

Report to Stanwick Parish Council meeting 19th March 2020 re Website accessibility

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1. Background

1.1 The Public Sector Bodies (Websites & Mobile Applications) (No. 2) Accessibility Regulations 2018 (“Regulations”) came into force on 23rd September 2018.

1.2 Accessibility Requirement - Public sector bodies must take the necessary measures to make their websites and mobile applications accessible by making them perceivable, operable, understandable and robust – Reg 6.

1.3 Disproportionate Burden - Public sector bodies are not required to comply with the accessibility requirement when doing so would impose a disproportionate burden on them. A full assessment will need to be undertaken – Reg 7.

1.4 Accessibility Statement - Public sector bodies must publish an accessibility statement and keep the statement under regular review – Reg 8. Standards - Websites and mobile applications must comply with the international WCAG 2.1 AA accessibility standard or its European equivalent – Reg 9.

1.5 Monitoring & Reporting - The Minister for the Cabinet Office will monitor compliance by sampling websites and applications. It will be required to report back to the European Commission. If a public sector body fails to comply with regulation 8, the Minister will take enforcement action and publish the name of that public sector body and its decision on “gov.uk” – Reg 10 & 14.

1.6 For websites published on or after 23rd September 2018, public sector bodies will need to comply with the Regulations by 23rd September 2019. For those websites published before 23rd September 2018, public sector bodies will need to comply with the Regulations by 23rd September 2020.

2. Checking compliance

2.1 The Parish Council checked the compliance of the web platform, determined that it was not compliant and commissioned a new website that went live in March 2020.

3. The Parish Council website

3.1 The new website is far more accessible.

3.2 Work is still required to ensure all of the current documents are accessible and that the text is in plain English.

4. Government required Accessibility Statement

4.1 A sample statement has been produced that all local authorities are expected to use and adopt. Some of the wording is a legal requirement and cannot be changed.

4.2 Where an authority cannot comply with an aspect, there is an expectation that there will be an alternative solution available.

4.3 The sample policy includes the following “If you need information on this website in a different format like accessible PDF, large print, easy read, audio recording or braille”

4.4 This above statement has been removed from the Stanwick Parish Council policy. A decision should be made whether the Council will provide such alternatives, considered against the potential costs. The Council will be required to respond in 5 days of a request being made for documents in an alternative format, therefore a policy position should be set.

5. Accessible Document Policy

5.1 The government has produced a [sample accessible document policy](#)

5.2 It is designed for government departments and larger organisations, so I have adapted this to the needs of the Parish Council.

5.3 In real terms the obligations on the Parish Council are reduced as the Parish Council does not provide ‘services’ through the website. The closest it comes to offering services, is the option to download a pdf to completion and submission.

6. Disproportionate burden

The [Government guidance on disproportionate burden](#) states that:

“If you want to declare that making particular things accessible is a disproportionate burden, you’re legally required to carry out an assessment. In your assessment you weigh up, roughly speaking:

- the burden that making those things accessible places on your organisation
- the benefits of making those things accessible

When making your assessment, you need to think about:

- your organisation’s size and resources
- the nature of your organisation (for example, do you have services aimed at people who are likely to have a disability?)
- how much making things accessible would cost and the impact that would have on your organisation
- how much disabled users would benefit from you making things accessible

You might judge that the benefits of making some things accessible would not justify the cost to your organisation. In that case, you can claim it would not be reasonable for you to make those things accessible because it's a disproportionate burden.

You cannot take things like lack of time or knowledge into account in your assessment - or argue that making things accessible is a disproportionate burden because you've not given it priority.

You're less likely to be able to claim disproportionate burden for services that:

- are specifically aimed at disabled people, for example 'apply for a blue badge'
- enable people to participate in society, like 'register to vote' or 'find a job'

In many cases you'll need to work out what it is reasonable for you to fix now, and what you'll be able to fix in the future."

7. Action required

7.1 The Council needs to consider whether a disproportionate burden exists for any areas of non-compliance.

7.2 The 'welcome pack' for new residents is not accessible and will need to be redesigned from scratch to create an accessible version.

7.3 The council will need to adopt both an Accessibility Statement for the website and an Accessible Document Policy as soon as possible.

7.4 The council needs to decide how the website will be 'tested' and approve appropriate wording for the policies.

- Is the council satisfied with 'self testing'?
- Is the use of the Microsoft 'accessibility checker' deemed sufficient for assessing the accessibility of documents?

7.5 The final draft version of the website accessibility statement will be referred to Tapiochre Ltd to ensure it does not contain technical inaccuracies.