

Little Bealings Website

<https://littlebealings.onesuffolk.net/>

Ease of Access Project

Progress Report for Little Bealings Parish Council

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RECAP

EU REGULATIONS

Legislation came into force on the 23rd September 2018 for Public Sector Bodies to implement the EU Directive to improve the accessibility of Public Sector websites by placing a duty on those bodies to make reasonable adjustments for disabled people. These regulations build on existing obligations to disabled people under the Equality Act 2010 and the duty to make reasonable adjustments for disabled people: such as people who are blind, partially sighted or colour blind; are deaf or hard of hearing; find it difficult to use a mouse or keyboard; or have dyslexia, autism or learning difficulties. Websites published before 23 September 2018 need to comply with the accessibility regulations by 23 September 2020. And Mobile apps need to be accessible by 23 June 2021.

In August 2019, the National Association of Local Councils (NALC) advised that these duties apply to local councils and that all local council websites must “make a plan to meet the standards by the 23rd September 2020 deadline and identify anything that is disproportionate to fix” as well as “consider whether new content is accessible so they don’t have to go back and fix it later”. In June 2020 NALC issued new guidance and in relation to Timing states that “at the least, councils should have a plan of action and an accessibility statement in place by the 23rd September 2020”. A slightly different emphasis than the earlier briefings.

The accessibility regulations do not require the council to fix documents published before 23rd September 2018 if they are not essential to providing the council services (although there are exemptions such as historical documents in scanned image form which are unlikely to achieve accessibility).

GOVERNMENT GUIDELINES

The UK Government website issued advice and guidance based on the Web Content Accessibility Guidelines (WCAG 2.1) which is an internationally recognised set of recommendations for improving web accessibility. Refer: <https://www.gov.uk/guidance/make-your-website-or-app-accessible-and-publish-an-accessibility-statement#decide-how-to-check-your-website-or-app-for-accessibility-problems>. The government has stated that websites will be monitored on a random basis and report failing websites on gov.uk.

COMMUNITY ACTION SUFFOLK (CAS)

Little Bealings website is built using templates provided by CAS OneSuffolk hosting service. OneSuffolk developers worked on the improving the templates in the spring of this year. They offer training and published a list of tasks with advice on what webmasters needed to address. These tasks were updated again in July 2020. Refer <https://www.onesuffolk.net/low-cost-organisation-websites/documentation-and-guidelines/v/accessibility>

COMMISSIONING THE WORK REQUIRED

Following an initial review of ease of access requirements by the webmaster (Refer Exhibit B1 – extract of her Email 6th January 2020), the Parish Council on 6th January resolved to pay for a half day 1-1 session at CAS for the webmaster. On 3rd February the Parish Council resolved to ask the webmaster to proceed with the work based on her estimate at a fixed fee of £250. (Refer Exhibit B2 – extract of her Email 23rd January 2020).

This report aims to document the work carried out on Little Bealings website and makes recommendations as to what happens going forward.

EXECUTIVE SUMMARY

1. The website has 55 web pages, 49 of which is managed by the webmaster. The other 6 pages are direct links to other websites. The content of each page has been checked for the known issues relating to accessibility and reconstructed as necessary. Then a final check was carried out using an industry recognised automated tool known as WAVE and a 'screen reader' tool. Only one webpage has an error - the News webpage has a minor contrast error requiring a fix by OneSuffolk developers which is expected to be fixed by the end of August 2020. For more detail refer to Section 1.
2. There are 273 existing PDF documents which relate to the work of the Parish Council, only 70 of these were published since 23rd September 2018 and these must be made accessible by 23rd September 2020. At this stage 67 of the 70 have been checked using Adobe Acrobat Pro DC software and made accessible and the remaining 3 should be completed on target. We are not planning to make the remaining 203 older documents compliant as these are exempt. However, a sample of 17 documents were tested using 'screen reader' software and this has proven that the vast majority of the older documents do meet most of the requirements as they stand. For more information refer on the approach used to make documents accessible refer to Section 2 of this report.
3. In line with the government requirements the Parish Council section of the website now includes an Accessibility Statement which explains the level of compliance that users can expect from the website and how to request information in a better form if necessary. This Statement was prepared on 28th July 2020 and published on 31st July and includes a link to evidence of the final testing of webpages and sample documents as at that date. Refer <https://littlebealings.onesuffolk.net/parish-council/accessibility-statement/>
4. Going forward we aim to ensure new webpages and new documents will be created with accessibility requirements in mind. And the Parish Clerk has been using accessible templates for new documents since 28th July 2020.
5. Section 3 explains that the quality of available webpage checking tools when the government digital services team made their recommendations was poor with not one tool finding more that 40% of errors on their test webpage. It is likely that such tools will improve over time and future checks may identify more hidden errors.
6. Recommended Future Steps Post 23rd September 2020:
 - Include an annual review of Little Bealings website each September and prepare a budget for any major corrective work to be carried out in the upcoming financial year.
 - Given the significant level of manual intervention involved in making the website accessible, it might be prudent for Members of the Parish Council to be asked to check the content of particular sections of the website for sense and omissions.
 - Monitor the gov.uk website for reports of websites failing the accessibility test and any changes in guidance on tools.

SECTION 1: THE APPROACH USED TO MAKING WEBPAGES ACCESSIBLE

Each webpage went through a four stage process to achieve accessibility:

- Manual checking followed by manual improvements in areas such as:
 - a. structuring the text with formal headings;
 - b. simplifying the language used;
 - c. describing links to other parts of the website in helpful words;
 - d. remove any text underlining, text colours and bold text;
 - e. removing text tables
 - f. adding alternative text description to explain the content of the image.
- Listening with 'screen reader' software [JAWS and Windows 10 Narrator and Microsoft Narrator] to check for sense.
- Testing with an automated checking tool [WAVE] to identify structural errors, followed by manual correction and a repeat of the automated test until all the obvious problems were resolved.
- Saving a copy of the final test results for each page as at 28th July is included in the Test Report at the end of the Accessibility Statement which is published on the website.

SECTION 2: ENSURING THE ACCESSIBILITY OF PDF DOCUMENTS

The Parish Clerk is already producing new PC documents in the accessible format ready for publication, in particular, using heading structures and avoiding text tables. For more information on making new documents accessible refer to <https://www.gov.uk/guidance/how-to-publish-on-gov-uk/accessible-pdfs#check-a-pdf-for-accessibility> This guidance states a preference for documents to be published as HTML webpages, particularly on the gov.uk website. However, it is not a requirement so the decision was taken to keep publishing PDFs because it is a simpler process.

Because there were so many documents to be analysed, I chose a sample of 17 documents of different types (Minutes, Agenda etc.), made them accessible using screen reader software and then checked them using 'screen reader' software. And evidence of each PDF's test results as at 28th July 2020 is included in the test report published as part of the site's Accessibility Statement.

The outcome of the sample tests indicates that most Parish Council documents are capable of being read using screen reader software without much change. There are however exceptions – in particular with Minutes documents which are drafted with text tables and especially with nested headings within the text table. In the latter circumstances the plan is to rework the documents without text tables.

Refer EXHIBIT A for a list of the ten document types to be made accessible showing that 67 documents have been completed with 03 to do by the 23rd September 2020. Please note, the accessible versions have been republished with an x at end of the file title

SECTION 3: BACKGROUND TO THE CHOICE OF AUTOMATED CHECKING TOOL FOR WEBPAGES

The Government Digital Services Team (GDST) identified 13 different tools that provide automated checking of webpages for accessibility. They tested the tools using an especially created, poorly constructed webpage which had approx. 140 errors.

The GDST team reviewed all 13 tools and came up with a top 5. The best of these tools (Sortsite) only found 40% of the errors on the test document.

And quite recently OneSuffolk recommended WAVE (one of the five tools) because it produces output that is easiest for the layperson to follow. Whilst WAVE is one of the top five tools – the downside to using WAVE is that when tested by GDST it only found 30% of errors. More information about the tests can be found on the alphagov website: <https://alphagov.github.io/accessibility-tool-audit/>

EXHIBIT A: NUMBER OF DOCUMENTS PROCESSED 'AS AT' DATE OF REPORT

A total of 70 documents were published from 23rd September 2018 of which 67 have been processed and republished. The remaining 3 are due to be updated by the Parish Council at the 7th September meeting and will be published thereafter. Earlier documents, of which there are 203, do not have to be processed. The following breakdown of the numbers processed is given for each type of document.

Type: Agenda

A total of 256 PDF Agenda have been 'made accessible' and republished. All of these were originally published from 23rd September 2018. Sixteen older PDF Agenda have not been processed.

Type: PC Approved and Draft Minutes

A total of 24 PDF Minutes have been 'made accessible' and republished, All of these were originally published from 23rd September 2018. Earlier PDF Minutes, of which there are 53, have not been processed .

Type: Protocol Documents

A total 7 out of 10 PDF documents have been 'made accessible' and republished. The remaining 3 are due to be redrafted by the Parish Council at the meeting on 7th September and will be checked for accessibility once they are signed off.

Type: Budget Documents

The budget papers for the year 20.21 have been made accessible and republished. In previous years the budget papers have been scanned to PDF and then published which makes them more difficult to 'make accessible' at this time.

Type: Annual Parish Meeting Minutes (APM Minutes)

A total of 42 APM minutes have been made accessible and republished, All of these were originally published from 23rd September 2018. Earlier PDF Minutes, of which there are 112, do not have to be processed.

Type: Parish Plan or Review Documents

All 4 of these documents were published before 23rd September 2018 and are therefore not required to be accessible. However the documents were all checked out and found to be complex scanned documents – some better than others.

Type: Governance and Accountability PDFs

A total of 2 out of 7 documents for 2020 have been made accessible. The remaining are scanned documents and we have been advised by the external source that these are not accessible.

Type: Miscellaneous - A total of 3 out of 3 such documents are externally sourced but were tested out of interest.

EXHIBIT B1: Extract from Email 6th Jan 2020

What webmasters need to do is carry out checks on every page of the website and make changes as necessary on the following aspects:

1. **Screen based text** must be reviewed to ensure that we use headings correctly to organise the structure of our content. Changes may be needed - without which readout software may give false impressions to the disabled user. We need to check the style of every line intended to be a heading and set the style according to Heading 1, 2, 3 in sequence.
2. **Images** must be given a textual description which can be read out by the software.. There are 7 different purposes of an image and a decision tree is available to help determine what is needed - I will need to study tutorials provided on <https://www.w3.org/WAI/tutorials/images/tips/> before I can create the correct content. I would focus on the Parish Council pages as a matter of priority. There are few images in those sections.
3. **Links** to other parts of the website must be described in helpful words – an example is – existing text “*Click here* to read about our company” – would be better expressed as “To learn about our company read *About Us*”
4. **Colours** affect what can be seen by the various groups of disabled readers – 8% of the population have problems with seeing green and red whilst other groups such as people with learning difficulties benefit greatly from the use of colour. So the guidelines have to ensure that there is enough contrast in the website so that text is readable by anyone. e.g. they suggest not using much change of colour in our main text sections (leaving it as a white background and black text) and making it as a default font on the system. This may not be problematic for us but we need to look at every page. CAS have confirmed that the proforma should be set appropriately but we need to check that at some stage we have not changed the colours and fonts from default.
5. **Tables** in text must only be used for tabular data. Thankfully this is not used much. **[This turned out to be an incorrect assumption- all the minutes are drafted in this way]**
6. **Language** must be clear and easy to understand. Advice given is - Its best to avoid complicated sentence structures, adverbs, use of passive voice and unnecessary clauses. I would focus on page content as we cannot really be expected to change published documents. **[This latter assumption was also incorrect]**. But we would need to adhere to these guidelines for new documents published.
7. **Audio and Video** on websites – captions and audio descriptions must be added - **does not apply** to LB website

We also have to add an accessibility statement to the website giving users instructions how to report issues and request information in other forms if not accessible on the site. The Government's Cabinet Office is responsible for monitoring websites and they will select a set of random sites annually. Any website found to not be compliant will be named on the gov.uk website. However when we leave the EU the requirements will be reviewed

The LB website is designated as a Parish Council website but there are really two aspects - one is the Public Sector aspect (for the Parish Council) and the other is a source of background Community Information. I would focus on the Parish Council pages as a matter of priority. But I do wonder what it means if we fail to achieve the necessary standard through misinterpretation of the guidelines.

The good news is that (as our website was set up before 2018) we have until 23rd September 2020 to complete the compliance. To get me started it would help if the PC would approve spend of £48 plus VAT for me to attend CAS offices for a 2 hour 1-1 session on this topic.

EXHIBIT B2 – Estimate of Work [Extract from Email 23rd January 2020]

My estimate for the work to comply with Website Ease Of Access legislation is a maximum cost of £250. Please think of this as a Fixed Price Contract based on a £5 an hour to keep the cost down for the council. I will keep the Parish Council informed of the status of the work carried out each month. If the number of pages/images requiring work the cost will be based on the actual hours of work.

As part of my preparation for costing the work I have tested the CAS OneSuffolk guidelines by making changes to the Home page which is now published.

I have ascertained that CAS still has some other work to do to make the templates compatible – particularly on things like the Search and Go boxes, the Events Calendar and other such Widgets. CAS Website team plan to do this work in the next couple of months. I will be working in parallel with them and so final outcomes may not be available until mid-summer. Interestingly they have said that they may be limited in what they can do with these particular areas. I await results of their deliberations.

In assessing the level of work I noticed a number of links with other websites have stopped working – these were all due to changes made to the other websites. I have corrected these links. Also some content was out of date and I will seek to address these issues as I go through the tasks.

Based on the above I have prepared the following list of tasks which has been the basis for the cost estimate I have given above:

Task Descriptions	Time in Hours	Status
Attend 1-1 Induction at Community Action Suffolk	2	Complete
Download SiteImprove Software and test against Home Page [to understand the technical output showing issues to be resolved) and make changes .	4	Complete
Download “Readout” Software and check how it works then test against changed Home page.	1	Complete
Prepare Checklists to manage work [list Pages; list Images etc.]	2	Complete
Identify the number of pages and images that need to be reviewed	1	Complete
Improve each Page as required and check readout for effectiveness (40)	20	Estimate
Compose and Add text and readout for all images (138)	12	Estimate
Prepare Final Report on outcome	4	Estimate
	46	Sub-Total Hours
Contingency	4	
With Contingency	50	Total Hours

EXHIBIT B2 ESTIMATE continued

The changes that have been made so far are as follows:

Colour Contrast - Green background made darker.

Header and Footer background - changed from Dark to Light.

Both these changes have been applied across the website as they are part of the Website templates settings and themes.

Text Colour

The text is remaining set at the default colour of black but to improve colour contrast the Home page normal text has been made bold. This will be something we need to do to all pages containing plain text.

Text Structure – The text on the Home page has been restructured with delineated Headings in line with guidelines.

Links – better text descriptions have been added to the links on the Home page.

Image – descriptive text has been added to the Home page image but the readout software is not picking it up and more research is needed to understand why. I expect that the effort involved for images will reduce once the matter is clarified.

Tables - not applicable.

Language –Home page is using simple language. Once this work is complete the council will be asked to check out the content of the website.

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Finally, if anyone on the council knows of anyone who is a current user with accessibility issues it would be good to talk to them as part of the verification of our website.

Notes re some original assumptions:

1. **Tables** in text must only be used for tabular data. Thankfully this is not used much. **[This turned out to be an incorrect assumption- all the minutes are drafted in this way]**
2. **Language** must be clear and easy to understand. Advice given is - Its best to avoid complicated sentence structures, adverbs, use of passive voice and unnecessary clauses. I would focus on page content as we cannot really be expected to change published documents. **[This latter assumption that we cannot be expected to change published documents was also incorrect]**. But we would need to adhere to these guidelines for new documents published.