



LEIGHTON-LINSLADE TOWN COUNCIL

Policy and Finance Committee

Date:	21 September 2020
Title:	Accessibility Regulations 2018
Purpose of the Report:	To provide the Committee with compliance information on the above legislation.
Contact Officers:	Sarah Sandiford, Head of Democratic and Central Services/Deputy Town Clerk

Corporate Objective/s		LLTC Five Year Plan – Aim 1: To ensure value for money, operational efficiency and a structure which will underpin current and future service delivery by the Town Council.
Implications:		
Financial	X	
Risk management	X	
Operational/service delivery	✓	The Regulations will ensure Town Council information is widely accessible
Legal/compliance	✓	The Town Council must meet published compliance dates in respect of these Regulations.

1. RECOMMENDATION

Should members be minded, the recommendation is:

1.1 To note the report.

2. BACKGROUND

2.1 The Public Sector (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018 came into force on 23 September 2018.

2.2 The purpose of the 2018 Regulations is to improve the accessibility of public sector websites/mobile apps so that they can be used by as many people as possible. They build on existing obligations under the Equality Act 2010 and the duty to make reasonable adjustments for those with disabilities or impairments.

2.3 In terms of the Act, accessibility refers to website design and content, type of

font etc and the ability for users to access content using just a keyboard, or with a screen magnifier or screen reader software.

- 2.4 Although the 2018 Regulations are now in force, the requirements to meet the accessibility standards do not apply for existing websites until 23 September 2020. For apps, the deadline is 23 June 2021.
- 2.5 The “public sector bodies” definition applies to local authorities and it is the view of the National Association of Local Councils that it also applies to parish councils.

3. REQUIREMENTS

- 3.1 The Regulations require a number of actions to be undertaken by the compliance date of 23 September 2020 (for websites) and 23 June 2021 (for mobile apps).
- 3.2 In terms of the main Town Council website, the wireframing and refresh project undertaken last year has meant that the website structure already meets compliance requirements. As the site now incorporates the TACTIC website and the Astral Park website, these are also compliant in terms of structure.
- 3.3 The structural work being undertaken to the new Market website will achieve the same result in ensuring compliance.
- 3.4 In addition to achieving compliance with website design and structure, the next requirement will be to review website content. All content published after 23 September 2018 must be compliant by 23 September 2020.
- 3.5 There is no requirement for content published prior to this date to be made compliant as this would represent a disproportionate burden.
- 3.6 The main areas of content affected are:
 - i) Images – this includes logos, photographs, icons, pictures. All images should have an embedded alternative text description (“alt tag”) to describe what they portray.
 - ii) PDF or Word documents – this includes documents such as application forms, fees & charges, information sheets, publications, meeting agendas, reports and minutes, finance documents and policies.
- 3.7 Committee received a summary of next steps at its meeting held on 24 February 2020. This is now updated as shown in **appendix A**.
- 3.8 Once work on the websites has been completed, focus will turn to the Town Council and Buzzard Trails mobile apps. As a first step, we will be writing to the app providers to ascertain their position on the new regulations.

4. UPDATE

- 4.1. All Central Services staff involved with uploading documents to the websites or apps attended the SLCC webinar 'Creating Accessible Documents' in May 2020.
- 4.2. An Accessibility Checklist has been shared with other officers involved in creating documents at regular intervals, so that the burden on Central Services staff does not become disproportionate.
- 4.3. Officers running the original in-house monthly accessibility compliance check on websites have now implemented a more comprehensive check which better identifies issues, enabling them to be swiftly corrected.
- 4.4. The Town Council's website provider continues to run a quarterly check on websites to ensure compliance is maintained, which so far has only resulted in one recommendation:
 - a) The LLTC logo on the website did not have suitable contrast in terms of font over background. Merits of changing this were debated, as the logo could be considered 'decorative', however it was decided that the logo on each page represented the official ownership and therefore authority of the site's contents and needed to be read more easily.
 - b) An enhanced logo was produced using the most similar font and Brand Guidelines updated accordingly.
- 4.5. Sight Concern were invited to test accessibility, and this was carried out by a completely blind individual using a Super Nova screen reader with internet explorer and no mouse. Feedback was very positive overall with one recommendation:
 - a) It was highlighted that some links were missed when using the tab button to navigate the site.
 - b) Aubergine were not only able to fix this but found it useful learning for their team, applying the fix to other websites they had developed.

5. NEXT STEPS

- 5.1. Due to the additional work generated by the Covid-19 pandemic, website accessibility checks were not completed as early in the year as had previously been anticipated.
- 5.2. To allow time to complete this element of work, communication with App providers is pushed back to October 2020 which still allows time before the deadline of June 2021 for compliance.

- 5.3. The wire framework for the new Market site is complete and content is now being added, in accordance with Accessibility Guidelines.
- 5.4. Once the Market site is fully populated it will be further tested for functionality and accessibility by Aubergine.
- 5.5. Sight Concern has agreed to carry out an accessibility check on the Market site once it has been made public, using the Super Nova software.

6. CONCLUSIONS

- 6.1. The Accessibility Regulations represent the most significant legislative change since the introduction of the new Data Protection Act in 2018 and represent a similar burden in terms of working towards compliance.
- 6.2. We recognise that all content cannot be made accessible.
- 6.3. Our Accessibility Statement covers the event of non-compliant content, e.g. where content is provided by a third party.
- 6.4. Officers are committed to providing alternative format information, should such a request be received.
- 6.5. Despite setbacks earlier in the year we are still ranking in the top 5%* of UK Councils in terms of our WCAG compliance and all website contributors understand how to maintain that.

*Figure provided by Aubergine

End.

Appendix A

Accessibility Regulations 2018: next steps

Task	Target Completion Date	Owner	Comments
Create and publish Accessibility Statement	January 2020	Sue/Sarah	Complete.
Create and publish Accessible Documents Statement	January 2020	Sue/Sarah	Complete.
Write to App providers	February 2020	Sue/Sarah	Scheduled for October
Review Mod.gov guidance and ensure compliance of Democracy web pages	February/March 2020	Website provider, Sue & Sarah	Complete other than Calendar function.
Ensure design/structural compliance of Market website	February 2020	Website provider	Complete.
Committee update	24 February 2020	Sarah	Complete.
Staff training on Regulations & accessibility checkers	March 2020	Sarah	Complete and ongoing.
Review website management processes to ensure all new content added to sites is compliant	April/May 2020	Sue/Sarah	Complete.
Alt text descriptions for all images on all websites	23 September 2020	Sue/Laura	Complete and ongoing
Meeting agendas, reports and minutes published after 23/9/18 to be checked for accessibility, amended and republished	23 September 2020	Mellony/Sarah	Complete.
Documents for all service areas to be checked for accessibility, amended and republished	23 September 2020	All staff	Ongoing
Monthly compliance checking of websites	Ongoing	Sue	Ongoing
Identify steps to be undertaken in respect of Apps	October 2020	Sue/Sarah	
Next Update to Committee	January 2021	Sarah	