telling your accessibility story

Creating Compliant + User-Focused Accessibility Statements

Huw Alexander | textBOX
describe things for a living

create accessibility services

@textboxdigital
overview

1. What is an accessibility statement anyway?
2. The Public Sector Bodies Accessibility Regulations
3. Accessibility statement survey 2020
4. Writing a useful statement
5. Third party content
6. The mysteries of disproportionate burden
7. Securing senior management support
8. Useful tools + services
What is an accessibility statement?
An accessibility statement will make clear the level of accessibility across the site or app. Where there are barriers, the statement will inform users of alternative routes to access. The statement will also enable users to contact the website owner if they identify issues.

Government Digital Services
A legal requirement
A tick box exercise
A time consuming chore
A window on your institution
An opportunity to tell your story
A user reference + support guide
Section 2

Public Sector Bodies Accessibility Regulations

23 September 2020
Sample accessibility statement (for a fictional public sector website)

It contains sample wording and guidance on what to include in your statement.

GDS

• Accessibility statement for [website name]
• How accessible this website is
• Feedback and contact information
• Reporting accessibility problems with this website
• Enforcement procedure
• Contacting us by phone or visiting us in person
• Technical information about this website’s accessibility
• Compliance status
• Non-accessible content
• Non-compliance with the accessibility regulations
• Disproportionate burden
• Content that’s not within the scope of the accessibility regulations
• What we’re doing to improve accessibility
• Preparation of this accessibility statement
Some of the wording is legally required
missing information

- Which website?
- Preparation + update date
- Contact information
Non-compliance with the accessibility regulations

Some images do not have a text alternative, so people using a screen reader cannot access the information. This fails WCAG 2.1 success criterion 1.1.1 (non-text content). We plan to add text alternatives for all images by September 2020. When we publish new content, we’ll make sure our use of images meets accessibility standards.
language

https://www.coleggwent.ac.uk/accessibility
https://www.coleggwent.ac.uk/cy/accessibility
Preparation of this accessibility statement

[Note: the wording about when the statement was prepared is legally required, so do not change it.]

This statement was prepared on [date when it was first published]. It was last reviewed on [date when it was last reviewed].

This website was last tested on [date]. The test was carried out by [add name of organisation that carried out test, or indicate that you did your own testing].

We used this approach to deciding on a sample of pages to test [add link to explanation of how you decided which pages to test].

You can read the full accessibility test report [add link to report].
http://www.leeds.ac.uk/info/5000/about/239/accessibility/3

https://www.swansea.ac.uk/the-university/accessibility/swansea-ac-uk/accessibility-testing/
living document
Section 3

Accessibility Statement survey 2020

textboxdigital.com/aspire-education-survey
How ready is your institution for the launch of the new Public Sector Bodies Accessibility Regulations on 23 September?
How confident are you that your accessibility statement(s) is compliant with the Government Digital Services accessibility statement requirements?

Average score 6.57
How confident are you that your accessibility statement is genuinely useful to disabled students?

Average score 5.33
COMPLIANCE
6.57
A lack of confidence in the compliance of the institutional accessibility statement

USEFULNESS
5.33
A sense of doubt in the usefulness of the institutional accessibility statement
College

- Statement Available: 278, 68%
- No Statement: 131, 32%

University

- Statement Available: 152, 97%
- No Statement: 5, 3%
ASPIRE

COMPLIANCE

USEFULNESS
Section 4

Writing Useful Statements
What is current priority in meeting the new regulations?

- Writing the accessibility statement: 36%
- Auditing the website to identify issues: 24%
- Remediating Existing Content: 24%
- Raising staff awareness: 4%
- Replacing a particularly old + inaccessible system: 2%
- Stem the flow of inaccessible content: 2%
- Third party + satellite systems: 2%
- Training staff + students: 2%
- Video + audio: 2%
- Gaining governance institution-wide: 2%
How not to write a user-focused statement
The GDS Sample

We want as many people as possible to be able to use this website. For example, that means you should be able to:

• change colours, contrast levels and fonts
• zoom in up to 300% without the text spilling off the screen
• navigate most of the website using just a keyboard
• navigate most of the website using speech recognition software
• listen to most of the website using a screen reader (including the most recent versions of JAWS, NVDA and VoiceOver)

most of this sandwich is edible
making a statement

- Ensure the statement is discoverable
- Use plain language
- Be specific + relevant
- Well-structured (headings)
- Ensure you include the legally required language
- Take care with claiming disproportionate burden
- Tell your story and what you have done
- Be user-focused
the FACTS model

Formative: it makes users smarter at exploiting accessible content.

Actionable: it makes users resilient, helping them deal with inaccessible content.

Compliant: it keeps the organisation safe by covering the legal requirements.

Transparent: it keeps disabled users on board by being honest and accountable.

Supportive: it makes users confident by clarifying support options.
Formative:

**Good example:** "We have used heading styles to create an easily navigable hierarchical structure to all our text content. This allows blind users with screen readers to navigate pages very efficiently. Browser plug-ins such as Headings map for Chrome/Firefox allows sighted users to instantly navigate to the relevant part of the page."

**Poor example:** "Pages are structured using heading styles”

Actionable:

**Good example:** "The online forms for requesting a prospectus and applying for halls of residence are not accessible to screen readers. Alternative contact details are provided on those pages.”

**Poor example:** “Not all the forms on our website work with screen readers.”

Compliant: The accessibility statement covers all legal requirements on GDS sample statement.
Transparent: 

**Good example:** "The 3D virtual reality tours have no audio options for blind users. The suppliers quote £8,000 - £10,000 to make each tour accessible. This would benefit less than 4 students in a typical year. We believe this is a disproportionate burden. Blind students can already access 1:1 orientation training. We plan to keep using the 3D virtual tour which benefits around 200 students with anxiety and mobility issues."

**Poor example:** “We have several interactivities on the site. Fixing these would be a disproportionate burden.”

Supportive: 

Contact information, response times and processes are explicit and supportive. Self-help resources are available where appropriate.

**Good example:** “Contact us through the email address or dedicated phone number below. We will endeavour to get back in touch with you in 2 working days. If the request will take longer than that, we will contact you to discuss options and alternatives. We can provide accessible alternatives in digital format much more quickly than physical formats such as large print or Braille.”

**Poor example:** "If you have a problem email reception@university.ac.uk.”
ASPIRE education review process

Once you submit your accessibility statement to us we will assess your statement against our FACTS model: Formative, Actionable, Compliant, Transparent + Supportive.

Once you submit your accessibility statement to us we will assess your statement for compliance with the Public Sector Bodies legislation.
Welcome to the ASPIRElist for education. The ASPIRElist contains the rankings of all ASPIREverified universities + colleges. How do you fare against other institutions?

Click on a row to explore a detailed dataset for each institution. Examples are provided below.

<table>
<thead>
<tr>
<th>Rank</th>
<th>Institution</th>
<th>Formative &amp; Actionable</th>
<th>Compliance</th>
<th>Transparency</th>
<th>Supportive</th>
<th>ASPIRE score (%)</th>
<th>Verified</th>
<th>Audit Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>AllAble Institute of Enlightenment</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>GOLD</td>
<td>12/08/2020</td>
</tr>
<tr>
<td>2</td>
<td>Xavier's School for Gifted Youngsters</td>
<td>89</td>
<td>96</td>
<td>64</td>
<td>50</td>
<td>87</td>
<td>GOLD</td>
<td>30/07/2020</td>
</tr>
</tbody>
</table>
free guidelines or bespoke support

To learn more about the FACTS model + making your accessibility statement a more user-focused experience, please visit our guidelines pages.

Writing a compliant + useful accessibility statement is a challenge. To help you navigate the process we’ve teamed up with our friends at McNaught Consultancy + All Able to provide you with expert ASPIRE consultancy services.

They will be happy to guide you through the writing process + ensure your statement achieves an excellent ASPIREscore. Learn more about McNaught Consultancy + All Able at the ASPIREcommunity link below.

https://www.textboxdigital.com/aspire-education-guidelines
Education and Training foundation Accessibility Statement
Section 5

Third Party Content
What are the most challenging aspects about writing an accessibility statement?

- Addressing third party content
- Assessing and justifying disproportionate burden
- Identifying non-compliant content
- Making the statement user-focused and meaningful
- Writing in plain English about technical matters
- Identifying exceptions
- Colleagues holding different meanings of the term 'compliant'
- Getting teams responsible to write them
- Identifying scope
- Lack of ownership/responsibility in institution
- Pulling it together to cover multiple component platforms in a large web presence
- Producing evidence of testing
What is your current priority in meeting the new regulations?

- Writing the accessibility statement: 36%
- Auditing the website to identify issues: 24%
- Remediating existing content: 24%
- Raising staff awareness: 4%
- Replacing a particularly old & inaccessible system: 2%
- Stem the flow of inaccessible content: 2%
- Third party + satellite systems: 2%
- Training staff + students: 2%
- Video + audio: 2%
- Gaining governance institution-wide: 2%
close encounters of the third party kind

Addressing Third Party Content is a barrier (23%)

Third Party Content is a Priority (2%)
2) These Regulations do not apply to the following content of a website and mobile application of a public sector body—
(e) third-party content that is neither funded nor developed by, nor under the control of, the public sector body.

Public Sector Bodies Accessibility Regulations
managing the ecosystem
- 6000+ organizations
- Contact information
- Statement links
- Favourites feature

https://www.textboxdigital.com/searchboxhome
• 6000+ organizations
• Contact information
• Statement links
• Embed in statement

https://www.textboxdigital.com/searchbox-finder
Third-party content

We know that some of the third-party content included in our websites and applications is not accessible.

The accessibility regulations do not apply to third-party content that is not funded, developed, or controlled by the University, and many of these sites have their own accessibility statements. The searchBOX finder tool allows users to search for third-party accessibility statements.

We will work with our suppliers to make sure they know about any accessibility issues we find.

Third-party content

We use third-party services and content across our website. This includes things like forms, timetables, calendars, social media feeds and more. We often do not have control over the accessibility of these, but are working with vendors and reviewing our procurement processes to make sure that as many people as possible can use these services.

We support the searchBOX project, which provides a database of accessibility information about third-party vendors across the public sector. You can search for third-party accessibility statements using the free searchBOX finder tool.
<table>
<thead>
<tr>
<th>Imprint/Platform/Product</th>
<th>Owner</th>
<th>Country</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abingdon and Witney College</td>
<td>Abingdon and Witney College</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Accrington and Rossdale College</td>
<td>Nelson and Colne College Group</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Activate Learning</td>
<td>Activate Learning</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Ada, National College for Digital Skills</td>
<td>Ada, National College for Digital Skills</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Alton College (HSDC)</td>
<td>Havant, South Downs and Alton Colleges</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Aquinas College</td>
<td>Aquinas College</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Ashbourne Independent Sixth Form College Kensington</td>
<td>Ashbourne Independent Sixth Form College Kensington</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Ashton Sixth Form College</td>
<td>Ashton Sixth Form College</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Askham Bryan College</td>
<td>Askham Bryan College</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>Ayrshire College</td>
<td>Ayrshire College</td>
<td>UK</td>
<td>College</td>
</tr>
<tr>
<td>BMet</td>
<td>Birmingham Metropolitan College</td>
<td>UK</td>
<td>College</td>
</tr>
</tbody>
</table>
searchBOXhost

- searchBOX favourites integration
- vendor list + statement links
- branded page (logo + URL)
- bespoke marketing copy
- contact information + links
DIRECTORY

the most comprehensive source of accessible content + contact information

FINDER

third-party search functionality for your accessibility statement

EXCHANGE

sign up for searchBOX + ASPIRE updates, lunchBOX interviews, new feature requests, multiple vendor uploads

REACH

found a vendor without a statement? let us know + we’ll encourage them to tell their accessibility story

HOST

all your searchBOX favourites hosted on a bespoke, branded page to solve your third-party statement issues

FREE

FREE

FREE

FREE

FREE

FEE
procurement tactics

• Require accessibility statement from your suppliers as part of your procurement process + contract
• A vendor accessibility statement:
  o mitigates your risk
  o provides a better service to your users
  o saves you time + resources
  o ensures the statement is designed by the creator of the product.
Section 6

disproportionate burden + exceptions
Non-compliant content

- List accessibility issues
- Map to WCAG criteria
- Outline plans to address the issue
Exceptions to the rule

(2) These Regulations do not apply to the following content:

a) office file formats published before 23rd September 2018, unless such content is needed for active administrative processes.
b) pre-recorded time-based media published before 23rd September 2020.
c) live time-based media.
d) online maps and mapping services, as long as essential information is provided in an accessible digital manner for maps intended for navigational use.
e) third-party content that is neither funded nor developed by, nor under the control of, the public sector body.
f) reproductions of items in heritage collections that cannot be made fully accessible.
Disproportionate Burden

- does not require a public sector body to comply with the accessibility requirement if doing so would impose a disproportionate burden on the public sector body.
- must perform an assessment of the extent to which compliance with the accessibility requirement imposes a disproportionate burden.
- the size, resources and nature of the public sector body.
- estimated costs and benefits for the public sector body in relation to the estimated benefits for persons with disabilities.
- explain in its accessibility statement the parts of the accessibility requirement that could not be complied with.
- where appropriate, provide accessible alternatives.

failure to comply


Organisations that do not meet the accessibility requirement or fail to provide a satisfactory response to a request to produce information in an accessible format, will be failing to make reasonable adjustments. This means they will be in breach of the Equality Act 2010 and the Disability Discrimination Act 1995. The EHRC and ECNI can therefore use their legal powers against offending organisations, including investigations, unlawful act notices and court action.

https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps#history/
Section 7

Senior Management
What are the biggest barriers to implementing accessible practices at your institution?

- Time: 18%
- Staffing: 18%
- Management Buy-in: 18%
- Expertise: 16%
- Budgetary Concerns: 12%
- Lack of clear guidance: 6%
• There is no silver bullet because there is no single cause of an inaccessible digital experience.

• Accessibility will only become the norm when it is part of policy and practice.

• “There are 3 layers within the organisation to consider.” Alistair McNaught
Foundations

Policy layer

- Accessible procurement
- Policies & quality assurance processes
- Recruitment and job descriptions
- Training and guidance
Basement

Technology layer

Accessible platforms
Accessible templates
Accessible resources / activities

Policy layer

Accessible procurement
Policies & Quality assurance processes
Recruitment and job descriptions
Training and guidance
Living Area

People layer

Technology layer

Policy layer

Digitally confident staff
Digitally confident students
Accessible templates
Accessible platforms
Accessible resources / activities
Accessible procurement
Policies & Quality assurance processes
Recruitment and job descriptions
Training and guidance
3 minutes from risk
• One college, one click (SiteImprove), many issues.
• Repeat (Wave, Lighthouse)
• Compare with accessibility statement.
• Contact solicitor.
• Evidence (para 12 (a), (b))

'A “failure to make a reasonable adjustment” in this regulation means a failure to make a reasonable adjustment for the purposes of— (a) sections 20, 21 and 29 of the Equality Act 2010; or (b) sections 19 to 21 and 21B to 21E of the Disability Discrimination Act 1995.'
devolved responsibilities

AUTHOR’S RESPONSIBILITY
• Page titles
• Meaningful hyperlink text
• Text alternatives for images (where needed) or mark decorative for eye-candy.
• Heading structure for pages
• Transcripts for video or captions
• Colour contrast
• Captions for video
• Scene description for video

DEVELOPER/SYSTEM RESPONSIBILITY
• Tab order
• Reflow and magnification
• Skip links for keyboard users
• Keyboard accessibility for menus, video controls etc.
• Heading structure
• Screenreader accessible forms and interactivities.
• Screenreader error trapping.

SENIOR MANAGER RESPONSIBILITY
• Vision
• Coherence
• Risk assessment
• Empowering
• Facilitating
• Policy integration
• Job descriptions
• Quality assurance and reporting
Section 8

Tools + Remediation
a little help from your friends
advice

JISC COMMUNITY
ABILITYNET
GDS
LEXDIS ARCHIVES
W3C

help

ASPIRE RESOURCES
Accessibility Regulations

What you need to know

Jisc

https://www.jisc.ac.uk/guides/accessibility-regulations-what-you-need-to-know
Auditing websites
support options

- DIY tools
  - GDS basic checklist
  - McNaught/James checklist template
  - LexDis accessibility toolkits.
  - University of Southampton Web2Access tests
  - Guidance on auditing a website

- Professional audit – short form
  - AbilityNet FE/HE digital accessibility bundle
  - All Able

- Professional audit – long form
  - AbilityNet (and others) deep audit
Web2Access Checker

Results for https://web2access.org/reviews/new

Non compliance with the accessibility regulations

- accessibility problems
- which of the WCAG 2.1 AA success criteria the problem falls on
- when you plan to fix the problem

Do not include any problems where you're claiming disproportionate burden, or where the problems regulations (those should go in the subsections below).

There exists a failure for WCAG 2.1 success criterion 1.1.1 - Non text content.
We plan to [resolution to above issue] by September 2020. We will make sure that we meet the accessibility Non text content.

There exists a failure for WCAG 2.1 success criterion 2.5.3 - Label In name.
We plan to [resolution to above issue] by September 2020. We will make sure that we meet the accessibility Label In name.

There exists a failure for WCAG 2.1 success criterion 1.3.1 - Info and relationships.
We plan to [resolution to above issue] by September 2020. We will make sure that we meet the accessibility Info and relationships.
Remediating existing content:

• **AbilityNet**: bespoke support with accessibility improvements and training.
• **codemantra**: support for bulk transformation of PDFs
• **Brickfield**: Support for Moodle accessibility enhancements
• **Blackboard ALLY**: accessible content creation for VLEs
• **Sensus Access**: VLE alternate media solution
statement writing

Consultancy services:

- ASPIREeducation + All Able writing support.
- ASPIREeducation self-assessment FACTS tool.
- ASPIREeducation review + scoring service.
- AbilityNet accessibility statement mapping service.
tell your accessibility story
questions

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aspire@textboxdigital.com
@ASPIRElist
textboxdigital.com
@textboxdigital