LAMBETH SCRUTINY ACTION PLAN

Report title: Digital Accessibility

Report commissioned by: Overview and Scrutiny Committee

Date adopted by Cabinet: 19 March 2018

Proposed dates for monitoring reports to Overview and Scrutiny Committee

Update	Date	Note	Completed?
1st	Jan 19	10 months after adoption	Y
2nd	Jan 20	22 months after adoption	

Accessibility of Council Digital Services Scrutiny Commission   **Action Plan – Jan 2019**

	Recommendation	Response	Milestones & target dates	Resource implications	Lead Officer	Update Jan 2019
	General					
1.	The council should strive to ensure its digital services and platforms become the 'gold standard' in terms of digital accessibility by achieving the Web Content Accessibility Guidelines (WCAG) 2.0 'AAA' rating.	The digital and ICT teams worked closely with this commission and enjoyed doing so, and fully endorse this principal though cautioned that significant cost may need to be applied to attain full AAA status. We also noted that AA and AAA compliance are moving targets under frequent revision, so this should not be considered a 'start and finish' task. I became increasingly concerned that we were unable to find any fully AAA compliant reference site worldwide which prompted further investigation into what the standard means. After further enquiry with our accessibility partner DAC (UK based Digital accessibility specialist) and on the WCAG website guidance pages (WCAG being the international body that grants the ratings) we discovered that "**It is not recommended that level AAA conformance be required as a general policy for entire sites because it is not possible to satisfy all level AAA success criteria for some content**" source: WCAG compliance site http://www.w3.org/TR/WCAG21/#conformance and "**Our feeling is that complete compliance with this level would be very costly and very difficult if not impossible for you to achieve**." Source: DAC, Director of sales and service development.	Jan 2018: Follow up DAC review – **completed.** March 2018: Internal review of DAC findings and prioritisation. September 2018: Completion of quick win improvements on main website October 2018: accessibility user's consultation panel completed. Aim to identify priorities for AAA (or highest possible) compliance.	Existing resource BAU internal resource Estimated £5k external design specialism, £5k BSL presenter and video production, plus BAU internal resource £11k external resource, £3k internal costs not BAU	MC	To preface this update, it should be noted that the primary address to these commission recommendations has been the construction of the council's new Digital Strategy over the last 9 months. This comprehensive strategy covers 5 themes: a digital council, a digital place, harnessing data, and agile workforce and digital fairness for all. This strategy comes to cabinet for approval in February as planned currently. Relevant to this commission is that the strategy includes a ground-up rebuild of all our digital service and websites which will be created with the highest reasonably possible accessibility features. Specific actions completed since the commission review so far are: Completion of DAC review and confirmation that main sites meet WCAG 2.0 'AA' at a minimum. Completed content reviews on numerous pages based on DAC

#	Recommendation	Response	Timeline	Resource/Cost	Owner	Progress
		If this is disappointing on the face of it, there is some relief in that early calculations pointed to more than £1m investment needed to achieve AAA compliance on www.lambeth.gov.uk alone, not including ancillary sites. We can still endorse the recommendation to strive for AAA compliance as we will use this driver to continually improve accessibility standards across Lambeth web estate. As stated during the commission, the key success criteria will be assurance that Lambeth website's accessibility users needs are met, even more so than an accreditation (a view endorsed by WCAG and DAC) although resulting improvements in accreditation standards will ratify. This means that resource investment necessary to meet this recommendation is significantly reduced.	November 2018: Website prioritisation for AAA conversion agreed July 2019: Priority site areas and quick wins updated, follow-up DAC review.	BAU internal resource Estimated £35k external design specialism, £45k BSL presenter and video production, £30k internal resource not BAU Note: some existing funding can be applied to some of the non-BAU costs, but it is likely that around £90k capitalisation or additional resource will be requested		report, the largest being Adults Social Care and Families Information. Commissioned 'SiteMorse' which is an automated tool which reviews content changes (made by service team content editors) to check for conformance to accessibility standards as well as language clarity and broken links / technical problems. We are currently implementing ReciteMe which allows individual users support in accessibility, screen reading, language translation as well as customise colour and font size for any website viewed. These services will be carried over onto the new website when created. Other activities in this area will be rolled into the website rebuild to avoid double spending now that we know that a new website will be a priority.
	Website User Interface Improvements					
2.	The issues raised in the Digital Accessibility Centre's July 2017 audit of the Lambeth website should be remedied as soon as practicable to ensure Lambeth is compliant with WCAG2 and	Resource is already deployed to continued compliance improvement on a BAU basis. Remaining issues and remedies will be outlined via an action plan as requested. www.lambeth.gov.uk is already compliant though improvements are needed, and some of the 30+ ancillary sites not governed by the	May 2018: Action plan released to commission and leadership	www.lambeth.gov.uk site improvement: £30k non-BAU investment achieved with either external resource or a delay	MC	Completed for primary websites. As per (1) further improvements to be expected in upcoming website rebuild. This project will also tackle the numerous non-standard websites remaining and

	meets its requirements under the Equality Act 2010. An action plan should be provided with timescales indicating how the issues will be rectified.	digital team are further behind. Lambeth consistently rates well on the annual SOCITM benchmark but of course has ambition to improve.		to other BAU work, eg new requests. Other site improvement not yet costed as depends on contract provisions.		either roll them into the main site or discard them. So far DAC has rated almost all of Lambeth.gov.uk as at least AA compliant with an action plan to follow during the above exercise to ensure full compliance on both main and ancillary sites. We have retained the SOCITM 3 star rating (out of four) overall with some areas achieving 4 stars
3.	The council should follow the *Tips for Clearer Websites* as laid out by the Plain English Campaign (PEC) and, longer term, aim to achieve the PEC's *Internet Crystal Mark*.	Content on the Lambeth web estate is not governed by the digital or communications teams, it is devolved to services. Plain English instructions exist for content editors, but results are varied. Emphasis needs to be applied from a senior leadership level to ensure that service content editors adhere to existing standards. Digital and Communications team will review existing standards to meet PEC compliance	May 2018: Presentation to leadership on web content expectations (see 4) June 2018: Review of Lambeth DCE (devolved content editors) resource May 2019: PEC accreditation review	None Leadership to agree devolved resources for improvement programme or consider external investment Existing resource	MC	Ongoing and as per (1) some quick win improvements have been made. The new website build will ensure Internet Crystal Mark attainment from launch.
4.	The council should accelerate its rationalisation of 'spin-off' microsites. This should include drastically reducing the number of such sites and ensuring that those remaining all adhere to the Digital	Progress is being made on website rationalisation using BAU resource with 3 unsolicited sites closed, 2 major ancillary sites being migrated into the main site and 3 new web projects stopped from being incompliant and instead released following Design Guide recommendations.	May 2018: presentation to leadership on web content expectations (see 3)	None	MC	In addition to the 'spin-off' websites noted in the original paper, two further websites have been prevented and a further three removed or replaced since adoption of the action plan; Future Brixton has been removed, Libraries have been consolidated into a single site

	Design Guide. No new procurement of spin-off sites by individual parts of the council should be allowed.	In-house resource can manage 4 or 5 migrations per year on BAU availability if other priorities are not inserted. Some spin-off sites are produced under contract which might require significant investment to remove early and / or replace content. Clear communication is necessary to be sure that council teams are aware than all online content must in every case be approved via ICT / digital review before any procurement. This should include Line of Business application procurement which has a customer-facing aspect.	June 2018:Updated review of ancillary sites released to leadership August 2018: Action plan for site rationalisation confirmed September 2018: (optional) additional funding for acceleration	BAU internal resource BAU internal resource Approx £11k per site migration not using BAU resource alone. £150k new investment estimate for maximum acceleration		and Fostering and Adoption has migrated in. There remain 29 ancillary sites to be replaced during the digital programme. As per (3) all ancillary sites will be rolled into the new website build with full and consistent accessibility standards, or discarded as part of that project
5.	The commission endorses the recommendation of the Lambeth Equality Commission to "*ensure information on key issues affecting disabled residents is available in a wide range of accessible formats e.g. provision of British Sign Language (BSL) videos*". This should cover key web content as informed by relevant data and user insight, and include	This recommendation can be covered in the response in Recommendation 1, including caveats	See recommendation 1	See recommendation 1 – although the extent of how much of the site content requires this level of improvement will affect potential costs	MC	As per (1) specific recommendations such as BSL video and subtitles will be a key part of the website rebuild, which also resolves the funding issue.

	subtitles as well as BSL.				
	Frontline Access and Support				
6.	The commission endorses the recommendation of the Lambeth Equality Commission that the council should "*promote more inclusive front-line services through a refresh of mandatory equalities and diversity training for front-line staff*".	See below, this will be addressed through the 2018/19 learning and development plan and commissioning Further, approximately half of all Library staff have undergone training to support customers with visual impairments delivered by SELVIS. Staff have also undergone extensive training on Autism and Dementia awareness. Customer Centre staff have largely also received this training and a programme to enhance this is underway	Commissioning will commence from April 2018 March 14th 2018 and ongoing	See item 7 Internal resource	JT	Completed – all staff have received training. This is now mandatory training and also includes visual impairment as well as dementia and autism, and refresher training will be provided periodically as well as new staff receiving the training as part of induction.
7.	The council should formulate a comprehensive training programme on accessibility to cover the whole organisation. This should be led by Learning & Development and be tailored according to departmental areas. Key contacts should be introduced to departments who can cascade the training via a peer learning arrangement.	Equality, diversity and inclusivity training and development is planned to be commissioned for 2018/19 and forms a key part of the learning and development plan for the forthcoming business year, as well as reflecting the committed actions from the Council's Equalities in Employment Action Plan agreed at Joint Strategy Forum in September 2017	Commissioning will commence from April 2018	External provider to be commissioned. At this stage exact cost not known but estimated to be £10,000 with budget allocated in anticipation	DS	Events including accessibility and equalities awareness including unconscious bias training are being delivered (200 managers have been trained and a rolling programme continues). It is mandatory that all hiring managers have received unconscious bias training Managing and leading diversity forms a key element of the Lambeth Leadership Essentials 2 programme which will be provided in the new financial year As per (6) specialist training on supporting autism, dementia and visual impairment training is now

					delivered as standard to frontline staff
8.	The council should ensure that accessibility is a fundamental requirement in all future service developments (e.g. the New Town Hall / Civic Centre).	Accessibility awareness and service design workshops are taking place for all relevant staff with the first event on 14th March. This will be attended by accessible users and includes learning from role-play scenarios. These were arranged in consultation with accessibility leads in the council, which has already influenced service delivery design, business processes and the layout of the Centre. These accessible users will also be reviewing the Customer Centre set-up to advise on further recommendations to put equality for all service users at the heart of our front-line services. This group will become a regular event after the new Customer Centre opens so that we can continue to improve and engage service users and ensure accessibility remains a focus. The new buildings provide significantly improved physical access in the Town Hall and modern standards in the Civic Centre which allows the public to get access public terminals with support provided by Council Staff. This includes a Changing Places facility.	March 14th 2018 June 30th 2018 Ongoing quarterly	Internal resource	JB	Ongoing. Further consultation due on the implementation of the new queuing system which is now imminent. In addition, Customer Service Officers have been issued a translation app on their phones. 8 dedicated accessible PCs are in place in the new Civic Centre
9.	The council should ensure that accessibility is a key consideration in decision making in	Every Lambeth library has access to the People's Network – free access to the Internet, with support from staff if needed. Each computer has Supernova software and keyboards. The People's Network is due to be			SB	Roll out of new PCs started in November 2018 at West Norwood Library. All were fitted with keyboards and software to

	relation to the library computer refresh.	refreshed in the 2018/19 financial year. The models available through the procurement system have been assessed and the product chosen for the refresh has taken into account suggestions and comments from the DTVIP group, who have assisted us throughout the libraries enhancement of the Peoples network in terms of Digital Accessibility			make them accessible to people with visual impairment. Following user testing with a group of visually impaired users, the layout for USB sockets, microphones etc was made standard. The current contract for Supernova ends next year and at this point we will work with users to see if they would like to move to alternative software.
10.	Accessibility software, such as speech readers and magnification, and large print keyboards should be installed in all front line customer locations such as the New Town Hall / Civic Centre, libraries and housing offices.	Large print keyboards and removable magnifiers will be available in the YNTH customer service centre. 3rd party accessibility software, especially speech readers, are not best deployed to shared devices as they are customised to individual users. Staff and customers will be supported in using the in-built accessibility features within Microsoft Windows for screen reading, text-to-speech, magnification, contrast control Hearing loops are installed across the new customer centre	May 2018 and ongoing	Equipment cost within YNTH budget Otherwise internal resource	JB	Complete and ongoing review as per (8) and (9) There are now machines to convert hardcopy print to speech in four libraries (Brixton, South Lambeth, West Norwood and Streatham)and funding in place for this to be put in all Lambeth Libraries this financial year so this becomes a standard offer. These machines will also provide magnification of all hardcopy documents.
11.	There should not be a requirement for disabled users and those with other conditions to seek assistance each time they log on to our	To maximise uptime and maintain data security, the People's Network PCs utilise a standard build which refreshes the configuration each time someone logs off the system. This is to ensure that any personal data they had been using has been wiped and not accessible to the next customer. The	May 2018: MC and SB to clarify options to leadership for public use machine 'memory' based on GDPR	Not fully understood, based on contractual and GDPR parameters	SB/MC	The People's Network upgrade is still being worked on to maximise benefits in this area, but as per the original response this must be balanced against data

	computers. The user's accessibility settings/preferences should be remembered at logon when their profile is loaded.	Supernova software does however allow customers to carry their accessibility settings and preferences on a USB, which they can apply once logged on to the People's Network. The library service has also taken accessibility into to consideration in the selection of a new LMS and have chosen a system which is developing the facilities to create profiles that allow customers to personalise their self–service experience. Libraries and ICT (SB and MC) will review how existing provision might be improved and what possibilities exist to maintain user preference maintenance while safely considering data protection issues when using public internet environments.	advice and risk of user inexperience.			security and GDPR requirements for public access machines.
12.	An exercise should be undertaken to assess the benefits and drawbacks of the range of accessibility software on the market prior to the renewal of the annual licence for the existing supplier (Supernova), to ensure that the option chosen represents the best possible offer to residents. Affected communities and organisations should be a fundamental part of the decision making process.	The library service has worked extensively with local community groups to deliver a range of improvements for visually impaired people. Alongside Supernova, the People's Network also provide access to Microsoft's built-in magnifier and screen readers via the Ease of Access centre, and to a free screen reader called Lightning (at the request of a community group who have used it for training for home use). Libraries are also working with the DTVIP group to deliver the NVDA (Non Visual Desktop Access) screen reader via USB.			SB	The option for continuing with an improved Supernova offer or using a different service will be explored further in 2019 as the existing contract approaches expiration.
13.	The council should ensure that the support offer to residents with respect	The council is starting to develop its Customer and Digital strategy. As part of this we will articulate methodology for supporting those	April 2019	Transformation funds and internal resource.	JB	The draft Digital Strategy is due for presentation to cabinet in the

	to digital inclusion is coordinated and widespread. Wherever possible such support should be delivered in the community in line with, and potentially linking in to, the Lambeth Clinical Commissioning Group's *Project Smith* model.	customers with a variety of different needs and requirements		Exact costs not yet known		coming months. Once cleared, the specific scope of increasing digital inclusion in the borough will be consulted upon.
Procedures and Processes						
14.	The processes which govern procurement and commissioning of digital services should be strengthened to give more weight to accessibility considerations and ensure they are built in from the outset.	While this principal has been agreed by senior management in 2017, some pockets of the organisation evidently were not aware as at least two new sites were created without suitable governance in 2017/18. The existing design guide and consultation with the digital team will always ensure a minimum WCAG 2.0 AA compliance so consultation should be reconfirmed to all levels of management as a necessity for any online proposal.	May 2018: presentation to leadership on web content expectations (see 3 & 4)	Internal resource	JB/MC	Ongoing. No new sites have been procured since the commission report which have not been properly sanctioned. Requests for digital services purchasing are flagged by Procurement colleagues to ICT, and must also be approved through the Technical Design Authority approvals board. Any sites wishing to use Lambeth.gov.uk are not able to do so without the consent of our web team.
15.	Systems and processes should be reviewed to ensure internal knowledge of	ICT contract lifecycle improvements are now covered by Lambeth's Enterprise Architecture approach which will minimise the risk of replacement / upgraded systems not having	Ongoing within the Enterprise Architecture and	Internal resource	JB/MC	As per original response, all new technology must be cleared by ICT Technical Design Authority

	digital accessibility issues is maintained and built on centrally. This should include a comprehensive lifecycle management system to ensure web content is properly managed and kept up to date.	customer interface requirements meet a compliant standard, as long as they are adhered to. Web content management, being devolved to services, is not a new requirement but should be re-enforced.	Technical Design Authority lifecycle.		which comprises accessibility reviews as well as appropriate fit with the organisations architecture
16.	The commission endorses the recommendation of the Lambeth Equality Commission to "*ensure that, as more services and processes are digitalised, residents who might need additional support (such as disabled residents) are involved in designing and testing systems and technology*".	As we develop more digital solutions we will adopt an "agile" approach. Using the Local Government Digital Standards we will design and test our solutions across a diverse user base, this will include those with disabilities.	Ongoing following agreed strategy and principles	Transformation fund and internal resource	JT	As per original response with the note that, as per (1) a new website rebuild will involve consultation with many demographics including uses with a variety of accessibility needs
17.	When all officers and councillors start working with the council an assessment should take place to determine any requirement for special equipment to enable them to fulfil their role.	Workplace assessment and the approach to reasonable adjustments (Equality Act 2010) will be included within the overall Equality, Diversity and Inclusivity learning and development package for 2018/19 for staff. Please refer to action point 7 above	Commissioning will commence from April 2018	HR/learning and development team and included within £10,000 budget allocation for EDI training for staff	DS	As per response
18.	The council should immediately carry out a review of all internal systems and provide	Links to item 15. Business Liaison Managers within the ICT Enterprise Architecture function will review all systems as part of their remit.	Review: April to July 2018	Internal resource	JB	Ongoing.

| | | an action plan with timescales for rectification of any elements that result in them not being accessible. | Some Line of Business and legacy systems will likely have issues and some may not be easily rectifiable in the short term as they are iterations of old products, so contractual renegotiation and new procurements will be the solution in some of these cases | Rectifications:

2018 - 2021 | New / replacement system costs rolled into standard system refresh contract and procurement financing | | The council has recently signed up to the localgov Digital Charter which among other things will enable councils to work together to pressure suppliers of ageing or non-conforming Line of Business systems to improve to the appropriate level or be replaced. |
| | | | An audit has been undertaken of physical access in the refurbished Town Hall, and will undertake a further audit in early April of the Civic Centre. | April 2018 | YNTH resource | | |