

## PFCC Decision Report

**Please ensure all sections below are completed**

**Report reference number:** 02-23

**Classification** (e.g. Not protectively marked/restricted): **Not Protectively Marked**

**Title of report:** **Accessibility Strategy and Revised Accessibility Statement**

**Area of county / stakeholders affected:** **Countywide**

**Report by:** Darren Horsman

**Chief Officer:** Darren Horsman

**Date of report:** 6.1.2023

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### 1. Executive Summary

The Police, Fire and Crime Commissioner for Essex has engaged Formation Media to ensure that the infrastructure and content of the [essex.pfcc.police.uk](http://essex.pfcc.police.uk) site is up to and exceeds Web Content Accessibility Guidelines (WCAG) 2 Level AA. Significant changes have been made to improve the accessibility of the site both prior to the legislation coming into force and once further reviewed in 2022. While the site is now largely accessible there remains a small number of issues relating to the nature of the content, rather than the structure, of the website.

Image ALT text and PDFs are the two problematic areas of content. Our obligation to make sure our content is accessible should be viewed alongside our obligation to publish information about the work of the Commissioner as set out in the Standard Information Order. There is a large burden of work that is required to bring these elements of the site up to standard and there is also a significant volume of content provided by third parties.

The decision report seeks agreement to an accessibility strategy that set out the approach to managing this work and an updated accessibility statement which provides a summary of the site and approach.

## **2. Recommendations**

That the Commissioner agrees the approach set out in the Accessibility Strategy and the Accessibility Statement.

That the Commissioner approves the allocation of up to £3,000 from the staff pay budget towards the cost of starting to improve content currently published on the site.

That the Commissioner notes that once the ongoing time commitment for making published content accessible is better understood, this will be provided to his Senior Management Team and will need to be addressed within the team.

## **3. Background to the Proposal**

The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 requires that all public sector websites are accessible to everyone. This came into force on 23 September 2018 and websites were required to be compliant by September 23<sup>rd</sup> 2020.

In preparation for this change the Commissioner commissioned Formation Media to perform a website audit and help produce an accessibility statement for the PFCC website. This decision was made in decision report 09-20 with the work completed prior to September 2020. As with most public sector organisations the Commissioner's site complied with these regulations by altering and improving the website and identifying areas where it was not possible to fully meet the standards set out in the regulations. This can be because of the use of third-party content or technology, historical information or an undue burden being placed on the organisation. These were clearly set out in our Accessibility Statement as required by the regulations.

Since introduction of the regulations the public sector has been adapting to these new regulations. One area that has provided difficulty over the last two years is the treatment of documents uploaded onto official sites. PDFs in particular can cause significant accessibility issues however government transparency requirements mean that there is still a significant need to publish documents detailing the operation of government business.

In 2022 the Commissioner's site was randomly selected by the Cabinet Office's Website Accessibility Team and underwent an accessibility test. The site performed well, however; a range of areas were identified for improvement. As a result of this an updated audit was undertaken of the full site and content. The findings from this audit along with the results provided by the Website Accessibility Team have led to a number of improvements being made to the site as set out in the Essex PFCC Accessibility Summary.

Two issues remained that were not easily fixed, the use of images on the site and the use of PDFs. To address these issues an Accessibility Strategy has been developed setting out the approach to be taken and the pace of that work and an updated Accessibility Statement to publish on our site.

#### **4. Proposal and Associated Benefits**

Making a website accessible means making sure it can be used by as many people as possible. This includes those with impaired vision, motor difficulties, cognitive impairments or learning disabilities, deafness or impaired hearing. Accessibility means more than putting things online. It means making 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, someone with impaired vision might use a screen reader (software that lets a user navigate a website and 'read out' the content), braille display or screen magnifier, or someone with motor difficulties might use a special mouse, speech recognition software or on-screen keyboard emulator.

People may not have a choice when using a public sector website or mobile app, so it is important they work for everyone. The people who need them the most are often the people who find them hardest to use. Accessible websites usually work better for everyone. They are often faster, easier to use and appear higher in search engine rankings.

Improved accessibility will also support the PFCC's commitments under the Public Sector Equality Duty and support the implementation of the Commissioner's Equality, Diversity and Inclusion Strategy. It will help more people engage with the decisions and work undertaken by the PFCC, building awareness of the work and confidence in it.

#### **5. Options Analysis**

The Commissioner could have decided not to comply with these regulations but that would have increased the risk that they would have been challenged for this decision by the Equality and Human Rights Commissioner. The site could also have been highlighted as an example of non-compliance. Most importantly if the decision had been taken not to comply the Commissioner would have missed out on the opportunity to make the information, they publish about the work that they do accessible to as many people as possible.

The public sector is learning together how to create and maintain accessible websites that allow everybody to participate. That is a journey we are all on together and benefiting from developments in this field will help the commissioner achieve their vision and deliver their objectives within the Police and Crime Plan and Fire and Rescue Plan.

#### **6. Consultation and Engagement**

There has been no direct consultation on this issue with staff, however, we have engaged with other PCC offices who have been audited and shared information. Our

strategy and statement are based on the best information we could obtain from these conversations along with expert independent advice.

## **7. Strategic Links**

Engagement with the public is a core part of both the Police and Crime Plan and Fire and Rescue Plan.

## **8. Police operational implications**

There are no operational policing requirements arising from this decision.

## **9. Financial implications**

This decision will allocate £3,000 from the PFCC staff pay budget to start to improve the accessibility of documents currently published on the website. Once we have a better idea of the time required to complete this work and to ensure that all new documents are accessible prior to publication we will bring this information back to the Commissioner's Senior Management Team with a proposal on how this can be undertaken, and this may require further funding.

## **10. Legal implications**

Compliance with these regulations is a legal requirement and failure to do this may result in further action by the Equality and Human Rights Commission.

## **11. Staffing implications**

This decision will impact staff as some staff will be asked to undertake overtime to complete the work on existing documents. Our existing publication processes will also need to be changed for future publications which will add time to a number of processes undertaken by staff within the team. Once these are better understood they will be shared with the Commissioner's Senior Management Team.

## **12. Equality, Diversity and Inclusion implications**

This will have a direct positive impact on equality and diversity. It will also support the PFCC's commitments within the Equality, Diversity and Inclusion Strategy, specifically making the information relating to the scrutiny of Essex Police and Essex County Fire and Rescue Services' implementation of their own obligations under the Equality Act 2010 more accessible.

As set out above, making a website accessible means making sure it can be used by as many people as possible.

## **13. Risks and Mitigations**

It is possible that the Website Accessibility Team do not accept that the information received from Essex Police and Essex County Fire and Rescue Service is third party

content. If this is the case we will need to reconsider our strategy and our approach to either stop publishing this information or work with both Services to alter the content provided.

While this is unlikely it is possible. We have sort advice from Formation Media and other PFCC officers when developing our strategy and this has mitigated the risk that our proposal that this be classified as third-party content isn't accepted.

#### **14. Governance Boards**

This was discussed at the Commissioner's Management Team on the 3<sup>rd</sup> of January and will be discussed at the Commissioner's Senior Management Team on January the 17<sup>th</sup>, however a decision is required before this to submit these documents to the Website Accessibility Team at the Cabinet Office.

#### **15. Links to Future Plans**

This is not linked to any future plans.

#### **16. Background Papers and Appendices**

*Essex PFCC Accessibility Strategy  
Accessibility Statement  
Essex PFCC Accessibility Summary  
09-20 Website Accessibility*



If 'YES', please provide details of required redaction:

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Date redaction carried out: .....

**Chief Finance Officer / Chief Executive Sign Off – for Redactions only**

If redaction is required, the Treasurer or Chief Executive is to sign off that redaction has been completed.

**Sign:** .....

**Print:** .....

**Chief Executive / Chief Finance Officer**

**Decision and Final Sign Off**

I agree the recommendations to this report:

**Sign:** 

**Print:** Roger Hirst

**PFCC/Deputy PFCC**

**Date signed:** 3 February 2023

I do not agree the recommendations to this report because:

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**Sign:**

**Print:**

**PFCC/Deputy PFCC**

**Date signed:**