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Meeting	Finance and Policy Committee
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Report Title	Assertion 10 Compliance - Accessibility
Agenda Reference	Agenda Item 12
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Recommendation to Full Council

That Full Council:

- **approves the reviewed Accessibility Statement, noting that the Council remains partially compliant in respect of historic PDF documents;**
- **agrees that full retrospective remediation of all legacy PDFs would be a disproportionate burden, based on the Council's resources, the volume of documents, and the estimated staff time required;**
- **confirms that priority will be given to ensuring all newly published content is accessible, with alternative text and descriptive hyperlinks used as standard;**

Purpose

To update Council on accessibility compliance activities undertaken by officers, provide findings from recent investigations, and seek agreement on the next steps required to improve compliance with the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.

Current Position

Haydon Wick Parish Council currently remains partially compliant with accessibility regulations. We have made significant progress in improving accessibility arrangements, particularly in relation to newly published content. Current practices include:

- Producing new PDF documents with accessibility considerations where practicable.
- Introducing improved document structures and formatting.
- Beginning the implementation of alternative text for images contained within documents, online forms and website content.
- Reviewing website content to replace generic hyperlinks with more meaningful and descriptive link text.

These measures have improved accessibility for newly published content; however, a number of historic PDF documents hosted on the Council's website remain non-compliant and require further review.

Investigation

A meeting was held with a company specialising in solutions for improving accessibility compliance, focusing primarily on the remediation of historic PDF documents.



The supplier demonstrated a PDF Remediation Tool designed to identify and rectify accessibility issues within PDF documents. The supplier advised that the tool could significantly reduce the manual resource required to make historic documents compliant.

Concerns were noted during the demonstration as the software was unable, on a number of occasions, to recognise or scan PDF documents accessed through links hosted on the Council website. Further investigation would therefore be required before any procurement decision could be recommended.

The supplier also outlined a Website WCAG Checker service, which includes quarterly website audits, accessibility reports, recommendations for improvements and support with maintaining an Accessibility Statement. The service is available from £2,400 per annum plus VAT.

Indicative pricing

Annual Pages Processed	Annual Cost (Excl. VAT)	Cost Per Page
1,000	£3,000	£3.00
3,000	£7,200	£2.40
5,000	£9,000	£1.80
10,000	£12,000	£1.20
25,000	£25,000	£1.00
50,000	£40,000	£0.80

There are approximately 4,289 PDF documents on the Council's website. Based on an estimated review time of 15 minutes per document, a full manual accessibility assessment would require approximately 1,072 administrative hours, equivalent to 143 working days or almost seven months of full-time resource.

This demonstrates the scale of the historic document backlog and supports the need for a proportionate, risk-based approach to compliance, prioritising new publications and high-use documents whilst investigating automated remediation solutions where appropriate.

This assumes every PDF genuinely requires 15 minutes and takes no account of quality assurance, training, uploading revised documents, or dealing with complex documents.

Professional Advice Received

Advice has been sought from the Council’s website developer regarding accessibility requirements and proportionality. The advice is that the Council's immediate priority should be updating its Accessibility Statement to accurately reflect current compliance status, ongoing improvement work and future commitments. They further advised that, amongst the parish councils they currently support, none have commissioned additional accessibility support services, although this will vary according to the volume of content published and the Council's individual risk assessment.

Risks and Considerations

The Council's principal accessibility risk continues to relate to historic PDF documents which may not fully meet current accessibility standards.

The Regulations recognise that public bodies may relay on the concept of disproportionate burden, but the Council should be able to demonstrate that:

- accessibility has been considered in current publishing practices.
- reasonable steps have been considered to improve historic content.

- accessibility barriers identified by users can be addressed upon request.
- an up-to-date Accessibility Statement is maintained.

Accessibility Statement

The Accessibility Statement must be revised to reflect the work already undertaken and the planned programme of improvements.

Consideration should be given to including a statement confirming that the Council will prioritise resources towards ensuring all newly published content is compliant while a retrospective review of legacy documents has been thoroughly considered but concluded as unreasonable and disproportionate due to the excessive cost and time to the Council.

The statement should not claim full compliance where historic documents remain non-compliant. Instead, it should accurately explain that the Council has considered the burden of retrospective remediation and has concluded that full immediate remediation of all legacy documents would be unreasonable and disproportionate in light of the Council's available staffing and financial resources.

Statement Review

Statement on the Council's website has been reviewed for adoption: Accessibility Statement – Haydon Wick Parish Council

Conclusion

Positive progress has been made towards improving accessibility compliance, particularly through the introduction of more accessible publishing practices for new content. The Council continues to face challenges in relation to historic PDF documents, and the estimated review time of almost seven months of full-time resource represents a disproportionate burden when balancing compliance requirements with available resources.

It is therefore recommended that the Council's immediate priorities are to update the Accessibility Statement, continue ensuring all newly published content is compliant, improve the use of alternative text and descriptive hyperlinks, and develop a phased improvement plan for legacy documents.

By adopting this structured improvement programme and accurately reflecting it within the Accessibility Statement, the Council can demonstrate a commitment to continuous improvement while managing accessibility compliance in a proportionate and practical manner.

Being partially compliant does not automatically create a legal issue, provided the Council can demonstrate that it is actively managing accessibility, has an accurate Accessibility Statement, and is taking reasonable steps to improve accessibility over time.

For AGAR Assertion 10, the safest position is not to assert that the website is fully compliant, but that the Council has considered website accessibility requirements, maintains an Accessibility Statement, and has documented a disproportionate burden assessment in respect of legacy PDF remediation.