

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2424

Title: Accessibility auditing and specialist advice

Executive Summary:

The GLA must comply with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 ("the 2018 Regulations"), which came into force in September 2018, by 23 September 2020. The 2018 Regulations require public sector bodies to take steps to ensure their websites and mobile applications are accessible to users with disabilities.

The decision seeks approval to:

- conduct an audit of our websites and mobile apps to ensure compliance with the 2018 Regulations; and
- review existing practices and update them where appropriate in order to ensure that we remain compliant and ensure that our websites and mobile apps are as accessible as possible.

The work would be done by an agency specialising in web accessibility which would provide auditing, specialist technical advice, training and user testing.

Decision:

That the Assistant Director of External Relations approves:

Expenditure of up to £50,000 in the 2019-20 financial year to enter into a contract with an accessibility agency to provide expert advice and accessibility testing for the London.gov.uk digital estate, to ensure the GLA achieves compliance with the 2018 Regulations in line with the timeframes specified.

AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Emma Strain



Position: Assistant Director External Relations

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1. The 2018 Regulations – The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 – are there to ensure public sector websites are useable by all, including those with temporary or permanent disabilities. Websites published on or after 23 September 2018 have been required to comply with the Regulations since 23 September 2019. Any other public sector websites (such as the GLA's) have a further year, until 23 September 2020, to comply, and public sector mobile apps must be accessible by 23 June 2021.
- 1.2. Public sector bodies are required to publish an accessibility statement on compliance with the accessibility requirement and keep that statement under regular review. These requirements are already being built into the GLA's new proposals at commissioning stage and via testing during the development cycle.
- 1.3. London.gov.uk is a large and complex site and while it was originally built in 2014/15 to meet the accessibility guidelines at that time, the accessibility of all sites tends to diminish over time as content changes and new functionality and products are introduced – especially with involvement of multiple editors and suppliers.
- 1.4. Accessibility testing is a very specialised field – expert knowledge is required to understand the guidelines and recommend design solutions that will work, as well as for testing across different platforms and assistive technologies, such as screen readers and voice recognition software.
- 1.5. Commissioning an agency to carry out auditing and expert testing will help ensure that the GLA identifies any areas that need to change to achieve compliance with the Regulations and to meet the specified deadlines. In doing so we will improve user experience across our digital products, services and information for all Londoners; accessibility is good for all users.

2. Objectives and expected outcomes

- 2.1. The audit and expert review will provide a clear and detailed report with insights and data that can be actioned and built into our website development work programme to ensure the GLA is complying with the 2018 Regulations.
- 2.2. It will also support future capacity development. Partnering with an expert who can provide technical advice and training across content, design and development will help to develop the capacity, skills and knowledge within the GLA. This will ensure we maintain and continue to develop our digital products, so they are as inclusive as possible for all Londoners.

Workstream	Procurement approach	Estimated expenditure (£)
Accessibility audit	Open competitive tendering	50,000

3. Equality comments

- 3.1. This work supports the aims of the Mayor's Equality, Diversity and Inclusion Strategy, in actively reducing barriers to accessing digital services for people with accessibility needs and will ensure content from the GLA is as accessible as possible.

- 3.2. Under section 149 of the Equality Act 2010, as a public authority, the GLA (including the Mayor of London) is subject to a public-sector equality duty and must have 'due regard' to the need to (i) eliminate unlawful discrimination, harassment and victimisation; (ii) advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and (iii) foster good relations between people who share a relevant protected characteristic and those who do not. Protected characteristics are age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (all except the last being "relevant" protected characteristics).
- 3.3. This work will enhance the GLA's reputation as a provider of accessible services. The accessibility audit is a fundamental step to ensuring the GLA's websites cater for all users, including those that may have disabilities.

4. Other considerations

Key risks and issues

- 4.1. There are numerous risks associated with not following the suggestions outlined in this decision; Without the accessibility audit we will not know any areas where the GLA is non-compliant with the 2018 Regulations.
- 4.2. Without a review of the digital estate there is a risk that future websites will not properly serve the GLA or Londoners. Currently around half a million people visit our digital estate every month, viewing more than two million pages. The websites are a key engagement tool for the GLA, as well as being a growing provider of services and information. Our websites must be built on research to ensure they can fully support the GLA's priorities, the policies of the Mayor and the requirements of the London Assembly.

Links to Mayoral strategies and priorities

- 4.3. This decision supports Inclusive London, the Mayor's Equality, Diversity and Inclusion Strategy, by ensuring our digital information and services are as accessible as possible.

5. Financial comments

- 5.1 Approval is sought for expenditure of up to £50,000 to appoint an Accessibility Agency to provide advice and accessibility testing for the London.gov.uk digital estate.
- 5.2 The expenditure will be funded by the 2019-20 financial year Corporate Contingency.

6. Legal comments

- 6.1. As a public sector body, the GLA must comply with the 2018 Regulations¹.
- 6.2. The 2018 Regulations create an "accessibility requirement" for public sector bodies to make their websites and mobile applications "perceivable, operable, understandable and robust" for people with disabilities in particular. They build on existing obligations that public bodies have under the Equality Act 2010 which provides that all UK service providers must consider 'reasonable adjustments' for disabled people.

¹ <http://www.legislation.gov.uk/uksi/2018/952/introduction/made>

6.3. The Government Digital Service will monitor compliance with the 2018 Regulations and the Equality and Human Rights Commission will enforce the 2018 Regulations.

7. Planned delivery approach and next steps

7.1 Accessibility audit:

Activity	Timeline
Tender sent out	February 2020
Proposals received / decision communicated	February 2020
Audit start date	March 2020
Project closure – recommendations ready for implementation	April 2020

Appendices and supporting papers:

None

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 - Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form - NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Martin Chaney has drafted this report in accordance with GLA procedures and confirms the following:

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 10 February 2020.

ASSISTANT DIRECTOR OF FINANCE AND GOVERNANCE:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature



Date

10/2/20

