



The Scottish Parliament
Pàrlamaid na h-Alba

Web Accessibility Regulations Project Update

4 February 2021

Reference: SPCB(2021)Paper 06

Executive summary

1. The Corporate Body was previously made aware of new regulations relating to web accessibility which came into force for public sector bodies on 23 September 2018. The requirement to ensure that websites are accessible to all users was not new, and was already enshrined in the Equalities Act 2010; the new regulations are more about how this is applied and enforced. They require organisations to commit to being compliant, and be open and clear about how they are addressing issues.

2. SPCB approved the initiation of a project to assess the implications of the new regulations, and to develop and implement an action plan to ensure compliance. The purpose of this paper is to report back on completion of this project and provide an update on how we anticipate the management of ongoing compliance.

Update

3. The project is now closed and the closure report provides full details of work undertaken. This paper provides a summary and highlights outstanding actions and recommended next steps.

4. To remind SPCB, it is considered that websites are accessible if they meet level AA of the internationally accepted WCAG standards. Under the regulations, organisation must also publish an accessibility statement that includes details of content that is not accessible and how to request this in an alternative format, and how the organisation is planning to address any outstanding issues. The scope of the project was therefore to audit our existing sites, to address any quick wins, and to develop accessibility statements as required.

5. Members are also reminded that colleagues from Legal Services established at the outset that Members websites did not fall within the scope of the Regulations. Whilst Office Holders websites were covered, they were the responsibility of the Office Holders themselves.

6. In phase 1 (September 2019 to March 2020) we worked with a social enterprise (Passion 4 Social – P4S) to audit our websites (of which there were

27), and test them with a combination of manual and automated tests, using assistive technologies and users with a range of disabilities.

7. It was important to carry out both automated and technical tests as Passion4Social were keen to stress the difference between technical compliance (or non-compliance) and “real life” accessibility. The automated testing threw up issues which were considered technical fails but did not actually cause users any difficulty. This is a useful distinction to make when we come to prioritise future work on web accessibility and reinforces the importance of seeing accessibility as something that sits at the heart of our content strategy, not just a matter of technical compliance.

8. Most of the corrective work fell within the scope of the Web and Online Programme and the new content governance model that is introduced as part of that.

9. The focus for phase 2 was therefore on the development of accessibility statements and developing good practice guidance on how to produce accessible content (pdfs etc). These have been shared with SPS as well as Members and their staff. Accessibility statements were all produced and published by the 23rd September 2020. We also shut down 6 of the microsites as part of this process, aligning with the web and online programme’s microsite rationalization work. The closure report includes links to the accessibility statements for each site and a note of next steps which have been taken forward in the Web and Online Project and, importantly, will be taken forward more generally by business areas.

10. The main issues relate to accessibility and usability being at the heart of our continuous improvement planning. Specifically, we have recognised the need to upskill colleagues in relation to content creation. Also, we will work with third parties who are responsible for a lot of the content on our website, for example the Scottish Government and stakeholders responding to calls for views in committee inquiry work.

11. We will re-run accessibility audits at least every 2 years.

12. We also recommended that a post implementation review is undertaken before the end of March 2021 to tie in with the web project closure and handover to business as usual. This will form the basis for discussing and agreeing an improvement roadmap for the following year (and beyond) between the hub and Digital Services.

Governance

13. The closure report was agreed by both the project SRO, Callum Thomson, and DSB, and was endorsed by Leadership Group on 25th January. Under the new content governance model, overarching accessibility will be the responsibility of the “service owner”, which will be the Head of the Engagement

and Communications Group (Susan Duffy). Operational responsibility will fall to the Digital Content and Communications Team (managed by Emma Armstrong). Responsibility for technical compliance will fall to Digital Services.

Resource implications

14. The project's overall budget was £50k, and the final outturn was £34,870, and underspend of £15,000. However, it should be noted that the Outreach Services commissioned some research under the contract with P4S, taking total spend against the contract to just under £40,000. The remaining budget has been allocated to WSM's operational budget to cover the costs of the post implementation review and further testing of the beta site.

Publication Scheme

15. This paper can be published in line with the SPCB's publication scheme.

Decision

16. SPCB is asked to note that the project has successfully delivered against its brief (both on time and under budget), and to endorse the recommended approach to how web accessibility will be managed on an ongoing basis.

Web and Social Media Team

February 2021