CIVICA

Transforming the way you work

WCAG, Accessibility and Modern.Gov

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July 2019

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Name/Group:	**Business Unit (BU):**
Modern.Gov customers	Democracy and Engagement

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What exactly is WCAG?

The title of the actual regulations is The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. These mandate that nearly all public bodies must ensure that all of their websites and apps fulfil the Web Content Accessibility Guidelines (WCAG): Version 2.1 AA – an international accessibility standard to support everyone browsing the web.

What are the timescales for implementing it?

There are four key timescales involved:

- New Websites: 23 September 2019[1]

- Existing Websites: 23 September 2020

- New Apps (i.e., the Modern.Gov tablet apps): 23 June 2021

- Intranet / extranet websites[2] created on or before 22 September 2019: when the site next undergoes a substantial revision (any such website created on or after 23 September 2019 must be compliant when it launches)

What is the impact in relation to Modern.Gov?

There are several key areas that are impacted:

Website – The Branding

- The **look and feel** of a Modern.Gov website: this is fully within the control of your organisation and your IT / web team. Depending on the flavour of website branding your IT / web team has historically implemented, this can be updated either directly via your IT / web team, or via a new branding request to us. More on this in **Accessibility and your branding** below.

Website – The Structure

- The **technical structure** of the page: this is the Modern.Gov framework that the system uses to generate webpages dynamically. This is the area that Modern.Gov is working to improve in B1505 (see **What has Modern.Gov been doing?** below).

Website – The Data

- The **content**: this is what is populated in the back-end of the system (i.e., in Issue Manager). There are four types of data that can be displayed on the website / intranet / extranet:

  o Agenda / Minutes / Decision sheet content: These are the fields that are edited in Word from within Issue Manager, merged into Word templates and packed into PDFs.

  o Embedded media: These are links you add to Issue Manager to generate a media player on the website for that meeting.

  o Webpage Descriptions: These are the customisable header / footers on Modern.Gov webpages. Elements of HTML can be added to these by you, and they therefore might be impacted by WCAG.

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[1] This timescale also applies to existing websites if they are substantially revised between 23 September 2019 and 22 September 2020, i.e., if your website gets a makeover in that period, it needs to be fully compliant when it launches.
[2] Defined as 'a website only available for a closed group of people and not to the general public'.

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  ○ Everything else: This should compliant by default as it is typically just text.

Reports / Documents / Templates

▶ All attachments (Agendas / Minutes / Decision sheets / Reports / Attachments / Appendices / etc.) and the templates into which all the data is merged will need to be compliant.

Apps

▶ The branding and structure of the new Modern.Gov app were designed to be WCAG-compliant at launch.

▶ All content will be compliant if the reports, documents and any other attachments you have added to Issue Manager were compliant in the first place.

What's the impact on me and my team?

Accessibility and your data

There are multiple ways that your data enters our system: simple 'fields' in Issue Manager (such as Councillor name or agenda item title) do not pose an issue for accessibility as they are typically just text.

Any fields where you can enter data using Microsoft Word is an area where we encourage you to follow the same practices you would to create an accessible document.

Similarly, it is important to ensure that reports are produced with accessibility in mind prior to being attached to an item in Issue Manager. See **Reports and appendices** on the next page and

Templates on the following page for general guidance for you and your report writers.

Website data and content to check

▶ Agenda / Minutes / Decision sheet content and all templates / Embedded media: Given that most of these areas use Word, you can use Word's built-in accessibility checking tool (see Guidance and Support on the Modern.Gov Forum) to ensure that this content is compliant. In most typical reports, it will be tables, images and links that are likely to be affected.

  However, we'd also recommend checking all content which was copied and pasted from other documents.

  Please be aware that when merging, if using Heading styles, this can cause potential accessibility issues with regards to content structure. We would advise avoiding the use of Heading Styles where possible when creating agenda /minute / decision sheet content.

  Embedded media is not produced by Modern.Gov but we have included a list of mandatory and optional requirements under **What about embedded media?** below.

▶ **Webpage Descriptions**: We are aware that many customers change the headers / footers to customise the Modern.Gov site to their needs.

  Certain customised elements might get highlighted in accessibility scans, and these can be changed directly by your team to comply.

▶ **Everything else**: There's a small possibility that customisations (i.e., the use of custom fields) might be impacted; however, we do not expect this to be widespread.

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Reports and appendices

You will need to ensure that your report authors supply you with WCAG-compliant reports and appendices.

As mentioned on the previous page, you can use Word's built-in accessibility checking tool to ensure that the content of reports and appendices is compliant.

If your organisation uses Google Docs to produce its reports, please refer to Google's own guidance on how to make your document or presentation more accessible: https://support.google.com/docs/answer/6199477?hl=en&ref_topic=6039805

Google Docs does not currently support a built-in accessibility checker, although some third party browser extensions are available. Please contact your IT / web team for support and advice.

What are the broad principles I need to follow for producing accessible documents?

Here are some areas we would advise you focus on, based on our interpretation of the legislation (caveat: this is not legal advice), with a reference in parentheses to the specific section of the WCAG guidelines.

Things report authors need to do:

▶ Always add text alternatives to images, also known as alt-text (PDF1)

▶ Ensure that tabs have a sensible reading order (PDF3)

▶ Hide decorative items as artefacts (PDF4)

▶ If using forms, ensure they are suitably labelled, laid out, and have correct validation (PDF5, PDF10, PDF12, PDF15, PDF22, PDF23)

▶ Ensure that table headers repeat on each page (PDF6) and also that they don't have malformed columns (this is normally caused by splitting or merging content) (PDF20)

▶ Don't just scan documents: ensure they are correctly processed for Optical Character Recognition / Optical Character Reading (OCR) (PDF7)

▶ Ensure that abbreviations are spelt out in full; ideally this should be through linked abbreviations but this isn't a feature currently supported in Word (PDF8)

▶ Use correctly labelled header elements throughout the document (PDF9)

▶ Ensure that links in documents are actually links; and that they have alt-text if the link text is not clear as to where it will take you (PDF11 and PDF13)

▶ Make sensible design decisions about the data shown in headers and footers so that the documents are clear to navigate (PDF 14)

▶ Ensure that report writers add a clear document title in the document properties – not just a filename (PDF18)

▶ Use actual lists using properly-formatted bullets and numbering, not just things that look like lists by typing in symbols and numbers as you go along (PDF21)

▶ Ensure that a sensible language is set for the source document (PDF16)

What about images?

We discourage attaching images directly to an agenda item, as this will not be accessible in your merge document nor on your website.

If you need to include an image, insert it into a Word document, add the text alternative (alt-text), and attach the Word document to your agenda item.

Templates

The system uses Word templates (.dot) for its dynamic generation of Agenda / Minute / Decision sheet documents. If these are not compliant, the resultant Agenda Front Sheet, Printed Minutes, etc., and full meeting packs, might not be compliant either.

Changes to templates can be made directly by your team within the Word document; however, if new templates are required, please contact our Support Team for a quote.

We recommend that you run Word's built-in accessibility checking tool to ensure that all your templates are compliant.

Please note, the accessibility checker only works with newer templates created as .dotx files. Since templates can currently only be added in .dot format they will need to be saved out of Issue Manager in the newer .dotx format, then renamed back to .dot for re-addition to Issue Manager: doing this also avoids any potential security issues Word might find when merging, which can manifest itself by showing either a blank window after the merge process or a 'Cannot automate Microsoft Word at this time' message appears. (If you require any assistance with this process please contact our Support Team.)

What about legacy reports?

It's good news!

In the regulations there are various sections that apply to legacy reports:

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(2) These Regulations do not apply to the following content of a website and mobile application of a public sector body—

(a) office file formats published before 23rd September 2018, unless such content is needed for active administrative processes relating to the tasks performed by the public sector body;…

(h) content of websites and mobile applications qualifying as archives.

(3) In this regulation—

(a) "archives" means a website or mobile application which— (i) only contains content that is not needed for active administrative processes; and (ii) is not updated or edited after 23rd September 2019;…

(d) "office file formats" means a document in a format that is not intended primarily for use on the web and that is included in web pages, such as Adobe Portable Document Format, Microsoft Office documents or their open-source equivalents.

Therefore, it's clear that documents published before 23 September 2018 are defined as "archival": they are not part of active admin processes and (presumably!) not being updated or edited.

Only historical reports that are being included in a new meeting or attached as supporting / background documents would need to be made accessible.

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What about embedded media?

We provide customers with the facility to embed pre-recorded or live media on their Modern.Gov webpage. Embedded media should be WCAG-compliant at the time you add it to Issue Manager.

If you're embedding media, either pre-recorded or live, mandatory requirements are:

▶ Pre-recorded video and audio is available in alternative formats;

▶ Captions must be available for both pre-recorded and live video;

▶ Transcripts must be available for pre-recorded audio; and

▶ Audio descriptions are provided for pre-recorded media (even if an alternative format is available).

Optional requirements to provide greater accessibility are:

▶ Pre-recorded video includes a sign language option;

▶ Where an audio description is longer than the space allows, an extended audio description is made available and synchronised with the media; and

▶ All pre-recorded video and audio has an alternative available, with verbatim content.

For guidance on making your embedded media WCAG-compliant, please contact the supplier providing your livestreaming or recorded meetings. If you have an in-house solution, please discuss with your IT / web team to ensure that you are meeting your requirements.

Even without legacy reports, that seems like a lot of work for us to do…

Unfortunately, yes…it's not just a one-off exercise, it will very much have to be a culture change within your organisation as a whole. Your team, as the gate-keepers of reports published online, are likely to be the enforcers of this legislation with regards to meeting documents.

We recommend ensuring early engagement with your relevant internal senior management team, in conjunction with your IT / web team, to support compliance across your organisation.

The caveat you will always have to fall back on if you and your team are struggling, is 'reasonableness'. The regulation makes provision for information not being accessible if there is a 'disproportionate burden' on you; however, we're unable to define for you where that threshold might fall: please seek the advice of your legal team.

The government has produced guidance on that topic to help inform your organisation's decisions: https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps

What does my IT / web team need to do?

Accessibility and your branding

We encourage our customers to carry out a review of their website brandings to ensure compliance with the new legislation.

There are two types of branding used with Modern.Gov sites, **Reverse CMS** and **Static Branding**.

The type of branding you have will determine the course of action required to make amendments if necessary. In the first instance, you should check with your IT / web team who should know if they host a template for your Modern.Gov pages, and therefore whether you are using Reverse CMS.

Reverse CMS

Reverse CMS uses a 'template' hosted by your IT / web team to style the Modern.Gov pages. Changes made to the template will automatically appear in the Modern.Gov site.

This means that your IT / web team simply need to make the necessary changes to this template for accessibility improvements to appear on the Modern.Gov pages.

Static Branding

Static brandings are made by us to match your branding at the time the Modern.Gov pages were created; they are not updated in the way reverse CMS templates are, and as such are more likely to become out of date.

While Modern.Gov takes accessibility seriously, static brandings are bespoke to each customer and those that need adjustment will be charged-for work.

By default we would suggest re-branding, and would encourage customers to not only request this work soon, as we expect potentially high demand, but also to seriously consider moving to the Reverse CMS method as this gives you control over your branding templates in the future.

Reports / Documents / Templates

Automatically-generated Agendas / Minutes / Decision sheets and document packs that are produced by the Modern.Gov merge engine will pass through the content that is attached in Issue Manager.

There is an improved version of this process to ensure PDF compliance in B1506; however, full compliance requires that the underlying templates and attached documents were compliant when they were first added to Issue Manager.

Embedded Media

If your IT / web team has developed an in-house solution to broadcast meetings, either live or pre-recorded audio or video, they will need to ensure that it is WCAG-compliant.

If it isn't, an accessibility checker will flag up issues with some of your Modern.Gov webpages: any issues relating to non-compliance of embedded media will need to be addressed by your organisation.

My IT / web team have done a scan, and founds some issues. Is this normal?

The first step is to determine whether the issue is in your branding, your content (including embedded media) or our page structure.

If the issue is in your branding you will need to either correct it in your reverse CMS template or contact us to request a rebrand.

If you believe there is an issue with our page structure, please contact our Support Team; however, as changes have been made in B1505, we will require you to be upgraded to B1505 (or later) before we will investigate issues.

What has Modern.Gov been doing?

Modern.Gov has carried out an accessibility review of our public-facing webpages.

The majority of our pages were compliant for AA standard accessibility under WCAG; however, we have identified some improvements that could be made, and as such these have been implemented; there is one exception regarding the third-party jQuery-ui date picker, as detailed in **Non-accessible content** below.

These improvements are available to customers in B1505 and are available as a hotfix for customers who are on B1504. It is our preference that customers upgrade to B1505 as the hotfix for 1504 will not be made available until after a review of current customer versions closer to the statutory deadline of 23 September 2019.

Technical Overview

Accessibility for all our public pages was tested using the WAVE accessibility checker in Firefox, the Site Improve plugin for Chrome and ChromeVox screen reader, and a developer-led review of WCAG standards alongside the WAVE and Site Improve results to identify other improvements that might be necessary or beneficial.

This review was **only** against our page's structure: please see **Accessibility and your data** and **Accessibility and your branding** below for information regarding your data and your page branding.

Non-accessible content

Modern.Gov uses the jQuery-ui date picker control for the date boxes across the system. Currently there is not an accessible version of this control but it is detailed on the third-party developer's future roadmap. This control does not affect the usability of the pages; however, it may show up on accessibility checks.

Our intention is to update this control as soon as a new version is available, as we have already with other third-party libraries we have used.

In the interim, for customers who want to prevent this element being reported in accessibility checks, we have added a system parameter, 'DisableDateTimePickers', which can be used to turn off the Date pickers on our website.

This can be set by yourselves under Configure > Advanced > System Parameters in Issue Manager in B1505 or after the hotfix has been applied to B1504 systems.

On-going development

We anticipate that our works have met the core requirements of WCAG AA standard for the page structure; the release of 1505 and the 1504 hotfix for accessibility ahead of the statutory deadline affords us the opportunity to address any unanticipated additional requirements.

We ask and encourage customers to assist us with improving the accessibility of our pages. We ask that customers wishing to do so arrange for a 1505 upgrade in the first instance, and we will only address accessibility issues that are confirmed to be caused by our page structure.

Issues with your branding or content must to be addressed by your IT / web team, by your content authors, or via a rebrand.

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Guidance and Support on the Modern.Gov Forum

The following manuals will support you in meeting WCAG accessibility requirements (Forum login / registration required):

▶ Adding Text to Modern.Gov Webpages (customisable header and footer text): https://forum.moderngov.co.uk/adding-text-to-moderngov-webpages_topic4553.html

▶ Creating a reverse CMS website template for use with Modern.Gov webpages: https://forum.moderngov.co.uk/reverse-cms-guide_topic4597.html

▶ Using Word's built-in accessibility checker: https://forum.moderngov.co.uk/user-group-presentations-2019_topic6469.html

▶ Working with Templates: https://forum.moderngov.co.uk/templates_forum40.html

▶ 2019 Modern.Gov App – Walkthrough and Guidance for Administrators: https://forum.moderngov.co.uk/moderngov-app-walkthrough-2019_topic6478.html

Document Control:				
Version:	Author:	Date:	Comments:	Status:
1.0	Holly Adams, Stan Edward, Steven Garratt	3 September 2019	Initial version	Published