Derby City Council

Corporate Resources:

Website Accessibility Policy

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Version Control

To make sure you are using the current version of this policy please check on iDerby.

Version Number	Date	Author	Reason for Version
V0.1	26th February 2021	S A Coldron	Initial draft
V0.2	4th March 2021	S A Coldron	Second draft following initial review
V0.3	17th March 2021	S A Coldron	Third draft following review by Ann Webster

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1. Introduction

Derby City Council (the Council) recognises that the way we communicate with both our citizens and our colleagues through the internet and intranet must be accessible to all. This is both key to the delivery of digital services as well as complying with our legal obligations.

1.1 Purpose

This policy outlines the Council's commitment to establishing a consistent approach to implementing and maintaining accessible websites that meet Web Content Accessibility Guidelines (known as WCAG 2.1).

1.2 Scope

The Website Accessibility Policy applies to:

- Councillors
- All permanent and temporary colleagues
- Consultants, contractors and agents employed by the Council

It applies to all Council owned websites, whether developed in-house or procured from a third-party supplier, on both the internet and the intranet. It also applies to any Council owned mobile applications.

2. Legal Framework for Website Accessibility

The Council has an obligation to make sure that all internet and intranet websites and mobile applications it owns meet the relevant regulations. The legal framework for this is the Public Sector Bodies (Website and Mobile Applications) (No. 2) Accessibility Regulations 2018.

Websites or mobile apps will meet the legal requirements if:

- They meet the Web Content accessibility Guidelines (known as WCAG 2.1)
- the Council publishes an accessibility statement that explains how accessible a website or mobile app is.

Web Content Accessibility (WCAG2.1) guidelines are an internationally recognised set of recommendations for improving web accessibility. They explain how to make digital services, websites and applications accessible to everybody, including users who are

- visually impaired people
- disabled people with physical impairments
- people with learning difficulties or who have cognitive impairments
- Deaf or hearing impaired people

The Government Digital Services (GDS), working on behalf of the Minister for the Cabinet Office, can request information and access to any Council owned website as part of its sampling of public sector websites on an annual basis.

If the GDS decides that the Council has failed to publish an accessibility statement or that the accessibility statement is incorrect, it will publish:

- the name of the Council
- a copy of the decision

The Equality and Human Rights Commission (EHRC) in England, Scotland and Wales has the legal power to enforce the requirement to make public sector websites and mobile apps accessible.

If the Council does not meet the accessibility requirement or fails to provide a satisfactory response to a request to produce information in an accessible format, it will be failing to make reasonable adjustments. This means that the Council will be in breach of the Equality Act 2010.

2.1   Exemptions to the rules

The regulations allow for the following exemptions:

- Third party content that's under someone else's control if the Council did not pay for it or develop it in-house - for example, social media 'like' buttons
- pre-recorded audio and video published before 23 September 2020
- live audio and video
- heritage collections like scanned manuscripts
- PDFs or other documents published before 23 September 2018 - unless users need them to use a service, for example a form that lets them request school meal preferences
- maps - but the Council will need to provide essential information in an accessible format like an address
- 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 the Council provides and they are not updated

However, the Council will still need to explain in the site's accessibility statement that they have not made things like these accessible because they are exempt.

3. Definitions

Accessibility means more than putting things online. It means making web 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, a visually impaired person might use a screen reader (software that lets a user navigate a website and 'read out' the content), Braille display or screen magnifier. Or with a disabled person with a motor impairment might use a specific type of mouse, speech recognition software or on-screen keyboard emulator.

4. How the Council will Comply

The Council will comply by applying the following:

Accessibility will be considered at all stages of a website lifecycle from initial design through implementation and how it is updated and maintained. This includes both websites developed in-house and those procured from a third-party supplier.

Accessibility audits will be regularly carried out on all council-owned websites. If a website or mobile app does not meet WCAG 2.1, or where there are problems, a remediation plan will be agreed with the website owner who will be responsible for the plan's implementation to ensure that the site meets WCAG 2.1.

All web content submitted to the Digital and Web team for upload to a council-owned website will be reviewed in line with house-style, content guidelines and accessibility before being uploaded.

All website owners within the Directorates will be expected to ensure that any sites that they are responsible for meet accessibility requirements and to comply with all of the relevant guidelines. They must also be committed to providing the resource to update and maintain content to ensure it is always relevant and accessible.

Service managers will take responsibility for ensuring that subject matter experts within their service areas undertake training in web content authoring and follow the set guidelines for web content including associated pdfs.

Services considering procuring a standalone website are required to follow the Corporate Procurement Policy and seek approval from Digital Services beforehand. If approval is given:

- Potential suppliers must demonstrate that they meet both the Council's IT technical standards and the Digital Standards as part of a tender evaluation
- the website must undergo and pass an accessibility audit prior to the website being launched.

For in-house developments, the website will be developed from existing core modules that already meet accessibility standards.

Website branding, including logos and colour pallets, must be signed off by the Corporate Communications team and meet accessibility standards. This includes both new and updated branding.

5. Other Relevant Policies, Standards and Procedures

This document should be read in conjunction with:

Derby City Council Digital Standards (Service Standards for Digital by Default

Derby City Council Equality, Dignity and Respect Policy (October 2017)

6. Contact Details

For advice on this policy please contact the Digital and Web team

Appendix – Action Plan

The Website Accessibility Policy will be applied by undertaking the following actions:

Guidance Documentation and Training

Guidance documentation and training will be provided to all website owners and nominated staff within service areas to support this work.

Initial Audit

During the financial year 2021/2022 the Digital and Web team will schedule and undertake an audit of each Council-owned website. This will cover:

- All public facing websites and portals
- All websites and portals used by staff members
- Mobile apps

A report will be produced for each website or mobile application to highlight any accessibility issues identified which need to be remedied.

An updated Accessibility Statement will be published on the website to reflect the current status of the website and the plans in place to remedy any accessibility issues found.

Remediation

Following on from the report, the Digital and Web team member will work with the website owner and, where required, the third-party supplier, to produce a remediation plan.

The website owner will be:

- Responsible for ensuring that all accessibility issues are resolved within the agreed timescales.
- expected to adhere to accessibility and web content editing guidelines where the service is responsible for maintaining and update web content including associated pdfs.

Follow Up Audit and Sign Off

Following the completion of the remediation work the site will again be audited. If all issues have been resolved, the website's Accessibility Statement will be updated to reflect this.

Post Project Activity

To minimise the risk of the recurrence of accessibility issues, sampling of web content and pdf documents will be undertaken on a regular basis. If issues have been

reintroduced or continue to be found, senior officers from the Web and Digital team have the authority to either request that urgent changes be made or, in extreme circumstances, to take the web page offline.