



The Scottish Parliament  
Pàrlamaid na h-Alba

# Web Accessibility Regulations Project Update

## 25<sup>th</sup> January 2021

### Reference: LG(2021)Paper003

#### Executive summary

1. Leadership Group was previously made aware of new regulations<sup>1</sup> relating to web accessibility which came into force for public sector bodies on 23 September 2018. While 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. A project was initiated to assess the implications of the new regulations for the SPCB, and to develop and implement an action plan to ensure compliance by deadlines set out below, and then to implement said plan. The purpose of this paper is to report back to Leadership Group on the delivery 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 LG, 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 be able to provide an accessible alternative in response to an individual request within a reasonable time. This applies to each site that the organisation is responsible for.
5. The scope of the project was to audit our existing sites (as opposed to the new website which is being built to comply with level AA), with a view to assessing the extent of their accessibility issues, to address any quick wins and to develop accessibility statements as required. Colleagues from Legal Services were involved throughout the project, and it was established that Members websites

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<sup>1</sup> The Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018 (S.I 2018/952). <http://www.legislation.gov.uk/ukxi/2018/952/contents/made>

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. The findings largely confirmed what we had already expected to be the main issues (details provided in the closure report), and that most of the corrective work fell within the scope of the Web and Online Programme and the content governance model that is introduced as part of that.
7. The focus for phase 2 was therefore on the development of accessibility statements, working with other site owners to ensure that all statements were published ahead of the 23rd September deadline. We worked again with P4S on the production of these, and we also developed some good practice guidance on how to produce accessible content (pdfs etc). These have been shared with SPS as well as Members and their staff.
8. Accessibility statements were all produced and published by the 23<sup>rd</sup> 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. However it should be noted that these will need to be monitored and kept up to date, particularly where they refer to planned fixes and improvement work. This will become the ongoing responsibility of the Digital Content hub once established, which will be part of the new Parliamentary Communications Office (PCO - previously Media Relations Office and Web and Social Media Team). The closure report includes links to each accessibility for each site and a note of next steps.
9. It should be noted that the published statements do not make us compliant; rather they mitigate against the risks of not being comprehensively compliant and outline a plan for improving in this area. The organisation needs to commit to prioritise this and the project has therefore made a number of high level recommendations:
  - Ongoing accessibility and improving in this area should be one of the Parliament's key digital priorities
  - Accessibility and usability should be at the heart of our continuous improvement planning. We should be excelling in this area rather than being just about good enough.
  - There needs to be an owner of and champion for digital accessibility at a senior level (product owner) and clear operational responsibilities across DS and web content hub.
  - Upskilling and resource allocation is needed in these teams (including budget available for call-off activities)
  - Accessibility should be built into content at source (at the point of creation)
  - We should re-run accessibility audits at least every 2 years.
  - All digital resources should be tested for accessibility before they are made public.

- Guidance and training should be available to all staff involved in content production (and the number of people reduced over time to make this more manageable)
  - All external suppliers need to incorporate accessibility into their products and services
10. 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. As discussed above, the beta site should have been reviewed before this and any outstanding issues highlighted and “accepted” by the digital content hub before the project is closed. 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**

11. The closure report has been agreed by both the project SRO, Callum Thomson, and DSB. Following this LG update, a paper will be considered by SPCB on 4<sup>th</sup> February.
12. 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), that will be part of the PCO. Responsibility for technical compliance will fall to Digital Services. Both teams will need to collaborate on planning and prioritising, and then committing to allocating appropriate resource. How this will work in practice is being discussed as part of the web project’s transition work.

## **Resource implications**

13. A budget of £20k was allocated for the first phase of the project (initial audits and report with recommendations), and a provisional budget of £80k was agreed for phase 2. This was reduced to £30k (with agreement from DSB) following completion of phase 1. The final outturn for the project 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.
14. This leaves us with the option of engaging with the social enterprise for further testing on the beta site before the closure of the web project, assuming that further testing will be needed to ensure that any ongoing compliance issues are highlighted to and accepted by the product owner during transition from project to business as usual. It was agreed that the outstanding £10,000 would be transferred to WSM’s operational budget to facilitate this.

## **Communications**

15. Raising awareness regarding the implications of the accessibility regulations among relevant stakeholders, and the practical implications of these, continues to be necessary. As mentioned above, input, advice and guidance from various teams and stakeholders has already been circulated. It is also a key component of training that is being provided to content producers for the new website as well as other publishing tools such as Fonto and Citizen Space. We are also intending to offer an awareness raising snippet style session to all staff (and Members and their staff) once the core teams have been further upskilled.

## **Publication Scheme**

16. This paper can be published.

## **Decision**

17. LG is asked to agree 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.

**Emma Armstrong**  
**Web and Social Media Team**  
**25 January 2021.**