

# **PFCC Decision Report**

#### Please ensure all sections below are completed

Report reference number: 090-20

Classification: Not protectively marked

Title of report: Website accessibility assessment and compliance

Area of county / stakeholders affected: Countywide

Report by: Liane Edwards (Communications and Engagement Officer)

**Date of report:** 03/07/20

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# 1. Purpose of the report

To gain agreement for Formation Media to carry out an audit of the PFCC website and make corrections so that the PFCC meets the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 within the required time frame.

#### 2. Recommendations

That the PFCC agrees to Formation Media carrying out the work required to make the PFCC website accessibility compliant in line with the regulations.

## 3. Benefits of the proposal

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

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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.

# 4. Background and proposal

New regulations mean that public sector organisations have a legal duty to make their websites and mobile apps accessible by making them perceivable, operable, understandable and robust. The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 became UK law in September 2018 and aim to make online public services accessible for everyone, including those with disabilities. Websites must be compliant by September 23<sup>rd</sup> 2020.

There are four steps public sector organisations must take to ensure they are compliant with the regulations:

- 1. Understand how the regulations will impact them
- 2. Check the accessibility of their websites
- 3. Make a plan to fix any problems they find
- 4. Publish an accessibility statement

To do this an audit of the website is required as well as a good technical understanding of the website and a sufficient understating of Web Content Accessibility Guidelines 2.0 and 2.1 so that we can determine whether the content is WCAG 2.1 AA compliant or not. We also need to ensure any new content and features that we publish meet accessibility standards. This means:

- making any new PDFs or other documents we create accessible
- writing good link text
- structuring content well
- publishing accessible images and videos
- · checking new features work on assistive technologies

## 5. Alternative options considered and rejected

Making the PFCC website accessibility compliant can be done in several ways:

Method 1. Carry out a detailed audit in-house

This requires a member of the team to have the technical skills and understanding that the functionality is WCAG 2.1 AA compliant which would have required significant additional training.

Method 2. Pay a third party to undertake a detailed audit for us If there is no-one in the team with the skills and time to audit content and functionality to see if it is WCAG 2.1 AA compliant, we can pay a third party with the necessary skills and capacity to undertake a detailed audit instead.

Method 3. A combination of the above

It was decided method 2 would be preferable, due to the amount of time it would take a team member to carry out the audit and to rectify any issues as well as gaining a detailed understanding of WCAG 2.1 AA compliance.

We looked at three different organisations to undertake the work including Essex County Council, Viewpoint (our current website supplier) and Formation Media which has carried out website accessibility audits and corrections on other PCC websites. It was decided that Formation Media offered the best option as it has the expertise and experience of PCC websites; is able to provide a full service, and has the capacity to undertake the work within the required timeline.

#### 6. Police and Crime Plan

The website is the online platform that communicates what we do, what we deliver and what we aspire to in the Police and Crime Plan 2016/2020 and the extension for 2020/21.

## 7. Police operational implications

There will be no impact on operational policing.

#### 8. Financial implications

The financial costs of outsourcing to Formation Media are as follows:

Phase 1 - Website Accessibility Report

**FREE** 

Phase 2 - Manual Audit (2 days)

£1.900

Phase 3 - Quote & Corrective Dev (3 days +)

£3.010

Phase 4 - Compliance Statement & Report

£950

**TOTAL £5,860** 

#### 9. Legal implications

By law, the PFCC has to comply with the accessibility requirements by September 23<sup>rd</sup> 2020.

## 10. Staffing implications

The work will be overseen by the Policy and Public Engagement Team and the time commitment for this has been allocated. There are no other direct staff implications involved in this proposal.

## 11. Equality and Diversity implications

This will have a direct positive impact on equality and diversity as stated in the Benefits of the Proposal above. It will also support the PFCC's commitments within the Equality,

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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.

#### 12. Risks

By not implementing the necessary changes to make the PFCC website more accessible to all, we would risk failing to reach members of society who require our help the most. We would also risk failing to adhere to the Government requirements which will be monitored by Government Digital Services.

#### 13. Governance Boards

The project has been discussed at the PFCC's Senior Management Team on a number of occasions, most recently on 14.7.2020

# 14. Background papers

N/A

#### **Report Approval**

The report will be signed off by the PFCC Chief Executive and Chief Finance Officer prior to review and sign off by the PFCC / DPFCC.

Chief Executive / M.O. Sign:

Print: P. Brent-Isherwood

Date: 20 August 2020

Chief Finance Officer / Treasurer Sign:

Print: Elizabeth Helm

Date: 24 August 2020

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<u>Publication</u>			
Is the report for publication?		YES X	
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1. Of Decision Sheet?	YES	2. Of Appendix?	YES
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	Chief Executive/	Treasurer	
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Decision and Final Sign Off			
I agree the recommendations to this report:			
Sign:			
Roger Hirst Print:			
PFCC			
Date signed: 3 September 2020			
I do not agree the recommendations to this report because:			
Sign:			
Print:			
PFCC/Deputy PFCC			
Date signed:			