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Accessibility of Council Digital Services
Scrutiny Commission Report

November 2017

Commission Members:
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Councillor Marsha de Cordova (Co-chair)
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Foreword by the Co-Chairs of the Commission

Lambeth council understandably needs to move a majority of services online, realising efficiencies both financially and for the benefit of residents through better access to services and records.

It was in discussions between the co-chairs that a number of issues were raised both about the current Lambeth Council digital presence and the potential for future developments not meeting the needs of all in our community. We also believed that Lambeth should share our ambition for the borough to be a leader in the delivery of digital services that are accessible to all.

To give the commission focus we decided to only look at digital services. However, commissioners felt it was important to note that during the work of the commission, members were concerned that non-digital services from the council also needed to be looked at. Examples included a bollard in the middle of an entrance to a housing office, which would be dangerous for someone who was visually impaired, or poor signage in a library.

In the work of the commission there was a great deal of learning for all involved, especially during visits and talks with differently abled users of digital services. It was invaluable to have a combination of expertise among commissioners – from first-hand experience, to working with people with learning difficulties and technological knowledge.

For Lambeth to achieve the ambition of its digital services and platforms being 'gold standard', accessibility needs to be at the front and centre of all developments. This must not be simply a tick box exercise and our people need to have a thorough understanding of different needs.

It was evident from our visits that council officers were aware of the need to meet the needs of those who are differently abled but did not always understand what being truly accessible means. For example, if you have to ask for help every time you come to the library to log on, is it really accessible?

It cannot be assumed that companies that we commission services and platforms from will have expertise in accessibility and we found that some companies who claim this did not meet accessibility standards on their own sites.

The Co-Chairs are very grateful to our fellow commission member Councillor Robert Hill for bringing his experience and insight to the commission, to officers who facilitated our visits and those we met with to discuss the challenges of working for the authority from the point of view of internal systems and the intranet.

We would like to give huge thanks to Gary O'Key, the Lead Scrutiny Officer, for bringing together a huge amount of information involved in compiling this report and we would in particular like to recognise his excellent organisational skills which helped keep the commission on track.

No-one within our organisation should underestimate the importance of making sure our digital systems and services are accessible to all in Lambeth. Failure to do so would have an incredible impact on those they are intended to serve and can impact on their ability to engage with the council to their full potential.

Christopher Wellbelove – Councillor, Clapham Town ward and Commission Co-Chair

Marsha de Cordova – Councillor, Larkhall ward and Commission Co-Chair

List of Recommendations

GENERAL

Recommendation 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.

WEBSITE USER INTERFACE IMPROVEMENTS

Recommendation 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 meets its requirements under the Equality Act 2010. An action plan should be provided with timescales indicating how the issues will be rectified.

Recommendation 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*.

Recommendation 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 Design Guide. No new procurement of spin-off sites by individual parts of the council should be allowed.

Recommendation 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 subtitles as well as BSL.

FRONTLINE ACCESS AND SUPPORT

Recommendation 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*".

Recommendation 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.

Recommendation 8
The council should ensure that accessibility is a fundamental requirement in all future service developments (e.g. the New Town Hall / Civic Centre).

Recommendation 9
The council should ensure that accessibility is a key consideration in decision making in relation to the library computer refresh.

Recommendation 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.

Recommendation 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 computers. The user's accessibility settings/preferences should be remembered at logon when their profile is loaded.

Recommendation 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.

Recommendation 13
The council should ensure that the support offer to residents with respect 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.

PROCEDURES AND PROCESSES

Recommendation 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.

Recommendation 15
Systems and processes should be reviewed to ensure internal knowledge of 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.

Recommendation 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*".

Recommendation 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.

Recommendation 18
The council should immediately carry out a review of all internal systems and provide an action plan with timescales for rectification of any elements that result in them not being accessible.

Introduction

1.1 The Accessibility of Council Digital Services Commission was established in early 2016 following the submission of a proposal by Councillor Christopher Wellbelove and Councillor Marsha de Cordova, who co-chaired the commission. This was approved by the Overview & Scrutiny chair and vice chairs soon after, whereupon a third Member – Councillor Robert Hill – was appointed.

1.2 The commission's key aims were to investigate how well Lambeth currently performs with regards to meeting accessibility standards and make recommendations for further development in order that the borough's digital service provision is seen as the gold standard. Given the local and national backdrop of continuing budget cuts, organisational redesign and increasing developments in, and use of, technology, delivering high quality and fully accessible digital services has never been more important.

1.3 The commission scope, which outlines the core questions Members were seeking to answer and resultant terms of reference, is attached at Annex 1.

1.4 The commission held six meetings over an 18 month period. This began with a briefing with officers to explore the current activity being undertaken on digital accessibility; the web content accessibility rating framework; the vast array of Lambeth digital platforms which currently existed and the issues this posed; and the value the commission could add both through Members' expertise and by providing links with service users. Members went on to look at the website style guide and emerging benchmarking data, as well as feeding in their views to influence the development of the council's website and the plans for extensive user testing which would provide comprehensive feedback on the strengths and weaknesses of the site in terms of accessibility.

1.5 In addition to this the commission conducted visits to a local library and housing office to see first-hand the barriers faced by those with specific access requirements, and held a meeting with two Lambeth staff members with sensory impairments to receive feedback on the accessibility of the council's intranet and internet sites, and internal systems. These sessions in particular proved extremely valuable.

1.6 Throughout the process Members aimed to provide scrutiny and challenge while also influencing the direction of development by working collaboratively with officers. The commission wishes to put on record its gratitude to the officers involved whose time, expertise and constructive engagement were crucial to the outputs described below.

1.7 In response to the evidence gathered, the commission has formulated a set of draft recommendations. These are included in the appropriate sections of the main body of the report below and are also compiled above, for ease of reference.

Background

2.1 The Equality Act 2010 saw the introduction of the Public Sector Equality Duty (section 149 of the Act) which states that public bodies have an obligation to "advance equality of opportunity between people who share a protected characteristic and people who do not share it". The aim is to make sure public bodies deliver policies and services which are efficient and effective, accessible to all and meet different people's needs. The nine protected characteristics enshrined in law are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

2.2 In addition to the statutory characteristics Lambeth also considers three additional local characteristics when assessing equalities impacts. These are:

- Socio-economic factors
- Health
- English as a second language

2.3 In the case of this commission, the most relevant characteristic is disability, which is defined in the Equality Act as a physical or mental impairment which has a substantial and long term adverse effect on one's ability to carry out normal day-to-day activities. This can cover a range of impairments which might make someone less able to access digital services, such as sensory impairments or learning disabilities. However, there are also correlations between other characteristics and digital exclusion, most notably age and the three additional local characteristics listed above.

2.4 Under the Act, local authorities have a duty to make reasonable adjustments to avoid putting people with disabilities at a substantial disadvantage compared to those who are not disabled. The duty is anticipatory, which means there is a need to think in advance, and on an ongoing basis, about what disabled people with a range of impairments might need. Any failure therefore to adequately consider accessibility issues in relation to digital provision could result in the council falling foul of its obligations.

2.5 The Mayor of London published his Digital Inclusion Strategy for London in 2015, the aim being to help those most excluded (i.e. who do not, or feel they cannot, access the internet) to be able to acquire basic IT skills, such as managing information, communicating, completing transactions, creating and problem solving. The strategy details the impacts of digital exclusion including social isolation, not being able to apply for employment and training opportunities, and adverse health impacts, and outlines the

costs of digital exclusion to the individual, society and the economy. While this, and linked Lambeth strategies such as the Financial Resilience Strategy 2016-19, focus more on widening online access generally rather than specifically on the accessibility measures built into websites themselves, it is clear that their aims cannot be achieved if websites are not created in the correct way to enable full access regardless of impairments.

2.6 In September 2016, Cabinet approved *Future Lambeth: Our Borough Plan 2016-21.* This is the Council's key strategic document and identifies three core outcomes: *Working Together to Reduce Inequality*, *Inclusive Growth* and *Strong and Sustainable Neighbourhoods.* A number of the objectives under the *Reducing Inequality* theme chime with the work of the commission; these include providing high quality universal services so that families have the resources and opportunities to give their child the best start in life, and protecting and supporting our most vulnerable children and adults, supporting them to be resilient and to have fulfilling lives. Neither of these aims are achievable without full access to online services. The Borough Plan also sets out a series of public service principles, one of which is that: "Over the next five years we will… (make) sure that as a partnership we are open, transparent and accessible".

2.7 In order to achieve the aims of the Borough Plan in an increasingly tough environment for local government, Lambeth has embarked on an organisational redesign programme aimed at transforming the council into a smaller, more customer-focused organisation. Part of this transformation, as detailed in a report to the Overview & Scrutiny Committee in July 2017, involves improving the customer experience via a 'contact and assessment' work stream. The report outlines how new technology will be embraced so that the Council has a 'digital front door' and highlights the importance of responding to rising resident demand for easily accessible, online services. It states that "the council will be looking to improve accessibility and responsiveness to more and more Lambeth services by investing in digital technologies and skills. This will deliver a more effective and efficient service for many residents and provide the level of accessibility that our citizens and members expect and want in 2017". The savings target related to the organisational redesign 'contact and assessment' work stream is between £6m and £9m, to be achieved largely through channel shift (i.e. moving from more traditional forms of customer contact, such as face to face and telephone interactions, to online). This gives even greater urgency to the need to bring all digital services up to standard with regards to accessibility as a matter of priority.

2.8 In recognition of the challenges and complexities associated with reducing inequality in the borough, in 2016 the Leader of the Council announced the establishment of the Lambeth Equality Commission (LEC), which aims to understand how the living standards and life chances of the borough's worst off residents could be improved. The LEC's final report was published in July 2017 and includes a number of recommendations which reinforce with the findings of this commission, and which are therefore referenced or adopted here.

2.9 Developed by the World Wide Web Consortium (W3C) in cooperation with individuals and organisations around the world, the Web Content Accessibility Guidelines (WCAG) provide a single shared technical standard for web content accessibility that meets the needs of individuals, organisations and governments internationally. The current standard – WCAG2, developed in 2008 – consists of fourteen guidelines:

Guideline 1: Provide equivalent alternatives to auditory and visual content
Guideline 2: Don't rely on colour alone
Guideline 3: Use mark-up and style sheets, and do so properly
Guideline 4: Clarify natural language usage
Guideline 5: Create tables that transform gracefully
Guideline 6: Ensure that pages featuring new technologies transform gracefully
Guideline 7: Ensure user control of time sensitive content changes
Guideline 8: Ensure direct accessibility of embedded user interfaces
Guideline 9: Design for device independence
Guideline 10: Use interim solutions
Guideline 11: Use W3C technologies and guidelines
Guideline 12: Provide context and orientation information
Guideline 13: Provide clear navigation mechanisms
Guideline 14: Ensure that documents are clear and simple

2.10 There are three priority levels which describe the level of accessibility:

Priority 1: Web developers must satisfy these requirements, otherwise it will be impossible for one or more groups to access the Web content. Conformance to this level is described as A.
Priority 2: Web developers should satisfy these requirements, otherwise some groups will find it difficult to access the Web content. Conformance to this level is described as AA.
Priority 3: Web developers may satisfy these requirements to make it easier for some groups to access the Web content. Conformance to this level is described as AAA.

2.11 Lambeth currently aims to conform to WCAG 'AA' standard but the accessibility statement on the website acknowledges that some web applications and pages do not adhere to this and that work is ongoing to bring them up to standard.

2.12 The key benchmarking tool used by local authorities to assess their online performance is the Society of IT Managers (SOCITM) 'Better Connected' test. This has been in place since 1999 and explores the ability of websites to provide quick and easy 'customer journeys' and successful resolution of a series of tasks. The survey evaluates site navigation, search functions, and accessibility to people with disabilities, and has evolved over time to ensure it remains current and relevant. Lambeth was awarded a rating of two stars (out of four) in 2013 and 2014, and three stars in 2015 and 2016 – though the 2016/17 accessibility stage one test in December 2016 was failed, due principally to a problem involving the rotating 'carousel' news story on the homepage. Once this issue was rectified a re-test was applied for and this was passed in February 2017, enabling the website to retain its three star rating.

Section A: General Findings

3.1 The commission recognises the efforts made within the organisation to improve the council's online services and welcomes the enthusiasm and commitment demonstrated by the officers who gave evidence. Members found many positives, noting for example that Lambeth was the first authority to sign up to the UK Digital Inclusion Charter, and was shortlisted for a Local Government Chronicle 'Digital Council of the Year' award in 2016. However, in scrutinising the state of Lambeth's digital assets over the course of its work, it has become clear that despite these efforts there is still much more to do to get to a point where Lambeth could be considered a leader in this field.

3.2 The commission has identified a number of areas for improvement and makes a series of recommendations aimed at achieving this. The recommendations are themed around three main areas – website user interface improvements; frontline access and support; and procedures and processes. These are outlined below along with a summary of the evidence gathered which underpins the recommendations.

3.3 In addition to its findings on these three themes, the commission leads off with a more general recommendation which, though in many senses simple and obvious, is a pre-requisite for its terms of reference to be truly met – namely, that in order to become the 'gold standard', it is not sufficient to settle for a WCAG 'AA' rating but instead the aim must be to achieve the top rating of 'AAA'. It is accepted that this is a 'moving target' (since the standard is constantly evolving) and that obtaining an 'AAA' rating is a rare achievement – so this will of course take time and have implications in terms of resources. The commission heard, for example, about the levels of investment committed by organisations such as the BBC and UK Government (both cited as best practice examples) when it comes to online accessibility, which an organisation such as Lambeth would not be able to meet. There are also trade-offs between the use of what to many might be considered more visually appealing and engaging content – use of images, for example – and accessibility. However, the commission believes it is necessary to make the recommendation in order to provide a stretch target and highlight the fact that all sections of the borough's population deserve the same level of access to digital services. Furthermore, it is considered that savings targets associated with the organisational redesign are unlikely to be met without advancements in this area and therefore investment is necessary for this to happen.

Recommendation 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.

Section B: Website User Interface Improvements

4.1 Given the focus of the commission, the council's website user interface (UI) was under constant consideration and review throughout. Members heard in their first meeting how Lambeth upgraded its main website with a complete rebuild in 2014. The new site had been built to perform well in usability and accessibility testing and was user tested with diverse pool of residents before launch but it was accepted that not enough had been done since to ensure standards were maintained. While usage figures had risen, feedback was mixed, highlighting the fact that different people want different things from a website. As part of their work, Members provided observations on an ongoing basis which officers then responded to and updated on in a constant 'feedback loop'.

4.2 It was agreed early on in the commission's timeline that, as with the 2014 rebuild, user testing had to play a key role in decision making regarding the ongoing development of the UI. This focus on resident involvement is also acknowledged in the LEC report, which states: "*The council should 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*" (a recommendation adopted by this commission under the Procedures and Processes section below). Commission members fed in not just their own views, but those of service users in the disability sector with whom they have strong links. As a result of a practical brainstorming session Members devised the following "wish list" of user types and 'journeys' to be involved in the testing:

Users
• Young person under 25
• Person for whom English is not first language
• Blind person that uses screen reading software
• Partially sighted person that uses magnification software
• A person with learning disabilities

Journeys
• Find out when bins are collected
• Apply for a parking permit
• Apply for a blue badge
• How to object to a neighbour's planning application
• How to pay my council tax
  - pay online
  - setting up account to pay
• Let the council know that you have moved
• Create a My Lambeth account
• Register a birth
• Renew a library book
• Apply for a leisure card
• Apply for a disabled freedom pass
• Report a housing repair
• Report fly-tipping
• Contact my councillor

4.3 In late 2016 a procurement exercise was undertaken and the Digital Accessibility Centre (DAC) was chosen to perform comprehensive user testing of the Lambeth website. This audit involved taking a slice across the site to ensure all different styles of page were tested, and many (though not all) of the user types and journeys highlighted above were included. The DAC audit report was received in July 2017 and highlighted a significant number of issues which need to be addressed in order to bring the website up to WCAG2 standard and become eligible for DAC accreditation. The commission has chosen to adopt the DAC report's findings in full and wishes to see the issues described therein remedied as a matter of urgency.

4.4 In addition to the technical aspects highlighted by the DAC audit, Members are keen to see further progress in terms of the clarity of language used on the website. This is particularly important for residents with learning disabilities and those who do not have English as their first language. While the site's accessibility statement declares that "we aim to make this site easy to understand", the commission believes more can and should be done in this regard. It is noted that several other councils' websites – among them the London Boroughs of Tower Hamlets, Greenwich and Kensington & Chelsea – have achieved the Plain English Campaign's *Internet Crystal Mark* and Lambeth is urged to strive for the same accreditation.

4.5 The commission heard how an unintended consequence of the 2014 website rebuild and new rule set was that some Lambeth teams broke away from the corporate environment and generated their own independent sites. As a result of this proliferation of 'spin-off' microsites – the number of which was put at between 46 and 67 at various stages of the commission's evidence gathering – a huge problem has arisen not only in terms of inconsistency with (and undermining of) corporate branding but, more worryingly, variable design quality, accessibility and usability. This means that, whilst the 'core' Lambeth site is WCAG2 'AA' compliant, some third party sites appearing within it are not, thus bringing down the rating of the whole web environment. Officers have acknowledged this problem and assured the commission of their commitment to tackling it but progress has, in the commission's view, been slower than expected. A recommendation is therefore made to redouble efforts to remedy this issue by not only reducing the number of microsites significantly and barring any new ones, but ensuring those that are permitted to remain are brought up to standard. It is acknowledged that the Lambeth Digital Design Guide – a reference for designers, product managers and developers who are delivering online content or services for Lambeth, which went live earlier this year – provides a good blueprint for doing this.

4.6 Finally in terms of the UI, the commission concurs with the LEC's recommendation regarding information on key issues being made available in a range of accessible formats. This should include a limited amount of key web content being made available via signed videos, in recognition of the fact that British Sign Language (BSL) is the first language (above English) for some deaf people; such videos should also carry subtitles. While it is acknowledged that there will be resource implications attached to this, it is noted that some local authorities are already producing BSL content and it is considered that supplying a small amount of targeted information in this way would help Lambeth lead from the front and enhance its standing in the accessibility field, while also leading to savings by reducing the need for more traditional forms of

customer interaction. User insight and data should play a key role in choosing which content to prioritise.

Recommendation 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 meets its requirements under the Equality Act 2010. An action plan should be provided with timescales indicating how the issues will be rectified.

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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 subtitles as well as BSL.

Section C: Frontline Access and Support

5.1 The commission's visit to a local library to observe the accessibility barriers faced by residents seeking to access the council's digital services offered much food for thought. Members found positives in terms of the availability of library computers and the installation of specialist screen magnification and screen reader software (SuperNova) on all machines, though some elements such as the self-service terminal presented significant accessibility issues. It is understood these are shared with all library services and that a range of issues are being raised with the suppliers at a pan-London level. Also, while there were a number of large print keyboards available, Members found some of these were being used by people with no access difficulties, raising questions about how well the needs of residents were being matched with the current resources available, and whether these could be extended to ensure basic accessibility aids were provided as standard in all front line locations. This must include the New Town Hall development – a key opportunity for Lambeth to establish a flagship location in terms of accessibility, not just digitally but on all fronts. Furthermore, while people with disabilities who were known to staff were well catered for, those who were not were limited in what they could do themselves without having staff support, which could sometimes mean a long wait.

5.2 Observations from the visit led the commission to suggest a number of improvements – some of which were already 'on the radar' – which the Head of Service, Libraries and Archives, has been very constructive in responding to. This includes the instigation of a system to ensure users are recognised at login and thus adapt their profile to any previously chosen accessibility preferences. Questions were raised about whether the current access software is adequate and a fresh look is proposed at the options on the market prior to the expiry of the current licence, taking into consideration functionality, usability and cost. The forthcoming library computer refresh also provides an excellent opportunity to look again at accessibility and Members would wish to see the learning from this commission taken on board as much as possible.

5.3 As part of their consideration of front line access and support, the commission also heard about the programmes commissioned by Lambeth which are aimed at tackling digital exclusion. As noted earlier, those who cannot, or do not, access the internet are known to suffer from poorer health and a greater degree of social isolation than those who do, at a cost not only to the individual but also the economy, and therefore providing inclusive support to help people get online plays an important part in the wider picture in terms of achieving the commission's aims, as well as achieving the organisational design objectives set out above.

5.4 Members focused mainly on the Digi Buddies service. This is provided by Advising London for Lambeth and consists of volunteer-led support provided at a range of community locations such as local libraries and St Luke's Hub in Kennington. The scheme is principally aimed at mitigating the impacts of Universal Credit – claims for which need to be made online – but also has wider aims to improve residents' skillsets and widen access to online services. Though anecdotally popular and very much supported by Members in its intent, monitoring data is limited in scope and volume, and that which was reported to the commission suggests it is having less impact in

helping certain sections of the borough's population who are among those who most need help (including the Somali and Portuguese communities) than might be hoped. It should also be noted that Digi Buddies do not provide support for sign language users or visually impaired people.

5.5 The commission also noted that a number of other schemes exist which have similar aims but are run independently. These include Digital Champions (provided by London Connected Learning Centre to support families with children under 5 to access and use digital services safely), Money Champions (delivered by West London Mission and involving the training of front line staff, volunteers and active local residents in money management tools and advice services); and in excess of 40 ICT skills courses commissioned by the council's Adult Learning department (delivered in a range of settings by various providers including community organisations). This is in addition to the support provided as part of library staff's core role, which includes special sessions for the visually impaired that have been commended by the Local Government Association. The commission considers that, while the target group for each of these differs, it is likely there will be overlap and it would be beneficial to explore how such support services could be better coordinated, notwithstanding the fact that some programmes are linked to specific funding streams and associated project aims. It is also vital that, in order to increase outreach in a cost effective way, as much of this support as possible should be delivered *in* the community, *by* the community, utilising individuals and provider organisations who have existing links with the relevant client base. This mirrors the Lambeth Clinical Commissioning Group's *Project Smith* model, which utilises 'Community Connectors' – residents who link others in their local community with activities and organisations that can help improve their quality of life – to create a network of social support.

5.6 The commission notes and agrees with the recommendations of the LEC that "*the council should demonstrate leadership on equalities and promote best practice, including as part of its HR practices*" and, more specifically, that it should "*promote more inclusive front-line services through a refresh of mandatory equalities and diversity training for front-line staff*". As noted previously, Commission Members are concerned that, while some officers and areas of the organisation have a good grasp of accessibility issues and how to ensure inclusivity, others do not, and a far more comprehensive and consistent approach is needed. This has to involve not just training for front line staff, as the LEC rightly recognises, but a whole organisation approach appropriately tailored to the range of departments and roles across the council. It is acknowledged that this is a significant undertaking and will need to be rolled out in stages, with front line staff clearly the priority. However, without a more thorough understanding of accessibility at all levels there are real concerns about the council's ability to properly meet its statutory equalities duties. It is suggested that a peer learning arrangement involving establishing key contacts in departments who can cascade the training may be an effective approach.

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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*".

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Section D: Procedures and Processes

6.1 In addition to the issues regarding the website UI and frontline access highlighted above, the commission believes improvements are also required in the systems and processes which underpin web development and accessibility. It became clear during the evidence gathering, for example, that accessibility was too often an 'add-on' or a 'fix' as opposed to being considered truly from the ground up, meaning opportunities for system wide approaches were often missed. The commission heard how accessibility issues are raised ad hoc by officers via the Technical Design Authority committee – the approval mechanism for implementation of new ICT systems (or changes to existing ones) – but that there was a lack of formal procedures in place to ensure accessibility issues were properly considered at the design stage. The commission is keen to see such processes implemented and is clear that proposed ICT developments which do not adequately address such issues should not be permitted to proceed until they do.

6.2 A further concern relates to the management of internal knowledge on digital accessibility. Whilst the commission believes there is no lack of will to make improvements in this area, its assessment is that the organisation does not effectively maintain and build on relevant knowledge centrally. Furthermore, the number of staff who have left the council in recent years as the organisation has shrunk in size has led to some problems with out-of-date information as web content editors have departed. The lack of a lifecycle management system means there are no prompts to help rectify this, and it is considered that the introduction of such a system is therefore imperative.

6.3 As referred to in paragraph 1.5 above, one of the most insightful sessions the commission held was with two members of staff with sensory impairments, who gave a considered yet frank assessment of the accessibility problems faced by council officers when using internal applications as well as the intranet and internet. Members heard how not all internal systems were compatible with assistive software, such as screen readers, and some, such as Oracle and WorkPal, were considered completely inaccessible. While some progress was being made on this via ongoing testing and development, it reinforces the point made above regarding accessibility often being addressed as an afterthought rather than at the design stage. While it is admirable how resilient the officers who gave evidence had become in overcoming accessibility barriers by using 'workarounds' and 'side doors', Members consider it unacceptable that the tools staff are expected to use to perform their day-to-day duties are not always up to scratch in this regard. The commission also believes a more thorough assessment could, and indeed should, be done when new officers or Members join the council to ascertain whether they require particular equipment – be it hardware of software – to perform their duties to the same standard as their colleagues. While there are currently schemes which in theory provide such support, such as Access to Work, those we spoke to considered it difficult to obtain assistance this way and often gave up trying.

Recommendation 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.

Recommendation 15
Systems and processes should be reviewed to ensure internal knowledge of 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.

Recommendation 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*".

Recommendation 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.

Recommendation 18
The council should immediately carry out a review of all internal systems and provide an action plan with timescales for rectification of any elements that result in them not being accessible.

Conclusions

7.1 At the inception of this commission, a series of core questions were posed to frame the terms of reference of the inquiry which it is pertinent to revisit here:

1) *What is the current state of play and the key issues with current Lambeth digital assets?*
2) *Does Lambeth currently meet legal requirements and accessibility standards?*
3) *How does Lambeth benchmark against other organisations?*
4) *What improvements can be made to ensure that Lambeth becomes the gold standard in digital service provision?*

7.2 The overall impression of the commission is that Lambeth is by no means a poor performer with regards to digital accessibility, as the benchmarking described above demonstrates, and that Lambeth's web environment is legally compliant. However, the DAC audit indicates that the website is a long way from where it needs to be in order to be considered fully accessible and despite the good intentions of officers, Members feel that the progress made over the course of the commission's timeline has been limited. Furthermore, it is clear that if no further improvements are made – in all of the areas around which the commission makes recommendations – there is a real risk that the council would not only struggle to meet its savings targets, but also be found wanting in terms of meeting its duties under the Equality Act. It is vital therefore that its findings are taken on board.

Annex 1: Commission Scope

Commission Proposal and Scoping Template

Scrutiny Principles agreed by Overview and Scrutiny Committee Chair and Vice-Chairs

The Overview and Scrutiny Committee and the Commissions it sponsors should as far as possible:
- *Be independent from the administration and stakeholders;*
- *Be as accessible and inclusive of everyone in the borough;*
- *Enable decisions to be challenged constructively;*
- *Strive for better services that produce the best outcomes;*
- *Base its decisions and recommendations on the best evidence available;*
- *Follow up its recommendations.*

Commission members:
Cllr Christopher Wellbelove (co-chair)
Cllr Marsha de Cordova (co-chair)
Cllr Rob Hill

Councillor(s) submitting proposal	Cllr Christopher Wellbelove, Cllr Marsha de Cordova
Working title	Accessibility of Council Digital Services
Reason for inquiry	*Proposers may want to refer to the 9 questions at the end of this proforma* Accessibility of council services by all members of our community is extremely important. Increasingly these services will only be available online and we need to ensure that these services are available to those who are differently abled - who whilst may have access to online services, if a website is not created in the correct way access to these services will be difficult or not accessible. The issues identified by the commission should create a roadmap establishing how any current issues are to be resolved together with establishing that in the development of any future services, for residents, staff and members by the council accessibility is an essential requirement.
Time constraints	Since the creation of the new Lambeth website we have had a number of complaints that the site is not currently accessible for a number of services – together with issues with the navigation of the site when using assistive technology. Given that the council is increasingly pushing people to utilise the website it is crucial that issues that are affecting access for all members of the community are resolved quickly and therefore would ask that this commission take place as quickly as possible.

Proposed completion date	July 2017
Core Questions	1) What is the current state of play and the key issues with current Lambeth digital assets 2) Does Lambeth currently meet legal requirements and accessibility standards 3) How does Lambeth benchmark against other organisations 4) What improvements can be made to ensure that Lambeth becomes the gold standard in digital service provision
Desired outcome	Lambeth being recognised as the gold standard in delivering council services digitally that can be accessed by all members of the community
Terms of reference	To understand the state of play and the key issues with current Lambeth digital assets. To investigate if Lambeth currently meets legal requirements and accessibility standards To compare Lambeth against other organisations and investigate best practice in the field of digital service provision To establish required standard within the organisation that Lambeth delivers digital services that can be accessed by all members of the community
What will not be included	Non-digital activities
Risks (mitigation)	Not being able to obtain the relevant information
Equality & Diversity considerations	Ensuring representation of different stakeholders at witness sessions e.g. those with visual impairment, elderly representation, non-English language speakers. Communication with Cllr Imogen Walker as to the equality and diversity implications of the commission.
Possible co-options	None proposed – expert witness sessions to be held as required
Key stakeholders/ consultees	The commission plans to work with different disability and language groups in the community, as well as Council staff with accessibility needs. Stakeholders: People living in the borough with accessibility issues Lambeth Council
Portfolio holder(s)	Cllr Imogen Walker, Deputy Leader (Policy – including equalities) Cllr Paul McGlone, Deputy Leader (Finance & Investment – including digital and technology) Cllr Marcia Cameron, Deputy Cabinet Member for Community Engagement & Customer Services

Potential witnesses	*To be discussed and agreed at follow-up session:* *Officers responsible for delivering and also service delivery of digital services* *Users of the service, with a focus on users who have access issues* *A Lambeth Council staff member with access issues* *A Digibuddy volunteer who assists residents with accessing council services online in the Customer Service Centre and Lambeth's libraries.* *Somebody from another organisation that is recognised for best practice for accessibility of digital services*
Research/Evidence required	*Review of current digital accessibility standards and roadmaps from the Customer Delivery team on improving accessibility to digital products.* *Customer journeys.* *Benchmarking from other councils and organisations (such as SOCITM)* *Service users with disabilities or non-English language speakers to provide a review of Lambeth digital assets*
Potential site visits	*'Digital Friday' events at the Customer Service Centre in Brixton, working with digibuddies, visits to local library and housing office.*
Timescales	*Scoping in early February, follow up conference call at the end of February.* *User testing to take place in Spring 2017.* *Report in summer/autumn 2017*
Publicity	*We need to ensure we target publications targeted at communities that are impacted by accessibility issues.*
Links to Community Outcomes/ Resident Priorities	*Digital inclusion*

Annex 2: Background Documents

Future Lambeth: Our Borough Plan 2016-2021

Equality Commission Report and Recommendations

Equality Act 2010

Public Sector Equality Duty

A Digital Inclusion Strategy for London

Digital Design Guide

Financial Resilience Strategy 2016-2019

Update on the Organisational Redesign Programme

UK Digital Inclusion Charter

Digital Accessibility Centre *Accessibility Audit Report: Lambeth Council*

Lambeth Better Connected test results 2016-17

Plain English Campaign *Internet Crystal Mark*

Plain English Campaign *Tips for clear websites*

Web Content Accessibility Guidelines (WCAG) Overview

Commissioning Lambeth CCG to expand the Community Connectors programme across all Lambeth localities, via the work of Project Smith

Lambeth Clinical Commissioning Group: *Project Smith – Community Connectors*

West London Mission *Money Champions Review*