

# GREATER LONDON AUTHORITY

## REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2460

### Title: PDF Accessibility

#### Executive Summary:

The GLA must comply with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (“the 2018 Regulations”) which require public sector bodies to take steps to ensure their websites and mobile applications are accessible to users with disabilities. The 2018 Regulations came into force on 23 September 2018 and they provide that websites published before this date must comply by 23 September 2020.

We intend to update PDF documents published on the london.gov.uk website in order to comply with the 2018 Regulations and/or to improve access to information more generally in support of Inclusive London, the Mayor’s Equality, Diversity and Inclusion Strategy.

The decision seeks approval to commission expertise to update our most important published PDF documents to comply with the 2018 Regulations and to improve accessibility of our published communications more generally.

#### Decision:

That the Assistant Director of External Relations approves:

Expenditure of up to £25,000 in the 2020-21 financial year for external services to make our published PDF documents more accessible in order to comply with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 which supports the Mayor’s Strategy for Equality, Diversity and Inclusion more generally.

#### 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

**Signature:**



**Date:**

25 August 2020

## **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 2018 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. A central monitoring team at the Government Digital Service will assess a sample of public sector websites and apps. The sample will be chosen based on a number of factors, including: how many people risk being excluded and where there are known or suspected problems (for example, because there have been complaints). Assuring compliance with the regulations will, in part, fall within the existing enforcement powers of the [Equality Advisory & Support Service](#) and the [Equality and Human Rights Commission](#).
- 1.4. 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.
- 1.5. The GLA has already carried out the following activities to ensure compliance with the 2018 Regulations. ADD2424 was approved in February 2020 enabling an accessibility audit, accessibility statements and detailed guidance on any remedial work. Remedial work is being undertaken, working with policy teams and the Assembly Secretariat.
- 1.6. All new websites and digital products are being built to meet the 2018 Regulations and they have been since early 2019.
- 1.7. A new publications content type on London.gov.uk. (a web page type that can be used instead of a PDF) has been developed and will be used to enable content supporting the next London Plan.
- 1.8. A tool is being developed (in line with best practice) to appear on all pages with documents on them to explain that users may request an alternative version. This will be complete by the end of August 2020.
- 1.9. We are currently planning the re-development of London.gov.uk and many pages, digital products and services will be re-developed as part of this programme to make them more accessible.
- 1.10. One outstanding task is to make our published PDF documents accessible, in line with the 2018 Regulations. There are tens of thousands of PDFs on London.gov.uk, although the majority are rarely viewed. In 2019 pages on London.gov.uk were viewed around 28m times. The total number of views for our top PDFs combined, however, is less than 1% of the total pages viewed. Many of these PDFs were created after 23 September 2018 and more are added every day by policy teams.
- 1.11. Some of our most important PDFs are very large and complex and to make them more accessible requires specific skills, tools and expertise. Expert knowledge and technical skills are required to understand the guidelines and convert these PDFs to meet the 2018 Regulations.

- 1.12. Most of our PDFs are not complex and, with appropriate training, can be converted by website editors across the GLA. Guidance is being created to enable those creating or commissioning large, complex documents to comply with the 2018 Regulations. This, in conjunction with the new website features outlined above will help to ensure compliance.
- 1.13. It is not feasible to update all of our PDFs to make them accessible nor is it a legal requirement for us to do so in relation to PDFs which were published before 23 September 2018 or where making the changes would impose a disproportionate burden.
- 1.14. To comply with the 2018 Regulations we will update documents published on or after 23 September 2018 that meet one or more of the following criteria:
- downloaded more than 1,000 times in the last year;
  - Mayoral strategies;
  - governance documents which are required to interact with the GLA (e.g. to make a complaint or to consult); or
  - documents related to service provision where there is no alternative version.
- 1.15. To improve accessibility in general we will also update some documents published before 23 September 2018, where they are key strategy documents within the current administration.
- 1.16. We will not update documents published on or after 23 September 2018 where doing so would impose a “*disproportionate burden*” having regard to the size and resources available to the GLA and the costs and benefits for persons with disabilities taking into account the frequency and duration of use. Documents for consideration in this category include those that are:
- downloaded fewer than 1000 times in the last year;
  - documents that are no longer relevant or up to date;
  - where there is an alternative / web version of the content which is accessible;
  - where we expect to have an accessible web version by 23 September 2020; and
  - documents published by the Assembly Secretariat through the ModernGov platform (as these are being addressed separately).
- 1.17. The GLA’s justification for not updating certain documents and document categories will be fully explained in its accessibility statement.
- 1.18. Commissioning an agency to update PDFs as above will help ensure that the GLA achieves compliance with the 2018 Regulations by the specified deadlines. In doing so we will improve user experience across our digital products, services and information accessibility for all Londoners.

## **2. Objectives and expected outcomes**

- 2.1. All in-scope PDF documents will be converted to make them accessible to ensure the GLA is complying with the 2018 Regulations and enable more people to easily access our published information and support Inclusive London, the Mayor’s Equality, Diversity and Inclusion Strategy.

## **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 support the GLA's role in providing inclusive services. This is an important step to ensuring the GLA's websites and documents cater for all users, including those that may have disabilities.

#### **4. Other considerations**

Key risks and issues

- 4.1. The effort required to complete the work exceeds the budget. This is mitigated by detailed planning and asking for fixed priced quotations.
- 4.2. The complexity of some documents may increase the duration of the task. This is mitigated by prioritising the order in which documents are updated to minimise impact.

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 £25,000 to appoint an Accessibility Agency to update the in-scope PDFs to comply with the 2018 regulations.
- 5.2. This expenditure will be funded by the 2020/21 External Relations Digital Programmes budget.

#### **6. Legal comments**

- 6.1. As a public sector body, the GLA must comply with the 2018 Regulations.
- 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 duties that public bodies have under the Equality Act 2010 which include making "*reasonable adjustments*" for disabled people.
- 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 (see Para. 1.3).

#### **7. Planned delivery approach and next steps**

- 7.1 PDF updates:

<b>Activity</b>	<b>Timeline</b>
Tender sent out	August 2020
Proposals received / decision communicated	August 2020
Project start date	September 2020
Project closure	September 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 24 August 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**

25 August 2020