and photos to provide information kept to a minimum;
- Plain English to be used, wherever possible. This may however be difficult where sector specific words are required, for example Precept;
- The use of scanned pdfs, often provided by partners and outside bodies, will be kept to a minimum;
- It is unlikely that videos will be updated to the Council's website, as these would require full captions for them to be accessible to the hearing impaired;
- We are aware that Tavistock Town Council's website will not be fully compliant by 23rd September 2020, however The Accessibility Statement will still be published by that date;
- We will continue to review the layout and content of the existing Council website, to make it as compliant as possible prior to the deadline. As advised during our training sessions, we will focus on correcting the errors which will benefit the most people;
- However, work will continue after that date with the Accessibility Statement being updated as issues are rectified, this will be a 'living' document as we progress towards full compliance.

3. OPTIONS & ANALYSIS

Compliance with the Website Accessibility Regulations is not optional, therefore Tavistock Town Council needs to ensure;

- i. Its Website Accessibility Statement is published no later than 23rd September 2020; and
- ii. The website becomes fully compliant as soon as possible; and
- iii. The website is kept fully compliant, going forward

4. CONCLUSION

That the Committee make a recommendation to Council, as set out at G above

Jan Smallacombe Assistant to the Town Clerk

September 2020