**Web Accessibility Regulations for UK HE and Public Sector - UPDATE**

Webinar: 4th July 2019

WEBINAR TRANSCRIPT

MARK: Hello, we can see you. Hi, Ben, hi, George. Hello everyone, I can see you are all joining, just a couple of technical glitches there to make sure we can see Ben and George's smiling face on the video. Welcome to this webinar. I am Mark Walker from AbilityNet, I am hosting the event. I have Natalie from AbilityNet, Abi, Ben and George from Kent County Council. I am going to introduce them in a moment, but hopefully you can see them on the video.

Before we get going I am going to make sure all the technology is working, so if you can see the chat box, could you tell me that you can hear me? Hopefully you know where the chat box is and yes you can. Thank you, a lot of people, brilliant. Can you also do the same thing in the question and answers, can you ask me a question to make sure that is working because the Q&A function on Zoom is great and we can see everyone's questions. That is a very important question, exactly. Chips, I think, Martin. It's very sunny in Brighton. It's really nice at the moment, I am having a good day, thank you. Are you there Sydney? I don't know. Thank you very much. So we seem to have some technology working I will see what we have in the way of attendees so far. We have got 86 attendees so far, we are excelling over 100 so we will give it a couple of minutes and get rolling.

If you have any questions about technology, accessibility, any concerns, please let us know. We will be recording this webinar and we will be, I am just checking it was recording when I said that we will be recording it and we will be sharing it afterwards. It is captioned on this live event, using a human being, not a robot, that is Jen, who is beavering away in the background, so these captions will be burnt into the video, if you are going to share it with somebody else and we will also have the slides available, I think they are on SlideShare at the moment, I believe they got put up this morning. So the slides are going through, if it's helpful for you are available on SlideShare and will be available afterwards with the relevant links you are going to see going through. So hopefully that helps you in terms of work, but also obviously if you need to share it with other people who may have different accessibility needs then that should cover most bases for you. We can also share a transcript for you at the end if that is helpful. So we just jumped over the 100 mark there, I think we are more or less ready to go. We are going to be, just to make sure you are in the right place we are going to be talking today about the new UK web accessibility regulations which apply to the public sector, including HE. We had a webinar at the beginning of May at which point some of this was news and this is an update on that session, because things are changing quite quickly. So the purpose of today is to round up some of the bear, basic information, but also to focus in on a couple of areas that are emerging as the most important and in particular accessibility statements and what is happening from the Government side and then also some good practice about accessibility statements. So, welcome to the webinar, I am going to get started, as say I am Mark Walker, I am from AbilityNet and I am the head of marketing. I have Abi and Natalie here, who are both accessibility consultants with George from Kent County Council and Ben from the University of Kent. We are going to be running through a few different things today we are going to be looking at an update on what is happening around this legislation, what is doing what, what is the Government doing? How those decisions are coming together because Abi is involved in some of that stuff, then Natalie is going to talk us through the basis of accessibility statements because we know that is a question a lot of people are asking and then George and Ben are going to talk through how they have built their accessibility statement and the work they are doing together on that, which is very interesting. There will be time for questions and answers at the end, but also I will be monitoring my role on here is probably mostly around hosting and monitoring, so, if you have questions and you want to pop them into the open question box it means other people can see them, so that is a great advantage of doing it that way, so you don't have to keep asking the same question. If you see something in there you want to get answered I will be doing my best to keep track of that, so use the questions and answer panel as we go along.

Great, the next thing I am going to do is start a poll. I have a couple of questions here, so we know a little bit about you, so hopefully the poll will be on your screen now, which will ask you two questions, one of them is how confident are you about meeting requirements and the other one is about how, which organisation, type of organisation you are from. So we are, interestingly we asked this question at the start of the previous session, which is two or three months ago now, so I am hoping that people are starting to lean more towards the more confident end. It may be that you have had long enough to work out that actually you are less confident than you were, I seem to remember it was fairly middling. I don't have the numbers in front of me, but, so most of you voted now and I can see that, actually interestingly, you are mostly in the top half, beyond starting work, have identified priority issues, one percent, one person would have audited the sites and confident they would meet all the requirement, but sadly 10% or 9% are saying no where to start. You can see the spread and hopefully that gives you the sense that you are not unusual and there is some light at the end of the tunnel hopefully. If I end that poll then I can share the results and you can see some of this now. So you can see that the most popular one is had a few meetings and starting to think about it. Sorry I saw someone put their hand up there. Your poll was missing an option for very concerned about it but unable to get senior management to show any interest whatsoever. I guess if I put that one in that would have been 100%. Very concerned about it, but unable to get senior management to show any interest whatsoever, what I am sure you are finding is there is a lot of technical requirements here that are being thrown up into the air, but equally it's the seriousness with which they are addressed because the resources will follow. I am sure that is where a lot of people are feeling unsure about how much they are going to be able to invest in solving these problems until senior management understand the seriousness of them. I would say that would be a common answer. So, I am just going to check which sectors you are from. This is another poll, so we can at least make sure we are aiming towards the right sort of content, how many of you are from universities or central Government or charities. We have, just to be clear we have typically been focussing on HE, we have a lot more experience in that area. There are organisations working around all of these year areas, business and charity, university, the university stuff does contain stuff in particular to university. A lot of the regulations will apply broadly to any of these sectors but we have been connected into the university sector for some time, so we are finding, we are tending to focus on that the most in terms was our own knowledge and expertise, but we are obviously interested in making sure we meet the needs of everyone here today and also that we understand the need as they change because they may apply differently in different sectors. So most people have answered and just to show you we are primarily today, most people are from the university sector, that is related to how we have advertised it. But we are definitely interested in other areas and if questions come up that are outside that we will do our best to answer that and we may decide we need to do something different in the future. Someone is asking about what we put on our statements. You will be pleased that is what we are can going to be covering today. Whether or not we have one or two or several and what the standards are in terms of that compliance. Someone from FE, but that is similar to HE as far as we understand it and not for profit would be charity in this instance, we haven't clearly identified that. Great. Okay, so let's crack on. I am going to introduce Natalie. Natalie is going to, sorry, Abi, Abi is going to talk to us about the position and the updates that have been going on around us, Abi you sit on a working group, sitting around the table with Government, can you tell us about that process.

ABI: So, actually our other speakers Ben and George are involved in that working group and Ben has been key in working trying to engage with Government digital services so there are about five or six of us who have tried to engage with Government digital services and other stakeholders like the Department of Education, office of students, universities UK etc and through that we try and collate information and ask questions, so in this update I just wanted to flag some new resources and some new information that may help people who are either just starting out on their journey, about the regulations or have some critical questions and present, as much as we know. So, since we did the webinar, just at the beginning of May, Government digital services did publish some more guidance, still not that in-depth, but they published, particularly a document called making your website and app accessible and in that they flagged up what they called a sample accessibility statement, so that is now available, because they legally had to provide that and I am sure George and Ben will go into in much more detail because that is what we are going to be talking about today. It also provided some high level technical requirements about what accessibility is. At the same time, late April, beginning of May we did have a meeting between some of us and a representative GDA and we have collated those in a Google Drive document and there is a link in the slides and I have put a link to the SlideShare version and we can flag them up in the chat Payne as well. That gives some discussion about disproportionate burden and a particular third party content which is critical for universities in that the Government has made it clear that if you are purchasing content or systems then it does fall under the regulations that a university or public sector organisation is responsible for that. Another document we have just published, literally on Tuesday and we talked about it yesterday on a different session, is we have been trying to look at the timelines and deadlines for things like documents, intranet, want, it is very complicated in the regulations, so there is an article on the Lexus website which is advice about digital accessibility that you can go to and also there is, at the bottom of that article, is a link to a set of slides which Alastair McNaught has put together with some nice diagrams and some tables with actual timelines and deadlines to work out when you publish the document when does it have to come under the regulations, etc. So, those are some things that are still in the pipeline.

In terms of engagement with Government digital services, it's become more difficult, they have lost a couple of staff that were working on the regulations, we were also due to meet the minister which was great, except it got postponed, so many of the questions people are asking, they are on the list to get further advice from GDS, but unfortunately a lot of the time when we ask for guidance they say "*individual organisations have to go back to their legal advisors."* We don't think that is practical, we think that GDS should be telling us exactly who they are going to monitor and how they are going to monitor organisations and that is something we will continue to stress to them. Mark, if you can move on to the next slide.

MARK: Sorry, just answering a question there.

ABI: No problem. So, finally, another document to, they released, did set out their monitoring and enforcement process, did explain that monitoring would be done by Government Digital Services and that is their sample they have to legally take each year and it's also, it also sets out that the enforcement process will be through the equality and human rights organisation, however that process, we know, isn't fixed yet, that is internal discussions still going on between GDS and EHRC. But, within that document is a really clear statement, which is something GDS have put out, really in response to people raising questions and queries about the regulations, where they are not sure where they are covered by them and I think this is quite important for us to take back to senior managers and leaders within the university of FE sector as well. That says if you think something is exempt under the regulations.... but a clear stance that reasonable adjustments equals digital accessibility, so I think that is a really nice piece of text, if you need someone to get someone's attention, really. So, hopefully the links in those slides will help people to have some reading to do, after this session and I am sure there will be some questions we can answer later on as well. Thank you.

MARK: Brilliant, thank you, Abi. I want to pick up something in here, this is a good example of where some of the details are becoming clearer. There is a point in here in a couple of places about the difference between HE and FE. Is that specifically late out as a difference in the requirements or is it maybe more a case of that their content is different so therefore the response is going to be different?

ABI: In the regulations there isn't any difference, the only part of education that isn't exempt is schools and nurseries and even the part that has to be accessed by public still has to be accessible. We are having discussions on the Department of Education on that, as they feel they need to give the guidance to schools and colleges, so there may be something coming down from that route to inform leaders of their statutory requirements as such. I think the difference may be in the size of the college, the disproportionate burden then becomes more of a play, if you are not dealing with tens of thousands of students, you are dealing with thousands or smaller, then obviously disproportionate burden may be something that you can demonstrate, if you feel that it's not possible to do it. However, Ofsted are also aware of these regulations and they are starting to look at digital accessibility in their inspection framework as well. So, under the Equality Act and Children and Families Act responsibility. So although the FE sector sometimes feels like the piggy in the middle between HE and schools there is still clear reason they need to meet digital accessibility standards.

MARK: Thank you and I think that is helpful and hopefully anyone from the FE sector can see that the difference is not that you are not affected by it, it's just that maybe your response may be different. And someone is saying it's not about wanting to avoid it, it's obviously that there is a lot of strategic, topdown lobbying needed.

Someone has mentioned about the national and strategic bodies, you are not providing a situation where everyone is getting on and doing it, you are describing a situation where it's difficult to engage with the FE people and they keep changing. That is the point, that isn't deliberate, it's just the way things are.

ABI: Yes, very particularly and at the moment actually the HE sector is being seen as an example, leading in this field, that what these webinars and the work from this group and what we have been doing is seen as leading across other sectors as well. I think with FE it's particularly the engagement with Department of Education and as part of that strategy they have an assistive technology group that is just formed. Myself and Alastair McNaught sit on that and it is on the agenda for the next meeting about the regulations. So there is a definite awareness that FE does get overlooked and we are particularly interested to get FE more engaged with the issue.

MARK: Great, brilliant, thank you. So, it's a changeable picture, it's why we are doing the updates, there are stuff going on and in the last session there was a lot of questions about what the intentions were and the overall direction, some of that is clear, some of that is not clearer and hopefully it will become clear. In terms of our own updates we have introduced some training courses that we are running, starting at the end of the month, Abi is running two sessions in July and a pause for August and two more in September. These are paid for courses, they are not free, they will be smaller numbers and they are on hour‑and‑a‑half long. They are delivered online and you can go and book those, they are £90 each or you can get four for the price of three if you book all of them. We are trying to provide insights that will be valuable across your digital teams. They are not necessarily about these regulations, though they are clearly informed by them and in particular developing and maintaining an accessibility statement will be taken in the context of the requirements, but we are also conscious we want to help people raise their skills generally and that may not be you on this call, you might have joined because you are the accessibility lead and you want others in the team to know more, so we are hoping this programme can help fill some of those gaps. There is a booking form online and you can go in and do that, the first one is in two or three weeks' time. So that is on update from our side in terms of what we are providing. Moving on to accessibility statements. Natalie, if I can introduce you and if you can tell us a bit about the basics of accessibility statements and then we will go on and talk a to Ben and George about what they have done with their accessibility statement.

NATALIE: Sure, okay, hi, as you can see on this particular slide, legally and internationally there are many laws in different countries which help prevent against discrimination of people who are disabled. Essentially we want to create products that are inclusive for all.

So, the new regulations that came into force for the UK public sector on the 23rd of September 2018, is called, it's quite a mouthful, it's called The Public Sector Bodies (Websites and Mobile Applications) Regulations 2018. This aims to provide that the public sector websites and mobile apps will need to meet certain accessibility standards and are accessible to all users and especially those with disabilities. So, the public sector bodies include central government and local government organisations and some charities and other non‑government organisations. So a public sector body would need do two things essentially. You would need to meet the International WCAG 2.1 Accessibility Standard and you need to publish an accessibility statement that explains how accessible your website or app is. If we can go to the next slide, Mark. So I mentioned you need to publish an accessibility statement, so what is that? An accessibility statement is essentially a declaration on your website that defines it's level of web accessibility the website or app aims to achieve.

So, firstly the public sector bodies will need to assess whether the regulations apply and if so whether compliance would be a disproportionate burden. I do proportionate burden, Abi did mention it, it's what the 2018 regulations refer to when the impact of fully meeting the requirements is too much for an organisation to reasonably cope with. If, however, compliance is required, a review of existing and planned websites and apps should be carried out in line with the implementation timetable which I will be sharing in a few minutes and an accessibility statement should then be prepared and published where necessary. So, why do we need to do this, next slide, Mark. Well, it's law, non‑compliance could result in discrimination and reputational damage and it's a way to communicate to your users how you are currently supporting their needs.

So, if someone comes to your site you want them to easily see what you can do, what can't they do and what are you doing about it to improve it. So just some more information on it. What would you include in this? Well, Ben and George shortly will be going through it, their hands‑on approach, but in a nutshell, there are numerous bits of information you need to include. You need to state which part was your service are accessible, which are not and if not why and with the intention of what you are going to do to improve it and providing alternatives to content that is not accessible.

So, measures taken by your organisation to ensure accessibility, have an evaluation done on your site, how much do they comply, are there any exceptions or limitations, because sometimes, despite our best efforts, there are areas of the website that fall outside of the intended web accessibility targets, so we need to acknowledge these and say these are our limitations and this is what we are doing about them. You need to have some contact information to report any problems, technical prerequisites, so which browsers are currently supported, it's good to have various environments in which it was tested on and laws applicable to local laws and policies.

So, how many accessibility statements do you need and where would you find them well each public sector bodies will be different. You need to bring them into a coherent form and put it in one batch together, but also depending on how many sites or system you have, you might need numerous statements for each one. So, it is dependent. Where would you find it? You need to make it as easy to find as possible. Can you have numerous links to it from several prominent areas. For example your footer, the page or the help menu, but the main goal is you want to make it as easy to find as possible.

So, the 25 timelines were made. The new public sector bodies websites are published after September 2018 must conform to the accessibility standard by this September, 2019. This includes intranet and extranet, this means it's not only public websites but also in your digital estate that your staff might use. Existing public sector websites, so sites created before the 23rd of September 2018 must conform by September 2020 and if you are, if you are a public sector body publishes mobile apps you must comply by June 2021. Next up we have George Rhodes from Kent County Council and Ben Watson from the University of Kent who will tell you about their journey and their collaboration in creating their web accessibility statements and the process they used to develop the content.

MARK: Fantastic. George, Ben, I don't know who has control of the mouse, but we are going to give you control of the screen, so I am going to sort that out and jump over. So could you give us a bit of context in the sense of your respective roles in your organisation and how you came to be working on this together?

BEN: I am Ben Watson, the Accessible Information Officer Advisor at the University of Kent. We have been working on a project called the Opera Project which has preceded these regulations by a couple of years. We were working on making our learning and teaching materials more accessible. And around good inclusive design for seminar materials and lecture materials. So these regulations actually came along at just the right time for us to further that role really. George is actually a graduate of the university, so we already had good relationship with the university. And Kent County Council, through the partnership work that George was doing with the university had various links with the School of Computing around embedding accessibility awareness as a kind of transferrable graduate attribute within the School of Computing students. So that was the kind of initial involvement, but at the point that the regulations were a bit more firmed up and it was clear about what the responsibilities were, it became very clear to us that there was a great opportunity to not reinvent the wheel and to share resources and expertise, as two public sector organisations that had exactly the same commitment and requirements under these regulations to share the learning we had already done and the expertise we had already developed for the greater good. So, that is definitely the background to it, do you want to say about your role, George?

GEORGE: I am the Disability and Accessibility Compliance Lead for KCC currently. We already had some interaction going on with the University, trying to embed accessibility skills with the School of Computing, but it was nice when we discovered this, this shared group that we should be working with and started talking about what we can do. Particularly because the university and KCC had started approaching this from different perspectives. So Kent County Council, unsurprisingly as a council, started approaching this from a very compliance based viewpoint, very much about the letter of regulations, how we are going to do auditing and that side of things, where as the university was more focussed on the product for the end user and how it actually affects students and how we make sure our services are as best as possible for the end users. It was really beneficial to sort of be covering off the basis that each other had missed up to that point. So it was really valuable to find someone else who had been looking at this, but from a completely different perspective.

MARK: Before we dive in, someone mentioned about senior management buy‑in, how much of what you just said reflects the fact that that buy‑in was there in the first place, or how much does it reflect that you have been allowed to get on with this and everyone is happy that you have done it?

BEN: Good question.

GEORGE: Getting involved from senior managers is always an ongoing process. I would say both of us have had senior management see the value in what we are doing say low us to get on with it and where he had this relationship with the Council and University anyway, it's through well‑worn channels that everyone is used to. But it is still a constant challenging speaking to senior management and getting them to understand the scale we have to cover in the next, we are in July now, so 14 months, something like that for 2019, 2020, deadline, sorry.

BEN: I think it's been really helpful. George has attended, we have a local digital accessibility working group, it's a strategy group for how the university is going to meet the regulations. George being involved in this has not only given us this different perspective, but George has mentioned that Kent County Council were strong in areas that the university wasn't and hopefully we are able to pay the council back in a different way. I also think in terms of the senior management buy‑in, having the local council similarly reinforce the messages we are making to senior management has actually really worked in our favour. So it's not just Ben's team within the university that is nibbling away at people, it's very clearly an external force that the university needs to work with. I have to say that the senior management in the university have all been really good about this and it's something that the university really feels strongly about. So that has felt like we are pushing an open door, but there is obviously a lot of kind of culture change that needs to happen at every level, which is something we are currently working on.

MARK: Brilliant. Thank you, that is really interesting. I think that, as the story unfolds there is a few elements in there like your digital accessibility working group that others may be interested in knowing more about as well. Because that may be a reason why you have had some of those open doors to push through. Could you take us through where you are with your statement? You have a few slides, a few things here to run through on the internet and just tell us about what you have got in there and how you arrived at it.

GEORGE: Sure thing. We both published our accessibility statements at the same time, on the 5th of June. So they have been live for over a month now. I looked at the analytics, interestingly, yesterday and we are up to around 700 page views on it in the last month, which is really positive, I think. We haven't had any complaints back yet, we haven't had any sort of negative feedback about the statements at all, which has been really good, because I think one of the first questions that pops up when we were talking about doing this was if we start publishing where our known issues are and start committing to things on the accessibility statement then aren't people going to start swarm swarming us with challenges and questions and so far the first month, you know, touch wood, that is, that has not been the case. It's just been valuable information that is now up on the website and is being looked at.

So, we published our statements a month ago, we have done them for both the University of Kent's main website and KCC's main website, Kent.Gov. Obviously both of us have quite vast web estates across our organisation, so not all of the domains we own and support have accessibility statements yet, but we are in the process of rolling out and getting people to adopt to the ones we have finished. We have put one up, both of our websites, exactly the same, University of Kent one, with university language tweaks and KCC with the organisation specific tweaks for us as well.

MARK: That is what removes the captions, what you just did.

BEN: Sorry, Mark, if you control that, it would be useful to flash one of them up.

MARK: That is it. You go ahead and scroll down.

BEN: It's the maximising the screen. This is an example of how the University of Kent one is laid out. If you were to jump straight into the Kent County Council one, you will see in almost every way formatting the cosmetics of it, they are identical except for where the contact us bits lead and any sort of local variation, but the ultimate mat vision we have is we are going to try and work together in ways beyond the statement as well, so we have shared procurement guidance, so that if you are a supplier coming to Kent and you come to the university in the morning and you go to County Hall in the afternoon you are going to get the same set of questions and the same robust grilling about the accessibility of your platform or your resource. I think one of the really lovely things about the partnership is not only do we share resources and that means we can travel further with the resources we have, but I think it gives people, it certainly gives us locally a greater level of reassurance that we have an ability to check our thinking with another organisation that is similarly kind of minded to do the same things that we are doing.

So, it doesn't, I think there is an awful lot of fear factor around these regulations, possibly because there has not been an awful lot of guidance coming centrally, so it does feel like we are all finding our way, so finding a really helpful ally locally has been really helpful and that was one of the guiding lights for Abi and I when we were looking for setting up something like the Further Higher Education Digital Accessibility Working Group was that we wanted to create that voice so that people could ask those questions and get some general reassurance.

GEORGE: Locally that has expanded now. Although KCC and the University have been pushing on this, we are now starting to get a lot more involvement from all of our other districts and boroughs and parishes and things like that. We, I won't go on about the conference we have just held locally, because we are supposed to tab undertaking about accessibility statements but we are getting a lot more buy‑in from our local group as well which is fantastic.

So, yeah, let's, I think first let's have a look at GDS's sample statement, which will help us explain why and where we have done some things differently. I am hoping most people who have come on the webinar today have had a glance at GDS's accessibility statement. If not, the point I would give sorry, there we go. The sort of overview I would give of it is I see it as a selection of building blocks that you can use to make an accessibility statement, but I wouldn't necessarily say that the order in which they are is a viable accessibility statement for you to effectively copy and paste. I think they have got most of the start of good wording there, but I think there are a few bits that need adjustment and you need to be fairly well‑versed in the subject to be able to pick out where bits don't really make sense from their statement.

So, one of my first comments about their guidance is that throughout it, they don't take some of the opportunities that they could to point users in alternate paths where something isn't accessible. There is one particular part as well that I think really demonstrates that this is a building blocks thing where each paragraph, each little sentence can be used, but not necessarily in this exact order. Sorry, let me try and find it, I have clearly gone past it. The bit I am looking for, if anyone spots it before I do, give me a shout, but the bit I am looking for, the bit I was looking for is this, where it's saying, issues with technology, their thing here which you could take as a few building blocks, it says no skipped content on the main page, text doesn't reflow and not possible for users to alter text spacing.

These three issues are under issues with technology and at the end they have blocked we will assess the cost of fixing this, but it would be a disproportionate burden section at the end. I would never say to skip to content would fall under a disproportionate burden and also they don't then go into detail about how they have proved that or how you can ask to see some detail as to why it's a disproportionate burden.

So, I think the wording is good, but you need to know the orders to put it to make an accessibility statement, not only meet the tick boxes for the regulations, but also provide something useful to the end users, so that was one of the other areas that we really thought is where ours differs in focus from GDS one. GDS, one understandably seems to focus on what you need to say to meet the Regulatory requirements which is fine. Another area, I think, that is missing, in the GDS one and it was interesting that this was mentioned earlier on the webinar, was third party content. And a more in-depth view on that. Theirs is, I can't remember if they mention it at all, or they only mention it slightly, but it wasn't as in-depth, certainly as I think it should be.

BEN: I think the ethos of ours, I think the accessibility statement, obviously as George said should tick the right boxes in terms of what you have to do to meet the regulations but we saw it as more of an opportunity to help people get more from our site, you know, so we have tried to point people at tools that will improve their digital experience, whether or not they have a disability or not we think that is a good thing to be able to do. An awful lot of the tools that we point people at, it's a university curated list of we call them productivity tools but they include a lot of things that have been recommended in disabled students allowances and stuff like that, are now being used in Kent public libraries to support people who are trying to develop their IT confidence and digital literacy, so I think there is a lot of good opportunities, I don't think your accessibility statement has to just be seen as this core document around legal compliance, it's a really good chance to sing a kind of, sing about the broader opportunities to get more from your website and that is definitely the way, so we have actually ended up splitting it to create a user friendly plain English kind of version of the statement, which is the one we are primarily promoting to our wide range of users across the university and the local council, but then similarly we do have a technical version, which is where we fully outline how we meet the regulations.

MARK: Can we jump to that, I am conscious of the time as well. If we see the sample, because I think that the questions that will follow from, you are picking up a lot of it anyway.

GEORGE: One of the things I was going to mention is that there is some regulatory sense in us takes this approach as well, because one of the first things we looked at when Ben, Abi and others were looking at accessibility statements, these came out of it, was the EU Directives and Ajax Appendix, I think it was called. That was split into two sections, section one which is what you have to say for the regulations and section 2 which is optional which is provide more information that is valuable to the users. If anyone looks that up, that lends some weight as to why we changed this over. So to get back on track, because I know we are conscious of time, as Ben says ours is split into three main areas; what we have termed the Plain English Statement, which is our main statement, that is the one on the screen now, the KCC one. This was set for your everyday user who actually wants to complete tasks, wants to know how they can get on and in what ways we are committed to accessibility and how they can get the best out of our site.

So, we have a lot of content on navigation, listening to content, the productivity tools that Ben mentioned, using different device, alternate formats, Web Standards which is where we link off to our technical accessibility statement where we say a lot more and our auditing process. What we do about known issues which is where we split off to our third section which is the known issues list. Third party content, as you can see, ours on third party content is quite a hefty section of the accessibility statement, because the more we thought about it, the more different situations we thought would come up when it comes to third party content. Interestingly, for the toolkit we will shortly be releasing public with a lot of guidance in our public party else, we will have a lot of third party context guidance in almost a matrix that you could go through to work out whether you really are responsible for a particular scenario with third party content or not.

So, that is hopefully going to be something quite valuable. Video audio downloads and then we get into and this is the bit that does change if we are talking about contact us. How to get in touch with us, because from the conversations we have had, with Abi, with GDS, the escalation process to us and these conversations took place before GDS really announced their part of it, was they expect users to contact you and reasonably go through your internal complaints process first, before it would, it would get to the stage where it needs to be collated to GDS, as a monitoring body, to the EHRC as the enforcement body and then progressed in some ways. It's always a challenge and I think that is fairly sensible and that is why GDS has been more supportive than punitive so far, when talking to people about the regulations and that seems to be their plan going forward.

BEN: Because we have taken this, hopefully quite a positive approach to it, just at the top of the bit where it says contacting us and what happens next, we are keen to know about areas where we need to make improvements, but we are keen to know about things that are good and that we, because then we can build case studies those to say that people like this element of our web page. I am hoping that people are seeing this as something positive. As George mentioned, there was initially a concern if you put your statement out there what are you encouraging? But we are just encouraging, hopefully, a really positive interaction and a user centred experience of our web pages and it's actually really helpful for us to know when something isn't quite right because then then we get the opportunity to put it right. But it's also useful to know where people are having a good experience because then we can do more of those things and we wouldn't inadvertently switch one of those off.

MARK: I have a couple of questions coming in. I am going to try and finish by 2.00pm, so I think what I am seeing is how much breadth to this question, clearly there is a lot of things you are working on. There is a few things that are significant, rather than this element we do this and that, the collaboration you are working on illustrates two things:

One is it's good to work with someone else on it and the other is actually there is not that much difference between what you are doing in your two respective organisations. You may consider that the university and the council may end up with different statements but that doesn't appear to be what is turning out, so I think that is very interesting. Also we are going to provide links to all of this, so I am conscious with ten minutes left, I think we have to be careful we don't turn into like a long detailed examination of every element. It's showing that that is what someone has to do, that is the point of exercise. We have to go through this bit by bit, work out our answers. The other bit is interesting is you are taking an approach which is not the checklist one and it would appear to me that the guidance, as it stands at the moment, isn't quite up to scratch because you don't yet know, so you are being positive about that, using other signposts as well. I think that is important, looking at some of the questions that are coming in, they are saying do you think we should do this or that? I think the answer you are saying is think about who is best for the person using the site and the sort of positive messaging you are trying to do and do your best to achieve that.

Where you haven't done that, be clear that may need to be an alternative. I think that is an important answer, because there is a lot of unknowns about what the regulations are going to measure and what they are going to except of you. I have a couple of quick questions one said and we are fighting over the mice here, just so you know, so I can see it. Someone mentioned there is no graphics and icons on it, have you done a text‑based approach that. Did you consider other ways of communication within the statement?

GEORGE: When we were thinking about it, there never occurred a time when we needed pictures or anything like that. Certainly you could make some of this more visually appealing, but, yes, there was just never a time we thought.

MARK: Would there be a case for using Makaton, or some other point where that the communications is the point, there may be people who want to use some sort of icon‑based language that they are familiar with. I am guessing that is part of the question, there is different ways of communication and you have used text. The question would be how you would do that text and where it fits into the needs of your users, rather than a complete reproduction of everything.

BEN: It's nice, even if people, I see this as an iterative thing, this isn't necessarily the statement we are always going to have, over time this will develop, based on more feedback we get, both from our members of staff in the organisation, web developers, but more importantly our users, so I think it would definitely evolve. This was our first opening account, but I think the idea is now that we have a framework and this has helped to generate further awareness‑raising within the organisation that people can see the kinds of things that an accessibility statement would contain and therefore the sorts of work that goes into improving that overall position, the accessibility maturity of your organisation. So I think it's a positive thing, I really do.

MARK: It's a journey, that is the other thing. So a particular question, what was the process behind testing. What sort of testing have you done to arrive at the results you have?

GEORGE: We thoroughly tried to test this with as many stakeholders a possible. Obviously this was developed ability, Jicsmail and Policyconnect. We had other experts look at this when we were building it, our statements were looked at by plain English experts and to help us get the wording more straightforward, they were looked at by our legal teams, so that we know they were happy with it from their understanding. It was looked at by our digital and web development teams.

MARK: Can I just check, I think it actually means did you test your website, not did you test your statement?

GEORGE: Okay, sorry.

MARK: Did your audit your website to arrive at the statement?

BEN: We have both had active auditing processes behind the scenes for exactly, to, the statement is as Natalie said, is only part of the journey, that you then also have to audit your site to understand what your known issues are and how you are going to address them. So we both are very active processes, again, wherever possible we are sharing the same methodologies of auditing our site, so they are both being audited pretty much in the same way. So, yes, that is actively going on and very much that is indirectly informing the ongoing evolution of the statement in that a lot of the outcomes that those audits are the things that are informing, or will inform the known issues section that George mentioned.

MARK: Do you do that internally or externally? Do you both use the same agency?

GEORGE: We audit internally. We found it, in our experience, to work quite well developing the skills inhouse.

MARK: Great.

BEN: And actually Kent County Council have helped us as a university. We use students, we are training students up to understand how to, the supervision but to understand how to do the auditing but with the ultimate goal that this is a graduate attribution that we would like them to have, about building accessibly into the work they do going forwards.

MARK: Fantastic, thank you, I am going to, I am going to see if we can stop at 2.00pm, so I think, Abi, have you a couple of bits you want to jump in on some of the details. I am keen to see if we can answer them after the call, if we can, particularly the ones trying to clarify what the dates are, because they are in the regulations.

ABI: The dates I have put a link into the chat pane to the article that was published yet about timelines. In terms of intranets, they only, they are exempt until the intranet is substantially updated and then they have to meet the regulations by 2020. September 2020. The unknown is what is the legal definition of substantially revised? We did get some advice from Marianne Deepwood who runs ALT, the Association of Learning Technologists for most intranets after a year there is so much content which has changed that that would be a timeline for intranet content to be revised.

From our expertise in doing accessibility audits again we would say after 1 months our audits would be out of date given how much websites do get updated. So, when you are thinking about am I actually looking at a new website you need to think about the content and the background coding behind the content. I think generally to be on the same side, even having an accessibility statement on your intranet is a good idea from as soon as possible, even if you are saying we haven't audited everything yet, we haven't checked everything for now, because it may be exempt until 2020. The Government, the responsibility for checking whether accessibility statements has undertaken is the responsibility photograph the cabinet office, as I understand they have naming and shaming powers to say there isn't an accessibility statement there and the Office of Students is aware of that as well and it might be a tool they would look at when looking at widening participation and access plans as well.

So, I think, in terms of the actual statement it's better to do it as early as possible and add to it as George and have said. Do I have time to answer another question?

MARK: No, I am afraid you don't.

ABI: We will have to do another webinar.

MARK: The next question I am going to ask in here is it useful to have the updates? I am very conscious that it's very difficult to answer questions because there is so much that is changing and so, I think we are doing the updates rather than, this is not a training session, this is actually just saying we know this at the moment, this is what we are working on and I think that is coming across in our session and the next one. I think the idea will be that we do more of these. Sorry I am struggling with my technology now. I just want to do one final question for the people attending. I can spot a spelling mistake in there.

How useful have you found the update session? We want to be careful that we don't dig so deep that you don't get anything from this. On the other hand, if these sort of format works for you in the future of course we could continue to host these. So, AbilityNet has an interest in the regulations being accessible, rather than the regulations being clear, we want to make sure that you are delivering accessible education to as many people as possible, we can help support that in a lot of ways. I will go back to the training, it's obvious that there is a lot of requirements inch this area that aren't clear, but it's equally important as George and Ben have said that you realise this is an ongoing need that you need to develop skills and training and resources inhouse. It was very interesting you have invested in doing your own inhouse testing because we advocate that as well. We think that you should be using either some of the freely available tools to do simple testing or investing in some of the paid for tools that mean that your team has the right tools at their disposal, that is what we do within our services, but equally you could be doing the same thing. That is why we think training is a big part of the answer.

So we are highlighting that, is there a lot of training that you have done and there is other training around that may or may not be relevant to particular parts of the picture. As you say I am trying to hurry along so we can say we finished on the hour. Thank you so much, Ben and George, I think you might be back, I think there might be more to see and learn. I am interested in the model on how you have collaborated. I think a lot of people will want to go away and find people to work with, separately to what you have produced. I think that was valuable to see that contribution.

Thank you, Natalie and thank you, Abi for keeping us up to date with the latest news that is going on. Everyone who is on call thank you so much for joining us. I hope you found it useful, as I say, everything will be recorded and we will be sharing useful links afterwards and you can find updates and other information around the internet, but if you aren't on our mailing list, join our mailing list because this is the kind of information that will be circulated through our emails. If I ended poll you can see if you thought it was useful you are in the 94% of people who have answered and if we have update sessions in the future it looked like then we should be doing more of these. I think our plan is to do them every couple of months. There is enough changing that we could come back in and update on what is happening and given the lack of clarity there is at the moment that might continue for some time, I suspect. So, thank you all very much for joining us, I hope you found it useful and we will see you on the next one in a couple of months’ time. Thank you.