Clackmannanshire Council Accessibility Disproportionate Burden Statement

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Clackmannanshire Council is committed to meeting the requirement to make websites accessible, set out in The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 ("the accessibility regulations").

However, our work covers a huge array of local services which encompass a large and broad range of information and online activity. We have a vast, complex collection of websites and tools, many of which we procure from other organisations and third parties, and have limited resources to check them all for accessibility issues.

Our approach to carrying out accessibility checks

We've decided to use a combination of methods, as set out in the GOV.UK guidance on deciding how to check your websites and in compliance with the accessibility regulations.

Detailed checks

We're doing a detailed accessibility checks for:

- the main Clackmannanshire Council website (clacks.govuk)

This is our 'main website'.

The process for doing a detailed check will include:

- Manual testing based on GOV.UK's guidance on doing a detailed accessibility check
- Automated testing using accessibility monitoring software.

We believe it is reasonable to carry out a detailed check for our main website, as this covers the most important web-based services provided Clackmannashire Council.

Our accessibility statement for clacks.gov.uk covers problems we found for our main website, our plans to fix them and any issues it would be a disproportionate burden to fix at this time.

Basic checks

We will also carry out basic accessibility checks on Clacksmannanshire Council's websites that are independent of our main website.

These basic checks will be carried out by the team responsible for the website, based on:

- GOV.UK's guidance on doing a basic check

- our own internally produced guidance

We will check samples of content, which may include:

- their 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 website has them
- PDFs and other document types they publish
- navigation pages, including their sitemap and pages with search functionality

Disproportionate burden assessment

We believe that our approach to carrying out accessibility checks is reasonable but means that we will not do detailed accessibility checks on all of our websites. This might mean accessibility issues on some of websites are not fixed.

However, the accessibility regulations say that we do not need to make a website accessible if doing so would impose a disproportionate burden on us. We believe that carrying out more detailed checks and fixing documents, beyond what is set out above, would be a disproportionate burden.

You can read why we consider this to be a disproportionate burden.

Checking websites

Our most important content and transactions are provided on our main websites. We're doing detailed checks of these.

However, we do not believe the benefit of paying an auditor for detailed checks of our other websites would justify the impact on us except where those sites are specifically aimed at people with a disability.

Checking documents

We've also assessed that it would be a disproportionate burden to fix all documents published on these websites since 23 September 2018.

The majority of these documents are rarely viewed; therefore they are unlikely to be negatively impacting users with disabilities or impairments. For this reason, we don't believe the cost of time, effort and resource to fix all the documents is justified.

We will focus on fixing the most-viewed documents on these sites (top 5%), and ensuring that new documents are accessible where they are required for essential services or specifically address the needs of, or are meant for, persons with disabilities.

Types of website and documents

Websites
Clackmannanshire Council has a number of websites and services independent of its main website.

These websites vary in purpose, size and content. Some are hosted by us; others are hosted and maintained by external suppliers, and managed by an individual council service, programme or directorate.

Most of our independent sites are relatively small in scale, usage and complexity, and do not provide essential services or specifically address the needs of, or are meant for, persons with disabilities.

Examples of these sites include:

- GOSS Online Forms and Self Service
- Library Catalogue
- ePlanning and eDelivery portal

Documents
As of 2 September 2020, there were 416 documents on our main website published since 23 September 2018 (within scope of the accessibility regulations), however if you consider our entire web estate there would be around 2300 historic documents created by the organisation.

Focusing on fixing the top 5% most viewed documents on our main websites is equivalent to about 20 documents.

Estimated costs

Paying for detailed audits
We have estimated the costs for an external expert to do a detailed check (and later re-audit) on our full collection of websites.

On the basis of these assumptions, we estimate the cost to our organisation overall for detailed audits for all of our websites and services would be between £30,000 and £70,000.

These costs are based on estimates from GOV.UK's guidance on deciding how to check your website and getting an accessibility audit. These include:

- a third-party day rate of £1,300
- about 1 to 3 days to audit a small website
- about 5 to 20 days to audit a large website

Cost of fixing documents
It's difficult to know how long it would take to make every document accessible without first reviewing each one.

Potentially each document would require several hours of work to be recreated in a fully accessible version. (Estimated based on extensive experience of converting documents at between 2 and 30 hours per document, depending on length and complexity, plus any required sign-off, or subject matter expert involvement)

However, if we use a conservative estimate of three hours to review and fix each document within scope, fixing all 416 would take 178 working days (based on a 7 hour working day at Clackmannanshire Council).

Assessment of costs and benefits
We believe that:

- The size, resources and nature of our organisation mean that there are limited public resources available which must be managed appropriately and in the public interest to prioritise the delivery of essential services to the public
- The costs of paying for detailed checks for all our websites and fixing all of the documents on our main websites would be a substantial burden on us and the public resources we manage
- The benefit to users would be limited and their needs can be met in other ways
- Therefore, doing detailed checks on all of our websites and fixing all documents on our main website would impose a disproportionate burden on us.

In reaching this decision, we have considered the following:

Our organisation's size, resources, and nature
Clackmanananshire Council has a very small amount of dedicated Web Development and Content resource.

At the time of writing we have the following personnel, both equivalent to 1 FTE:

- 1 x Web Manager
- 1 x Content Coordinator (Non technical)

During 2020 / 2021 we have also been forced to re-prioritise resources owing to the coronavirus (COVID-19) pandemic, ensuring business continuity of essential services and focusing mainly on our COVID-19 response.

Additionally we have a wide variety if BAU tasks as well delivering projects and maintaining the existing website and functionality The Content Coordinator also manages certain aspects of communications and social media.

The estimated costs and benefits for our organisation: accessibility checks

We believe the potential of paying the substantial costs set out above on audits (before we've actually fixed anything) is unreasonable and not a good use of valuable public resources. It could also have an impact of the delivery of the services themselves that the websites relate to.

Many of the teams that maintain sites independent of our main websites provide valuable support to public services such as education, housing, social care and community support.

We believe that:

- maintaining these essential public services should be prioritised over paying for audits of our websites
- it would be reasonable for our services to carry out basic checks of their independent websites, and use any available budget to fix the main issues found on their sites

Our team will be assisted in their basic checks by:

- automated accessibility monitoring software
- guidance from the

The estimated costs and benefits for our organisation: fixing documents

The vast majority of this work would have little to no benefit to users with disabilities due to the low usage of the majority of online documents.

The estimated benefits to users
Our users with disabilities will benefit from us making our websites and online documents accessible.

For our main websites, we already undertaking detailed accessibility checks, fixing the most accessed documents, and ensuring that new documents are accessible where they are required for essential services or specifically address the needs of, or are meant for, persons with disabilities. This focuses our accessibility improvements where they will provide the most benefits to people with disabilities.

However, for the majority of our websites, we do not believe that the limited additional improvements that could be gained from detailed checks or more document fixes would justify the substantial costs of doing so.

How to request content in an accessible format
If you need information in a different format contact us and tell us:

- the web address (URL) of the content
- your name and email address

- the format you need, for example, audio CD, braille, BSL or large print, accessible PDF

We'll consider your request and get back to you as soon as possible.