Website accessibility policy

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Contents

Ownership

Paul Middlemas, HSE Online is the day-to-day contact for the guidelines; if you have any questions or comments please email Paul.Middlemas@hse.gsi.gov.uk

Sarah-Dean Kelly, HSE's Communications Director, a member of HSE's senior management team has overall responsibility for this policy.

Introduction and background

HSE's aim is to prevent death, injury and ill health in Britain's workplaces. Accessible web products help HSE achieve this aim by making it easier and quicker for as wide an audience as possible (businesses, leaders, managers, employees, trainers, coaches etc):

- to understand, and comply with, health and safety law;

- to access relevant guidance wherever and whenever it's needed; and

- to keep up to date with relevant changes.

The purpose of this policy is to ensure that we consider access by disabled people at all stages of website development. This policy applies to www.hse.gov.uk.

HSE is committed to ensuring that its websites, intranets and online applications are accessible to everyone. People access the web in many different ways and HSE supports inclusion for all, regardless of disability, capability or technology. HSE will comply with recognised web standards and Cabinet Office guidelines on accessibility.

Web accessibility is about designing sites so as many people as possible can access and interact with them effectively and easily, whoever they are or however they access the net. This is our key principle in developing this policy. There are several additional benefits, for example:

- People **without** disabilities can use web content optimised for accessibility more effectively and more successfully.

- Accessible sites transfer more easily to other media such as mobile phones and handhelds.

- Accessible content is highly visible to search engines.

- Accreditation to accessibility / usability standards can generate good publicity for HSE.

- It is easier to convey our working standard to third parties when we use it with HSE's Online Developers' Guide.

We do not want to develop a website and then find it is inaccessible after launch. If we did, we would then have to make 'reasonable adjustments' which would inevitably be constrained by the design. This would leave us open to a legal challenge. There is no upper limit to compensation in discrimination cases and this would result in negative publicity for HSE. We also need to ensure that we comply with the spirit and intention of the law, which in this case is the Equality Act 2010.

The Equality Act 2010

Equal rights to accessing online content for disabled users is covered by the Equality Act 2010.

Under the Act duty holders must make "reasonable adjustments" to prevent "substantial disadvantage" by ensuring "information is provided in an accessible format". Organisations providing a service to the public "must not discriminate against a person requiring the service"

The Act also places requirements on public authorities to:

• eliminate discrimination;

• advance equality of opportunity; and

• foster good relations between those who are protected, such as disabled or older users and those who are not.

This means HSE has an absolute duty to provide information in an accessible format and foster good relations with disabled users by not only making the website accessible but also enjoyable to use.

Only a court can decide whether a website complies with the Equality Act or not.

If a disabled person cannot use a key feature of a website such as the site search, watch a video or contact HSE and no alternatives are available, they might make a complaint.

Typically they will complain direct to the website if they can find a way to do so. If they don't get a satisfactory response, they may ask a third party such as the Royal National Institute of Blind People (RNIB) or the Equality and Human Rights Commission to take up their case. The third party will first open a dialogue to try and fix the issue. If this is unsatisfactory, they may start legal proceedings in the county courts.

The key questions for a court are likely to be: is the user being discriminated against, are they at a substantial disadvantage?

As an organisation we need to take reasonable steps to ensure our websites are 'real world' accessible rather than just meet guidelines.

It is always good to go back to first principles when considering how to make something accessible. We need to focus on the information or service required rather than the medium it is delivered in, particularly if the medium is very visual.

A continuous process

We must consider access through all stages of the website lifecycle to ensure a site is, and remains, accessible:

- **Before design and build work begins** – be clear about your objectives and identify the technologies you are going to use.

- **During the design and build** – check wireframes, mock-ups and templates for accessibility.

- **When the site is live** – regularly monitor the accessibility of the site; review standards, legislation etc to ensure that the site continues to meet the most up-to-date requirements. This includes the adoption of WAI WCAG 2.0 standards, when appropriate.

With this policy we will:

- document our approach to accessibility; and

- regularly review how we provide information and services on our websites.

Accessibility standards

HSE proposes to adopt, wherever appropriate:

- WCAG 2.0 AA web accessibility standard;

- Cabinet Office guidelines; and

- The British Standard BS 8878:2010 Web accessibility – Code of practice.

All new sites will be tested, either in-house, or by third party experts to ensure these standards are met prior to publication.

These documents will help us to ensure all new sites are accessible.

All new projects should be built to and tested for compliance with WCAG 2.0 AA standard. In summary WCAG 2.0 requires sites are:

- Perceivable;

- Operable;

- Understandable; and

- Robust.

Accessibility is not about reducing design quality, but we do need to think about new ways to make sites usable for all. The standard is for everyone involved – both internal and external agencies – to work to as a common approach**. We must build the requirement to meet the HSE accessibility standard into all the tendering and commissioning processes for new websites.**

Communicating the policy

To communicate the policy, we will:

- post a summary of the policy on the main HSE website at www.hse.gov.uk/accessibility-statement.htm

- tell all relevant people about the policy, including developers, designers, authors, editors and third parties;

- run internal workshops to ensure that all relevant people know about the policy and how to implement it;

- encourage feedback from disabled users; and

- provide a way on HSE websites for people to give us feedback on the accessibility of the site.

Using the policy

We will implement a process where accessibility is a core component of any site redesign or new website build.

You must notify Paul Middlemas and involve him in the initial concept development of all new sites. The project manager must follow the guidance in this policy document. You can use the **Accessibility Policy Checklist** (Appendix A) to capture details of the process of creating, designing and building the site.

Meeting disabled user needs

We will consider the needs of disabled people and take steps to involve them through consultation and user testing when we redesign a site or develop a new site. The range of disabilities we will consider includes:

- **Vision** – including people with no vision and partial sight including colour blindness and tunnel vision

- **Hearing** – deaf and hearing-impaired people

- **Mobility issues** – such as RSI, arthritis, paralysis and basic hand-eye co-ordination

- **Cognitive issues** – such as dyslexia

- **Learning disabilities** and **specific impairments**

We will also consider people over 55 and any other relevant group, depending on the website being created.

Example of HSE meeting the needs of disabled people

HSE has already started to engage with disabled people, for example:

- AbilityNet disabled user testing in March 2009, December 2010 and July 2014 with a representative range of disabled users. This will be repeated regularly.

- Testing with HSE staff who use JAWS screen reading software.

- AbilityNet accreditation in 2011 and 2013.

Responding to disabled users' needs

After feedback from disabled user testing we have made changes to a number of our website features including Lightbox, concertina, left navigation and diary widgets.

Core tasks

An accessible website is one where disabled users can access and complete the core tasks on the site. For each HSE website, we need to identify and test core tasks, which need to cover, at a minimum:

- **Perceivable** - can users see or hear it?
- **Operable** - can users interact with it, complete actions?
- **Understandable** - do users understand it?
- **Robust** - does this work in users browsers, with their screen reader or their tablets etc?

For example, the main HSE site has the following core tasks:

- do a risk assessment

- write a safety policy

- search site

- find a recent press release

- find details about the industry they work in

- report a concern about health and safety in a specific workplace

- get simple advice or guidance on health and safety

- find out if company 'xx' has been prosecuted

- submit an F10

- watch a video.

Technology considerations

When you create or redevelop a website, you need to consider the impact of the technologies you will use. HSE's Developers Guide lists the [most popular browsers](#), screen resolutions operating systems to help you make an informed decision about supported technologies.

W3C technologies such as X/HTML and CSS have the best support for accessibility. However, Version 2 of the Web Content Accessibility Guidelines (WCAG 2.0) also proscribes techniques to make for non-W3C technologies accessible.

So you can use a wider range of technologies such as Ajax and PDF – but you need to be aware that all these technologies have their own issues with accessibility.

The popularity of Flash has fallen dramatically in the last few years and because of that HSE will not commission any new work that is dependent upon the use of Flash.

For example see the W3C's [PDF Techniques for WCAG 2.0](#).

You need to ensure you have the expertise to build these technologies with accessibility in mind and build in additional time in the project to test them for accessibility. Ideally, you should test them with adaptive technology, such as screen readers used by blind and visually impaired people.

If you cannot make them accessible you need to provide alternatives.

Legacy technology

If you have legacy content that is not accessible, you need to consider how to handle this material. Legacy content might include multimedia or PDFs that are not coded and tagged for accessibility.

It is unrealistic to convert such material to accessible versions, so it is good practice to provide a way on the website for people to request an alternative format.

You also need to think through the accessibility issues around rich media technologies you will use on the website, such as Ajax, Flash and PDF.

Content management systems (CMS)

Will your content management system (CMS) or development environment limit accessibility? If it does, you will need to find ways to minimise the impact. For example, can you:

- enforce alt text for images?

- add title tags for links?

- produce clean code?

If you are purchasing a new CMS, you need to consider:

- how accessible it will be to staff with disabilities;

- how accessible the content it produces will be; and

- how compliant with the Authoring Tool Accessibility Guidelines (ATAG) is the CMS?.

Exceptions

If parts of your website are inaccessible, you must:

- document the problem;

- explain how you are working towards fixing it;

- if possible give a time frame for this solution; and

- explain how disabled people can access this information or these services via alternative means

Accessibility testing process

We will test each site using an appropriate combination of:

- **expert reviews** – to evaluate real-world accessibility and WAI-WCAG;

- **user testing** – in context to evaluate real-world accessibility for key tasks; and

- **automated testing** – to evaluate technical standards

We will continue with:

- monthly/weekly machine audits;

- annual user testing; and

- annual user satisfaction surveys.

Appendix A - Conformance exceptions on main HSE website

On the HSE site many PDFs, especially on the research and FOI parts of the website, are not tagged and many are scanned as images rather than text. There are no plans to make these scanned research documents accessible. However, HSE will produce accessible versions upon request.

Some flash applications in the construction leadership worker involvement toolkit site are not accessible. Most have an accessible HTML alternate version. Two do not, they provide basic health and safety advice available elsewhere on the site, but in a fun and engaging way.

Some parts of the HSE website are managed by third parties and suffer from accessibility problems, they are listed below. We will continue to work with the developers to raise the accessibility of these products.

- The statistics tool Hands-On, limitations of the software managing the site preclude it being made truly accessible. Excel downloads are included as an accessible alternative.
- The email newsletter subscribe facility has some low contrast and small text. This will be fixed in the next product release. In the meantime please contact us and we will subscribe you, or complete a paper version of the sign-up process.

If you have difficulty using any sections of the HSE website please contact the author of this document.

Appendix B – Accessibility policy checklist

The project manager of any website redevelopment or new build should use this checklist as a tool to ensure the site meets HSE's accessibility policy. This checklist is only required for projects **not** using the HSE framework.

If building a website or application for HSE and you are not using HSE's framework then it is strongly recommended that you use the BS8878 16 step approach to define, design, build and document your project.

Ownership	Pass/fail
Who is responsible for the site design / development? Give contact details	
Contact Paul Middlemas to advise him of the project Paul.Middlemas@hse.gsi.gov.uk	
Date created	
Version details	
Standards	
What is the level of accessibility the site conforms with? For example WCAG 2.0, level AA is it POUR?	
Meeting disabled user needs	
Other documents referenced (such as accessibility testing process, or HSE's developers guide)	
How have you have engaged with disabled people in the creation of the website?	
Which users have you consulted or considered? (internal / external)	
What steps have you taken to understand their needs?	
Making people aware you have a policy	
Have you published a summary on your website?	
Have you told all relevant people about the policy, including • Developers • Designers • Authors • Editors	

Ownership	Pass/fail
• Third parties?	
Is the policy easy to find on your internal systems?	
Have you identified training needs?	
Do you need to run a workshop?	
Core tasks	
What are the core tasks disabled users should be able to achieve on the site? Examples could include: • how to contact you (for any site) • use the search feature of the site to find information • log in to the website (if applicable)	
Technology considerations	
As far as possible, have you used standard W3C technologies (HTML /CSS)?	
How you have thought through the accessibility issues around rich media technologies you will use on the website such as Ajax and PDF? Have you developed non-W3C technologies using their accessibility guidelines? Have you tested them with adaptive technology? If you cannot make them accessible, have you provided alternatives? Does your CMS or development environment limit accessibility?	
Exceptions	
For any part of your website which is inaccessible have you: • documented the problem? • explained how you are going to fix it? • (if possible) given a time frame for this solution? • explained how disabled people can access this information or these services by alternative means?	

Ownership	Pass/fail
Feedback	15
Have you provided a way for disabled users to give feedback?	
Do you have a mechanism to deal with feedback on the accessibility of the site?	
Accessibility testing	
Document how you are going to test the site for accessibility – cross referenced against your testing documents as necessary. For example, you it should include the tools and techniques you are going to use: • Automated tools • Adaptive technology such as screen readers • Plug-ins such as the web accessibility toolbar (WAT)	
How often you are going to review the site for accessibility?	
Have you have engaged with user testing with disabled people?	

Appendix C – Glossary

Term	Description
AbilityNet	A national charity that helps disabled adults and children use computers and the internet by adapting and adjusting their technology. (www.abilitynet.org.uk).
Ajax	Asynchronous JavaScript And XML - group of web development techniques that create interactive web applications.
ATAG	Authoring Tool Accessibility Guidelines produced by the WAI (see below).
BS 8878	British Standard for *Web accessibility – Code of practice*. Informs organisations how to commission an accessible website from a design agency. Supersedes PAS 78. (www.bsigroup.com)
CMS	Content management system. Makes it easier for people to share content and to publish content to the web and mobile devices without technical knowledge of the mark-up languages.
COI	Central Office of Information. Publishes *Delivering Inclusive Websites,* which sets out the minimum standard of accessibility for public sector web content and web authoring tools. It recommends a user-centred approach to accessibility, taking account of user needs in the planning and procurement phases of web design projects. (http://coi.gov.uk)
Concertina widget	A javascript widget that expands and contracts sections of information, useful for chunking information down into bite size snippets.
DDA	Disability Discrimination Act 1995. Makes it unlawful to discriminate against people in respect of their disabilities in relation to employment, the provision of goods and services, education and transport. Now superseded by the Equality Act 2010.
Diary widget	A javascript widget used to break long pages down into apparent smaller pages. Deprecated after user testing in 2009.
Double A	See Level AA, below.

Term	Description
EHRC	Equality and Human Rights Commission. Protects, enforces and promotes equality across age, disability, gender, race, religion and belief, sexual orientation and gender reassignment. Took on the work of the former Disability Rights Commission in 2007. (www.equalityhumanrights.com)
Flash	Software that adds video and animation to web pages.
JAWS	Screen reading software for people who are blind or visually impaired.
Level A	First level of conformance set by WCAG (see below) – requirements that all web developers **must** satisfy
Level AA	Second level of conformance set by WCAG (see below) – requirements that web developers **should** satisfy, otherwise some groups may find it difficult to access the web content. The default minimum level of accessibility for all HSE web sites.
Level AAA	Third level of conformance set by WCAG (see above) to make it easier for **most** groups to access web content.
Lightbox widget	A web application that allows users to magnify an image without leaving the web page they are on.
PDF	Portable document format. Captures documents exactly as they appear so people can open them on other computers, even if they don't have the software the document was created in.
RNIB	Royal National Institute of Blind People. Publishes guidance on making websites work for people with sight problems. (www.rnib.org.uk)
Triple A	See Level AAA, below
W3C	World Wide Web Consortium. An international community working together to develop Web standards. (www.w3.org)
WAI	Web Accessibility Initiative. W3C (see above) initiative to improve web accessibility for people with disabilities.

Term	Description
WAT	Web accessibility toolbar. Plug-in software that helps web developers to check sites for accessibility.
WCAG	Web Content Accessibility Guidelines. Published by the W3C WAI (see above) to make content accessible, primarily for disabled users, but also for mobile phones. The current version is 2.0.
Web 1.0	Web technology before 2004
Web 2.0	Web technology since 2004 that allows users to interact with the web using, for example, wikis, blogs, social networking and file sharing
X/HTML	Extensible hypertext markup language. Enhances HTML – the language or 'code' that web pages are written in. One advantage is that web pages look the same in all browsers.
XHTML+RDFa	An extension of HTML that allows snippets of content to be coded to be both human and machine readable.