Website Accessibility Report

Introduction

All local council websites have to comply with The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018. A website meets the legal requirements if it meets the international WCAG 2.1 AA accessibility standard.

Accessibility means more than putting things online. It means making content and design clear and simple enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt things.

For example, someone with impaired vision might use a screen reader (software that lets a user navigate a website and 'read out' the content), braille display or screen magnifier. Someone with motor difficulties might use a special mouse, speech recognition software or on-screen keyboard emulator.

Some organisations although not exempt may not need to fully meet accessibility standards. This is the case if the impact of fully meeting the requirements is too much for an organisation to reasonably cope with. The accessibility regulations call this a 'disproportionate burden'. It is unlikely that Houghton on the Hill Parish Council can claim an exemption. An example of a disproportionate burden would be if achieving compliance would use up most of the organisation's budget for the year and leave it unable to do any of its other work. Clearly this is not worth pursuing.

What needs to happen to achieve compliance

There are two specific actions to be considered, namely:-

- Publishing an accessibility statement that explains how accessible the website is.

- Making the website accessible to ensure it can be used by as many people as possible, including those with:-

    o cognitive impairments or learning disabilities.
    o deafness or impaired hearing.
    o impaired vision.
    o motor difficulties.

Each requirement is considered in turn.

Publishing an Accessibility Statement

Local councils need to make reasonable adjustments to their websites and operations so people can access information. They are required to include an accessibility statement on their website setting out to what extent they meet the requirements and what alternative arrangements are available. Good practice will also see councils including a plan to narrow the accessibility gap over time.

The Government has produced a sample Accessibility Statement based on the model published by the EU which 2Commune (the Parish Council's website provider) has modified and placed on its Parish Council customers' websites.

The Parish Council can create its own page and 2Commune will remove the generic statement at the bottom of each web page and replace it with the customised one.

if an editable version of the generic statement is needed, 2Commune can provide a page with this information on for amendment/adaptation by the Parish Council. There would be a £50 one off fee to set this up.

2Commune is unable to remove the accessibility link at the bottom of the website for an individual Parish Council without removing it for all Parish Councils.

The statement which the Parish Council is invited to consider is shown at Appendix 1.

Making the website accessible

There are a number of exemptions where online material does not need to meet the WCAG standards. These include:

- Pre-recorded audio and video (published before 23 September 2020).

- Live audio and video such as streaming meetings.

- Heritage collections like scanned manuscripts.

- PDFs or other documents (published before 23 September 2018 — unless users need them to use a service).

- Maps — provide essential information in an accessible format like an address.

- Third party content that's under someone else's control if you did not pay for it or develop it yourself (e.g. social media like buttons).

- Content on intranets or extranets published before 23 September 2019 (unless you make a major revision after that date).

- Archived websites if they're not needed for services your organisation provides and they are not updated.

Identification of accessibility issues can be undertaken using various software applications. Documents on the website originate in 'Word' and are then saved in PDF (portable document format). The latest version of Word (already on the Parish Council's new computer) has an in-built accessibility checker and the PDF Validator Online Tool (recommended by 2Commune) can be used to check PDF documents. The checking does not always produce consistent results (i.e. separate checks on ostensibly the same document produce differing answers) although collectively they reveal most (perhaps all) accessibility issues.

The table below shows that 269 publicly accessible documents have been published on the website since 23 September 2018 (the qualifying date). In addition, 798 publicly accessible documents were published prior to that date which need to be checked to determine whether they are currently used to access a service.

Analysis of Website Documents			
	Public	**Private**	**Restricted**
Pre 23 Sept 2018	269	17	0
Post 23 Sept 2018	798	79	1

A 'light touch' sample of documents requiring analysis has been undertaken to determine the technical issues to secure compliance and, if possible, the likely resource demands.

Fifty randomly selected documents of the 269 were considered for a preliminary accessibility check. The results are shown below.

	Documents	%
Created externally – (third party content exempted)	3	4%
Maps or other documents not in a suitable form for easy checking	6	7%
Fault - Missing alternative text	21	25%
Fault - Check reading order	30	36%
Fault - Hard to read text contrast	4	5%
Fault - Image or object not in line	12	14%
Fault - No headings in document	3	4%
Fault - Suggested alternative text	1	1%
Pass - No accessibility issues found	3	4%

Appendix 2 contains explanations for each fault category.

Of particular significance are those documents requiring the reading order to be checked. Faults often related to tables where screen readers 'hop over' unpopulated cells whereas a reader who can see an image would know that they need to move to the next populated cell.

For example, consider the following table extract. A screen reader will read out the first line (INCOME, ORIG BUDGET etc.) but will skip over blank entries. On the 'Community Grant' line, it would read the three positive entries only thereby giving the impression that £500.00 was the revised budget.

INCOME	ORIG BUDGET	REV BUDGET	April	May	June
Community Grant	£0.00		⬅ £500.00		£100.00

The number of such occurrences is not high although the changes which need to be made to correct this anomaly for individual documents can be significant.

Although an objective has been to assess likely resource demands, this cannot readily be determined to a reasonable level of precision. The number of accessibility issues within a document can vary considerably as can the remedial action needed for any particular fault. Reading order faults discussed above are a particular challenge.

The Parish Council needs to determine the approach to be undertaken including resources to be deployed and timescales to achieve compliance. If invited, it is unlikely that there would be a shortage of third-party interest to assist with/undertake the task. This approach would involve a third party in changing documents including for example, past agendas and minutes. This would necessitate 'in-house' checking and loading to the Parish Council website by the Clerk as third-party permission to access the website would be inadvisable.

As resource demands are unknown, the Parish Council might want to proceed using existing resources and to receive a progress report in (say) three months. Work on some accessibility issues principally relating to document titles, image titles and corrections to tables (as previously outlined) has commenced and has not been as daunting as might have been imagined.

Appendix 1

Accessibility Statement

We want as many people as possible to be able to use this website. For example, that means you should be able to:

- Change colours, contrast levels and fonts
- Zoom in up to 300% without the text spilling off the screen
- Navigate most of the website using just a keyboard
- Navigate most of the website using speech recognition software
- Listen to most of the website using a screen reader (including the most recent versions of JAWS, NVDA and VoiceOver)

We've also made the website text as simple as possible to understand.

AbilityNet has advice on making your device easier to use if you have a disability.

How accessible this website is

Some parts of this website may not be fully accessible:

- Some PDF documents may not be fully accessible to screen reader software.
- Some video and audio streams may not have captions.
- Some text and links may have poor colour contrast.
- Maps may be difficult to navigate using screen reader software.

How to request content in an accessible format

If you need information in a different format contact us and tell us:

- The web address (URL) of the content.
- Your name and email address.
- The format you need, for example, audio CD, braille, BSL or large print, accessible PDF.

Reporting accessibility problems with this website

We're always looking to improve the accessibility of this website. If you find any problems not listed or think we're not meeting accessibility requirements, contact us using the details at the bottom of this website.

Enforcement procedure

The Equality and Human Rights Commission (EHRC) is responsible for enforcing the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (the 'accessibility regulations'). If you're not happy with how we respond to your complaint, **contact the Equality Advisory and Support Service (EASS).**

Technical information about this website's accessibility

The Parish Council is committed to making its website accessible, in accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

This website is partially compliant with the **Web Content Accessibility Guidelines version 2.1** AA standard, due to the non-compliances and exemptions listed below.

Non-accessible content

The content that is not accessible is outlined below.

Non-compliance with the accessibility regulations

We may have some scanned PDF documents on our website e.g. our Annual Governance and Accountability Returns (AGARs). Scanned PDF documents do not comply with the Accessibility Regulations 2018 but these documents can be provided in an alternative format or on alternative media, on request.

Disproportionate burden

Not applicable.

Content that's not within the scope of the accessibility regulations

3rd party products

- We use Google maps. These may not be accessible to some people. We will always provide the information by alternative means on request.

- Social media share bars may not meet the required colour contrast levels.

We do not plan to add captions to live video streams because live video is exempt from meeting the accessibility regulations.

The accessibility regulations do not require us to fix PDFs or other documents published before 23 September 2018 if they're not essential to providing our services.

Preparation of this accessibility statement

This statement was prepared on 30 July 2020. It was last reviewed on 14 August 2020. We used the methodology described in 'Website Accessibility Requirements' produced by **NALC.** This website was tested using the Microsoft **Accessibility Insights for Web** tool recommend in that publication.

This website was last tested on 14 August 2020. The test was carried out by **2commune Limited**.

Appendix 2

Fault Categories

Missing alternative text/ Suggested alternative text	Add alt text to images, such as pictures, screenshots, icons, videos, and 3D models, so that screen readers can read the text to describe the image to users who can't see the image.
Check reading order	The warning is about asking the author to make sure the table is set up to read from left to right rather than down column 1, up to column 2 and down, etc.
Hard to read text contrast	If a document has a high level of contrast between text and background, more people can see and use the content.
Image or object not in line	This is to ensure images or objects are not floating but are anchored to a particular part of the document.
No headings in document	To preserve tab order and to make it easier for screen readers to read documents, the author needs to use a logical heading order and the built-in formatting tools in Word. Conventional headings used for users who can see the image are insufficient.