Accessibility Evaluation

Requirements

Legislation

The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 requires public sector bodies, which includes local councils, to ensure reasonable adjustments are made to websites so they are accessible to people with various disabilities. These include:

- Impaired vision
- Motor difficulties
- Cognitive impairments or learning disabilities
- · Deafness or impaired hearing

From 23 September 2020 all local council websites will have to comply with those regulations.

Standards

Local councils need to make reasonable adjustments to their websites and operations so people can access information. They are required to include an accessibility statement on their website setting out to what extent they meet the requirements and what alternative arrangements are available. Good practice would also see councils including a plan to narrow the accessibility gap over time.

The website standards that councils are expected to meet are the Web Content Accessibility Guidelines (WCAG) 2.1.

Exemptions

There are a number of exemptions where online material does not need to meet the WCAG standards. These include:

- Pre-recorded audio and video (published before 23 September 2020)
- Live audio and video such as streaming meetings
- Heritage collections like scanned manuscripts
- PDFs or other documents (published before 23 September 2018 unless users need them to use a service)
- Maps provide essential information in an accessible format like an address
- Third party content that's under someone else's control if you did not pay for it or develop it yourself (e.g. social media Like buttons)
- 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 your organisation provides and they are not updated

Evaluation

Sample

The sample needs to include:

- the homepage
- content pages that are mostly text based
- images, video and audio content
- interactive tools and transactions, like forms
- pages including login functionality, if the site has them

- PDFs and other document types that are online
- dynamic content like pop-up windows
- navigation pages, including the sitemap and pages with search functionality

Also, to be included in the sample are any pages containing information about accessibility, how to contact you, how to use your site, legal information (for examples terms and conditions pages, or things like your privacy policy) and any settings or preferences pages.

Current Content

The site currently consists of:

- 46 pages, providing static information
- 401 posts, providing snippets of information going back to 2015
- 21 content blocks, providing common content that is used across many pages and/or posts
- 591 media objects, such as images and documents

Of the 46 static pages:

- 7 are specific to the Parish Council
- 10 are specific to the Neighbourhood Plan
- 22 are village information pages
- The rest are required for various site functions, such as responses to contact forms

Of the 401 posts:

- 156 are specific to the Parish Council
- 68 are specific to the Neighbourhood Plan
- 68 are specific to the Lound Crier
- The rest are village information posts

Of the 591 media objects:

- 80, or so, are .PDF files belonging to the Parish Council (agendas, minutes, policies, etc)
- 80, or so, are .PDF files relating to the Neighbourhood Plan
- 75 are .PDF files relating to the Lound Crier
- 194 are .PDF files relating to village information (events, flyers, etc)
- The rest are image files relating to village information pages and posts

Evaluation Sample

The following have been selected as the representative sample for the site:

- the homepage: www.loundvillage.co.uk
- content pages that are mostly text based: https://www.loundvillage.co.uk/neighbourhood-plan/
- images, video and audio content: all images in the Media Library
- interactive tools and transactions, like forms: https://www.loundvillage.co.uk/parish-council/contact-the-clerk/
- pages including login functionality, if the site has them: Not Applicable
- PDFs and other document types that are online: 1 set of historic Parish Council Minutes from October 2018, and the
 most recent set of published Parish Council Minutes. Most recent Lound Crier. Neighbourhood Plan Minutes.

- dynamic content like pop-up windows: Not Applicable
- navigation pages, including the sitemap and pages with search functionality: Not Applicable
- Lound Village Emergency Plan
- Parish Council Data Breach Policy
- Two representative posts, Village Crier and Parish Council Agenda

Strategy

The site currently uses a predefined theme to provide a look-and-feel based on a blog presentation. This theme is now over 5 years old and predates much of the Accessibility best practice and regulation. Simply replacing this with a modern accessibility-ready version is likely to make an immediate difference for little time and effort. However, changing a theme inevitably comes with side effects which can cause issues with the site. So, for the purpose if this exercise, the evaluation has been performed against the current theme. This should then indicate whether moving to a new theme is preferable.

There are a number of online tools available to visualise how compliant a site is, which will reduce the overhead of having to manually assess every page and post. However, files such as. PDF's cannot be assessed on an automated basis.

There is a defined checklist of things to evaluate. Some of these can be automated, but others are manual. The evaluation will follow the process defined at <a href="https://www.gov.uk/government/publications/doing-a-basic-accessibility-check-if-you-cant-do-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-detailed-one/doing-a-

Evaluation

Evaluation using the current website theme

In the following evaluation, the resulting Action to be taken, specified in the right-hand column, refers to the set of actions described in the subsequent Analysis and Recommendations section.

1. Text Content

- www.loundvillage.co.uk
- www.loundvillage.co.uk/neighbourhood-plan/
- www.loundvillage.co.uk/parish-council/contact-the-clerk/
- www.loundvillage.co.uk/2020/07/crier-august-2020/
- www.loundvillage.co.uk/2020/07/lound-parish-council-agenda-july-2020/

Check	Pass / Fail	Comment	Impact
Check you're using proper headings	×	Home page has no content of its own. It simply displays a set of individual posts. Other sample pages implement headings, but they are inconsistent in places. Sample posts do not use headings and in some cases rely on formatted (bold) text.	Action1 Action2 Action4
Check pages are usable when stylesheets are disabled	×	The site generally looks horrible, but then most sites do when their stylesheets are disabled. There's a lot of shrapnel around which is primarily due to the theme and a lot of busy content. I'm not entirely convinced that this check adds any real value since it is reliant on a fundamentally broken site. However, a change of theme may unclutter the view.	Action3 Action4

Check	Pass / Fail / 🔀	Comment	Impact
Check that instructions are styled properly	V	Sample pages and posts look OK	Action1 Action2 Action4

Check	Pass / Fail	Comment	Impact
	✓ / ×		
Check that links make sense	×	There are a lot of very brief and / or inconsistent link names being used, particularly in posts. The vast majority of these will be non-compliant. Back in the day there was a design philosophy that stated that all links to documents and external websites should be displayed in a new browser tab. This was to ensure that users didn't lose your site. However, the downside of this is it that it is all too easy to end up with dozens of tabs open, which can be very confusing particularly on small devices. Accessibility rules now seem to be swinging back to simply popping all content into the same tab and overwriting whatever was there previously, or have a warning such as "Opens in new tab" explicitly on the link. The site as it stands tends to open new tabs, but often without warning the user where the target will appear. So, from this perspective, link behaviour is inconsistent and so probably non-compliant.	Action4
Check that pages have good titles	V	Sample pages and posts	Action1

2. Images, video and audio content

- www.loundvillage.co.uk
- www.loundvillage.co.uk/neighbourhood-plan/
- www.loundvillage.co.uk/parish-council/contact-the-clerk/
- www.loundvillage.co.uk/2020/07/crier-august-2020/
- www.loundvillage.co.uk/2020/07/lound-parish-council-agenda-july-2020/

Check	Pass / Fail	Comment	Impact
		The majority of images are classed as "decorative", such as the one below, and as such do not require a description:	Action5
Check any images have a description	×		
		However, there are a number of images that have been clipped from documents, or advertise events which do contain information, but which don't have an appropriate description.	
Check any video or audio content is properly described	V	There doesn't appear to be any video or audio content on the site.	
Audio descriptions for video and audio content	V	There doesn't appear to be any video or audio content on the site.	

Check	Pass / Fail / 🔀	Comment	Impact
Check for images containing text	×	Decorative images and logos are exempt. But there are a number of images which do contain text, and which must be transcribed.	Action6

3. Interactive tools and transactions

- www.loundvillage.co.uk
- www.loundvillage.co.uk/neighbourhood-plan/
- www.loundvillage.co.uk/parish-council/contact-the-clerk/
- www.loundvillage.co.uk/2020/07/crier-august-2020/
- www.loundvillage.co.uk/2020/07/lound-parish-council-agenda-july-2020/

Check	Pass / Fail	Comment	Impact
	√ / ×		
Check form fields are marked up appropriately	V	There are two contact forms, which appear to be OK	
Check it's clear what information users need to provide	×	Field labels are too vague to be compliant	Action10
Check form elements are consistent across your website	×	Form elements are consistent, but too vague to be compliant, as above	Action10
Check users get a warning before they're timed out	$\overline{\checkmark}$	There are no timeouts	
Check that any error messages are helpful	$\overline{\checkmark}$	OK	
Check users can review their answers before submitting a form	V	ОК	
Check that form elements behave as expected	$\overline{\checkmark}$	ОК	

4. PDFs and other documents

- Parish Council Minutes from October 2018
- Parish Council Minutes from July 2020
- Lound Crier from August 2020
- Neighbourhood Plan Minutes from January 2020
- Lound Village Emergency Plan 2019
- Parish Council Data Breach Policy

Check	Pass / Fail	Comment	Impact
Check the documents have meaningful titles	×	Titles are either missing, inconsistent or too vague.	Action7
Check for headings	×	Generally non-compliant. Headings are either missing or used inconsistently.	Action7
Check the documents convey instructions in an accessible way	V	Doesn't appear to be any references of this type.	
Check that any link text makes sense	V	No obvious links in the sample documents, but may be some in others.	
Check that images, charts and tables have a description	×	We have a few home- grown charts and tables. In general, none of these appear to be compliant.	Action7

5. Technology

Evaluation based on the following:

- www.loundvillage.co.uk
- www.loundvillage.co.uk/neighbourhood-plan/
- www.loundvillage.co.uk/parish-council/contact-the-clerk/
- www.loundvillage.co.uk/2020/07/crier-august-2020/
- www.loundvillage.co.uk/2020/07/lound-parish-council-agenda-july-2020/

5.1 Tests using a mobile or tablet device

Tested using an Android phone and a Galaxy tablet.

I'm not sure how useful this check is, because a lot will depend on the features available on the device being used.

Check	Pass / Fail	Comment	Impact
Check the page orientation	V	All samples responded as expected on both devices.	
Check you can navigate using just one finger	×	One-finger functionality is available on all samples. However, there appears to be no access to the main menu on the phone device. This may be caused by the current theme.	Action3 Action8
Check you're not relying on complex motions	×	The current theme and busy content of the pages do not help here. All pages have Left and Right panels for information. These have to go somewhere, even on a small device. As a result, there's a lot of left, right, up and down swiping to be done, which probably falls under the "Complex Motions" category, particularly on small screens.	Action3 Action8

5.2 Navigating just using a keyboard

Check	Pass / Fail	Comment	Impact
Check you can tell where you are on the page	×	On occasions you have no idea where the page focus is at any one time. This is primarily due to the current theme, together with busy page content.	Action3
Check the order makes sense when tabbing	×	There is a defined tab order, but it's a bit random in places and anything but obvious. This is primarily due to the current theme, together with busy page content.	Action3 Action8
Check nothing unexpected happens when tabbing through a page	V	Putting aside the failings of the previous two checks, there's nothing unexpected happening.	
Check you do not get stuck when navigating through content	V	Putting aside the failings of the first two checks, you don't get stuck.	
Check forms are still usable without a mouse	V	There are two Contact forms (Clerk and Crier), both of which seem to function correctly using just a keyboard.	
Check users can skip to the main content on a page	×	No. You have to tab past all the heading and menu links to get to the content.	Action8

5.3 Checking content is usable when zoomed in or magnified

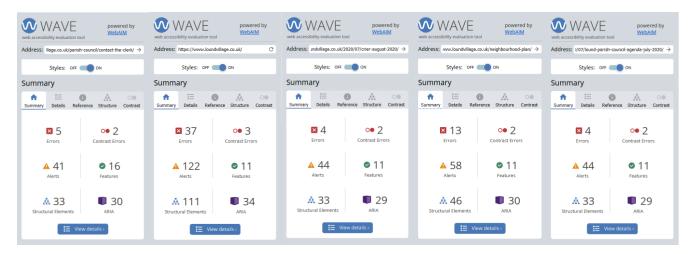
Check	Pass / Fail / K	Comment	Impact
Checking content is usable when you enlarge the text	×	With the exception of the Google Calendar pane in the left-hand side panel, the theme seems to be blocking the ability to increase the font size. This is probably non-compliant when it comes to making a site more accessible. Where increasing font size does work, there is a degree of wrapping and lost text.	Action3
Checking how the page behaves when users zoom in	\sqrt	All sample pages and posts OK up to 300% zoom. The site theme is fluid, which pushes the side bars below the main content. This appears to be fine. Some images don't zoom well due to their low-resolution quality. However, this doesn't really affect the accessibility.	

5.4 Colour contrast

Evaluation based on the following:

- www.loundvillage.co.uk
- www.loundvillage.co.uk/neighbourhood-plan/
- www.loundvillage.co.uk/parish-council/contact-the-clerk/
- www.loundvillage.co.uk/2020/07/crier-august-2020/
- www.loundvillage.co.uk/2020/07/lound-parish-council-agenda-july-2020/

The following images are taken from the WAVE analysis for all sample pages and posts, with the Colour Contrast score seen on the top right.



Check	Pass / Fail	Comment	Impact
	√ / ×		
Check for text contrast	×	All sample pages and posts show a few Contrast errors. This is primarily due to the current theme and Look & Feel.	Action3
Check any buttons and navigational elements	×	All sample pages and posts appear to be OK, with the exception of the Home page which has an additional noncompatible navigation link. This is due to the current theme.	Action3 Action4

5.5 Pop-ups and interactive or flashing content

Check	Pass / Fail	Comment	Impact
Check that users can disable animated or moving content	×	There isn't generally any animated or moving content, with the exception of the home page image slider which acts as a visual navigation to the most recent posts. However, this can be paused by hovering over it, but has no obvious start-stop controls and so is probably non-compliant.	Action3
Check for content that plays automatically	V	There is no content like this.	
Check whether there's an alternative for people who cannot see maps	×	There are a number of maps, which use Google as the source. All pages using these for a specific location (e.g. Village Hall) also have a postal address. There are a number of static (PDF) maps for things such as the Neighbourhood Plan boundaries, which are not interactive. There is a case for providing a textual narrative for these.	Action9 Action11

5.6 Search and other forms of navigation

Check	Pass / Fail	Comment	Impact
Check there are multiple ways to navigate your website	×	There is currently no Site Map, but all pages and posts have a Search option. All posts show their Categories. Pages do not show any breadcrumbs, which is due to the current theme.	Action3
Check your navigation behaves consistently	×	Functionally consistent, but inconsistent placement of the Search facility between Posts and Pages.	Action3 Action4
Check links do not trigger on the down-press of a mouse	$\overline{\checkmark}$	All sample pages and posts appear to be OK.	

6. HTML checks

- www.loundvillage.co.uk
- www.loundvillage.co.uk/neighbourhood-plan/
- www.loundvillage.co.uk/parish-council/contact-the-clerk/
- www.loundvillage.co.uk/2020/07/crier-august-2020/
- www.loundvillage.co.uk/2020/07/lound-parish-council-agenda-july-2020/

Check	Pass / Fail / X	Comment	Impact
Checking tables and bullet lists are styled properly	V	All sample pages and posts appear to be OK.	
Check the language the content is written in	$\overline{\checkmark}$	All sample pages and posts appear to be OK.	

Check	Pass / Fail	Comment	Impact
	✓ / 区		
Check any video players are accessible	×	The site uses a third- party Gallery feature for photographs, but this appears to be non- compliant in terms of the controls it displays and the associated mark-up.	Action3

Analysis and Recommendations

Based on the evaluation it would appear that the site is generally compliant in 23 of the 43 sections, or 53%.

Exemptions

The site has a lot of historic content, stretching back to April 2015. There are a number of exemptions where online material does not need to meet the WCAG 2.1 AA standards. These include:

- Exemption1: Pre-recorded audio and video (published before 23 September 2020)
- Exemption2: Live audio and video such as streaming meetings
- Exemption3: Heritage collections like scanned manuscripts
- Exemption4: PDFs or other documents (published before 23 September 2018 unless users need them to use a service)
- Exemption5: Maps provide essential information in an accessible format like an address
- Exemption6: Third party content that's under someone else's control if you did not pay for it or develop it yourself (e.g. social media like buttons)
- Exemption7: Content on intranets or extranets published before 23 September 2019 (unless you make a major revision after that date)
- Exemption8: Archived websites if they're not needed for services your organisation provides and they are not updated

Disproportionate Burden

Section 6 of the legislation describes the disproportionate burden assessment. In short, this does not require councils to comply with the accessibility requirement if doing so would impose a disproportionate burden.

You will not know if changing parts of your website is a disproportionate burden until you have carried out an assessment. An assessment is a legal requirement before any declaration of burden. In your assessment you should weigh up the burden on your council of making parts of your website accessible, against the benefits of making those things accessible.

When carrying out your assessment, you need to think about:

- Your council's size and resources
- The nature of your council activities (e.g. do you have certain services aimed at people who are likely to have a disability)
- How much making things accessible would cost and the impact that would have on your council
- What the additional benefit to disabled users would be by making changes.
- The council will then need to publish an accessibility statement describing how their website is or is not compliant with the regulations.

Assessment

Assessment Exemptions

Taken together, the available exemptions will de-scope much of the work, leaving only the Total numbers below:

Pages published since 23 September 2019 (Exemption7)
 Posts published since 23 September 2019 (Exemption7)
 PDFs and other documents published since 23 September 2018 (Exemption4)
 PDFs and other documents which are never exempt, such as Policies (Exemption4)
 Images that need a description published since 23 September 2019 (Exemption7)
 Images that contain text published since 23 September 2019 (Exemption7)
 Total5: 3
 Total6: 1

Actions Required

The following actions are required to achieve compliance with the Web Content Accessibility Guidelines (WCAG) 2.1 AA.

NOTE: There is also a Version 2.2, which is of a higher standard, and requires compliance with Version 2.1. It is not beyond the realms of possibility that this may become a requirement in the future.

Action	Commentary	Effort / Target
1	Review and correct all in-scope pages to ensure compliant:	23 September 2020
	Headings are being used, and are consistent	
	Instructions are clear	
	Titles are present and meaningful	
	Buttons and navigation elements	
	Navigation is consistent	
	The in-scope total (Total1) is 0 since no new pages have been published since 23	
	September 2019. However, pages tend to be very small and worth reviewing for general	
	compliance.	
2	Review and correct all in-scope posts to ensure compliant:	23 September 2020
	Headings are being used, and are consistent	
	Instructions are clear	
	Titles are present and meaningful	
	Buttons and navigation elements	
	Navigation is consistent	
	The in-scope total (Total2) is 55 which covers all posts published since 23 September 2019. However, posts tend to be very small and worth reviewing for general compliance.	
3	Change the existing theme to one which is accessibility-ready, and implement a general de-cluttering of content. The downside to this is that some content and site structure will inevitably have to be reworked to some degree to accommodate the change.	23 September 2020
	This should also help with fluidity on smaller devices, as well as general navigation.	
4	Review and correct all links to external objects (documents and websites). Difficult to say how many of these there are, but probably in the hundreds. Suggest removing the "target" attribute which directs the link to a new tab, rather than adding "Opens in a new tab" caption. There are some links that already have the caption, so these would be removed. Can probably do a Find & Replace to remove them. The reasons for choosing this option are:	23 September 2020
	 There may be some sort of tool that does this in bulk, which would cut down on the work It's likely to produce a more accessible site when done. 	

Action	Commentary	Effort / Target
5	Review and correct all images that need a description.	23 September 2020
	The in-scope total (Total5) is 3 which covers all images published since 23 September 2019 that need a description. A Description is just a one-line comment.	
6	Review and correct all in-scope images that contain text and transcribe them to page / post content.	23 September 2020
	The in-scope total (Total6) is 1 which covers all images published since 23 September 2019 that contain text.	
7	Review and correct all in-scope documents to ensure compliant:	31 December 2020
	 Titles are present and consistent Headings are present and consistent Meaningful link text Descriptions for images, charts and tables 	
	The in-scope total (Total3 + Total4) is 130 which covers all PDFs published since 23 September 2018.	
8	Add a "Skip to content" link at the top of all pages.	23 September 2020
9	Accessibility Statement requires a map on the Contact Us page. There is a map on other pages, but this seems to be a specific requirement on the Contact Us page.	23 September 2020
10	Review the two contact forms to ensure clarity on what information is expected from the user. Ensure consistent form elements across pages.	23 September 2020
11	Ensure maps have a textual narrative to explain what they are showing.	23 September 2020
12	Produce an Assessment Statement and a roadmap of how compliance will be achieved, both of which must be published on the website.	23 September 2020
	The Assessment Statement is a legal document, which contains some wording that cannot be changed.	
	The roadmap indicates how compliance with the regulation will be achieved over time.	
13	There are a number of documents (10 at least) that have been published in Microsoft Word format, rather than .PDF. This can create problems for users who do not use MS Word, or have older versions. These seem to be primarily Parish Council Policies.	23 September 2020
	These should all be reworked to make them Accessible and then published as PDF files.	
	As an aside, MS Word has a Check Accessibility function (Review / Check Accessibility) which provide a good indication as to how accessible a document is before publishing it. However, be warned that this does not appear to check for good titles, heading structures, or table captions.	

Action	Commentary	Effort / Target
14	Moving forwards, Parish Council Agendas and Minutes, and the Crier need accessibility-ready templates.	23 September 2020 (i.e. prior to the next Lound Parish Council
	In addition, all future content published to the site must be accessibility-compliant. This may involve a degree of (awareness) training for anyone producing content for public consumption.	meeting for Parish Council documents.
	Looking at a recent Crier, this could be problematic since it appears to have more of a magazine feel, rather than a document per se. However, this shouldn't stop it using structures such as a title and headings which provide some accessibility to text readers.	
15	There are a number of Neighbourhood Plan background documents which should also be verified, such as Consultation documents. Most, if not all, of these were produced prior to 23 September 2019 and since they simply document the journey they are effectively archives and therefore probably exempt. Those published after this date should be made compliant.	Unclear as to who owns the original documents
	However, moving forwards, all subsequent Neighbourhood Plan documents published to the site must be compliant.	